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The following comments did not include proposal numbers or last names:

They are available for viewing on the meeting information webpage at:

<http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=03-04-2022&meeting=fairbanks>

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Comments on Proposals 22 and 199 previously submitted for the Central Southwest Region Meeting may be viewed at:

<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-21-2022&meeting=wasilla>



Submitted By

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Submitted On

2/16/2022 3:29:53 PM

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I write in full support of Proposal # 267. Action on this matter has been delayed for far too long, and I fear that any further delay will be devastating to the Dall sheep population. The guide industry, in spite of agreeing that the sheep are in decline, have resisted placing any limits or restrictions on their clients. While I can agree that there may be some effect on the livelihood of the guides, better that than losing the entire industry to greed now when the situation can be turned around by logical action.



Submitted By
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Submitted On
12/23/2020 11:18:42 AM
Affiliation
self

December 23, 2020

Austin Ahmasuk

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Nome, AK 99762

RE: Unlawful Methods and Means, comment on proposals 129 & 130

Thank you for the opportunity to submit comment on Alaska's game proposals.

Proposal 129

I am opposed to proposal 129 which if adopted would prohibit full metal jacket (FMJ) bullets in the hunting of big game except wolf and wolverine. The proposal denigrates a type of bullet as being ineffective in the taking of big game, when in fact it is more likely the case it is the hunter who is ineffective and their behavior which should be resolved. Evidence that FMJ bullets can humanely kill big game is likely plentiful but would be an exhaustive and lengthy endeavor to portray in detail. Members of the public are posed with an incredible dilemma with Proposal 129. Proposal 129 makes the incredible claim that FMJ bullets are ineffective without providing enough evidence to show that is true. The proposal states "During many years of public testimony at Board of Game meetings, testifiers complained about hunters wounding moose, bear and caribou when using full metal jacket bullets in high velocity, small caliber rifles." That generalization does not apply to hunters in rural Alaska who have and do use high velocity small caliber rifles for generations with success. How reliable is the generalization from public testimony across the many ecoregions of Alaska that FMJ's are ineffective? The supposed public comments have not been subject to critique by local and regional people with experience and knowledge of hunting, and because the prohibition has the effect of impacting the subsistence lifestyle the Board of Game must not change a regulation that works in rural Alaska. Without providing the evidence for the incredible claim that FMJ's are ineffective the Board of Game must deny the proposal. The proposal attributes the popularity of public testimony to be validation of FMJ ineffectiveness but has not established any truthfulness to the claim that FMJ's are ineffective. Instead of conforming methods and means based on evidence, the proposal is instead convinced that an obscure public opinion who may believe FMJ's are ineffective, constitutes the truth on this subject. I am much in favor of humanely killing animals which for me involves destruction of the major nervous system components which support life. There are thousands of hunting shows out there which portray killing in a brutal fashion. Hunters glad handing themselves after they have made a shot on a big game animal, and then that animal running off into the bushes somewhere to be found later not knowing what manner of stress or suffering occurred. In my hunting culture killing an animal involves killing that animal where it stands and not letting it run off somewhere. We accomplish this because we are keenly aware of visualizing where the vital life organs are at the various shot angles that are presented to humanely kill. It seems the hunting shows (if they follow popular hunting culture) are full of hunters following a blood trail and hours later, they find the animal and then deem that method was humane when in fact the opposite may be true. Perhaps hunting culture as it exists today has lost some skills, good marksmanship, and the understanding of animal anatomy to hunt well and kill humanely; hunter education may in fact be at the center of the problem of this perceived issue. Hunting by some may in fact be a misnomer for "outdoor recreation" or a "party" or "something to prove" and may in fact be at the center of wounding loss. Ensuring an animal feels as little pain as possible when killed is a very important aspect of my hunting culture, which may have lessons for society as well. A quick kill ensures an animal is taken so that it feels as little pain as possible, and also ensures the meat is of the best quality. It is a demanding process, however, and it requires years of experience, a vast traditional knowledge, and experience with the anatomy of the animal. Because of the training involved to ensure quick kills, modern hunting society may not know the processes that must be understood to ensure humane kills.

There are numerous antiquated rifle and caliber combinations that may not be "special" or may not be "magnum" that are presently legal for use and would be if this proposal were adopted, but could be considered ineffective or too diminutive for humanely killing big game but yet are used every year by skilled hunters in rural Alaska. I will not go into what calibers those might be so as not to denigrate time honored calibers that I and others use with extraordinary effectiveness. Because ADF&G does not require caliber disclosures when filing hunt reports we have no way of knowing what kind of rifle or method and mean leads to success or failure in any empirical way. Humane kills result from a head or neck shot. It is likely that the hunter themselves possessed with the skills to hunt is the primary measure of success and not the tool used.

When I use high velocity small caliber rifles I recognize how they are effective and practice good judgement because the margin for error is small when using smaller calibers. For example the .223 in the 55 grain load has depending on several factors in excess of 1,000 foot pounds of energy out to 100 yards. When using a soft point bullet the wound channels are shallow and broad with little penetration which are very effective on light skinned game such as anything bigger than a fox up to caribou. When using a 55 grain FMJ in .223 the wound channel changes from broad and shallow to deep with more effectiveness at destroying larger bone. This lends itself to neck and head shots on large game to great effect within 100 yards. Assuming a hunter practices the same level of judgement I do and uses good shot placement on those regions which would cause nervous system collapse and very quick kills that tool is effective.

The incredible claim that FMJ's are not effective requires incredible evidence. The bottom line is that people who claim ineffective are displaying ignorance, FMJ's should be allowed in the hands of people like myself who value food, who value life, and who practice good hunting.



PC002
2 of 2

Proposal 130

I am opposed to proposal 130 and request the Board of Game repeal the prohibition for the Arctic. I trap and use gland based lures such as urine that I make or collect myself. The regulation is unenforceable because of the impracticality of determining the lure a trapper used because they could lie. As trappers we are always on the lookout for lures and though I cannot speak for other trappers I make my own food and gland based lures from the nature around me which does not have chronic wasting problems. If the Board of Game wishes to outlaw sellable urine which comes from outside of Alaska I am ok with that but the BOG should allow trappers to use urine on their traplines that they collect.



The Ahtna Intertribal Resource Commission (AITRC) represents eight (8) tribal communities, two ANCSA Corporations, their shareholders & tribal citizens. We are submitting the following comments on select proposals in the Board of Games' 2020-2021 Statewide Proposal Book.

PROPOSAL 118 – Require completion of crossbow hunter certification course at the time of permit application

Comments: AITRC supports proposal 118. Crossbow hunters should be certified before applying for permit hunts. If they have not completed a certification course, they may present a danger to other hunters in the field.

As well, there is a high rate of wounding loss among archery hunters generally. Anything that reduces wounding loss would contribute to more sustainable management.

Certification courses should include information about avoiding trespass on private lands.

PROPOSAL 120 – Allow proxy hunting for any antlered bull moose

Comments: AITRC supports proposal 120; it is a housekeeping proposal that would allow proxy hunting for any-antlered bull tags.

PROPOSAL 121 – Allow the use of dogs to hunt, track and retrieve big game

Comments: AITRC opposes proposal 121. This would likely create issues with poorly-trained dogs frightening and chasing away large game, harassing wildlife, etc. The proposer states that it is illegal to hunt for large game using dogs; however, hunting with a dog is currently allowable by permit to take black bears (5 AAC 92.085(5)(B)) as well as to track wounded game (5 AAC 92.085(5)(A)).

PROPOSAL 122 – Lower the minimum draw-weight for bows for hunting big game

Comments: AITRC opposes proposal 122. Lowering the draw weight is likely to increase the chances of wounding loss in large-game archery hunting.

PROPOSAL 233 – Eliminate the requirement for peak draw weight of bows

Comments: See comments under proposal 122.

PROPOSAL 123 – Allow electronic range-finders mounted on bows to be used for hunting big game

Comments: AITRC opposes proposal 123. AITRC opposes the use of rangefinders in bow hunting. This is likely to create more competition for subsistence hunters.



PROPOSAL 124 – Allow the use of integrated bow sights/laser range finders for hunting big game with bows

Comments: See comments under proposal 123.

PROPOSAL 125 – Allow the use of crossbows for hunting big-game in weapons-restricted hunts

Comments: AITRC opposes proposal 125: we oppose weapons-restricted and other specialized hunts.

PROPOSAL 126 – allow muzzleloaders with scopes for hunting big-game

Comments: AITRC opposes proposal 126: we oppose weapons-restricted and other specialized hunts.

PROPOSAL 127 – allow air-rifles for taking big game

Comments: AITRC opposes proposal 127, which would allow the use of air rifles for hunting big game.

PROPOSAL 128 – prohibit the use of mechanical body-suits for big-game hunting

Comments: AITRC supports proposal 128 as written by the proponent: mechanically-powered body suits should not be allowable as methods and means of hunting game.

PROPOSAL 129 – require soft-point bullets for big game

Comments: AITRC opposes proposal 129. This would eliminate the opportunity to hunt using full-metal jacket ammo, which is often the only kind of ammunition available in rural communities. The proposers have not demonstrated any clear benefit to this proposal. There are currently nationwide ammunition shortages; restricting the type of bullets that can be used would disenfranchise hunters who are unable to obtain soft, expanding bullets.

PROPOSAL 130 – Prohibit the use of deer or elk urine as bait or natural scent lures

Comments: AITRC supports proposal 130 for the reasons stated by the proposer.

PROPOSAL 131 – Allow game-bird wings and backs to be used for trapping bait

Comments: AITRC opposes any proposal that would lead to wanton waste of parts of large birds. Ahtna people would not use edible parts of geese or swans as trap-bait. There are lots of other things that can be used for trap-bait, without creating wanton waste.

**PROPOSAL 132 – allow bird-wings and backs to be used for trap-bait**

Comments: See comments under proposal 131.

PROPOSAL 133 – add bow and arrow as a legal method of taking beaver

Comments: AITRC opposes proposal 133. Hunting beaver with bow and arrow presents a significant risk of wounding and losing the animals underwater.

PROPOSAL 134 – allow the use of cameras or sensory devices to monitor trap locations

Comments: AITRC opposes proposal 134. Trappers should be checking their lines regularly and should not need the assistance of wireless surveillance technology to deter theft. The use of game cameras without cellular technology is already available to them and can be used to document theft, etc.

PROPOSAL 135 – Repeal the restriction on using aircraft for locating Dall sheep

Comments: AITRC is opposed to proposal 135. Helicopters have a lot more flexibility in where they are able to land. They can drop people directly on the mountains, whereas an airplane must land on an airstrip. This gives people with access to helicopters an unfair advantage over those who do not have access to them.

PROPOSAL 136 – Repeal the restriction on using aircraft for locating Dall sheep

Comments: AITRC opposes proposal 136. Aircraft often startle sheep and drive them deeper into the mountains, making it more difficult for those who are on the ground to effectively hunt sheep. The proponents state that there is an absence of biological concern, but this assertion is questionable. Dall sheep throughout Alaska have shown some concerning trends of population decline. Proposal 207 took years of public comments and broad stakeholder engagement to successfully craft and get passed through the Board. We urge the Board to think very carefully before repealing such a well-crafted and effective proposal, especially at a statewide level.

PROPOSAL 137 – Repeal the restriction on using aircraft for locating Dall sheep

Comments: See comments under proposals 136 and 137.

PROPOSAL 138 – prohibit the use of aircraft to locate Dall sheep during the entire sheep season

Comments: AITRC supports proposal 138, to expand the restriction on aircraft use to also include youth-hunts. Part of the purpose of youth hunts is to give youth the opportunity to learn effective hunting skills. Giving youth an advantage that nobody else has will not help them to develop the real-world skills necessary to effectively harvest Dall's sheep. Because the youth hunts have the advantage of an early hunting season, they afford youth with more opportunity for



success. Moreover, youth hunts exist for the purpose of training youth, not for the purpose of allowing transporters and guides to spot sheep before the general season begins.

PROPOSAL 139 – Restrict the use of aircraft for making multiple, consecutive approaches near Dall sheep for hunting

Comments: AITRC opposes proposal 139. The replacement language that is being proposed is more unenforceable than the language in the regulation as it currently stands. Moreover, this proposal waters down the intent of the regulation adopted in proposal 207—under this proposed change, spotting sheep from aircraft would be permitted as long as the party made only one approach.

PROPOSAL 232 – Allow the use of dogs to recover wounded furbearers

Comments: AITRC opposes proposal 232. Skilled trappers are already able to track down wounded animals using the snow on the ground, and should be checking their traps regularly. New or inexperienced trappers should attend one of the trapping classes hosted by the Alaska Trappers' Association. It would be difficult to enforce the use of dogs for the intended purpose.

PROPOSAL 234 – Allow the use of stationary game cameras that transmit photos wirelessly

Comments:

AITRC opposes proposal 234. The use of communication in sharing game locations is already illegal and unnecessary. This proposal raises some serious concerns about fair chase hunting.

PROPOSAL 140 – Increase the number of bear-bait stations from 10 to 20 per guide-use area

Comments: AITRC opposes proposal 140. Increasing the number of bait stations to 20 seems excessive—it would be very difficult for most guides to effectively tend to this many stations. Furthermore, while the proposer requests this increase "temporarily," no definition is given for what constitutes a temporary timeline here.

PROPOSAL 141 – Require bear-baiting sites to be at least one mile apart

Comments: AITRC opposes proposal 141. This is not enforceable without knowing the locations of existing bear-bait stations, information that is currently kept confidential. Requiring bait-stations to be one mile apart will create other problems, resulting in people putting bait-stations private lands or other areas where there should not be bait-stations.

Proposal 235 – Allow the use of artificial light for hunting

Comments: AITRC opposes proposal 235. The use of artificial light is not necessary for hunting in Alaska, where there are long twilight hours.



PROPOSAL 236 – Require ADF&G to notify bear-bait station registrants of other bait stations within a one-mile radius of their desired locations

Comments: In regard to proposal 236 and 237, AITRC supports ADF&G working with various bear-bait registrants to ensure proper placement of bait-stations so they are not too close to one another, or located in an illegal area. It is not clear why bear-baiters need to register with ADF&G if this information is not used to prevent such conflicts. ADF&G can do this without disclosing locations of bait-stations—it can just recommend moving sites based on their proximity to other bait-stations. ADF&G should encourage bear-baiters to contact landowners in these areas to obtain the necessary access permits.

PROPOSAL 237 – Clarify that ADF&G will not issue permits for bait or scent lures near roads, trails, houses, schools, campgrounds, etc.

Comments: AITRC supports the intent of proposal 237, although we feel it needs modification to make it more enforceable. This proposal would put the onus on ADF&G not to issue permits in prohibited areas, although AITRC has concerns about its enforceability. For example, ADF&G does not know where every cabin is located. It seems that the proposer intends for this to apply primarily to well-known development areas such as roads, trails, railroads, etc., but as it is written, this would put an impractical burden on the department. See our comments on proposal 236.

PROPOSAL 145 – Classify house-cats as exotic wildlife and prohibit their release into the wild, feeding, etc.

Comments: In regard to proposal 144, AITRC would remind the Board that this issue was addressed in 2017. We leave it up to the Board's judgment to address this issue.

PROPOSAL 238 – Allow the Czechoslovakian Vlcak (a kind of wolf-dog) to be possessed without a permit

Comments: AITRC opposes 238. Wild animals should not be crossbred with domestic animals for use as pets.

PROPOSAL 146 – Limit big-game registration permits to one permit per species, per year

Comments: AITRC opposes proposal 146. This could compromise subsistence opportunity by preventing a hunter from receiving both a state and a federal permit for a given species in a single year.

**PROPOSAL 147 – Allow the sale of prepared game trophies under a permit**

Comments: AITRC opposes proposals 147 and 148. AITRC is broadly opposed to trophy-hunting. There are already a lot of exceptions to the regulation prohibiting the sale of trophies. These proposals would be a further step toward commercializing the hunting of big-game animals for personal monetary gain.

PROPOSAL 148 – Allow people over age 65 to sell trophies and rugs

Comments: See comments under proposal 147.

PROPOSAL 149 – Create a separate Dall sheep permit draw for second-degree-kindred hunters in areas that limit the number of nonresident hunters

Comments: AITRC opposes proposal 149. Nonresidents are nonresidents, period. This proposal seeks to create a more privileged class of nonresidents—it is discriminatory to have different categories of nonresidents. The proposer states that "2DK sheep hunters also have to compete with guided hunters in the draws with no guarantee of getting any permits at all." The entire nature of draw-hunts is that there is no guarantee of getting any permits.

PROPOSAL 151 – Require all hunters to apply for permit hunts and pay the application fee during the application period as follows

Comments: AITRC supports proposal 151. The system currently in place allows nonresidents to exploit a loophole, receiving permits while bypassing the drawing system altogether.

PROPOSAL 239 – Require all registration permit hunts to be eligible for online application
Note: This proposal is an updated submission for Proposal #152.

Comments: AITRC opposes proposal 239. This proposal presents equity issues because many rural Alaska communities do not have good internet access. In fact, the Board has declined to meet in some of these villages because of internet access issues.

Until there is equity with internet service and connection across the state, this proposal should not be adopted. It would provide an unfair advantage to Alaskans living in urban centers. If they can go out to rural communities to hunt, they can also go out to these communities to register to hunt.

Moreover, permits for some subsistence hunts are available only in limited numbers. Adopting this proposal could fail to provide reasonable opportunity for subsistence for some rural communities.

**PROPOSAL 152 – Require all drawing permit hunts available to residents be available for application online**

Comments: See comments under proposal 239.

PROPOSAL 158 – Allow dog-mushers to receive inedible game meat from the state to use as dogfood

Comments: AITRC supports proposal 158 with modification such that this proposal would pertain only to roadkill salvage, and so that it would apply to any dog-owners, not just mushers. There have been multiple instances where game animals have been left on the side of a road for weeks because it was not permitted to give the meat to dog-owners, creating a hazard for vehicles and attracting predators/scavengers. This proposal would clarify that it is allowable to use inedible meat as dog food.

PROPOSAL 240 – Allow game skin or trophy to be placed into a revocable trust

Comments: AITRC opposes proposal 240. This creates a loophole allowing the further commercialization and monetization of big-game hunting, especially given that some trophies have been taken with subsistence permits.

PROPOSAL 242 – Allow hunting permits to be reissued for military personnel under "any official military deployment"

Comments: AITRC supports our military personnel, but opposed to proposal 242. The military are already afforded more opportunities than residents and/or nonresidents. This could create a loophole for voluntary deployment for training, etc., that could be abused.

PROPOSAL 243 – Recognize changes by the Alaska Legislature regarding the transfer of drawing permits

Comments: AITRC supports 243, as it appears to be a housekeeping proposal codifying in regulation an action passed by the Alaska State Legislature.

PROPOSAL 244 – Eliminate all community subsistence hunts

Comments: AITRC adamantly opposes proposal 244. After reading through this proposal, it appears that it is primarily geared toward eliminating the Copper River basin community harvest hunts. At its recent meeting for the Central and Southwest Region, in Wasilla, the Board indefinitely tabled two proposals to eliminate community harvest hunts in the Copper basin.

The proposer states that there are too many users from urban areas participating in the CSH. While this may be true for the Copper Basin CSH, community subsistence opportunities in the Yukon Flats and Chalkytsik area attract primarily local residents.



While the inclusion of groups of all Alaskan residents have resulted in many more people participating in this CSH than originally anticipated, this opportunity is consistent with the community customary and traditional use pattern identified by the BOG. Elimination of the community harvest system for moose would result in the lack of a reasonable opportunity for customary and traditional uses as defined by the BOG. The proposers have not put forward any reasonable alternatives with which to replace the CSH, and none were suggested at the recent Central/Southwest BOG meeting in Wasilla.

ADF&G's Subsistence Division administers a questionnaire to groups participating in the CSH that seeks to measure their consistency with the community use pattern. The results of this questionnaire, presented at the Central and Southwest BOG meeting (RC 4, tab 5.4 from that meeting) show that an overwhelming majority of participants in the CSH have showed connections with at least six of the eight elements of subsistence pattern of wildlife use defined in 5 AAC 99.010.

Rather than eliminating the CSH, ADF&G should review groups participating in the hunt to ensure that they are consistent with the regulatory definition of "community" (as defined in 5 AAC 92.072(i)(2)). Until the department actually reviews groups to ensure their consistency with this regulatory definition, there should be a moratorium on any further changes to the CSH. Many rural Alaskans are currently experiencing hard times due to the rising prices of food; eliminating the CSH would further undermine their food security.

PROPOSAL 159 – Change the sealing and reporting requirements to business days instead of calendar days

Comments:

No comment.

PROPOSAL 160 – Clarify the wanton waste regulation to specify that game animals taken by domestic pets must be reported and salvaged for human consumption

Comments: No comment.

PROPOSAL 161 – Change the salvage requirement for sheep, goat and deer to all meat outside the ribs

Comments: AITRC opposes proposal 161; this could increase the potential for wanton waste.

PROPOSAL 245 – Eliminate the requirement to salvage rib meat on the bone for moose, caribou and bison

Comments: AITRC opposes proposal 245. Moose, caribou and bison rib-bones contain a significant amount of meat—failing to salvage it would basically be permitting wanton waste. "Rolling" or filleting the ribs, as the proposers describe, increases the chances of potential spoilage. Rib-bone meat is a preferred meat among many Alaskans.



PROPOSAL 162 – Require the salvage of the meat or hide of snowshoe hare

Comments: AITRC supports proposal 162; this seems to be a commonsense housekeeping proposal that would discourage wanton waste.

PROPOSAL 163 – Count wounded animals all hunters' bag limits

Comments: AITRC recommends that the Board take no action on proposals 163 and 164. These proposals both create enforcement issues and difficult to prove. It is sometimes difficult for hunters to know whether or not they wounded animals they shot at.

PROPOSAL 164 – Count wounded animals toward nonresident hunters' bag limits

Comments: See comments under proposal 163

PROPOSAL 172 – Clarify the legal use of highway vehicles, snow machines and off-road vehicles in the Dalton Highway Corridor Management Area

Comments: AITRC is neutral on proposal 172 to clarify the use of offroad vehicles, but see our more detailed comments and concerns about offroad vehicle use under proposal 173.

PROPOSAL 173 – Repeal the Dalton Highway Corridor Management Area (thus allowing the use motorized transportation)

Comments: AITRC opposes proposal 173. The repeal of the Dalton Highway Corridor Management Area (DHCMA) could be devastating to reasonable opportunities for subsistence uses by local communities and landowners as well as the wildlife resources and habitats upon which they depend. It can take tundra decades to grow back after the incessant trampling by ATVs this would bring.

This proposal also presents trespass issues. Ahtna communities are located along the highway system, and must contend with frequent trespassing on Ahtna lands. This would present similar issues for native corporations whose lands are located along the DHCMA. Highways in the Ahtna region also present issues of extreme hunting competition. This is precisely why these protections are in place for the Dalton Highway.

When the Dalton Highway was constructed as an industrial road, statutory and regulatory protections were put into place to protect subsistence uses, habitat, and public safety, and the safety of the Alyeska Pipeline. Further erosion of the protections provided by the DHCMA should be opposed by the Board of Game.



PROPOSAL 246 – Remove the sealing requirement for Dall sheep horns, and instead use a locking tag

Comments: AITRC opposes proposal 246. The current system provides proof that the animal was taken legally in a way that a locking tag does not provide.

PROPOSAL 165 – Auction permit conditions and procedures

Comments: Proposal 165: Auction permits should only be used in the year they were issued, as they are issued on a biological basis. If people save permits for multiple years and then use them, it could create sustainability issues.

PROPOSAL 166 – Amend the requirement for licenses and tags to include game legally taken with dogs and cats

Comments: No comment.

PROPOSAL 168 – Adopt a new regulation that specifies the Board of Game will not require guides for nonresidents hunting moose, caribou or black bear

Comments: AITRC opposes proposal 168. Most nonresidents do not have the knowledge of the terrain or species needed for safe and successful unguided hunting.

PROPOSAL 169 – Prohibit the harvest of white animals

Comments: Proposal 169: While AITRC supports the idea of respecting Native American religious/spiritual beliefs, this proposal is poorly written. As it is written, harvest would be prohibited for Dall's sheep, snowshoe hares, wintertime ptarmigan, and other important subsistence animals that are typically white.

PROPOSAL 247 – Discontinue lethal taking of wolves under predator control programs

Comments: AITRC opposes proposal 247. Alaska Statute AS 16.05.255 stipulates intensive management; it is not within the Board's authority to pass regulations that would run contrary to this statute.

PROPOSAL 183 – Reauthorize the antlerless moose seasons in Unit 20A

Comments: AITRC opposes proposal 183. Antlerless moose hunts should not be used as draw-hunt permits when they could be used to meet subsistence needs and provide for ceremonial uses.

PROPOSAL 270 – Open an antlerless moose hunt in a portion of Unit 20E

Comments: See comments under proposal 183.



PROPOSAL 189 – Reauthorize brown bear tag fee exemptions

Comments: AITRC supports proposal 189.

PROPOSAL 271 – Establish a definition for "position" as it applies to using a snowmachine to take game

Comments: AITRC recommends that the Board defer action on proposal 271 until Fish & Game Advisory Committees have the opportunity to weigh in on it.



Submitted By
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Submitted On
2/15/2022 8:27:20 PM
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February 15, 2022

Mr. Chairman, Alaska Board of Game, and Members of the Alaska Board of Game:

The Alaska Falconers Association is submitting comments on Proposals 108 through 114 that will be addressed by the Board at their State-Wide Board meeting being held in Fairbanks, Ak. March, 2022. We thank the Board for allowing us to comment on these proposals.

The Alaska Falconers Association (AFA) was formed in 1978 in order to improve, aid and encourage competency in the art and practice of falconry. AFA strives to promote scientific study of raptors, their care, welfare and training; to promote conservation of the birds of prey and an appreciation for their intrinsic value in nature and in wildlife conservation programs; to urge recognition of falconry as a legal field sport; and, to establish traditions which will aid, perpetuate and further the welfare of falconry and the raptors it employs. AFA has a long-standing working relationship with the Alaska Department of Fish and Game and continues to work with the Department in promoting scientific research projects and supporting and maintaining a high level of competency within the Alaska falconry community.

There are currently 51 falconers who are licensed by the Alaska Department of Fish and Game to practice falconry in Alaska. Alaska falconry regulations are promulgated by the Alaska Board of Game under the guidance 5AAC 92.037 and falconry standards listed in "The Alaska Falconry Manual Number 10"

Of the legal raptor species available for falconry in Alaska, the same species are available for falconry take by nonresident falconers in the contiguous 48 states except for nesting populations of gyrfalcons. Hawaii does not have a falconry program in place.

The Alaska Falconers Association supports Proposals 108,109,110,111, and proposal 114.

The Alaska Falconers Association opposes proposals 112 and 113.

PROPOSAL 108

5 AAC 92.037. Permits for falconry. Submitted by the Alaska Falconers Association,

Alaska Falconers Association (AFA) is requesting that the Board of Game allow additional opportunity for nonresident falconers to take eyas Northern Goshawks statewide and eyas Peale's Peregrine Falcons from Units 1 - 4. AFA is submitting this proposal at the request of nonresident and Alaska resident falconers to allow additional nonresident opportunity to take these two species as an eyas.

Current regulation, 5 AAC 92.037(g)(5), up to five permits for taking, transporting, or possessing a raptor for falconry by a nonresident shall be issued annually by the department;

Current regulation. 5 AAC 92.037(g)(7); "take is limited to one passage, hatching-year, raptor;"

Current regulation, 5 AAC 92.037(g)(8): The annual nonresident season for acquiring a passage raptor is from August 15 – October 31;

The new regulations would read:

5 AAC 92.037(g)(5), up to five permits for taking, transporting, or possessing a passage raptor for falconry; up to five permits for taking, transporting, or possessing an eyas Northern Goshawk for falconry statewide, and up to five permits for taking, transporting, or possessing an eyas Peale's Peregrine Falcon, from Units 1-4, for falconry by a nonresident shall be issued annually by the department; applicants can

only apply for one type of permit and must specify whether they are applying for a passage permit, an eyas Northern Goshawk permit, or an eyas Peale's Peregrine Falcon permit at the time of application.

5 AAC 92.037(g)(7): Take is limited to either one passage, hatching-year, raptor, one eyas Northern Goshawk statewide, or one eyas Peale's Peregrine Falcon from Units 1-4.

5AAC 92.037(g)(8): The annual nonresident season for acquiring a passage raptor is from August 15 – October 31; The annual nonresident season for acquiring an eyas Northern Goshawk statewide or an eyas Peale's Peregrine Falcon, (from Units 1-4), is from May 1 – July 20;

The AFA is asking the Board of Game to allow additional opportunity for nonresident falconers by allowing the take of certain eyas raptors. An eyas raptor is a bird that has hatched from the egg but has not fledged or has fledged but has not left the natal area and is still being fed by the parent birds. At least one eyas raptor must be left in the nest per the current regulation pertaining to resident falconers. AFA requests that this regulation as it applies to resident falconers, also apply to nonresident falconers.

AFA is requesting that the Board of Game authorize "up to" five eyas Northern Goshawk permits statewide, and "up to five eyas Peale's Peregrine Falcon permits from Units 1- 4, for nonresident falconers by drawing permit. Under 5 AAC 92.037(g)(8), the season dates for eyas Northern Goshawks, and eyas Peale's Peregrine falcon take is recommended to be from May 1 - July 20. (These dates are based on published scientific data documenting average hatching dates and fledge dates for these two species across their range.)

Because of the concern for the wellbeing of Alaska's Gyrfalcons and to eliminate any accidental take of eyas Gyrfalcons, Peale's Peregrine Falcon take by permit would only apply to Units 1-4. According to both ADF&G and US Fish and Wildlife Service (USFWS) raptor biologists, there is a low probability that there are gyrfalcon nesting sites in Units 1-4. Most importantly, days old or weeks old Gyrfalcon chicks are difficult to tell apart from like aged Peregrine falcon chicks, except by the most experienced biologists and falconers. By restricting Peale's Peregrine eyas take to these units, we would significantly reduce the potential that a Gyrfalcon eyrie would be targeted by mistake.

Raptor biologists report that Northern Goshawks are considered to have a healthy and stable population statewide and Peale's Peregrine falcons maintain a healthy, low density, population in Units 1-4.

Saint Lazaria Island located in Sitka Sound is designated a Wilderness area by the USFWS. This island supports a highly researched and viewed seabird nesting population. The required landowner permission required by regulation to take an eyas raptor would not be granted by the USFWS for Saint Lazaria Island. AFA would request that this Island be closed in regulation for the taking of eyas Peale's peregrine falcons.

PROPOSAL 109, submitted by the Alaska Falconers Association,

5 AAC 92.037(h). Permits for falconry.

Modify the microchip requirements for live raptors exported from Alaska by nonresidents as follows:

Current regulation: 5 AAC 92.037(h) all live raptors exported from the state, including propagated birds, must be microchipped.

Proposed regulation: 5 AAC 92.037(h) all wild caught live gyrfalcons exported from the state by a nonresident must be microchipped and the microchip must be registered with an internationally recognized microchip registry such as (Petlink). Proof of microchip registration must be submitted to the department within 90 days after export. Failure to provide proof of registration to the department makes the individual ineligible to receive a future permit under 5 AAC 92.037(g).

What is the issue you would like the board to address and why? Microchip requirements for raptors exported from the State of Alaska.

Current regulations require that all raptors including propagated birds must have a microchip implanted prior to being exported from the State of Alaska. This regulation was enacted by the Board of Game at its last Statewide Regulations meeting dealing with "permits for falconry" issues as a result of a proposal submitted by the Alaska Falconers Association (AFA). The proposal language and intent and was significantly changed by the Board of Game (board) to be more inclusive. There was testimony presented to the board for the reasoning behind the request by AFA for the need to microchip large falcons that are taken under a nonresident capture permit and exported from the state.

The current regulation does not require that the microchip be entered into an international registry. AFA believes that this important requirement was overlooked at the time and is requesting a "house cleaning" measure to provide a means for tracking the microchip once it is deployed.

During deliberations, the board expanded the original intent of the proposal from, "microchip requirements for the export of large falcons (Peregrine falcons and Gyrfalcons) taken by nonresident permit holders, to all raptors exported from the state by both nonresident and resident falconers. This expansion also included raptors exported by breeders under a propagation permit.

The current regulation is overburdensome and should be amended to only include the highly valuable wild caught Gyrfalcons exported from the state by a nonresident under a permit issued by the department. Alaska raptors that are commonly used for falconry (except

Gyrfalcons) are readily available to falconers in the continental United States, and propagation birds are highly regulated under the federal system. AFA feels that the Board should remove all species of raptors from the microchip requirement except wild caught Gyrfalcons exported by a non-resident under this section.

AFA is also requesting that the microchip be registered with an internationally recognized microchip registry such as "Petlink" within 90 days of the take of the Gyrfalcon. Failure to provide proof of registration to the department within the time frame listed above will make the permit holder ineligible to apply for a future permit under this section.

Since the inception of the nonresident capture permit regulation in 2014 which allowed up to five permits for passage raptors, ADF&G issued three permits per year for the first three years and five permits per year for the last four years. Nonresidents have taken a total of eleven birds under this program. Ten Gyrfalcons and one Northern Goshawk have been captured and exported from the State of Alaska from 2015 thru 2021. In the past four years since the inception of the current regulation, six exported wild taken birds (all Gyrfalcons) have been microchipped. Gyrfalcons are still the bird of choice for both falconers and breeders who participate in the nonresident take program. Gyrfalcons continue to have a stable low-density population in Alaska. Gyrfalcons are highly valued raptors and due diligence would dictate that wild birds that are taken from Alaska should be protected in a way that helps maintain the bird in its wild status. Microchipping this species aides significantly in this protection. Current regulation dictates that a wild caught raptor is always wild and can never be legally sold.

If a microchipped wild Alaska sourced bird is recovered, it will provide a valuable tool for law enforcement for their investigative efforts. If an Alaska sourced bird is lost or stolen, the microchip would be an invaluable tool in returning the recovered bird to its owner.

In the exotic bird industry, valuable species such as parrots, macaws, cockatoos, toucans and mynahs are microchipped to prove ownership and stem illegal trade. These birds are chipped by breeders and when acquired from the wild. Gyrfalcons are the same size or in many cases much larger and more robust than most of these species of exotic birds.

AFA also considered the possibility of requiring a DNA test instead of the microchip. Although this test would conclusively prove identity of an individual bird, this option was put aside, because there is no central registry for DNA sampling and if a bird was recovered by law enforcement or was lost and recovered by a non-owner, the bird and owner could not be readily identified and reunited.

PROPOSAL 110 submitted by the Alaska Falconers Association

5 AAC 92.037. Permits for falconry.

Extend the nonresident season for acquiring passage raptors as follows:

This proposal seeks to modify the nonresident season for acquiring a passage raptor as follows: 5 AAC 92.037(g)(8). Permits for falconry.

Current regulation: The annual nonresident season for acquiring a passage raptor is from August 15th to October 31st

Proposed regulation: The annual nonresident season for acquiring a passage raptor is from September 15 to November 15.

What is the issue you would like the board to address and why? Change the season dates for nonresident falconers to take passage raptors by permit.

The Alaska Falconers Association (AFA) proposes to change the nonresident season dates to acquire a passage raptor to better align the time of taking with the dispersal timing of Gyrfalcons from their natal areas, and to reduce the disturbance of nesting sites especially those nest sites located north and west of the Brooks Range.

This proposal is requesting the same season date changes that the Department of Fish and Game (ADF&G) recommends in their proposal (#114) to the Board of Game on this subject.

The nonresident season dates were established in 2015 to provide opportunity to take all legal falconry species after they leave their natal area (i.e. passage bird), including smaller species that disperse in August. ADF&G records show that to date, ten Gyrfalcons and one Northern Goshawk have been taken by nonresident falconers. There appears to be little interest in taking other legal passage falconry species by nonresidents since most of those species are available in the continental United States. Further, individuals of all legal falconry species either remain in Alaska year long or remain in Alaska through mid-September and would remain available for nonresident falconers even with the change in season dates.

The following information that has been compiled by ADF&G represents data published by Gyrfalcon researchers:

Gyrfalcons depart their natal area in Alaska in early September (median=27 August, range 15 August – 6 September., n=20, Seward Peninsula and Denali National Park, McIntyre et al. 2009; median=12 September, n=2, Yukon Kuskokwim Delta; Eisaguirre et al. 2014). Current nonresident season dates allow recently fledged young that have not yet left their natal areas to be taken for approximately three weeks.

This is a conservation concern because there is substantial legal and illegal interest in obtaining white Gyrfalcon nestlings. These birds are extremely valuable through legal captive breeding and illegal falconry trades. Having a passage season for nonresident falconers that

allows take at or near Gyrfalcon nests incentivizes the sharing of sensitive nest site locations as well as the disturbance of these birds during a sensitive time in their life cycle. Further, most of this attention is focused on white birds that constitute less than 10% of Alaska's Gyrfalcon population and hence, taking a conservative approach to season dates is appropriate for such a small population of birds ($n < 100$) to ensure sustained yield into the future.

In addition, this proposal asks the Board of Game to extend the season dates later by fifteen days to allow additional opportunity for nonresident falconers to access transient passage Gyrfalcons migrating through road accessible areas of Western Alaska.

PROPOSAL 111 Submitted by Alaska Falconers Association

5 AAC 92.037. Permits for falconry.

Limit nonresident take of raptors to one bird every four years and limit unsuccessful permittees from applying the following year as follows:

Proposed regulation: 5 AAC 92.037(g)(5). Up to five permits for taking, transporting, or possessing a raptor for falconry by a nonresident shall be issued annually by the department. If a permittee successfully takes a raptor, that person would be ineligible to take another raptor for four calendar years.

If an applicant draws a nonresident capture permit, that applicant, if unsuccessful, will be ineligible to apply for a nonresident capture permit the following year.

What is the issue you would like the board to address and why? 5 AAC 92.037(g)(5). Up to five permits for taking, transporting, or possessing a raptor for falconry by a nonresident shall be issued annually by the department:

This proposal requests that the Board of Game (board) place a limit on raptors to allow a take of one raptor every four years by a nonresident. This request will prevent a falconer who successfully takes a raptor from applying for another permit for four years.

The proposer also requests that the board require that: "if an applicant draws a nonresident capture permit, that applicant, if unsuccessful, will be ineligible to apply for a nonresident capture permit the following year. This language is currently applicable for all other big game drawing permits the state administers.

Gyrfalcons in Alaska maintain a low-density population. Two published studies estimate 300 to 500 breeding pairs statewide. Gyrfalcons have been targeted almost 100 percent of the time by nonresident falconers and since the inception of the nonresident permit system in 2014, ten gyrfalcons and one northern goshawk have been taken by nonresident falconers during the first five years of the program. Two specific individuals have drawn two permits and have taken two Gyrfalcons in five years, and one individual has drawn three permits and has taken 3 raptors which include two gyrfalcons and one northern goshawk in five years. The chance of an applicant drawing a nonresident capture permit is about 1 in 5. Alaska Falconers Association (AFA) has had numerous contacts with unsuccessful applicants asking that the State implement a system that limits successful applicants to one gyrfalcon every four years. Gyrfalcons are highly sought-after birds by both breeders and falconers alike. The "one in four" management method is used in several areas by department managers when there is a reason to create opportunity for as many applicants as possible

The Board of Game's stated intent when nonresident take was implemented in 2014, was to give the nonresident falconer an opportunity to capture a raptor from a species that does not normally occur in the continental United States, and use that raptor as a falconry bird.

Up to five permits for passage, hatch year raptors will still be issued by the department. This proposed request from AFA will spread out the available opportunity, allowing different nonresident falconers an opportunity take a raptor from Alaska.

PROPOSAL 112

5 AAC 92.037. Permits for falconry. Submitted by the American Falconry Conservancy

Proposal 113

5AAC 92.037. Permits for Falconry. Submitted by the California Hawking Club

The Alaska Falconers Association is opposed to proposal 112 and 113.

Alaska Falconry Manual defines Falconry as the sport of pursuing, capturing, or killing game using a trained raptor. Falconry is a lawful hunting method when practiced in compliance with state and federal regulations under the terms of a permit issued by the Commissioner of the Alaska Department of Fish and Game.

The nonresident falconry take permit system was established by the Board of Game in 2015. The Board authorized ADFG to issue up to five (5) permits for nonresident falconers to take passage raptors of any of legal species available under regulation. Passage raptors are birds of the current hatch year that have left their natal area and no longer rely on their parents for food.



ADFG issued three of the "up to" five permits for passage take for nonresidents in 2015 thru 2017. Alaska Falconers Association requested the Board of Game in 2017, through ADFG, to increase the nonresident take allocation to the full amount of five passage permits authorized by the Board. Since 2018, ADFG has issued five passage permits per year to nonresident falconers under this program. A high of 26 applicants and a low of 13 applicants (average 20) have applied for the nonresident permits since inception. The nonresident falconers have targeted one species of raptor, the gyrfalcon, (10 gyrfalcons and one goshawk have been taken since inception). Of the available species in Alaska that are allowed to be taken, there has been no interest by nonresident falconers to take any of the other raptor species.

Alaska Falconers Association is concerned that due to a trend by nonresident falconers to target gyrfalcons in the legal passage take, there would be a conservation concern by allowing unlimited nonresident take of gyrfalcon eyas's from critical nesting locations. We believe that gyrfalcons would be targeted in an eyas take as they are desirable by falconers and commercial breeders alike. There has been release of critical nesting site locations by some nonresident falconers by social media, you-tube videos, and printed media globally. This is of particularly concern because some species, which include gyrfalcons, use the same nest site for centuries and those sites would be perpetually susceptible to disruption. This is especially true of those few road-accessible gyrfalcon nest sites.

There has been no interest in taking any other legal species of raptor by nonresident falconers except for gyrfalcons and one goshawk.

ADFG reported that over the past three years (2019-2021), resident falconers took only one gyrfalcon in each of those years.

AFA in proposal #108 is asking the Board to allow an eyas take of up to five northern goshawks and up to five Peale's Peregrine falcons. In addition, this proposal triples the opportunity from the current five passage bird allocation. This proposal submitted by AFA is in response to requests by both resident and nonresident falconers to take eyas birds of these two species of lesser biological concern. AFA requests that the Board continue to protect critical gyrfalcon nest sites, and vote no on proposals 112 and 113.



ALASKA FEDERATION
OF NATIVES

January 21, 2022

Alaska Board of Game
Via email to dfg.bog.comments@alaska.gov

Re: Opposition to Proposals 210, 211, and 244

To members of the Alaska Board of Game:

The Alaska Federation of Native (AFN) writes to submit the following comments on **Proposals 210, 211, and 244** as presented in the Board of Game's 2020-2021 Proposal Book and 2021-2022 Supplemental Proposal Book.

AFN is the largest statewide Native organization in Alaska. Our membership includes 158 federally recognized tribes, 141 ANCSA village corporations, 10 regional ANCSA corporations, and 12 regional nonprofit and tribal consortiums that contract and compact to run federal and state programs.

AFN strongly opposes these proposals seeking to eliminate the Community Subsistence Hunts ("CSH"). The CSHs provide an important opportunity for Alaska Natives and all Alaskans to meet their subsistence needs. The community-based pattern of subsistence hunting is a long-standing customary and traditional practice of Alaska Natives, and the Alaska Board of Game has recognized the need for these hunts to meet subsistence needs in many areas of rural Alaska, including Chalkyitsik, Yukon Flats, and a vast swath of the Copper River Region, including the eight Ahtna villages: Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina, and Kluti Kaah. Community Subsistence Hunts have been successfully conducted for more than 20 years.

The State of Alaska's subsistence priority statute (AS 16.05.258) obligates the Alaska Board of Game to provide for reasonable opportunities for customary and traditional uses of fish and game. While the CSHs do not entirely fulfill this obligation, the elimination of the CSHs would devastate the opportunity for many Alaskans to meet their subsistence needs. The state's statutory obligations may not be met simply by relying on fundamentally different federal subsistence hunting opportunities that are limited to federally qualified rural residents, especially given that federal opportunities are very limited in the communities that rely on the CSHs.



Alaska Board of Game

January 21, 2022

Page 2

Simply put, the customary and traditional needs of the Alaska Natives are not being met. To whittle away opportunities for subsistence users, like eliminating Community Subsistence Hunts, only takes us further from the obligations Congress imposed under Title VIII of the Alaska National Interest Lands Conservation Act and those required under Alaska Statute. Please **reject Proposals 210, 211, and 244.**

Sincerely,

A handwritten signature in black ink that reads "Julie E. Kitka".

Julie Kitka
President



Submitted By
Rodney M Arno
Submitted On
2/18/2022 2:44:16 PM
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Alaska Outdoor Council

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Alaska Outdoor Council (AOC) position on select proposals submitted to the Alaska Board of Game (Board) for the 2022 Statewide meeting held March 2022.

Proposal 101. Oppose.

Repeatedly bow hunters comment to the Board the reason they should have early and/or extended seasons is because of the fact that they are ineffective at harvesting. Modern crossbows can be too effective to be considered primitive.

Proposal 120. Support.

Adoption would be consistent with Title 8, section 3. Common Use of the Alaska State Constitution. Wildfood provides security for many elderly Alaskans who physically cannot retrieve moose out of the field.

Proposal 135. Support.

Proposal 139. Support.

Proposal 147. Oppose.

Proposal 150. Oppose.

Proposal 152. Oppose.

It would be beneficial to those who participate in the regulatory process of the Board if the Department would cull proposals that make no sense. Drawing permit applications are available online.

Proposal 155. Support.

Proposal 159. Support.

Proposal 162. Support.

Proposal 163. Support.



Proposal 173. Support.

Proposal 193. Support with a negative C&T finding.

Proposal 196. Support.

Proposal 199. Oppose.

Proposal 237. Amend and support.

Define "other permanent dwelling" in 5 AAC 92.044(b)(5)(B)(l) as permanently fixed and legally owned.

Proposal 239. Support.

Proposal 100. Support.

Proposal 267. Oppose.

New board member orientation by the department clearly needs to do a better job of defining what it takes to meet the threshold requirements for an agenda change request (ACR).

Allocative proposals do not qualify for ACRs.

5 AAC 92.005(3) the board will not accept an agenda change request that is predominantly allocative in nature in the absence of new information that is found by the board to be compelling



ALASKA

PROFESSIONAL HUNTERS ASSOCIATION, INC.

P.O. Box 240971 ~ Anchorage, AK 99524

Phone: (907) 929-0619

Email: office@alaskaprohunter.org ~ www.alaskaprohunter.org

February 18, 2022

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the March meeting in Fairbanks. The APHA's 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. 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 (2019), APHA partnered with Dallas Safari Club to add to and update McDowell's 2014 seminal work. "*The Economic Importance of Hunters Visiting Alaska; Alaska's Guided Hunting Industry 2019*" 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">• 91.8 Million total economic output (2019)	<ul style="list-style-type: none">• 57.4 Million new dollars to Alaska (2019)
<ul style="list-style-type: none">• 59% of guide industry spending occurs in <u>rural</u> areas (2019)	<ul style="list-style-type: none">• 1,380 people directly employed, total employment with multipliers; 1,890 (2019)
<ul style="list-style-type: none">• 85% Active Guides are AK Residents (2019)	<ul style="list-style-type: none">• Visiting hunters (guided & non-guided) purchase 14% of total Alaska hunting licenses (2019)



- | | |
|----------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">• Guided nonresidents represented only 3% of current licenses but 30% of License/tag revenue | <ul style="list-style-type: none">• Visiting hunters (guided & non-guided) contribute 76% of total revenue to the ADFG wildlife conservation fund (2019) |
|----------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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 that Alaskans reap from Guided Hunting. In 2019, 31.9 million new dollars went to Alaska business that were directly attributed to Guided Hunting. This generated another 19.1 million in economic activity in the support sector. Hunting guides do what they can to share the harvest; 223,500 lbs of well cared for, high quality game meat was shared with their fellow Alaskans in 2019.

Individual Proposal Comments

Below you will find our comments on individual proposals under your consideration for Statewide regulatory change. Leading up to the drafting of these comments the APHA held multiple teleconferences and invited all members to participate in the drafting of these comments. Our teleconferences were well attended with over 30 individual guides representing small Alaskan businesses participating. 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 147- OPPOSE

APHA opposes the creation of a for-profit industry to trade in big game mounts. APHA's opposition to Prop. 147 is conservation based. Proposal 147 puts the department in a troubling and what will likely be a difficult situation where they will be bombarded by permit requests to sell big game taxidermy. We fear the additional staff time required to



respond to these requests is far outside of the core mission of the department and will place an undue drain on department staff where this is no legal mechanism to capture costs incurred. Further, the APHA warns the board that passage of prop. 147 will create a new market for market hunters who wish to take animals with the intent to sell the taxidermy product. We are aware of a vast demand for taxidermy products across the country and in fact the world. Proposal 147 will open the proverbial pandoras box on the sale of big game without any public benefit to the sale or resale of trophies. Proposal 147 should be rejected.

Proposal 151- OPPOSE

Proposal 151 is purely allocative in nature and is without a conservation basis.

The sponsor of Prop. 151 relies on a truncated and cherry-picked interpretation of special permit provisions within 5AAC 92.050, 92.052 & 92.061. Passage of Prop. 151 will have dire unintended consequences for land owners, department managers, guided non-resident hunters and guide businesses. Prop. 151 is punitive to small guide businesses, offering no advantage to resident hunters what-so-ever.

Permit Reassignment and Transfer as a Matter of Policy:

Proposal 151 paints an unflattering and scandalous picture of the use of alternate lists for certain draw hunts allocated to non-resident guided hunters. A brief discussion looking more holistically at regulations empowering permit transfer and opportunity reassignment referencing Alaska administrative code follows below.

5AAC 92.050 (6) sets out various provisions for transfer for military personal deployed to combat zones for both drawing and Tier II hunts. 5AAC 92.050 (7)(8) outline requirements for proxy hunters to report and carry in the field while hunting on behalf of another Alaskan resident. These regulatory provisions are analogous to resident alternate lists for important hunt opportunities. We note that these permit transfers and proxy hunting opportunities assign a given opportunity in much the same way alternate lists do in 5AAC 91.061 and 5AAC 92.069, that is without an initial application for the hunt by the eventual recipient.

5 AAC 92.052 (22) allows for a resident to transfer subsistence opportunity in GMU 13 to a resident relative within the second degree of kindred. This transfer or reassignment of a resident permit operates much the way an alternate list works. Importantly, the transfer of a subsistence permit to a resident relative in GMU 13 stipulates "*may not receive remuneration for the transfer of a permit under this paragraph*" but it does not require that the recipient initially applied for the permit being transferred. Again, this is analogous to the alternate list Prop 151 attacks.



5 AAC 92.052 (23) is the general provision giving the department broad latitude to issue undersubscribed, surplus permits as follows:

“except as otherwise provided, if a drawing permit hunt is undersubscribed, surplus permits may be made available at the division of wildlife conservation office responsible for management of the applicable hunt. Surplus permits are not subject to the limitations in 5 AAC 92.050(2) and (4)(F);”

5 AAC 92.069 incorporates strict drawing hunt conditions describing provisions for guided nonresident moose hunts to include the use of “alternate list” and “undersubscribed hunts.” In the case of the moose hunts described in 5 AAC 92.069 unused guided non-resident moose opportunities will be reassigned to nonresidents generally ensuring full issuance of available tags. Guided nonresidents are prohibited from applying for more than one permit and alternate lists are maintained in the eventuality of a canceled hunt. Once the guided nonresident alternate list is exhausted the department makes available nonresident registration hunts ensuring the hunt opportunities are utilized. 5 AAC 92.069 is an important federal comity regulatory provisions because the moose hunts described within are conducted on federal lands with a set number of hunt opportunities managed by the Nowitna and Koyukuk National Wildlife Refuges.

5 AAC 92.069 limits applications, set criteria and creates administratively feasible reassignment provisions for guided bear hunting opportunity in GMU 8.

Paragraph (4)(a) limits applications:

“(4) the following provisions apply to a guided nonresident drawing under this section: (A) an applicant for a guided nonresident drawing permit may apply for one such permit for fall hunts and one such permit for spring hunts;” 5 Alaska Admin. Code § 92.061

Paragraphs (4)(B,C&D) outline reassignment provisions:

(B) after the successful applicants have been selected by drawing, the department shall create an alternate list by drawing the remaining names of applicants for a specific hunt and placing the names on the alternate list in the order in which the names were



drawn; **(C)** if a successful applicant cancels the guided hunt, the person whose name appears first on the alternate list for that hunt shall be offered the permit; if an alternate applicant cancels the guided hunt, the permit must be offered in turn to succeeding alternate applicants until the alternate list is exhausted; **(D)** if a guided nonresident drawing permit is available, but the alternate list is exhausted, the permit becomes available, by registration at the Kodiak ADF&G office, to the first applicant furnishing proof that the applicant will be accompanied by a guide;

5 Alaska Admin. Code § 92.061

5 AAC 92.061 is designed to work in areas open to unlimited entry on state land, private lands and satisfy the need for comity with federal Kodiak Wildlife Refuge lands.

Recent Legislative Action Commanding Hunt Reassignment:

In 2021 Senator Von-Imhof sponsored SB 125:

“AN ACT
Relating to the transferability of hunts awarded by drawing; and providing for an effective date.”

SB 125 allows the transfer of resident drawing permits to family members in the event of the permittee's death. SB 125 passed the 32nd legislature in rapid order securing unanimous support in both legislative bodies. Of note, the proponent of Prop 151 is not listed as a supporter of this discreet benefit to resident hunting families.

Consumer Protection and Punitive Impacts of Proposal 151:

Proposal 151 seems to have been drafted with malice towards nonresidents using Alaskan guide services. Just like military personal who find themselves deployed to a combat zone or residents who require the help of a proxy in GMU 13, nonresidents who retain a guide can have unfortunate, unexpected life circumstances that cause them to cancel a guided hunt. Current use of alternate lists for moose and bear hunters allow for nonresidents to cancel a hunt and his guide to find an alternative hunter so the hunt deposit can be refunded. Proposal 151 singles out guided nonresident hunters and will materially harm them if they have to cancel a hunt putting their guide and the state in an



uncomfortable situation where there is no alternative but to punish them for their unfortunate circumstances. Passage of Prop. 151 will inflict real harm on the consumer to the benefit of no user group, including resident hunters. The 32nd legislature chose to look after residents and their families in times of tragedy, it is too bad the sponsor of Prop. 151 is devoid of compassion and heartless in their drive for allocation.

Land Use Considerations:

Prop. 151 would strike down important regulatory provisions that guarantee a sustainable level of use on federal public lands. The APHA finds itself working with a variety of public and sometimes private landowners to develop fair and consistent land access for guided hunters. Much of what Prop. 151 seeks to do will upset those careful compromises and leave federal land managers explaining to the public at large why reasonable access to their lands has been denied or obstructed by state action. The APHA urges extreme caution where the board has the power to work with federal managers, as is the case now, and yet chooses to restrict access to federal lands. The current use of alternate lists and carefully awarded guided hunter allocations are appropriate and minimize state/federal conflicts. Passage of Prop. 151 will nullify reasonable, sustainable and predictable provisions protecting access to federal lands for guided hunters.

Guide Business Impacts:

Guide businesses rely on sustained yield management and wise conservation of Alaska's game resources. Fair and predictable allocations are also important to guide business viability. In areas where opportunity must be limited by drawing hunts it is favorable for guides to plan for a certain level of use i.e., number of hunts. The current use of alternate lists benefits the consumer, land managers, resource managers and guide businesses. Passage of Prop. 151 will drive a stake into the hearts of small family run guide businesses.

Conclusion:

Prop. 151 does nothing to benefit resident hunters, guides, nonresidents, guided nonresidents, or the department. Prop 151 reduces the value of the resource by pulverizing important consumer protections to the detriment of guided hunters who have canceled a hunt, likely due to circumstances or tragedies out of their control.

Even the Alaska legislature took time to pass a law to provide for hunt reassignment in the time of family tragedy. Prop 151 is a heartless and punitive proposal that seeks to single out and hurt guided nonresidents with reckless disregard for potential conflict with federal land managers. The APHA asks the Board of Game to send a strong message that proposals designed to hurt a class of hunters who have suffered personal hardship should be unanimously rejected.



Proposal 149- SUPPORT

The APHA supports Prop. 149 because time and time again the BOG has asked for discreet solutions to address 2DK allocations in specific drawing hunts. The APHA supports family hunting and supports the 2DK use but points out that not all Alaskans or all nonresidents get to enjoy this privilege. If the BOG does not act to allocate hunts to 2DK hunters as Prop. 149 suggests, all of the nonresident quota could eventually be 2DK hunters. We are firm, only SOME nonresidents have Alaskan family members who can take them hunting- this is an unequally enjoyed privilege.

We urge a careful and thoughtful discussion around the table on Prop. 149 because it doesn't eliminate 2DK hunt opportunities in fact, it guarantees them.

Proposal 159- SUPPORT

The APHA supports Prop 159 because it requires that bear sealing deadlines will occur on a business day. We are aware of wonderful department staff that are willing to be called out to seal bear on holidays and weekends so hides will be sealed in a timely fashion. Prop 159 clarifies that sealing deadlines will occur on a workday and alleviates unnecessary demands on department staff.

Proposal 239- OPPOSE

The APHA opposes Prop. 239 because it can work counter to area managers achieving important conservation objectives and could result in some registration hunts going to draw. The APHA is opposed to proposals that can cause overharvest of the resource and we oppose unnecessary drawing hunts. Prop. 239 looks like a good idea but it will result in chaos for some area managers and likely compel them to propose tightly controlled drawing hunts to the detriment of resident hunters.

If the BOG passes Prop 239 it should apply to residents AND nonresidents.

Proposal 247- OPPOSE

The APHA opposes Prop. 247 because it requires that populations of wolves that can be harvested sustainably be un-hunted. There is no conservation basis for Prop. 247.

Proposal 168- OPPOSE

The APHA opposes Prop. 168 based on its negative impact on wildlife conservation and meat sharing.

The proponent of Prop. 168 is asking the BOG to tie its hands and remove an important conservation and consensus building tool from its toolbox. Guided allocations, in certain circumstances, can be an important aspect of a comprehensive approach to achieving



the maximum opportunity for residents and nonresidents alike. The proponent of Prop. 268 asserts the BOG has no authority to impose a guided restriction on nonresident hunters. This assertion has no basis in fact or law as long as the entire allocation in question is not exclusively guide required. The APHA is unaware of ANY allocation for a given species in any given hunt unit for moose, black bear or caribou that is exclusively guide required.

Black Bears in Southeast Alaska:

During the time period from approx. 2005-2010 nonresident use and harvest of black bears in Southeast Alaska (SEAK) began to climb. Black bears are not a guide required species and the growth in harvest and hunting effort was attributed to non-guided nonresidents. This additional harvest required the BOG to address hunter effort and harvest with a quota-based approach. Drawing hunts for all nonresidents were considered but upon close examination it was identified that guides were already on strict quotas based on Forest Service permits administered by the Tongass National Forest. The BOG was also presented compelling data that guide harvest was predominately male bears where non-guided harvest was shown to have much higher rates of sow harvest. Guided black bear hunter effort was stable and working within game manager's goals to minimize sow harvest.

Resident hunter effort in the SEAK units in question was low but stable with a liberal two bear limit. Guided hunter effort was stable and predominately male with a one bear limit. Non-guided black bear hunters were shown to be using commercial services, usually a transporter or a lodge-based service and sometimes utilizing out-of-state hunt planning services. All nonresidents enjoyed a one bear annual bag limit. The BOG realized that resident hunting opportunity could be lost or reduced if harvest was not restricted.

Ultimately the BOG put resident hunters first and took a thoughtful approach to reducing nonresident black bear harvest. Guided nonresident hunters were placed on a registration hunt so hunter effort and harvest could be closely monitored. The Tongass National Forest worked with the BOG to cap guided hunts at the current level to stymie growth potential in the guided nonresident quota. Non-guided nonresident hunts were put on a drawing hunt structure with flexible tag levels so wildlife managers could adjust harvest based on harvest and trends.

Passage of Prop 168 will destroy this carefully constructed and well thought out SEAK black bear hunt structure. Hunting guides in SEAK are predominantly Alaskan (approx 90%) who live in mostly rural communities. Passage of Prop 168 will directly harm small Alaskan businesses and rural communities who benefit from the economic activity generated from guided nonresident black bear hunts. Economic hardship will befall guides because they are already capped by the Tongass National Forest and drawing hunts are randomly awarded. Chaos will ensue as guides may not draw enough tags for a viable season or potentially draw more hunts than they have land access for.



Conservation and sustainability and maximum resident opportunity are primary to the BOG decision making process. Prop 168 would crush carefully constructed conservation-based compromises to the detriment of the black bear resource and potentially resident hunter opportunity in SEAK. As important, Prop 168 would take an important tool out of the toolbox if the BOG ever needs to look at limiting nonresident harvest in other areas with coastal black bears. While APHA is not suggesting the SEAK black bear hunt structure is the only way to manage harvest of valuable coastal black bears we are asserting that Prop 168 would destroy structures that have demonstrated successful applications. Resident hunters still enjoy liberal seasons and bag limits in SEAK in all GMUs (1-3) with coastal black bears.

Interior Moose:

Starting around 2000 certain remote moose populations in the interior were in danger of being over harvested. The BOG took necessary steps to reduce harvest in areas encompassed by the Koyukuk and Nowitna National Wildlife Refuges. Residents and nonresidents were limited and remain limited by a variety of registration and draw hunts. Guides are limited by concessions in the NWR system and held to strict hunt opportunity quotas by the federal land managers.

Over time it became apparent that, due to the remote nature of some of the areas, nonresidents tags were not being fully utilized. This directly impacted guides who were striving to sell valuable hunt opportunities that were randomly awarded but allowed by their land use permits. The BOG worked to understand this problem and bring stability and better utilization of the nonresident quota. Because guides were limited in their hunt numbers by the federal land managers it was understood that guide use could not grow beyond a certain point. The BOG chose to take a thoughtful approach and work with guides, land managers and the department to more fully utilize nonresident opportunities.

Overtime the BOG heard testimony from guides and locals alike that identified valuable traditions of meat sharing facilitated by guides on behalf of their nonresident clients. It became clear that guided moose harvest was an important aspect to consider in the chain of beneficiaries of the interior moose resource. Guided nonresident moose meat was being donated to locals to distribute to elders. Guides and non-guides alike also testified to the board about important employment opportunities brought by guides in these remote and economically depressed interior communities. Testimony to the board included other holistic aspects of the guides relationship with the region and ecology such as guided winter wolf trapping efforts. It was clear that guides were interwoven in the fabric of these interior communities and the very ecology of the subarctic boreal forest.

As a result of public testimony and thoughtful work to understand how guide use was already limited by federal land managers the BOG took deliberate action. Nonresident



tags were bifurcated between guided and non-guided hunters in a few federal land hunts. This has worked well and stabilized harvest and worked to maximize the benefit of nonresident harvested moose. Guide businesses are viable, meat is shared and a few wolves are harvested each year to the benefit of the moose. Passage of Prop. 168 will destroy this carefully thought-out compromise to the detriment of rural residents, guides, federal land managers and wildlife managers.

Not only will Prop 168 destroy certain interior moose hunting structures described above it will remove the ability for the BOG to work with guides, land managers and local communities in other areas of the state. We state this firmly because there are large tracks of privately owned lands that may ONLY allow guided trespass as well as other large federal units in the state. Passage of Prop 168 will send a message that the BOG is no longer interested in benefits such as meat sharing and is now turning a blind eye elders and private and public land managers.

Caribou:

Caribou hunts in NW Alaska are currently in a state of near constant conflict. It is possible that the BOG could use discreet guided allocations to navigate this difficult landscape. It is possible that guided hunt allocations will alleviate some rural concerns especially where land managers are at the table helping find solutions to maintain hunting opportunity. Passage of Prop 168 will take this option off the table and leave the BOG with less tools to build compromise and consensus with federal and local stakeholders.

Proposal 241- OPPOSE

Proposal 241 is purely allocative and offers no conservation benefit nor does it add to the value of Alaska's game resource.

The APHA opposes the board tying its hands by removing authority to allocate between different types of beneficial uses as offered in Prop. 241. The APHA urges you reject the central supporting argument that the legislature in some way intended for nonresidents to be treated equally or in any way has commanded that the Board of Game be prohibited to allocating guided hunts. Passage of Prop. 241 would ignore reams and reams of precedent set at both the Boards of Fish and Game where allocations to or between commercial uses have been made. The sponsor of Prop. 241 ignores recent legislative action that struck down an identical concept in attempt to impose their view of allocation and limit your power now and in the future. Passage of Prop 241 will harm resident hunters in a myriad of ways and require that you ignore important guided hunt benefits, such as meat sharing, when considering allocations of limited game resources. Prop 241 targets guided allocation and, if passed, will crush small businesses that add value to limited Alaskan hunt opportunities.



Recent Legislative Action:

In 2016 the legislature had a chance to pass a law that would have had the same effect of Prop. 241. A summary of that consideration and ultimate failure follows.

Shortly after midnight on April 17th, 2016 the Senate passed a surprise and poorly understood floor amendment to House Bill 137 that nearly killed a concerted effort by all wildlife conservation groups in Alaska to raise hunting license and nonresident tag fees. The amendment would have amended AS 16.05.407 and resulted in all classes of nonresidents being treated equally for purposes of allocation. HB137 with its poison pill was sent to the house at 1 AM where it garnered concurrence. No one really understood what the amendment would actually do. A weary legislature returned to the capital and began to work to understand its actions after a night of activity where bills were shipped back and forth between bodies. Once the impacts of the senate amendment to HB137 were understood and the fact that it would undue countless game allocations and hunt structures efforts were put into motion for the house to rescind concurrence after willingness was expressed to form a conference committee to remove the devastating language and passed the hunting license and tag fee. Ultimately the legislature REJECTED the amendment to HB137 but unanimously passed the hunting license and tag fee increase. Fortunately for all hunters and wildlife conservationists in Alaska the legislature took the time and effort to understand the real effects of what is offered in now Prop 241 and removed it but passed the new revenue for wildlife conservation.

Guided Hunts are a Beneficial Use:

Alaska's constitution commands that allocations between beneficial uses be made and empowers the legislature to make those decisions. The legislature has delegated its allocation authority to the boards of game and fish while retaining the power to confirm appointments. Passage of Prop 241 would be a regulatory action unwinding a host of allocations made between beneficial uses, some of them guided opportunities some of them nonguided. The APHA urges caution as you approach this proposal because guided allocations made in 5 AAC 92.057,061&069 were carefully thought out on a case-by-case basis. A blanket removal of those allocations based on justifications offered in Prop 241 is not appropriate and would ignore the record where benefits brought by various nonresident uses were carefully considered and weighed by the board of game. A NEW policy of equal allocation between different types of nonresident allocations would require much work and record building for the APHA to accept as legally viable given the far-ranging implications and impacts of such an action.

Unequal Treatment of Alaskan Residents:

Passage of Prop 241 would disadvantage resident hunters by treating them unequally in two very important ways. First, not all residents have nonresident relatives. This is an important fact because all resident Alaskans are eligible to become hunting guides and



enjoy the benefits of that use. Because only SOME residents have non-resident relatives and only SOME nonresidents have Alaskan relatives Prop. 241 disadvantages Alaskans without families and nonresidents without Alaskan relatives. A family might be a closed class in this case and not be protected as a common or viewed favorably as equal access. Second, the benefits of guided hunts expand beyond the guide and client hunters. Many of the benefits brought to Alaska by guided hunts are enjoyed by Alaskans who do not hunt, especially the sharing of meat. Benefits from nonguided nonresident hunters are not as well described or understood at this time. Passing Prop. 241 disadvantages resident hunters and non-hunting Alaskan residents because it forces the Board of Game to ignore benefits of a use of wildlife brought by guided hunts no matter how well those benefits are understood or quantified or how far they reach. The APHA will submit a recent economic report quantifying social and economic benefits brought by guiding hunters in Alaska to illustrate this aspect.

Summary:

Alaska's legislature declined to rewrite AS 16.05.407 in 2016. Prop. 241 is an identical concept that would diminish the ability of the state to receive the maximum benefit of its game resource while treating some hunting families in Alaska differently than those without family living outside the state.

Proposal 267- OPPOSE

The APHA opposes Prop 267 because it is NOT conservation based and purely allocative.

Intro:

The APHA supports limiting the number of guides on state land through a concession program that promotes stewardship. The APHA continues to advocate for guide concessions that build on and duplicate the successes of the federal land concessions. The APHA agrees that GMU 19C sheep hunters, both resident and nonresident, would benefit from a stewardship-based approach to limiting the number of guides in the unit. The APHA adamantly opposes reallocating the resource with the use of drawing hunts because of the devastating impacts on guide businesses. The APHA agrees with the department that full curl management is the only tool necessary to manage human harvest to achieve sustainable sheep harvest.

Sheep Conservation and Impacts of Human Harvest:

At this time there is no data from any unit or region of Alaska that demonstrates reducing hunting effort, beyond the use of full curl management, will increase sheep populations or speed their recovery. The data is clear that national parks in Alaska (Denali, Gates of the Arctic and Wrangell St. Elias) closed to hunting are experiencing sheep declines at



the same rate as adjacent areas open to hunting. The data is clear that areas such as Tok and Delta that have been managed via strict drawing hunting quotas are experiencing the same types, if not worse, than areas open to general season hunting. The data is clear that areas with historically high levels of nonresident harvest such as 20A and 25A are experiencing sheep declines at the same pace as drawing units, federal concession areas and national parks that have the same weather patterns. The historical data is also clear that these same areas have experienced weather-related decline, principally in the early 1990s, and recovered to near historic high even while being open to general seasons and unlimited guiding. Human harvest, as long as its managed with the full curl restriction, has no demonstrated impact on sheep populations in Alaska.

Sheep population trends appear to be identical in both drawing and general season hunt areas at this time. Areas closed to hunting also appear to be following parallel population trends to areas open to hunt either by draw or over the counter tags. We also note that there is substantial data demonstrating populations have declined and recovered while being hunted. It is also important to realize that there is a large body of data that shows hunting effort will mirror resource availability- the more animals to harvest the more hunters the less animals to harvest less hunters.

Looking ahead and beyond the current series of bad winters it will be important to monitor and compare open areas such as 19C with drawing areas such as Tok and closed areas such as Denali National Park. It will also be important to fly regular surveys and track herd composition, lamb production and especially rates of predation. Given studies released by the department it is more likely that certain types of predator reductions will increase sheep populations FASTER than in areas like Denali National Park where predator control is off the table.

19C Sheep Conservation Observations:

*****No department sheep surveys have been flown in 19C for two years*****

Given the dearth of recent ariel survey information the APHA has reached out to guides with decades of experience in 19C to understand more about the sheep population in the unit. What we have learned is 19C appears to be suffering from a lack of 8yr old rams attributed to the 2013 winter but that lamb production in the fall 2021 was decent. Sheep populations are reported to have declined between 40-60% with low numbers of 7,8&9yr old rams. Cohort productions starting in 2015 and continuing to 2019 were apparently robust. Most of the sheep population in 19C is reported to be 2-6yrs old. Guides report harsh winter conditions again in winter 2021-22 but population impacts are unknown at this time. Guides are universally concerned about the population but older guides who hunted in the unit compare it to hunting after the steep population decline in the early 90s. All guides familiar with the population decline and rebuild from the early



90s until now remember “lean years” but increasing abundance and ultimately population recovery and growth until the winter of 2019-20.

All of the guides the APHA spoke with expect to reduce hunting pressure in the near-term to respond to lower sheep abundance. While guides are discouraged by population declines and realize this will decrease their success rates, decrease their hunt numbers they universally point to the late spring in 2013 and recent tough winters as the cause of declines and low legal ram abundance.

False Crisis:

Prop 267 paints a picture of a turning point or a crisis point in sheep sustainability and resident hunting opportunity in 19C. Nothing could be further from the truth. 19C is an extremely remote unit with vast intact sheep habitats. Hunting pressure is dispersed over great distances with vast sections of the unit being rough and difficult to access for any hunter. Prop 267 attempts to capitalize on sheep declines and reallocate hunting opportunity unnecessarily. Prop 267 plays on fear to suggest that 19C will have to go to drawing and putting nonresidents on draw now will save resident hunting opportunity down the road. This is absolutely false, not supported by biological fact or any real-world study while ignoring real history of sheep decline and population recovery WITH SUSTAINED HUNTING PRESSURE.

Sheep have been hunted by both resident and guided nonresidents under full curl management for almost thirty years. During that time sheep populations in 19C have cycled from high abundance in the late 80s to crashing in the early 90s to high abundance in the two thousand teens and now back down again. Sheep populations will continue to cycle independent of whether a drawing hunt for sheep is implemented. The current series of bad winters should prompt intensive sheep surveys and careful resource monitoring. If the department identifies a biological crisis, action should be taken. Prop 267 is a reallocation proposal using a false crisis to manipulate the public and the BOG to restrict guided hunting.

Sheep Management Objectives- Sheep Working Group:

The APHA was at ground zero in support of the sheep working group. The APHA was prompted to support the sheep working group as a way to resolve user conflicts by assessing sheep management strategies, allocations and management objectives. The sheep working group was a response to an onslaught of proposals similar to Prop 267 that bombarded the BOG in an effort to reallocate sheep hunting opportunity away from nonresidents. Looking back this is laughable because we were approaching all time population highs in “problem units” such as 20A and 19C with many old rams dying from old age each year. During the sheep working group management goals were identified and offered up to be considered for change. 19C was discussed as an area where sheep were managed to provide maximum opportunity for hunters. Not once was a



motion made that garnered any consensus to change management objectives to reduce harvest or stymie opportunity in 19C.

The APHA remains open to discussing management goals of units like 19C with other public stakeholder groups. If the department comes forward with data that shows reducing harvest in 19C will increase the speed of recover, the APHA will work with our members, the BOG and other public stakeholders to develop a path forward. At this time, we are not aware of any discussion to move away from full curl management or limit the number of full curl sheep harvested in 19C. The APHA cautions the BOG that taking action to pass Prop 267 will ignore the result of exhaustive work by the department, and stakeholders to set and achieve maximum sheep hunting opportunity in 19C.

Drawing Hunts and Loss of Hunter Opportunity:

Drawing hunts achieve two very important and definable outcomes. One, drawing hunts can increase the average size and age of harvested rams. Two, drawing hunts will restrict hunting opportunity. 19C is not managed as a trophy area so a drawing hunt is not appropriate for any user group. 19C is managed to provide for maximum hunting opportunity. Passage of Prop 267 would undermine set management objectives by reducing hunter opportunity.

Summary:

The APHA recognizes sheep hunting in 19C could be restricted to achieve different outcomes than maximum opportunity. The APHA opposes Prop 267 because there is no data to support drawing hunts being used successfully to increase sheep populations as a whole. Guide concessions are a proven solution to promoting stewardship and reducing conflict within the guide industry. The APHA adamantly opposes Prop 267 because it is not based on conservation and is purely allocative in nature.



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

ATTN: BOG Comments
Alaska Department of Fish and Game
Boards Support section
PO Box 115526
Juneau, AK 99811

January 24, 2022

Dear Chairman and Members of the Board

On behalf of the over 1000 members of the Alaska Trapper's Association, we wish to share our input on four supplemental proposals that you will be considering during your March 2022 statewide meeting in Fairbanks.

Proposal 231 - ATA supports relaxing the requirement for the salvage of meat from the wings of geese, cranes and swans to allow for the traditional use of wings as trapping bait. Even if the requirement for salvage of meat from the humerus is retained, it should be made clear that the rest of the entire wing, including the humerus, and associated skin and feathers, should be useable as bait. Please sort out this issue once and for all so that it is understandable for everyone.

Proposal 232 - ATA does not support the use of dogs in trapping other than for transportation. There is, at most, a very minimal need for their use in recovery and the opportunity for abuse is great.

Proposal 234 - The use of transmitting cameras for hunting is a complicated issue. Regardless of what may be allowed for hunting, ATA requests that their use for trapping be allowed. They are a safe, practical and efficient means of monitoring a site regardless of weather conditions and travel distances. Their use for trapping would not impose an unfair advantage in the ability to harvest a resource. They also provide a level of deterrence for tampering with traps and traplines.

Proposal 247 - ATA opposes this proposed curb on the control and harvest of wolves. It would take away a viable management tool and would needlessly restrict the harvest of a healthy resource. It is a philosophically-based proposal that would serve no practical management purpose.

The ATA appreciates the opportunity to participate in the regulatory process.

Sincerely,

Randall L Zarnke, president



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Alaska Wildlife Alliance supports the subcommittee amendment to Proposal 199. We also strongly encourage the Board to consider setbacks on trails in the Nancy Lake Recreation Area, which were discussed but not decided upon, in the Feb 14th subcommittee meeting.

The Nancy Lake Recreation Area is extremely popular for winter outdoor recreation. From the Alaska State Parks brochure (here: <http://dnr.alaska.gov/parks/brochures/nancylake.pdf>) the area is marketed as a “winter playground” designed for multi-use: “*Nancy Lake SRA is ideal for cross-country skiing, snowmachining, and dog mushing. With nearly 40 miles of maintained trails and lots of opportunities for backcountry snowshoeing, ice fishing, snowmachining and skiing, Nancy Lake SRA is a superb winter playground.*”

On the Nancy Lake Recreation Area webpage, the description reads: “*It is one of the few flat, lake-studded landscapes in Alaska preserved for recreation purposes.... In winter, the rolling topography is ideal for cross-country skiing, dog mushing and snow machining.*”

Because this area is marketed and designed for multi-use, and is a popular recreation destination, setbacks on designated and maintained snowshoe, mushing, and skiing trails in this recreation area are extremely reasonable. We urge the Board to assign trap setbacks on all designated multi-use trails in the Nancy Lake Recreation Area (see map here: <http://dnr.alaska.gov/parks/units/nancylk/nansumap.pdf>).

During the subcommittee negotiations, ATA agreed that two trails within Nancy Lakes Rec Area - Red Shirt Lake Trail and the Nancy Lake Parkway - would be suitable trails for trap setbacks, given their accessibility by large parking lots and heavy winter use. Individual trappers who did not represent an organization at the subcommittee meeting did not know the area, and thus felt they could not vote, which is why these trails are not listed in the subcommittee amendment. Setbacks on these trails would not close trapping within the Recreation Area, it would simply create buffers around the multi-use trails, and would still offer opportunities for underwater and above-ground sets within the multi-use trail buffers.

We appreciate the Board’s willingness to consider this proposal, and for supporting the subcommittee process. We are particularly appreciative of Mr. Keogh for spearheading this issue and coming to the table with sincere interest in finding compromises. We believe this process, with some tweaking, could be replicated to find common ground in other high-conflict areas.

During the Board’s deliberations on this proposal, it would be helpful to understand what variables the Board considers when determining if a trail is eligible for setbacks.

Additionally, we encourage the Board to direct both ADF&G and Alaska Wildlife Troopers to document reported pet catchments statewide, and report those data in the annual trapping report. Having a better understanding of where dog-trap encounters are happening (or not happening) will be helpful in ensuring that setbacks are applied on the multi-use trails where they are needed most. Trap-pet encounters have continued into this trapping season, as summarized by the Feb 17th article “Multiple dogs caught, killed in Southcentral Alaska traps” by Paxson Woelber (available here: <https://alaskalandmine.com/landmines/multiple-dogs-caught-killed-in-southcentral-alaska-traps/>). Agency data would provide helpful context on the situation.



Submitted By
Mike Harris
Submitted On
2/18/2022 11:42:46 PM
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The Alaskan Bowhunters Association (ABA) is a 501C-4 Nonprofit organization representing bowhunters from all over the nation who choose to pursue game in Alaska with the bow and arrow. Our mission is "To foster and perpetuate fair chase hunting with the bow and arrow"

These comments reflect our stance on upcoming State-wide proposals and we hope that the Board of Game seriously considers what our organization and membership have to say regarding these matters.

Proposal 101 OPPOSE:

This proposal would allow crossbows to be used in special bow and arrow only seasons and hunts. Currently, special archery seasons only work because of the lower success rates and impact to game populations. Adding crossbows as a means of take during archery season would cause higher success rates and result in higher impact to game populations. This could result in shortening bowhunting seasons and/or losing some bowhunting seasons and areas completely. The purpose of Archery seasons is to create more opportunity to hunt more days without having any impact on game populations. Some argue that age and health concerns warrant the use of a crossbow for all during the archery season, however there is already a method and means exemption for those that are truly disabled to use a crossbow during these seasons. Also, many bowhunters that are well into their 70's are still able to use conventional longbows, recurves, and compounds without any issue. It must also be noted that crossbows are allowed in general seasons for those that wish to use them. Adding non archery equipment to archery seasons threatens the very essence of why we have these opportunities in the first place.

Proposal 102 OPPOSE:

This proposal has several issues. First, recurve bows and compounds are excluded completely. Second, this proposal would potentially take away the option from ADFG to limit certain weapons in certain urban areas, management areas etc. This proposal would make things more complicated rather than more simple.

Proposal 123 OPPOSE:

Proposal 123 would advocate for electronic range finding sights on archery equipment. The whole idea of having archery seasons is based on limiting technology in order to have less impact on the resource. Range finding sights go against the idea of fair chase and are an excuse for circumventing ethics. If someone really doesn't have enough time to make an ethical shot on an animal, they should choose to not shoot at all rather than use a piece of technology to make up for it.

Proposal 124 OPPOSE:

We would ask you to oppose proposal 124 based on the same reasons stated under proposal 123.



We would ask that the Board oppose proposal 125 based on the same reasons stated under proposal 101.

Proposal 127 NEUTRAL WITH CONCERN:

While the ABA is neutral on the use of air rifles in the general season, we are concerned that allowing air "bows" as a legal method of take would eventually try and make its way into archery seasons. An air "bow" is nothing more than an air rifle that shoots a bolt. In several states, the air "bow" has been proposed to be used in the archery season based on its name alone. In some states it has actually been allowed. The ABA has concerns that if proposal 127 is passed, air "bows" will eventually be introduced into archery seasons.

Proposal 133 SUPPORT:

As long as there is no biological concern and no limit on beavers, we support adding bow and arrow to the method of take state wide.

Proposal 156 OPPOSE as written:

While we understand the reasoning and logic behind this proposal, the language would allow ANYONE who has completed the crossbow education course to apply for an archery drawing permit. This would allow for many people to apply for and receive permits prior to actually receiving a methods and means exemption. This could take away permits from many bowhunters by individuals that may never end up being approved for or even applying for a methods and means exemption.

Proposal 157 SUPPORT:

This proposal would make it easier for the department to vet those applying for methods and means exemptions as well as help prevent abuse of the system.

Proposal 173 OPPOSE as written:

We oppose any repealing of the Dalton Highway Corridor Management Area as it could eliminate the archery only opportunity we currently possess. Losing the corridor management area would result in unwarranted hunting pressure which the game populations could not sustain.

Proposal 233 OPPOSE:

Many of our members take Moose, Brown Bear, Elk, Muskox and Bison with compounds, recurves and longbows with draw weights under 55 pounds. With proper arrow set up, ethical shots and shot placement, 50 pounds of draw weight is more than enough to ethically take any big game in North America.

I would like to thank the Board of Game for their time and consideration of these proposals.

Respectfully,

Mike Harris - Legislative Vice President, Alaskan Bowhunters Association



Submitted By

Laura Hazelett

Submitted On

2/17/2022 8:13:00 AM

Affiliation

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PROPOSAL 109

5 AAC 92.037(h). Permits for falconry.

Modify the micro-chip requirements for live raptors exported from Alaska by nonresidents as follows:

Current regulation: 5 AAC 92.037(h) all live raptors exported from the state, including propagated birds, must be micro-chipped.

Proposed regulation: 5 AAC 92.037(h) all wild caught live gyrfalcons exported from the state by a nonresident must be micro-chipped and the micro-chip must be registered with an internationally recognized micro-chip registry such as (Petlink). Proof of micro-chip registration must be submitted to the department within 90 days after export. Failure to provide proof of registration to the department makes the individual ineligible to receive a future permit under 5 AAC 92.037(g).

What is the issue you would like the board to address and why? Micro-chip requirements for raptors exported from the State of Alaska.

The American Falconry Conservancy (AFC) doesn't see a need to micro-chip any Alaska wild taken raptor or domestically bred raptor. It is well established that wild take has no impact on wild raptor populations given the insignificant numbers taken. Domestic breeding of raptors is encouraged and there is proof that captive breeding supports research and conservation as well as conservation education. Science, the guiding force in wildlife management, identifies captive breeding and reintroduction programs as not only vital portions of conservation for a species but also reduces the pressure on wild populations, particularly in expensive or difficult to acquire specimens such as gyrfalcons. Taking occasional specimens from the wild to ensure genetic diversity is important to domestic breeding. Alaska has the largest resource of wild gyrfalcons. Gyrfalcon populations are quite healthy, and studies provide much information that gyrfalcons are the most widely dispersing falcons in the world.

The burden of micro-chipping raptors, when a robust federal banding program already exists, seems counterproductive. Such record-keeping adds to Alaska Department of Fish and Game's administrative costs with no social good being realized. We think of social good as things that benefit the largest number of people in the largest way. For example, clean air, water, and literacy benefit the common good and general public. Discouraging the take of Gyrfalcons by non-resident falconers prevents both Alaska and its citizens from realizing permitting and tourism dollars gained from non-resident falconers coming to stay, hire guides, and take raptors.

Illicit trade in North American gyrfalcons is either nonexistent or so low it does not rise to the level warranting such law enforcement monitoring. Unless law enforcement has reasonable suspicion, or sufficient criminal convictions of nonresident Americans, such enforcement and monitoring remains unnecessary. AFC believes reciprocity amongst

states is important but it seems that Alaska might find it equally objectionable if other states required only Alaska falconers to micro-chip birds from the lower 48 before allowing export to Alaska. Currently, there is no indication a widespread theft of Alaska gyrfalcons is occurring. It is unclear what issue Alaska is attempting to resolve with the micro-chipping regime and it does not seem to resolve any issue that the existing USFWS robust banding of birds does not address. If it is theft of the resource (sans evidence) as some Alaskans would have us believe, it seems unlikely that people who would trade in black market raptors from Alaska would bother to utilize the legal system of applying for and receiving permits to procure raptors in the state. Micro-chipping would be an ineffective method with which to address such an issue.

However, if Alaska feels compelled to require micro-chipping of gyrfalcons taken by nonresidents, all gyrfalcons should be micro-chipped regardless of origin—domestic bred or wild taken—whether by residents or nonresidents. The Privileges and Immunities Clause of the U.S. Constitution in Article IV, Section 2 of the Constitution states that "the citizens of each state shall be entitled to all privileges and immunities of citizens in the several states." This requires equal treatment of residents and nonresidents, to perpetuate mutual friendship and interactions unless there is a compelling public interest at stake that cannot be attained by any other less prejudicial or burdensome means. Micro-chipping gyrfalcons exclusively by nonresidents will not meet this threshold. In fact, it appears to be an effort by Alaska resident gyrfalcon breeders to erect unreasonable barriers to proscribe take of wild gyrfalcons in Alaska by nonresidents. This serves only the Alaska gyrfalcon breeders, but not Alaska public interests.

The final thing we contend is that a micro-chipping regime is designed in part or in whole to prevent or discourage falconers from visiting Alaska to take gyrfalcons. The micro-chipping requirement also ignores the many documented health risks associated with micro-chipping, from the chips migrating in the body, failures of the devices, and particularly, the risk of cancers that studies show are associated with the devices. These studies for the most part are done on rodents, and canines, but the fact that large falcons are considered indicator species, may equate to higher susceptibility to these cancers. In the study, Artificial Implants and Soft Tissue Sarcomas, Elcock et al. (2001) writes, "It should be noted ... that these tumor incidences only approximated the potential incidence of micro-chip-induced tumors for these studies. The original intent of the studies was to characterize the toxicological profile of the chemical test substance in question, therefore tissue surrounding the animal-identification micro-chips was not examined microscopically unless there was a gross lesion. Thus, small pre-neoplastic or neoplastic lesions may have been missed" (p. 488). As a whole, these studies indicate the percentage of mice, rats, and canines developing micro-chip-induced tumors in the six studies reviewed ranged from 0.8% to 10.2%. Several researchers, including Elcock et al. (2001), Le Calvez et al. (2006), and Tillmann et al. (1997) suggest that the actual rate of tumor formation may have been higher than was reported in their studies since they examined only visible lesions and thus may have missed microscopic changes that signaled the onset of additional tumors around the implants.

It is unlikely that any wildlife rehabbers or state game departments, much less un-named international entities, have the necessary equipment to detect all potential iterations of micro-chips in use on the rare occasions that these birds may come into their possession. As the "returning to owners the found pets" is the main function for micro-chipping animals, not as a law enforcement tool that already exists in the form of recorded bands, we find this step goes far beyond what is required to ensure compliance.

Based on this assessment, AFC requests that the Commission discard all micro-chipping requirements for any domestically bred or wild taken raptor species for resident and non-resident falconers alike.

The AFC appreciates Alaska's consideration of our comments; both this comment regarding Proposal 109 and our comments submitted earlier regarding the other Proposals. Thank you for your time.

Respectfully,

Laura Hazelett

President, American Falconry Conservancy



I'm writing in support of proposals 106, 107 and 145, and against 144.

Cats are clearly a huge problem and the people who like to play their science denialism games should be held responsible for killing off our wildlife and spreading disease to humans and wildlife.

An example of their complete disregard for logic and how they like to down play real threats, can be found in the IN SUMMARY section on page 12 of their appendix and references, on Toxoplasma Gondii. Giving support to feral cat hobbyists to deal with what is such a serious problem would be extremely dangerous.

TNR is nothing but a pipe-dream solution, being touted by no kill charities, who don't like cat's dying humanely, and really care nothing about wildlife dying.

Ian Anderson

Submitted By
Steven Aubry

Submitted On
2/18/2022 12:42:14 PM

Affiliation



PC013
1 of 1

Our Proposal 199 to the Alaska Board of Game (BOG) has moved forward with consideration to the Statewide BOG meeting taking place in early March 2022. Alaskans who recreate in the Mat-Su region (Wasilla, Palmer, Big Lake, Willow, Chickaloon, Knik): today is the last day to comment in support of trap setbacks from popular multi-use trails. There's still time to help!

I support Proposal 199 and am happy it has moved forward for your consideration. The proposal for 50-yard trap setbacks to increase public safety on popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more is definitely a needed change which will still not prevent the setting of traps, just make it safer for others. I understand that currently, it is legal for traps to be set on or near multi-use trails, campgrounds, roads, and pullouts from as early as September through May. I also have learned that statistics show that this winter alone, at least seven dogs have been caught in traps, and two of them have been killed in Southcentral Alaska. This proposal could prevent the majority of these occurrences. Please support this proposal. Make it safer for "all" the users that enjoy the use of these areas.

Respectfully submitted,

Steven Aubry, WI

Submitted By
Lisa Baird

Submitted On
2/17/2022 2:58:40 PM

Affiliation



PC014
1 of 1

I support Proposal 144 to exempt sterilized cats. Trap-Neuter-Vaccinate-Return programs have been shown through properly-designed scientific research to be good for cats and good for the environment. Of course, there are some sensitive areas, such as ground-nesting bird sites, that are not suitable for TNVR, but those can be regulated as needed. Returning sterilized, vaccinated cats to a residential neighborhood, or to their barn home in a rural area, will not have significant impacts on wildlife, and will start chipping away at the cat overpopulation problem. Years of killing free-roaming cats through trapping and lethal injections, poisoning, and shooting have not reduced their numbers; the remaining cats will always breed until the population is back to each area's carrying capacity. It's time to choose a modern, humane method of cat population control that has been proven to work. Thank you.

Submitted By
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Submitted On
2/18/2022 9:39:50 AM
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Proposal 108: I support this proposal if amended to say: "Taking of eyases for non-residents statewide of any species of raptor legally allowed to be taken in Alaska, up to five permits for taking, transporting, or possessing a passage raptor for falconry; up to ten permits for taking, transporting, or possessing an eyas raptor for falconry legally allowed to be taken from May 1- July 20."

Reason: Take by Alaska resident falconers is of no biological significance for any Alaskan raptor populations. Consequently, a take of up to 15 raptors by non-resident falconers would also be of no biological significance. Although the Alaska Falconers Association (AFA) claims that it is difficult to tell eyas peregrines and gyrfalcons apart, evidence does not exist to support this claim. Adult falcons associate closely with their young and are conspicuous during disturbance to the eyrie. Gyrfalcon chicks have grey beaks, ceres (the fleshy area above the beak) and feet while peregrines possess very pink beaks, ceres and feet. Identifying gyrfalcons and peregrine falcons is of no difficulty at any life stage due to their vast morphological differences.

Proposal 109: I strongly disagree with this proposal

Reason: AFA falsely claims "Alaska raptors that are commonly used for falconry (except Gyrfalcons) are readily available to falconers in the continental United States"

Gyrfalcons are readily available to falconers in all states in this country. They are bred in captivity in large numbers - perhaps even surpassing captive production of some other common raptor species. In addition, multiple other states allow gyrfalcon take including Washington, Oregon, Idaho, Montana, Wyoming, North Dakota, and others. Alaska is not the only state that allows take of this species that AFA claims to be "uncommonly available." Gyrfalcons are not an uncommon or unavailable species for falconers to access.

Proposal 110: I strongly disagree with this proposal

Reason: AFA is using verbiage that directly contradicts what they are proposing. They propose to "extend" the non-resident season from Aug 15-Oct 31 to Sept 15-Nov 15. This season they are proposing would be 15 days SHORTER. If this proposal were to be adopted a non-resident trapper may be forced to trap in winter conditions, combating all the issues that may go with below freezing temperatures and snow. This proposal restricts a non-resident's chances of securing a bird after spending thousands of dollars to take such a trip in rural Alaska. Alaska is known for adverse weather conditions that can make trapping or traveling impossible. Shortening and pushing back the trapping season unfairly pushes non-residents into a shorter time frame for success and more likelihood of adverse weather. In the last seven years of non-resident take, only three gyrfalcons have been taken from natal territories by non-residents.

Proposal 111: I strongly disagree with this proposal

Reason: Only 13 non-residents applied for a permit to trap in 2021. The Alaska non-resident take has so far never met its quota. Only 37.9% (29 permits available over 7 years, 11 birds exported) of the total permits issued so far have resulted in the export of a raptor. The four-year rule being proposed is pointless because the applicant pool is so low already and the odds of drawing the permit are so high already. With an already low number of people applying for a non-resident permit there is a high chance of any one of the applicants being successful in drawing a permit but not necessarily successful in capturing a raptor.

The big game hunts that this proposal references where successful applicants must wait four years before applying again is comparing apples and oranges. Hundreds to thousands of people apply for big game hunts in Alaska for a handful of permits. Non-resident falconry permit applications thus far have never numbered more than 26. The average number of applicants when you divide the numbers by 7 years is 20.7. If this proposal were to go through and roughly 20 people applied per year, you would be out of applicants in short order. Additionally, this is an attempt to fix a problem that doesn't exist. The total number of individuals who have applied in the last seven years is 63. The number of people who have applied every year and won is 5 individuals. The number of people who have won more than once is 4 out of 63 individuals over 7 years. The number of people who have applied *once* and won is 6 individuals. Therefore, arguing that it is unfair to let someone apply every year when only 4 out of 63 individuals have won more than once in 7 years is baseless.

Proposal 112: I support this proposal

Reason: Alaska hosts healthy populations of all native raptor species found breeding there. In addition, the landmass of Alaska is one-fifth the size of the entire lower 48 (per alaska.gov) with a very low number of resident falconers (less than 50, per ADF&G). Many other



states in the lower 48 have much smaller resource availability and no limits (except for peregrines) on the numbers of non-resident falconers applying for take, including Texas, Kansas, Indiana, Wyoming, Minnesota, Wisconsin, Oklahoma, and Washington to name a few. Oregon, a state with a non-resident quota for example, allows 20 non-resident permits in a landmass incredibly small compared to Alaska. Biologically, Alaska would stay well below the threshold of significance with respect to raptor take if all residents and the average number (20.7) of non-residents took birds each year. Furthermore, not all residents will take birds every year and that holds very true with non-residents as well. The quota for non-resident take has never been met in the 7 years of this program. In 2020 and 2021, zero birds were taken on non-resident permits. Alaska most certainly can biologically afford to allow unlimited take for non-resident permits since the chances of success remain low.

Proposal 113 I support this proposal as amended below. Rather than having three different drawings for peregrine, gyrfalcon and other species, take should be unlimited for reasons addressed above: the quota for non-residents has never been met and the resource is healthy and stable enough to allow unlimited take at this time. If the above proposal were to be adopted, it would force a permit holder to decide which species they were targeting before knowing their travel plans, weather, and seasonal influences on these species. Alaska has already determined that the season allowed for resident falconers is safe and biologically sound. Multiple states allow non-residents to trap the same numbers and during the same time as residents. I propose a change FROM "issue annually: up to 5 permits for a gyrfalcon (*Falco rusticolus*); up to 5 permits for a peregrine falcon (*Falco peregrinus*); and up to 5 permits for any other raptor species listed under (f) of this section."

TO: "Nonresident take permits for raptors shall have the same quotas as resident take. Take is limited to two raptors either eyas or passage, hatching- year-raptors; Include all raptors in section (f) for nonresidents."

I agree with all other portions of this proposal to clear up language and to extend the non resident trapping season to be in line with resident trapping season (Alaska Falconry Manual Part 34 - Taking of Raptors "An eyas or passage bird may be taken any day of the year.")

Proposal 114: I strongly disagree with this proposal.

Reason: If this proposal were to be adopted a non-resident trapper may be forced to trap in winter conditions while attempting to rent the correct gear (e.g. snow machine) and combating all the other issues that may go with below freezing temperatures and snow. This proposal restricts a non-resident's chances of securing a bird after spending thousands of dollars to take such a trip in rural Alaska.

The cost of trapping in a remote area of Alaska is extremely high and perhaps why there are low numbers of applicants for these permits to begin with. A proposal to push back and restrict trapping dates will only add to the cost of a non-resident's trip due to weather conditions. Shortening and pushing back the trapping season unfairly pushes non-residents into a shorter time frame for success and more likelihood of adverse weather.



Submitted By

Peter A. Barela

Submitted On

2/18/2022 10:09:17 PM

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I Oppose Proposal #267 for a few reasons:

1. It raises the question-is this an emergency action by the board or not?
2. The previous board prior to this one would have most likely followed the rules set forth to recognize and put attention to it at the beginning of the three year cycle.
3. This proposal really does not address conservation of the herd. Those that submitted this proposal took into consideration only two numbers, non-resident harvest and resident harvest.

I have lived in Alaska for the past 33 years, and I have observed the differences between resident hunters. There are a small percentage of passionate ones, and then the weekend warriors. The question is how many sheep heads do the passionate ones need? I can appreciate one from each of the ranges, that is five rams. It isn't as one is going to feed a family of say four for very long with that amount of meat.

4. The economic numbers that are not looked at by this organization submitting proposal 267. Money spent by non-residents to all the local businesses throughout the state, also to those involved directly with the hunt. Guides, assistant guides, packers, pilots, air taxi services, all have families who are dependant on the guiding industry. I have been in the guiding industry since 93 as an assistant guide, and then registered guide in 2007. I not only support my family, but all those involved I consider family. Also, the industries family-includes supporting numerous families in villages and patients at Providence Hospital for their Holistic healing from the game meat our industry family has and will continue to donate. This shows the conservation efforts in the guiding industry are a needed far and wide for the state. This is why I oppose proposal #267 that discriminates against non-resident hunters.

I Support #136 and #137:

1. The Alaska State Troopers have documented that this is an unenforceable law, and is a waste of the state's money to investigate when there are more valid investigations.
2. There are times as a pilot that safety requires one to spot out a safe landing area that may have sheep in that drainage, however, it is to scout sheep it is only to find a safe landing spot.

I Oppose Proposal #138:

There is already a regulation stating that you can't hunt the day you fly until 3:00am the following day

I Oppose Proposal #139:

There is already a regulation that specifies that you can't "Harass Wildlife."

I Oppose Proposal #271:

There is already a regulation that specifies you can't rundown or Harass Wildlife. In all reality how would this be enforced? Also, how would anyone catch to a herd of Caribou or a pack of wolves moving at 15 miles per hour. These animals survive with either fight or flight. And in this situation it will be flight.

I Oppose Proposal #146:

There are areas in the state where one side of a drainage is open for a registration hunt, yet the other side might not open until later in the week, month etc.; therefore, you would need to get both registrations if the goats are on either side. Additionally, if the weather doesn't allow a hunter to get into one registration area then a hunter will have to go to a different area, and this proposal doesn't allow a hunter to do that.

I Oppose Proposal #147:PC016
2 of 2

1. I think this is a bad idea because it could lead to promoting illegal hunting practices e.g. poaching, and then the next proposal may lead to selling black bear bladders etc. Keep it clean for Alaska and our future hunting families.

I Oppose Proposal #152



Submitted By
Candice Barnhart
Submitted On
2/18/2022 11:51:23 AM

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I fully support the Alaska Wildlife Alliance's Proposal 199 requesting 50-yard trap setbacks from over 200 multi-use trails in the Mat-Su area, including trails in: Nancy Lakes, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Nelchina, Chickaloon, Government Peak, Knik Glacier, Willow, and more.

Ideally, trapping should be fully banned in heavily populated and used areas. Alaska has plenty of room away from high-density population centers for people to trap without the risk of hurting people and animals who are out enjoying the amazing trails and wildlife areas in the state.

Submitted By
Ralph Basner

Submitted On
2/18/2022 7:46:06 PM

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PC018
1 of 1

Proposal 199, 50 yard setbacks from popular hiking/ski/biking trails is an entirely resonable proposal. As our urban/suburban trails become increasingly popular with the public at large, the potential for tragic incidents, such as pets becoming maimed and killed by poorly placed leg-hold and conibear traps will only increase. And god forbid, if a small child should come across one of these traps. Currently trappers enjoy virtually unfettered access to most of the state. A fifty-yard setback requirement should not negatively impact most trapping activities. Please adopt this proposal.



Submitted By

Alan Batten

Submitted On

2/18/2022 12:24:46 PM

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I am writing in support of Proposal 199, to require traps to be a minimum of 50 yards off of main multi-use trails in the Matanuska-Susitna region. This seems like a reasonable compromise and will save a lot of dogs. The vast majority of users of these trails are there for purposes other than trapping. Families out skiing, people out with their dogs, even people with little kids out snow machining; all of these shouldn't have to worry about traps set right beside the trail. Thank you.

Submitted By
Danielle Bays
Submitted On
2/16/2022 10:43:09 AM
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PC020
1 of 4

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ALASKA BOARD OF GAME

Statewide Regulations Meeting

March 4-12, 2022

Comments in Support of Proposal 144

And in Opposition to Proposals 107 and 145

Submitted by

Danielle Bays

Senior Analyst, Cat Protection and Policy

The Humane Society of the United States

The Humane Society of the United States (HSUS), the nation's largest animal protection organization, works to protect both wildlife and domestic animals. On behalf of our members and supporters in Alaska, please accept these comments in **SUPPORT of Proposal 144 and in OPPOSITION to Proposal 145 and 107**. These proposals relate to 5 AAC 92.029. Permit for possessing live game, 5 AAC 92.230. Feeding of game, and 5 AAC 92.990. Definitions as they pertain to the management of free-roaming domestic cats in the state.

The HSUS firmly believes that cat management should be designed to protect public safety and wildlife as well as to protect cats. We support strategic, non-lethal management of free-roaming cats who already exist outdoors through multi-faceted programs including sterilization and vaccination efforts, such as trap-neuter-vaccinate-return (TNVR). The goal of TNVR-based programs is to humanely reduce, and eventually eliminate, populations of outdoor cats, as well as the nuisance behaviors, wildlife predation and public health concerns associated with them.

The effects of free-roaming cats on wildlife are well documented and are a cause of legitimate concern to us, as well as wildlife agencies and animal protection organizations. The degree of impact is often hotly debated, obfuscating the desire on both sides of the debate to find an effective solution. Arguments against sterilization-based population management programs all too often focus on the current landscape, providing a laundry list of negative impacts cats may have on wildlife, and then essentially arguing for the status quo. This appears to be the case for Proposal 145, seeking to redefine domestic cats as "deleterious exotic wildlife" and prohibit the feeding and "release" of cats outdoors.

We urge the Board to instead focus on solutions to the conflicts caused by free-roaming cats. The majority of people appreciate both domestic cats and native wildlife and wish to see neither suffer. The question to consider here is not whether to have free-roaming cats or



A similar question was raised for a proposed sterilization-based cat management effort in Los Angeles, California. To resolve the question of the program's impact on wildlife and the environment, the city completed an environmental review process in compliance with the California Environmental Quality Act [1]. The exhaustive review found that the TNVR program would not have a negative impact on the environment or wildlife given that it would reduce the number of cats living outdoors. Fewer cats mean less of an impact. Similarly, the Alaska Board of Game should find that TNVR programs aimed at effectively reducing the free-roaming cat population will reduce the threats to wildlife in the state and thus are an improvement over the current situation.

We urge the Board to not be waylaid by unproductive debate and focus on the question at hand – does Alaska want to utilize effective and humane methods for managing free-roaming domestic cat populations or does the state want to entrench the status quo and leave outdoor cats unmanaged.

Proposal 144 allows for management of free-roaming cats

Proposal 144 requests that sterilized free-roaming domestic cats ("community cats") be exempt from the list of species prohibited from being released in the wild. This would allow for cats already living outdoors to be captured, sterilized and vaccinated, and then returned to the same location where they were living.

The intent of Proposal 144, and any TNVR program in any location, is to positively impact the current state of affairs by sterilizing enough of these cats to reduce the overall population, thereby reducing wildlife predation and public health risks. A study to evaluate the effect of a long-term, multi-faceted cat management program on the dynamics of a free-roaming cat population concluded that, "A comprehensive long-term program of neutering followed by adoption or return to the resident colony can result in reduction of free-roaming cat populations in urban areas." and documented an 85% reduction in cat population in the study area (Levy et al., 2003)

Numerous other studies support the claim that when conducted appropriately, non-lethal strategies can achieve the desired outcome [2]. For example, a population of over 300 cats at a waterfront site in Newburyport, MA was eliminated through a concerted TNVR effort paired with rehoming of adoptable kittens. (Spehar & Wolf, 2017) A 67% decrease in cat population was found in a Chicago neighborhood targeted for TNVR by volunteers. (Spehar & Wolf, 2018) And a study of TNVR in rural North Carolina compared the impact of TNVR with control groups, finding a 36% mean decrease where TNVR was employed (range 30-89%) versus a 47% mean increase of control groups—the actual increases in cat population across the three sites where no TNVR was performed were 31%, 127%, 283%. (Stoskopf & Nutter, 2004)

When sterilization is not part of a management strategy, cat populations can increase. Trap-and-remove efforts end up being a haphazard approach that address too few cats, often target household pets, and have little impact on animal welfare, environmental, wildlife or public health issues. These efforts are also incredibly costly, in terms of both financial and human labor/mental welfare impacts.

Additional peer-reviewed research comparing various free-roaming cat management strategies found that the most effective strategy with respect to both population impact and cost efficiency was a high intensity TNVR-based effort. (Benka et al., 2021; Boone et al., 2019; Miller et al., 2014) This means sterilizing a high proportion of cats at the start of the program (front-loading), followed by a less-intensive maintenance phase to address any new cats that appear. Often communities are not able to implement such intensive TNVR due to lack of government support or restrictive policies. Adoption of Proposal 144 would be a first step in clearing pathways to allow for such intensive management strategies in Alaska.

Proposals 145 and 107 are not a solution.

Proposals 107 and 145 request adding domestic cats to the state's list of "deleterious exotic wildlife" and proposal 145 goes further to request additional prohibitions on releasing domestic cats outdoors and on feeding cats outdoors. Such policy changes would likely be effective only on a landscape that did not already include free-roaming domestic cats. Clearly this is not the reality of present-day Alaska.

Instead of doing more to manage cat populations, these proposals would further hinder effective methods of reducing the number of cats living outdoors in the state.



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There is a misconception that if free-roaming domestic cats are prohibited from being returned outdoors, that once those cats are captured, they will be removed from the environment. The reality is that the bulk of those cats will never be captured in the first place. A cat management program will not trap cats who can't be returned to the same location once sterilized and vaccinated. There simply isn't the capacity to rehabilitate and rehome the cats on the scale needed to make a difference. The cats will continue to live outdoors, intact and unvaccinated, and thus allowed to reproduce and their populations to grow. Prohibition on returning cats does not accomplish the intended goal of having fewer cats outdoors. It does the opposite.

Research on the impacts of various cat management strategies conducted at both high and low intensities over a period of ten years showed, not surprisingly, that doing nothing was the worst possible choice, with the largest population of cats at the end of the experiment. (Benka et al., 2021; Boone et al., 2019; Miller et al., 2014) Support for Proposal 145 is essentially support for doing nothing, maintaining the inadequate status quo.

Feeding bans have also proven ineffective at managing free-roaming cats time and time again and may actually lead to an increase in free-roaming cats. It is impossible to eliminate all food sources, such as food scraps in garbage cans, and cats are adept scavengers. When feeding is sanctioned, it can be monitored and managed. This means it can be done in a way that is sanitary and will not attract wildlife or otherwise cause a public nuisance. A ban often does not result in cats not being fed, but rather creates a situation where people will drop large piles of food and leave, not wanting to get caught. For cats that have grown accustomed to being fed, to abruptly discontinue feeding them is cruel. With managed care, feeding sites can be placed in areas to minimize impact and leftover food promptly removed. Often, existing sanitation code allows for enforcement of problem situations.

The [American Bar Association](#) encourages government bodies to adopt TNVR programs and humane cat management policies. Regarding feeding bans, the ABA states:

"Feeding bans cause a real dilemma legally for caregivers. By feeding the community cats they care for, caregivers could be violating such an ordinance, but by adhering to the ordinance they could conceivably find themselves in violation of a cruelty provision, by failing to provide care to those same animals. Further, for those cats who have become dependent on food provided by a caregiver, a feeding ban is inhumane, usually forcing cats to subsist on insufficient resources and/or create a nuisance by rummaging through dumpsters for food. To rectify this, feeding ban laws should be interpreted to exempt ear-tipped community cats."[\[3\]](#)

The HSUS recognizes that there is an urgent need for practical and effective solutions to the challenges associated with the presence of cats outdoors. However, Proposals 107 and 145 are not it. With determination, innovation, and collaboration, we can implement and sustain effective programs to humanely resolve human-cat-wildlife conflicts. That means including animal care and sheltering professionals as well as wildlife professionals in the crafting of a plan. Animal welfare organizations invest significant resources and energy each year on cat rescue, sheltering, adoption, and other protection measures. More support is needed for accessible sterilization for all cats in Alaska and for programs to prevent abandonment of cats outdoors. A broad range of tools are needed to effectively reduce free-roaming domestic cat populations, including those that employ TNVR. Adoption of Proposal 144 takes Alaska a step closer to implementing effective solutions.

We encourage the Board of Game to support Proposal 144 and to reject Proposals 144 and 107. Thank you for consideration of our comments.

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202-839-2022

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[1] <https://eng.lacity.org/about-us/divisions/environmental-management/projects/citywide-cat-program>

[2] See <https://www.felineresearch.org/post/issue-brief-what-to-do-with-feral-cats-examining-trn>

[3] <https://www.maddiesfund.org/assets/documents/American-Bar-Association-TNVR-report.pdf>



Submitted By
danita bennett

Submitted On
2/13/2022 10:52:50 AM

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My name is Danita Bennett and my community of residence is Calgary, Alberta.

I am writing in **Support** of proposal # 265 changing RM855 to DM 855.

I find the process for applying for a non-resident moose tag in Unit 22E very complicated and the process unfair.

It requires being super adept on the computer and keyboard since those wishing to compete for the available tags must do so at the same **exact moment** on July 7th at 0900 when the ADF&G opens it to receive and award registration permits to the first electronic applications they receive.

This method is unfair because: **1)** puts older individuals who may have slower fingers or not skilled at the computer at an unfair disadvantage; **2)** speed of transmission of mobile technology is not the same for everyone from different parts of the country; **3)** many older hunters do not have access to a reliable computer or internet at their residence. **4)** there will be those super skilled at technology who may use multiple computers, and if possible set for a scheduled automatic transmission of the form or automatic recurring transmission of the form.

For the above reasons, I feel that the current method of obtaining a non-resident moose tag in Unit 22E are a barrier for many and perhaps discriminatory.

Because of this, **I urge you to approve Proposal #265 and take action for this regulatory year and changing it to a draw system on July 7, 2022 so this unfairness can be rectified for the year 2022 by a "draw system as described in Proposal #265.**

Thank you for your consideration.



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I support Proposal 144, and for trap-neuter-vaccinate-return programs in general. Sterilized community cats should be exempt from the list of species prohibited from being released into the wild.



Submitted By
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2/16/2022 7:52:27 PM
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I would like to comment in support of Proposal 199, requiring a 50-yard trap setback from popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more.

I believe pet owners need to be personally responsible for the safety of their dogs. I also believe Alaskans have the right to trap.

That being said, the explosive growth in population in the Mat Su does mean that it is time for there to be rules about trapping closer than 50 yards to popular multi-use trails.

I can't imagine that it makes for very good success (if one is ethically trapping) to be that close to high use areas.

As all user groups are judged by the worst of their members, it will always be in our best interest to make sure that we can reduce the opportunity for clashes to occur.

Thank you for your consideration.



February 18, 2022

Alaska Board of Game
Via e-mail: dfg.bog.comments@alaska.gov

Re: 2020/2021 Proposed Changes to Regulations

Executive Director Tibbles and members of the Alaska Board of Game:

Best Friends Animal Society is a leading national animal welfare organization dedicated to ending the killing of cats and dogs in America's shelters. On behalf of Best Friends and our many supporters in Alaska, I urge you to support Proposal 144 and oppose Proposals 106, 107, 145, and 166 during your upcoming meeting to discuss the latest round of regulatory proposals.

By exempting “sterilized community cats” from the list of species prohibited from being released into the wild under 5 AAC 92.029, Proposal 144 would allow municipalities to use trap-neuter-return (TNR) for managing their free-roaming cat populations. Proposals 106, 107, 145, and 166 would, in various ways, impede such efforts.

Numerous peer-reviewed studies have documented the efficacy of targeted TNR for reducing free-roaming cat populations^{1–11} and reducing feline admissions at local animal shelters.^{12–15} Lethal removal, on the other hand, has been shown to be ineffective. A 2015 study, for example, found that “low-level ad hoc culling of feral cats” is not only ineffective at reducing their numbers, but might actually lead to their *increase* due to “influxes of new [adult] individuals after dominant resident cats were removed.”¹⁶ More recently, researchers found that, despite removing “an estimated 44% of the population,” there were “no meaningful differences in the relative abundance and density of feral cats” just three months later.¹⁷

These results are hardly surprising to anybody involved in animal control. Indeed, nearly 15 years ago, Mark Kumpf, then president of the National Animal Care & Control Association (NACA), compared the traditional method for managing cats to “bailing the ocean with a thimble.” Kumpf continued: “There’s no department that I’m aware of that has enough money in their budget to simply practice the old capture-and-euthanize policy, nature just keeps having more kittens.”¹⁸ The lessons learned since then were codified last year, when NACA revised its policy on Animal Control Intake of Free-Roaming Cats. In it, the organization formed nearly 45 years ago “to provide resources, standardized training, and support for animal care and control professionals across the United States”¹⁹ noted that:

“indiscriminate pick up or admission of healthy, free-roaming cats, regardless of temperament, for any purpose other than TNR... fails to serve commonly held goals of community animal management and protection programs and, as such, is a misuse of time and public funds and should be avoided.”²⁰

Although Proposals 106, 107, and 145 claim to clarify existing regulatory language (e.g., the definition of *feral*), their adoption would likely create a great deal of confusion for state and local agencies tasked with managing wildlife and domestic animals—and among the general public as well. Proposal 106, for example, aims to define *feral* as “an ownerless and unconfined domestic animal, or the progeny of an ownerless and unconfined domestic animal, that no longer depends solely on food provided by humans to survive.” Although the determination of whether or not a particular animal is confined or not is relatively straightforward (setting aside for the moment confinement via invisible electric fencing), the determination of a cat’s ownership is not. This is further complicated by the fluid nature of cat ownership—a lost pet may, for example, become “feral” and later befriend a compassionate caregiver who eventually adopts the cat. In fact, it’s estimated that 23.7% of pet cats in the U.S. are adopted directly from the “stray” population, and another 20.6% from friends or family members (who themselves likely obtained the cat or kitten from the local “stray” population).²¹

If it can be difficult to determine whether a cat is owned or not, it can be even more difficult to determine if a cat is “feral” given the difficulties in applying the term to this species. Indeed, the meaning of the term itself can be difficult to pin down. In a 2014 decision, the Supreme Court of the State of Alaska found that the Game Board’s “regulatory definition of ‘feral’ is arbitrary.” While this case concerned bison grazing off-lease, not domestic cats, it’s not difficult to see how the Court’s decision might speak to the implications of the proposed definition of *feral*. To begin with, the Court pointed out that “the term ‘feral’ found in AS 16.05.940(19) can be traced to the common law concept *ferae naturae*, meaning “of a wild nature, untamed.”²² The proposed definition of *feral* described in Proposal 106, by contrast, departs considerably from this foundational concept, taking no account of a cat’s “nature.” In addition, the Court found that far too much importance was being given to boundaries that are, often by their very nature, arbitrary:

“...instead of considering objectively ascertainable, fact-driven standards for defining when a domestic bison becomes feral, when the Board drafted the amendments to 5 AAC 92.029(d)(2) and 5 AAC 85.010(a)(1), it defined ‘feral’ solely with reference to a grazing lease’s boundary line: the instant a lawfully owned, domestic bison crosses over the boundary line of the grazing lease, it is automatically classified as feral, owned by the State, and subject to an emergency hunt.”²²

The proposed definition of *feral* described in Proposal 106 would instead give too much importance to *ownership*—the determination of which is far more complicated than whether or not an animal exists on one piece of property or another. Consider, for example, a scenario in Anchorage, where a cat’s owner

includes, according to the city's municipal code, "any person or custodian, who owns, restrains, possesses or holds title to an animal or knowingly permits an animal to remain on premises occupied by such person" (§ 17.05.010). Because a microchip meets the requirement for identification when the cat is off the owner's property (§ 17.10.012), ownership cannot necessarily be determined visually. Under the definition of *feral* in Proposal 106—which fails to account for the real-world conditions under which the definition might be applied—the lawful owner of a cat might very well have their pet declared to be "game" and therefore killed. Proposals 107 and 145, which aim to include domestic cats among species deemed "deleterious exotic wildlife," would create similar confusion—with similarly disastrous results.

These attempts to classify domestic cats as wildlife also raise questions about which agency has jurisdiction over the enforcement of various laws and regulations. Domestic animals are generally handled by local animal control agencies—what happens when a "stray" cat is suddenly classified as "wildlife"? Or when an owner comes forward to reclaim the cat, making the issue once again an "animal control" issue rather than a "wildlife issue"? Proposals 106, 107, and 145 simply invite this kind of trouble.

It's important to point out the misinformation and scaremongering being used as justification for the proposals submitted as attempts to impede TNR efforts across Alaska. It's difficult to see, for example, how predation of reptiles in the Australian outback or birds in the "sage-scrub habitat" of "coastal southern California"²³ (Proposal 145) is relevant to Alaska's wildlife. Similarly, mortality estimates derived only for the Lower 48 states²⁴—and discredited long ago²⁵—are largely meaningless when it comes to addressing Alaska's legitimate conservation concerns (Proposal 107). Equally meaningless is "an analysis of the cost of alien and invasive species in the U.S. conducted in 2005" (Proposal 107), as this analysis was discredited long ago by a researcher who warned:

"bypassing accepted scientific and economic principles in order to [create favorable economic valuations for things that we know to be ecologically important] sets a dangerous precedent and risks many unintended consequences."²⁶

The public health concerns used to justify the classification of domestic cats as wildlife are similarly dubious. Proposal 145, for example, goes on for several pages about toxoplasmosis, which is not included among the "certain health conditions and diseases [for which reporting] has been mandated to the Alaska Division of Public Health."²⁷ One wonders if the Department of Fish and Game is truly expected to give this disease more attention than the state's public health professionals do. This same proposal mentions flea-borne typhus, a disease occurring in the U.S. only in Hawaii, Southern California, and parts of Texas.²⁸ Again, it's difficult to see how this is relevant to residents of Alaska, never mind the Department of Fish and Game.

Proposal 107 argues that, "because they are far more regulated, dogs are seldom as problematic as cats." This claim ignores the considerable research showing just

the opposite. Although the number of cats testing positive for the rabies virus annually in the U.S. exceeds the number of dogs testing positive, human cases are more likely to originate from exposure to dogs and wildlife.²⁹ A study of patients seeking post-exposure treatment at 11 “university-affiliated, urban emergency departments” found that 81% of 2,030 exposures were attributed to dogs compared to just 13% attributed to cats.³⁰ And 33% of dog exposures occurred in the public street or park, compared to 12% of cat exposures; by contrast, 24% dog exposures occurred in the home, compared to 53% of cat exposures.³¹ Dogs in public places clearly pose a greater public health threat than cats do. A more recent study found that the average annual dog bite hospitalization rate among “American Indian and Alaska Native” children in Alaska was nearly twice the national average: 6.1 incidents/100,000 children compared to 3.1/100,000.³² Obviously, such findings contradict any claim that “dogs are seldom as problematic as cats.”

In light of the evidence presented here, I again urge you to support Proposal 144 and oppose Proposals 106, 107, 145, and 166 during your upcoming meeting. Doing so will make it easier for the many Good Samaritans involved in TNR across the state to do their work managing community cats—and, by extension, protecting Alaska’s wildlife.

If you have any questions, please feel free to contact me.

Respectfully,



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PC025
1 of 1

Submitted By
Todd Bodenheimer
Submitted On
2/16/2022 9:31:15 AM
Affiliation
Hunter

Phone
503-887-6109

Email
elkrchr@earthlink.net

Address
10 Zachary Peak Trail
Three Forks, Montana 59752

I'm submitting comment in regards to Proposal 265, 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the Unit 22E registration moose hunt to a draw hunt with specific application conditions addressed below. My name is Todd Bodenheimer and I live at 10 Zachary Peak Trail, Three Forks, MT 59752. My contact number is 503-887-6109 and my e-mail address is elkrchr@earthlink.net.

I am in favor of changing RM855 to DM855 so that it becomes a draw hunt conducted by the ADF&G in Nov/Dec 2022 for the 2023 hunt season. Registered guides should only be able to submit as many applicants as there are tags available and each submission would require an accompanying guide contract. An alternate list should be established should a hunter back out for personal or medical reasons and those tags would then become available on first come, first served basis.

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

As stated on page 123 of the current ADF&G regulations for unit 22E, NR moose. One bull with 50-inch antlers or 4 or more brow tines on at least one side by permit available online on July 7 at 9 A.M. (in red: permits issued on a first come, first served basis [numbers of permits to be announced]). This does not allow hunters and guides a reasonable time to plan a hunt with the season opening on September 1. Over the last 3 years, the number of registered guides in unit 22E has risen from 1 to 4; thus, the demand for limited moose tags is significantly greater. Internet speed and hunter age (familiarity with the internet) could favor one hunter over the other. When I tried applying for the tag in 2021, the tags were sold out within 30 seconds. By changing over to a draw, all hunters would have an equal opportunity to obtain a tag.

If the commission does vote in favor of changing RM855 to DM855, I would advocate for a "special draw period" to occur in 2022 prior to being adopted for the 2023 season. Thank you for taking the time to read my concerns.

Proposed by: Todd Bodenheimer

Submitted By
Doug Bourland

Submitted On
2/18/2022 9:21:00 AM

Affiliation



PC026
1 of 1

I oppose proposals 123 and 124 rangefinding sights should not be allowed during archery seasons! I oppose proposals 101 and 125 crossbows should definitely not be allowed during archery seasons they should only be allowed during rifle season. I support proposal 138 no flying should be used to scout or locate sheep in any season which you do allow during some it makes no sense. I strongly oppose proposal 127

Submitted By

Robert Bourland

Submitted On

2/16/2022 9:41:02 PM

Affiliation



PC027
1 of 1

-Proposal 123 and 124, I oppose these proposals! Rangefinding sights should not be allowed on bows. Technology in archery seasons has gone far enough!

-Proposal 101 and 125, I oppose the use of crossbows during archery season!! A crossbow is not a bow and not what archery seasons were designed for. Technology has gone far enough in archery, we should be going the other way. We are losing most of our over the counter opportunities down here in the lower 48 because of these advancements in our "archery" seasons! That will also increase the pressure on the remaining areas that are open. I would hate to see Alaska start losing opportunities like we are down here!! I like to hunt up there!!

-Proposal 138, support the no fly rule for all sheep seasons!!

-proposal 127, oppose use of airbows and rifles during any weapon seasons!! No need just a push to get them closer to the archery seasons.



PC028
1 of 1

Submitted By

Jani Bowerman

Submitted On

2/15/2022 7:56:20 PM

Affiliation

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janibow@aol.com

Address

4761 E Crane

Wasilla , Alaska 99654

I support Proposal 199

Submitted By
Stephane Brault
Submitted On
2/18/2022 11:29:53 AM
Affiliation



PC029
1 of 1

Alaska Board of Game Members:

I am an almost 20-year Anchorage resident who has spent a lot of time recreating on trails in the Mat-Su area with my dogs. I am also an avid hunter and I'm aware of several regulation regarding hunting restriction that could be consider simmilar to the proposal 199, a few exemples are: Shooting on, from, or across the driveable surface of any constructed road or highway, weapon restriction (bow only, crossbow only, muzzle loader, ect) setback from road for allowable firearm discharge. I'm writing to support Proposal 199 which requests 50-yard trap setbacks on more than 200 multi-use trails in the Mat-Su area. I understand this distance is considered a "reasonable compromise" between user groups in other areas of Alaska.

Trail-users with dogs are a large stakeholder group for Mat-Su area trails, which is why it's difficult to understand how it is legal for traps to be set on or near multi-use trails, campgrounds, roads and pullouts. The Mat-Su Valley (and Southcentral Alaska generally) is growing rapidly. There are many more people (including tourists) and dogs using these trails, campgrounds, roads and pullouts and the consequences are too great to not set traps back at least 50 yards.

Sadly, I have two different friends whose beloved dogs were caught in traps in the past couple of months on multi-use trails in Southcentral Alaska. One incident occurred on a popular Mat-Su area trail—gratefully my friend had a tool to release the trap. And though I recognize it's outside the scope of this proposal, it's worth mentioning that my other friend's dog died in a conibear trap near a trailhead on the Kenai Peninsula. It has been a heart-wrenching loss. I share this to demonstrate the impact of these traps near trails.

Please approve Proposal 199 and 50-yard trap setbacks on more than 200 multi-use trails in the Mat-Su area. I believe this is a more humane, safe and reasonable rule than what is currently in place for trapping in the Mat-Su area.

Thank you for your consideration.



Submitted By
jeff broadbent
Submitted On
1/11/2021 3:45:15 PM
Affiliation
Nonresident falconer

To Whom It May Concern:

My name is Jeff Broadbent, and I am a long-time falconer and resident of the state of Utah. In 2018, it was my great fortune to draw an Alaska nonresident falcon take permit, and I was successful in capturing a female gyrfalcon. That falcon, which I named "AK" in honor of your state, is now in her third hunting season with me. She is the only falcon I possess, and I have actively pursued and taken wild quarry with her in each of the three seasons I've had her. The experience of going to your state to find and capture a gyr and the subsequent months I've spent establishing and enjoying a successful hunting partnership with her is one of the highlights of my more than 30 years practicing falconry. It should therefore come as no surprise that I have firm opinions regarding the opportunity for nonresident raptor take in Alaska, and am grateful for the chance to express them here. With that background, I humbly ask that you please consider the following comments in regard to the proposed statewide regulations #108-114 affecting nonresident falconry take in your great state:

#108-Proposal to allow additional opportunity for nonresident falconers to take eyas Northern Goshawks statewide and eyas Peale's Peregrine Falcons from Units 1–4.

In general, I support all the proposals that maintain or expand the opportunity your state has provided for nonresident take, and this proposal clearly would expand the opportunities available in Alaska for nonresident falconers. I therefore want to register my support for it.

#109-Proposal to revise the microchip rule so that it only applies to gyrfalcons

The gyrfalcon I captured in 2018 is microchipped as was required. I told the Alaska Fish and Game agents during my checkout that I strongly disliked this rule, as it forced me to grab my newly caught falcon at a time when my primary goal was to build trust with her. I continue to see little reason for microchipping raptors. The suggestion that it offers value for law enforcement is laughable; if criminal intent exists, it is far easier to "recycle" a microchip than a plastic federal band, since the former can be easily removed from a deceased bird and injected into a fresh one. My preference then is that the requirement for microchipping be removed altogether, but I support any rule change that reduces its need. I would add that reading the justification provided in the proposal book for microchipping gyrfalcons leads me to also question why this rule should only apply to nonresident falconers? If microchipping gyrs is so important and presents such advantages, shouldn't it be unilaterally required?

#110-Proposal to change the harvest dates for nonresident take from Aug 15-Oct 31 to Sept 15-Nov 15

This proposal would effectively reduce the opportunities available in Alaska for nonresident falconers, and so I strongly oppose it. As is noted in the proposal book, only 10 gyrfalcons have been taken by nonresidents in Alaska since 2015 and even with the August 15 open date, none have been eyasses. The justification for this proposal; i.e., reduce the likelihood of disturbance at gyr eyries by nonresident, is simply weak. Alaska falconers and wildlife biologists cause far greater direct disturbance every year – and at more crucial times in the breeding cycle- than the one or two nonresidents who have attempted to trap for fledged young near an eyrie. I should also add that I know for a fact that not every individual that has tried to capture a bird near the eyrie has been successful, and this outcome alone serves to discourage the practice.

For most falconers, the expense of going to Alaska to try and capture a wild falcon is, by far, the greatest impediment to their pursuing this opportunity. I can say from personal experience that it is less expensive to buy a captive-bred gyr than it is just to go to Alaska and attempt to trap a passage bird. I went because I wanted to experience Alaska (I'd never visited before) and because I hoped to capture a passage male gyrfalcon (which are found in the lower 48 states even less frequently than females). While I was not successful in that goal (I caught a female instead), the adventure I had (and which continues through my hunting partnership with AK) is something I will forever cherish.

I know from my experience and from talking to others that have done it (both successfully and unsuccessfully) that the risk/reward ratio for this adventure is high, and I need to emphasize that the proposal to extend the start date will inevitably serve to diminish the likelihood of success for future participants. I say this because inclement weather becomes a serious concern as the calendar gets longer. Part of my own planning effort involved looking at 5-year weather patterns for the area I chose to visit. That research confirmed that severe winter



weather is a lot more likely starting mid-October. Thus, extending the take period to November 15 is literally meaningless to any nonresident considering this opportunity. My Alaska trip cost several thousand dollars to execute, and I was only there for a week. No one of normal means will want to risk the high but necessary expense to pursue this opportunity if there is a strong likelihood they will end up sitting for days by a window in their hotel room watching a blizzard unfold! Delaying the start of the take period will, in practice, simply serve to compress the short window of time that is available to nonresidents. This outcome will inevitably increase the risk that more than one nonresident will end up in the same place at the same time, trying to fill their permits, and that will diminish the experience for everyone involved. PLEASE do not implement this proposal.

#111-Proposal to extend the eligibility to apply for a nonresident falcon permit to once every four years if a falconer is successful.

This proposal would expand the opportunities available in Alaska to more nonresident falconers, and I generally support it. However, four years is too long a time interval; please consider adjusting it to be every two or three years at most. Utah has a similar provision for peregrine take, where successful applicants cannot enter the drawing again the following year. This rule is applied uniformly to both resident and nonresident falconers, a practice which I submit reflects sound biology-based wildlife management. From my observations, the rule has provided greater opportunity to the falconry community while simultaneously ensuring those who most want to fly a wild peregrine will get another opportunity to capture one before too many years go by.

#112-Proposal to expand nonresident opportunity for acquiring raptors

As I noted in my comments for proposal #108, proposal #112 would substantially expand the opportunities available in Alaska for nonresident falconers, and I support it.

#113-Proposal to modify nonresident opportunity for acquiring raptors

This proposal also would substantially expand the opportunities available in Alaska for nonresident falconers, and I support it.

#114- Proposal to change the harvest dates for nonresident take

I cannot determine how this proposal differs from #110. In any event, I don't understand how the concerns that are raised regarding the August 15 start date are unique to nonresident take, since residents have been taking eyass gyrs for decades. As I noted in my comments to proposal #110, Alaska falconers and wildlife biologists every year cause far greater direct disturbance – and at more crucial times in the breeding cycle – than the one or two nonresidents who have trapped for fledged young near an eyrie. I am, once again, strongly opposed to this proposed rule. As I noted in my comments for proposal #110, the addition of November dates to the take period in Alaska are meaningless due to the likelihood for severe winter weather.

Thank you for the opportunity to comment on the proposed rules.

Sincerely,

Jeff Broadbent

Amalga, UT



PC031
1 of 1

Submitted By

Mary Dean Broussard

Submitted On

2/16/2022 7:57:23 PM

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Address 2

Anchorage, Alaska 99517-3676

Regarding Proposal 199 to be submitted to the Alaska Board of Game (BOG):

I am writing to urge you to support this proposal requiring a minimum of a 50-yard trap setback on popular multi-use trails. This is essential to protect our animals, children, and even adults who are looking to safely recreate. A multi-use trail is intended to support multiple activities and not put the needs of one group ahead of another. Thank you.

Submitted By
Christine E Brummer
Submitted On
2/17/2022 9:00:39 PM
Affiliation



PC032
1 of 1

Public Testimony for Proposal 144

My name is Christine Brummer, I am a lifelong Anchorage resident. I have a cumulative 18-years working in the veterinarian field. Outdoor cat communities in Anchorage is not new issue, but the ignorance surrounding this issue remains high. The more we understand outdoor cats and the issues related to them, the more we can work to effectively assist these cats, reduce cat populations in a humane way, and protect wildlife.

I am writing in support of Proposal 144, which seeks to trap-neuter-vaccinate-return (TNVR) cats to the wild. TNVR programs are a humane way to control feral cat populations. Catch and kill eradication programs have not been effective so a new approach is needed. TNVR helps to manage community cats by allowing them to be evaluated by a licensed veterinarian than having the cats spayed or neutered and vaccinated so they can be returned to the area in which they were found. TNVR helps reduce feral cat populations and assists in reducing the spread of feline diseases among cat communities.

The North Shore Animal League's Spay USA, International City/County Management Association and the Humane Society of the United States recognize that TNVR is the best way to manage cat populations. Overpopulation is a serious concern; the Human Society of the United States (2022) estimates that only about two percent of U.S. community cats (feral or strays) have been spayed or neutered. Those cats that are not spayed or neutered reproduce and add to the outdoor cat population. Humans often think that trapping these community cats and taking them to Anchorage Animal Control Center (AACC) is a great way to reduce the outdoor cat population. However, I argue that it is not.

What happens when one of these community cats are dropped off at the shelter. First, these cats are not socialized to humans so many of them are very fearful and do not pass the behavioral test that they need to pass in order to be considered adoptable. Many of these cats unfortunately are euthanized because current regulations do not allow for them to be returned to the outdoor community in which they came. Second, those community cats that are young enough to be socialized add to the number of cats at the shelter. AACC and rescue organizations are often at capacity. AACC has even had to close the shelter to taking in cats on a number of occasions due to capacity issues. It is obvious that we have a problem and we need to come up with humane solutions to solve the problem.

What can we do? We can halt cat reproduction by allowing community cats to be trapped and be spayed or neutered. We can also vaccinate these cats so that they live in a safer environment and do not spread feline disease among each other. We can return the cats to the communities in which they belong to live out their lives. This is what humanely controlling wild cat populations looks like and I urge the Board to support Proposal 144.

Reference

The Human Society of the United States. 2022. Outdoor cats FAQ: Learn about the outdoors cats-both community (feral stray) and owner-those you see in your community. Retrieved from <https://www.humanesociety.org/resources/outdoor-cats-faq>



PC033
1 of 1

Submitted By

Teri Buck

Submitted On

2/16/2022 4:14:47 PM

Affiliation

Phone

9072447911

Email

ak2bucks@gmail.com

Address

5650 N Tazlina Dr
Palmer , Alaska 99645

I am writing in support of Proposal 199. I fully support trap setbacks from popular Mar-Su multi-purpose trails. Thank you for your consideration.



PC034
1 of 1

Submitted By

Martin Burzynski

Submitted On

2/17/2022 6:50:45 AM

Affiliation

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srqsup@me.com

Address

15125 E. Valhalla St.
Palmer, Alaska 99645

The placement of traps near hiking, walking and biking trails needs to be regulated as to prevent domestic pets and children from injury and or death. There is absolutely no reason why lethal traps should be anywhere within a 100 yards from a trail or trail head. The need for safe family outdoor recreation greatly outweighs the social or economic burden that will be placed upon a small and statically insignificant group. As such I support proposal 199.

Martin Burzynski

Submitted By
Michael Caltabiano
Submitted On
2/17/2022 6:35:40 AM
Affiliation



PC035
1 of 1

Please Approve Proposal 265 for Unit 22E

The current system of "first come, first serve" via a timed computer submission is totally unfair to participants and is open for manipulation. I was advised by F&G staff that they knew applicants had several people using computers at the same time just to increase one (1) persons chances. Further, the lack of a random drawing opens the door for other abuses, such as allowing some to apply moments before others. While this may be accidental, Last years submission start time notification was not clear and very confusing. Finally, if you don't approve Proposal 265, then applicants should be eligible for a refund of the \$130. application fee since it isn't a fair and equal opportunity to draw a tag. A random computer drawing insures all applicants have a fair chance and prevents some from gaming the system. Finally, I would ask that you allow one other person to be included on the moose permit. This is a big animal and to share a permit just makes sense. Thank you for your consideration.

Farmed Emu Ratite in Alaska





**Proposition proposal #142, #143 for inclusion of Emu as
approved Ratite into the inclusion of Alaska's
“The Clean Animal List”**

I would propose (#142, #143) that the Alaska Board of Game Council, include Emu Ratites; into the inclusion of “The Clean Animal List” without a permit for Alaska farmers and residents as livestock.

(1) is not capable of surviving in the wild in Alaska;

although Ratites are weather tolerant, they would not be able to survive in Alaska's extreme wilderness without adequate care and shelter from the long cold winters. Alaska has predators such as black/brown bears, wolverines, lynx and wolves for which the Ratite has no true defenses. Also, Alaska wild vegetation is not Ratite friendly.

(2) is not capable of causing a genetic alteration of a species that is indigenous to Alaska;

although Ratites have been around for nearly 80 million years, they are not capable of mating and hybridizing with any indigenous Alaskan wildlife species.

(3) is not capable of causing a significant reduction in the population of a species that is indigenous to Alaska;

although Ratites are omnivores they will eat seeds, fruits, flowers and young shoots. They will also eat insects and small vertebrates. As a standard wild Ratite diet cannot be found in the Alaska wilderness, 90% of wild plants in Alaska will cause great harm if ingested by Ratites. They must be farm fed with a commercial ratite diet to survive Alaska' harsh landscape.

(4) is not capable of transmitting a disease to a species that is indigenous to Alaska;

Ratites are considered poultry; they present no more threat via disease to the indigenous species of Alaska than the common chicken. Ratites are extremely hardy and rarely present illness.

(5) does not otherwise present a threat to the health or population of a species that is indigenous to Alaska;

Ratites are not aggressive nor hostile to other species, they are quite placid curious animals, are extremely healthy and are not vectors for disease.

(6) is not captured from the wild for use as a pet;

although Ratites are indigenous to Africa, Australia and South America, Ratites are not on the endangered species list. Domestic farm breeding stock can be acquired throughout the United States.

(7) does not present a conservation concern in the species' native habitat outside of this state;

Ratites are not on any endangered species list in any country of the world. Ratites have been displayed in zoos and farmed as livestock throughout the world for over 100 years without there ever being a conservation concern or threat in the native habitat of the species.

(8) can be reasonably maintained in good health in private ownership;

Ratites are naturally healthy and rarely present illness. Ratites are not aggressive. Ratites are gentle, quiet and inquisitive animals, and can be easily cared for as pets or livestock, the average animal feed store will stock ratite feed once there is a demand for it.

(9) does not present a likelihood that concerns about, or threats to human health and safety will lead to adverse consequences to captive animals.

Ratites are extremely healthy animals that are not vectors for disease. They are not aggressive and do not pose physical harm to humans nor other animal life whether domestic pets or indigenous wildlife.



What Are Ratites?

There are 6 birds in the Ratite family, including the Emu, Ostrich, Rhea, Cassowary, Kiwi and Tinamou. Ratite is from the Latin meaning raft. These are, however flightless or 'running birds' with a flat breast bone (sternum) there is no breast meat like on a chicken, which has a keel type breastbone that allows for flight, because of this flat breastbone, Ratites do not fly. This first Ratite - The Emu - which has recently become of increased interest as an alternative farming enterprise is raised commercially in a number of countries including the United States.

Emu

Emus are native to Australia and is the second largest bird in the world and considered very docile. The original inhabitants of Australia consumed Emu meat and used the oil for medicinal purposes. The Emu species has been around for over 80-million years, and has adapted to Australia's different climates from desert conditions to snow-capped mountains. The United States first imported Emus between 1930 and 1950 as exotic zoo stock. However, commercial Emu farming in the U.S. did not begin until the late 1980's.

The Emu grows to full size within 2-years standing 5 to 6 feet tall and weighing as much as 150 pounds. With powerful legs, the Emu can run up to 40 mph. Documented domestic farmed birds may have a 20 to 30-year life span. The female begins to breed between 18-months and 3-years of age, and may continue to produce eggs for more than 15 years. It is the male who incubates the eggs alone and each egg will take up to 50 days to hatch. They can adjust to wide ranges in temperature, varying levels of food supply and are being raised in many States throughout the U.S. Generally, Emu's can be put with other livestock with no problem.

Emu products include leather, meat, and decorative egg shells. Emu oil contains fatty acids, including several beneficial acids like Omega-9, Omega-6, and Omega-3, making it popular as a natural skin moisturizer sold for cosmetic and pharmaceutical purposes. Young stock may also be bred for resale, and eggs can be sold for hatching. Emu meat, like Ostrich meat, is similar in texture and color to beef. Compared to beef, it is very low in fat and cholesterol, while at the same time containing higher amounts of vitamin C, vitamin E, protein, and iron. The low-fat meat has less sodium than beef, chicken, lamb or turkey.

Farming The Ratite

It has been found that when farmed properly as poultry these birds are healthy and can flourish in a variety of climates and do not require large tracts of land. Today Emu are raised in many countries including the United States, Australia, Israel, France, New Zealand, China, Korea, Zimbabwe, Botswana, Namibia, the United Kingdom, Belgium, Holland, Poland and Canada. Emu are now raised in at least 43 States of the U.S. by about 10,000 ranchers and farmers (3,000 are in Texas). The United States Emu population is about one million.

Emu are considered poultry, with Emu production as with all livestock requires care and diligence to maintain quality and minimize stress for the caregiver and bird livestock. If released in the Alaskan wild without proper protections from farm caregivers, these birds will have a difficult time surviving predation in Alaska. (in their native lands Emu have few predators, in Alaska they would be faced with many new predators). However, under proper conditions i.e., fencing, properly balanced ratite feed and protection from predators they are adaptable, healthy, hardy and can thrive for many years. There are some beliefs that these birds should not be farmed in northern regions because they will freeze to death, we need to correct this myth; this is simply not true, studies have shown that Emu have not only been farmed successfully in northern regions but they have thrived and are found to enjoy snow and cooler temperatures. Ratite farms are found in areas of the United States such as Minnesota, Maine and Montana. Canada there are ratites farms in Cowichan Valley Vancouver, Saskatchewan and Eastern Ontario, to as far away as Europe in places like Poland, Germany and the United Kingdom. When maintained by farm caregivers Ratites that are properly farmed in northern climates will put on maximum fat pads for warmth and just in time for the fall breeding season.

Most producers today are growing Emu for their meat, with the hides, feathers, fat, egg shells, and other parts of the birds as by-products.

Land Requirements of the Ratite

Land requirements for these birds are minimal. If diversifying farming operation to include Ratites, the farmer probably already has the basics of the operation. These birds can be successfully raised in small pens or large pastures – or a combination of the two. Most Ratite ranches are between 5 to 10 acres.

Are Ratites USDA Inspected?

Yes. Effective 22 April 2002, Ratites are under mandatory USDA inspection. Establishments that slaughter Ratites are required to implement and validate sanitation standard operating procedures and Hazard Analysis and Critical Control Point (HACCP) systems, as required by mandatory poultry inspection regulations. Previously, voluntary inspection was available for Ostrich beginning in December 1991. Ratites are slaughtered at about 10 to 13 months of age.

In Conclusion

These birds are considered poultry and pose no danger to species that are indigenous to Alaska in any way. These birds can be raised on smaller tracts of land (as opposed to ‘cows’) in 80’ x 200’ pens, and minimal barn construction is required from the caregiver. These birds usually prefer to live outside year-round in all weather conditions, however will seek shelter from extreme cold and windy conditions. These birds can be fed on a commercial ratite pelleted grain for which the average animal feed store will stock once there is a demand for it. With a little instruction, they can be easily cared for as pets or livestock. Young stock may be bred for resale, and eggs can be sold for hatching. Ratite products include leather, meat, feathers and decoratively carved egg shells for resale. The adaptive growth and characteristics of these birds can produce lean omega-rich red meat and health promoting fat and oil for retail sales.

Informational Video of Farmed Emu Ratite:

https://drive.google.com/file/d/1ZMBU4MvP_zTuavayXG0DV4UGWnsOub9u/view?usp=sharing



Emu Chicks



Farmed Emu in Canada



Farmed Emu in Lower States

Magazines & Associations Cited

Australian Ostrich Association
National Secretariat
45 Settlement Road
Bellarine
Victoria 3223
Australia
<http://www.aoa.asn.au/>

Canadian Emu Association
R.R.#1
Stratford, Ontario, Canada N5A 6S2

Maryland Emu Association
910 Western Chapel Road
Westminster, MD 21157
<http://www.marylandemu.com/>

North Carolina Ostrich Breeders Association
2 W. Edenton Street, Room 402
Raleigh, NC 27699-1020
<http://www.agr.state.nc.us/markets/assoc/ostrich/>

American Ostrich Association
227 W. Magnolia
Suite 210
Fort Worth, TX 76104

North American Rhea Association
11902 Elm St.
Suite 4
Omaha, NE 68144

Food Safety and Inspection Service
United States Department of Agriculture
Washington, D.C. 20250-3700

British Domesticated Ostrich Association
Craig Culley, Secretary and Treasurer
33 Eden Grange
Little Corby, Carlisle, UK CA4 8QW
<http://www.ostrich.org.uk/>

Canadian Ostrich Association
Site 1, Box 34, R.R. 6
Calgary, Alberta, Canada, T2M 4L5
<http://www.ostrich.ca/manual/index.htm>
<http://www.ostrich.ca/members/join.htm>

North Carolina Emu Association
Twin Creek Farm
4262 Hwy. 49 South
Asheboro, NC 27205
<http://www.twincreekfarm.net>

Ostrich Industry Council
4203 Weiland Rd.
Weatherford, TX 76086

American Emu Association
P.O. Box 8174
Dallas, TX 75205

Alternative Farming Systems Information Center
National Agricultural Library, ARS, USDA
10301 Baltimore Ave., Room 132
Beltsville, MD 20705-2351
<http://afsic.nal.usda.gov>

Emu Today & Tomorrow Magazine
Vol. 29 Issue 2, Spring 2019
Vol. 25 Issue 1, Winter 2015

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MT. Sicker family Farm. Emu Farming Made Simple. <http://www.bcemufarm.ca/>

Sugar Maple Emu Farm. Facts About Raising Emus. <http://www.sugarmapleemu.com>

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- Batty, Joseph. Ostrich Farming. Midhurst: Beech Publishing House, 1995
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- Wiley, C.B. "Dinosaurs to Ratites in Only 250 Million Years." Live Animal Trade & Transport Magazine V(2):5-16. June 1993.
- Minnaar, Phillip and Maria Mannaar. The Emu Farmer's Handbook. Groveton, TX: Induna Company, 1992. 178 pp.
- "Raising Emus and Ostriches" 10 January 2008, Published by USDA Alternative Farming Systems Information Center in August 1997.
- "Six Reasons To Keep Emus - 'Tastes like chicken' isn't one of them" Dec 29, 2017, Published by Samantha Johnson

Literature Cited

- American Emu Association News. March 1994.
- Boilen, Kenneth R. Biosecurity and Disease Prevention for the Ratite Owner.
- University of Nebraska Cooperative Extension (internet resource): May 1994.
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Submitted By
Brittany Carie
Submitted On
2/18/2022 2:15:13 PM
Affiliation



PC037
1 of 1

My name is Brittany Carie. I am a lifelong Alaska and currently reside in Wasilla. I am in support of Proposal 199. I don't trap but come from a family that does. I am not against trapping but believe current regulations fall short of protecting all trail user groups. I have frequented many Matsu Valley trails over the years. Every year they appear to get more and more traffic. I am a medical provider and am committed to the health and safety of my fellow Alaskans. A 50-yard trap setback is a fair compromise and an essential step towards ensuring public safety as trail use grows.

Submitted By
Peter Caruso



PC038
1 of 1

Submitted On
2/17/2022 10:49:30 PM

Affiliation

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9078803694

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Pjcaruso@hotmail.com

Address
PO Box 398
King Salmon, Alaska 99613

I lived in 9c for over 40 years. In this time I have hunted moose and caribou and I have also trapped for over 30 years. Your theory or suggestion for "positioning your snow machine" to me seems to work well for caribou. The last thing anyone of us wants to do is to stress our caribou herds which have diminished considerably over the years. As for wolf hunting this "theory or suggestion" does not and I do repeat does not work well at all. The second wolves hear our machines they start running and don't stop until they reach the trees or thick brush. In order for us to keep up your speed needs to be considerably more than 15 mph. We do not get a lot of chances to chase down wolves due to our weather conditions (lack of snow). If this proposal passes less wolves will be taken our caribou herds will diminish even more. From what I have been told by our biologist we take a very low percentage of wolves throughout unit 9 every year.

Allowing your proposed method will increase the wolf population and at the same time diminish our caribou and moose populations. It's bad enough our bear population has exploded we don't need anymore pressure on our herds than there already is. Thank you for allowing me to comment on proposal 271.

Pete Caruso
local resident
Hunter and Trapper

271.
Pete Caruso
local resident
Hunter and Trapper

Submitted By
Dan Casner

Submitted On
2/16/2022 12:08:21 PM

Affiliation

Good Day.



PC039
1 of 1

I'm writing to support a 50 yard setback for trapping along multiuse trails, per Proposal 199. We are lucky enough to have ample wild areas to support a thriving trapping community in our state, and this minor common sense regulation would in no way impede that, while at the same time preventing recreator-trapper conflicts that can result in injury or loss of life to pets, loss of property and hard work to trappers, and inhibit trapping success along those corridors. By preemptively taking action, we also show that the trapping community is happy to share our public lands with other users.

Submitted By
Chelsea Cassell

Submitted On
1/20/2022 4:55:44 PM

Affiliation



PC040
1 of 1

I support Proposal 199 to add restrictions that prohibit trapping near to popular multi-use trails. The numerous accidents in the recent years are extremely concerning. The restrictions would not greatly reduce the amount of trapping area and I believe it to be in the best use of the majority of trail users. Please approve Proposal 199.



PC041
1 of 1

Submitted By

Matthew Christ

Submitted On

2/15/2022 12:58:41 PM

Affiliation

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907-854-5254

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matthew_christ@hotmail.com

Address

124 Harvest Way

Crandall, Texas 75114

I lived and hunted in Alaska for almost 20 years. And now living in Texas for over seven years, I am in big support of Proposal 265. I believe that changing RM855, a registered hunt into a draw hunt, DM855 is a fantastic idea. I believe it makes things more fair for the non-resident hunter. What i mean is you have more time to sign up for the hunt. You have all these hunters trying to register at the same time till all the tags are gone. Its one big free for all, the guys with the fastest computer rule. At least with the draw you can put in for the hunt ahead of time. That way if drawn you have time to plan correctly. We all know that planning is crucial in Alaska. I think that Unit 22E can support the draw and i think it needs to be done now, as in this season. Should you wait to implement it then non-resident hunters will miss out. Make it an even playing field, please!!!



CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

18620 Seward Hwy, Anchorage, AK 99516 Phone: 907-345-5014 Fax: 907-345-6982

February 17, 2022

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

Subject: 2021/2022 Board of Game Proposals *PREVIOUS COMMENTS REVISED*

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

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

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

The 15-member advisory board is comprised of park users representing various interests ranging from backcountry skiers, hikers, hunters, bikers, horseback riding enthusiasts, as well as, ATV and snowmachine users. At approximately 495,000 acres, Chugach State Park comprises nearly half of the Alaska Game Management Unit (GMU) 14C. With over 1.3 million visitors to the park annually, we have an interest in Board of Game regulation changes that may affect park resources and visitors.

We have carefully reviewed the 2021/2022 Board of Game regulatory proposal that will affect the park's wildlife and users. These proposals were discussed at our January 10th and February 14th, 2022 meetings. Our recommendations and any proposed amendments are included below.

PROPOSAL 250

REAUTHORIZE THE ANTLERLESS MOOSE SEASONS IN UNIT 14C
AS PROPOSED BY THE ALASKA DEPARTMENT OF FISH AND GAME.



Amendment(s) Discussed: None

Recommendation: No objection

Findings: This hunt has proven to be an effective tool at managing the moose population within Unit 14C for several years. This proposal comes directly from the state's authority on wildlife management, the Alaska Department of Fish and Game. Requiring annual renewal of this hunt allows the Department of Fish and Game to closely regulate antlerless moose harvest quotas to keep the moose population within a sustainable number. Keeping the moose population at or near the goal of between 1,500-1,800 moose within subunit 14C helps to avoid over-browsing of winter habitat and the resulting die-offs from starvation.

PROPOSAL 155 ESTABLISH PROTOCOL FOR ADF&G TO ISSUE A LIMITED NUMBER OF "ANY BULL" RESIDENT MOOSE PERMITS IN UNITS MANAGED BY SELECTIVE HARVEST STRATEGY.

Amendment(s) Discussed: None

Recommendation: Support

Findings: CAB support for this proposal is in reference to GMU 14C, which was listed as a potential area to be included in new regulation. The CAB Wildlife Committee consulted with ADFG regarding this proposal and did not find any major safety concerns or conflicts with other user groups, as there are already several hunts that are managed within 14C. The "any bull" moose permits are highly coveted, and additional permits could generate additional revenue for management. The CAB encourages the Board to investigate the feasibility of this proposal, and if sustainable, to develop regulation as needed to include additional "any bull" permits as appropriate.

We greatly appreciate the opportunity to review and submit comments on this proposal. Please let me know if you have any questions regarding this recommendation. Thank you for your consideration.

Sincerely,

Ryan Yelle
Chair

cc: Ben Corwin, Superintendent, Chugach State Park
Dave Battle, Wildlife Biologist, ADF&G
Charlotte Levy, Chair, Wildlife Committee



Submitted By
Paul Claus

Submitted On
2/18/2022 7:29:38 PM

Affiliation

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907-390-0048

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Chitina, Alaska 99566

I am basically in favor of proposals #135-139 referring to repealing 5 AAC 92.085 , but I must first say that I'm very much opposed to any type of animal harassment and causing disruption to any hunter in the field. AAC 92.085 is too vague and should mirror more closely AAC 92.990 harassment definition. 92.085 is almost unenforceable as written. May I propose that these two statutes might be best served by combining them. They are both speaking of animal harassment and refining definitions of harassment and spotting would better serve the animals and hunters. Defining spotting and including it with harassment would lead to greater enforceable regulation by troopers.

I live and operate in the heart of the Wrangell/St.Elias National Park and wear numerous hats, Hunting/Guide, AirTaxi, and Recreational Tourism, In the later 2, I'm legal to point out white sheep dots on the hillside but with my hunting clients I have to put my blinders on and pretend we didn't see anything! Also in the area that I operate we have sheep and goats that literally live on the same hillsides and it is currently legal to spot goats anytime and from the 1st of September through the end of the sheep season (Sept. 20) we have clients who are hunting both. It is legal to spot a goat but we can't spot the sheep laying next to it. That is rather confusing, please define what spotting is and is not?

Thank you for the opportunity to comment on these proposals.

Submitted By
Robert Colo
Submitted On
2/18/2022 3:34:50 PM
Affiliation



PC044
1 of 2

**Proposal- 265
limits for moose.**

5 AAC 85.045. Hunting seasons and bag

Change Unit 22E registration moose hunt to a drawing hunt with specific application conditions as follows:

I am a non-resident hunter from Idaho, and I am asking to change RM855 to DM8SS- to become a drawing hunt conducted by ADF&G in November -December 2022 for the 2023 season, at the latest. That registered guides may only submit as many applicants as there are tags allotted for the upcoming season. A hunter/ guide contract must be submitted as well. That an alternate list be established should a hunter back out for medical or personal reasons and the next eligible hunter would be contacted. If there are no alternate hunters that the tag would become available on a first come first served basis upon request.

I want to request that all applicants want to hunt in this area need to submit an application earlier in the season and for ADF&G to conduct a drawing so that it will be a fair distribution of these limited non-resident moose tags.

Reasons why this should be changed:

- The current online drawing of tags in July does not allow hunters and guides enough time to prepare for a big moose hunt with the season opening on September 1.
- Nonresident hunters will not be given reasonable or fair opportunity to obtain a permit.
- Internet speed and the age of the applicant could favor one hunter over another. The first onlinedistribution of 10 tags in July 2021 required applicants to purchase a hunting license before attemptingto obtain a tag; they then encountered confusing steps to select the tag, which in the end, all tags weredistributed in under 30-seconds.
- There is no way to monitor if one applicant has several individuals applying on-line to obtain a tag for just this one person. Hunters should be given an equal playing field to obtain these tags and adequate time to plan a hunt.
- It's also hard to get a guide lined up in seven weeks and make it a good hunt. It is also not enough time for a hunter to prepare for the hunt.

Thank for your time,

Robert Colo



PC044
2 of 2

Submitted By
Robert Colo
Submitted On
2/18/2022 4:00:40 PM
Affiliation
Hunters Choice Taxidermy

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Nampa, Idaho 83687

Proposal 265

limits for moose.
application conditions as follows:

5 AAC 85.045. Hunting seasons and bag

Change the Unit 22E registration moose hunt to a drawing hunt with specific

I am a non-resident hunter, and I am asking to change RM855 to DM8SS- to become a drawing hunt conducted by ADF&G in November - December 2022 for the 2023 season, at the latest. That registered guides may only submit as many applicants as there are tags allotted for the upcoming season. A hunter/ guide contract must be submitted as well. That an alternate list be established should a hunter back out for medical or personal reasons and the next eligible hunter would be contacted. If there are no alternate hunters that the tag would become available on a first come first served basis upon request.

I am a non-resident of Idaho and have been an avid hunter my whole life. I have hunted in Alaska a couple times and it is one of my favorite places to hunt. I will definitely hunt Alaska as much as I can, and until I cant hunt anymore.

I think the lottery system they started last year to obtain a permit for moose in Unit 22E was unfair to so many hunters trying to apply online at 9am on July 7th. I actually got the permit to hunt moose in the area, not sure how I did but I was thankful. Once I got the permit I had very little time to plan everything out: plane fair, lodging, hunting preperations, guides, find someone to take care of my business, and all the other nessacites of a big once in a lifetime kind of hunt. More time would of had not such a rush on everything trying to get prepared properly.

I propose this to change to an application hunt and with guide earlier in the year for the non-resident moose hunt in Unit 22E.

Sincerly, please consider my request,

RJ Colo (Hunter Choice Taxidermy)



Submitted By
Robert Bourland

Submitted On
2/18/2022 5:23:03 PM

Affiliation
Compton Traditional Bowhunters

Compton Traditional Bowhunters would like share our recommendations for the following proposals.

-Proposal 123 and 124

Compton Traditional Bowhunters OPPOSE allowing the use of electronic range finding sights during archery seasons. This will increase harvest rates during archery seasons which can be a threat to opportunity in the future.

-Proposal 101 and 125

Compton Traditional Bowhunters OPPOSE allowing the use of crossbows during archery seasons. This will increase harvest rates during archery seasons which will be a threat to opportunity in the future. This is already proven in many of the states that have been allowing crossbows during archery seasons.

-Proposal 138

Compton Traditional Bowhunters SUPPORT the proposal to change the aircraft rule to include any area where there is an open sheep hunting season. This simple change to the rule would cover its original intent, as there are some seasons that fall out of the current dates and it would also cover any future changes.

-Proposal 127

Compton Traditional Bowhunters OPPOSE the proposal to allow air rifles and air bows for taking big game. Any state that has allowed the use of these has then made the push to include them in archery seasons. This we also believe will increase harvest rates to a point that will be a threat to future archery hunts and seasons.

Thank you,

Robert Bourland

Compton Traditional Bowhunters



Submitted By
Simone Cook
Submitted On
2/18/2022 12:52:51 PM
Affiliation
Master Falconer, Member of Washington Falconers Association

Proposal 108. 5 AAC 92.037.

I support as amended: change from proposed "5 AAC 92.037(g)(5), up to five permits for taking, transporting, or possessing a passage raptor for falconry; up to five permits for taking, transporting, or possessing an eyas Northern Goshawk for falconry statewide, and up to five permits for taking, transporting, or possessing an eyas Peale's Peregrine Falcon, from Units 1-4, for falconry by a nonresident shall be issued annually by the department; applicants can only apply for one type of permit and must specify whether they are applying for a passage permit, an eyas Northern Goshawk permit, or an eyas Peale's Peregrine Falcon permit at the time of application. 5 AAC 92.037(g)(7): Take is limited to either one passage, hatching-year, raptor, one eyas Northern Goshawk statewide, or one eyas Peale's Peregrine Falcon from Units 1-4."

5AAC 92.037(g)(8): The annual nonresident season for acquiring a passage raptor is from August 15 – October 31; The annual nonresident season for acquiring an eyas Northern Goshawk statewide or an eyas Peale's Peregrine Falcon, (from Units 1-4), is from May 1 – July 20;"

TO:

"Taking of eyases for non-residents statewide of any species of raptor legally allowed to be taken in Alaska, up to five permits for taking, transporting, or possessing a passage raptor for falconry; up to ten permits for taking, transporting, or possessing an eyas raptor for falconry legally allowed to be taken from May 1- July 20."

Take by Alaska resident falconers is of no significance biologically for any species of raptor. Hence, take of up to 15 raptors by non-resident falconers would also be of no biological significance. **The argument that Alaska Falconers Association (hereafter AFA) claims that only experienced falconers or biologists can tell eyas peregrines and gyrfalcons apart is incredibly incorrect.** Adult raptors defend their nests from every type of predator be it another raptor, humans or bears. There is almost zero chance the adult birds would not be seen on site defending the nest aggressively, including getting incredibly close and perhaps even making contact with a human near the nest. Nesting raptors are notorious for attempting to drive humans (researchers, biologists, falconers, etc) away from their nests. In addition, the color of even a days-old peregrine vs. gyrfalcon differs significantly. Gyrfalcon chicks have grey beaks, cerea (the fleshy area above the beak) and feet while peregrines possess very pink beaks, cerea and feet. The presence of adult birds defending the nest and the color of young gyrfalcons vs. peregrines makes the argument that these species are hard to tell apart null and void.

Proposal 109. 5 AAC 92.037(h).

I strongly disagree with this proposal. AFA falsely claims "Alaska raptors that are commonly used for falconry (**except Gyrfalcons**) are readily available to falconers in the continental United States"

Gyrfalcons are readily available to falconers in all states in this country. They are bred in captivity as commonly as peregrines, goshawks, harris hawks and a multitude of other species. The market is currently flooded with gyrfalcons, hence breeders listing the same birds multiple times due to lack of sales. It is easy to see this after breeding season on various public websites devoted to the sale of captive bred raptors in the United States to licensed falconers. If gyrfalcons were not readily available to falconers in the continental United States why would less than 30 falconers out of thousands in the US apply for Alaska permits targeting gyrfalcons? In addition, multiple other states allow take of gyrfalcons including Washington, Oregon, Idaho, Montana, Wyoming, North Dakota, and others. Alaska is not the only state that allows take of this species that AFA claims to be "uncommonly available." They are wrong on this account both in terms of birds available for take in multiple states in the wild and from captive breeding projects.

Furthermore, AFA states, "If a microchipped wild Alaska sourced bird is recovered, it will provide a valuable tool for law enforcement for their investigative efforts." It is nearly impossible to imagine that a non resident, permitted falconer would smuggle a legally taken bird out of Alaska that has gone through the check out procedure at ADF&G, been to a vet, had its photo taken for the ADF&G website, been inspected by TSA and been microchipped. If someone wanted to smuggle a bird out of Alaska one can only imagine they would do so without any sort of paper trail, check out trail, lottery winning or microchip paperwork. If someone were to do something illegal with a wild taken Alaska gyrfalcon, removing a microchip would be as easy as removing a federal band.

Additionally, why are non-residents being unfairly targeted as potential sources of unlawful behavior? Are all non-residents inherently suspect and is it impossible for residents, who have much more time, access and knowledge of raptor populations in their state, to act unlawfully?

Proposal 110. 5 AAC 92.037.

I strongly disagree with this proposal. Yet again, as was the case with the last falconry proposals, AFA is using verbiage that directly contradicts what they are proposing. **They propose to "extend" the non-resident season from Aug 15-Oct 31 to Sept 15-Nov 15. Extend is a very interesting word to use for a season they are proposing to be 15 days SHORTER.**



I was a permit winner three times and spent my time on the Seward Peninsula where the weather was fair for the months of September and half of October. However, this would most certainly not be the case into mid November. If this proposal were to be adopted a non-resident trapper may be forced to trap in winter conditions while attempting to rent the correct gear (e.g. snow machine) and combating all the other issues that may go with below freezing temperatures and snow. I stayed in Alaska from the beginning of September to the middle of October and it took me the entire time to secure a bird to export. There is no way to guarantee that a bird will be trapped quickly, thus with this proposal it restricts a non-resident's chances of securing a bird after spending thousands of dollars to take such a trip in rural Alaska.

The cost of trapping in a remote area of Alaska is extremely high and perhaps why there are low numbers of applicants for these permits to begin with. A proposal to push back and restrict trapping dates will only add to the cost of a non-resident's trip due to weather conditions, rental of snow machines, etc. Alaska is known for adverse weather conditions that can make trapping or traveling impossible. Shortening and pushing back the trapping season unfairly pushes non-residents into a shorter time frame for success and more likelihood of adverse weather.

Furthermore, if AFA members are concerned about nest disturbance and targeting of white genetics in gyrfalcon populations they should then be **restricting their own resident take of such birds**. Residents are legally allowed to take eyas gyrfalcons and in addition, with a higher number of resident permits than non-resident, the pressure on white birds would be higher from residents. This is basic math. Again, AFA is unfairly targeting non-residents with logic that should pertain to residents as well, if it pertains to anyone at all.

In the last seven years of non-resident take, only **three** gyrfalcons have been taken from natal territories by non-residents.

In addition, multiple people have had a first choice bird that was not a gyrfalcon. Goshawks are also sought after. Goshawks are harder to catch and harder to find because they are often in heavier cover. We know multiple people that came to AK for goshawks but were unsuccessful. Thus, most photos show gyrfalcons as being exported but you must take into consideration that there is a trapping bias towards female gyrs. I have spent 164 days trapping in Alaska over the last 7 years, either with permit holders or with a permit myself. The most abundant and easiest raptor to trap by far is a female gyrfalcon due to their dominance over male gyrfalcons and competition with other species of raptors in general. We have attempted to catch goshawks and have caught female gyrfalcons instead. I know of at least six permits over the last seven years that would have been used for other raptors besides gyrfalcons if the permit holders had had their preference. The obsession from AFA that gyrfalcons are the most sought after, the most sensitive and the most likely to be exploited ignores the fact that these birds are available in other states, are available in the captive bred market and are the most likely bird to catch in Alaska. It appears AFA would like to convince the board that gyrfalcons are the most precious resource in regards to this permit but they leave out important statistics that non-residents can bring to light if asked about their personal experiences trapping in Alaska over the last seven years.

Lastly, AFA's argument that "having a passage season for nonresident falconers that allows take at or near Gyrfalcon nests incentivizes the sharing of sensitive nest site locations" assumes that people who have spent lots of time, resources, money and effort will be sharing nest sites freely with other falconers. Raptor nest sites, hunting spots and trapping sites are often held close by falconers, much like a good fishing hole. I've been trapping in Alaska multiple times with permit holders and permits I drew myself. I have no idea and have not been told where other falconers have been trapping at nest sites. Despite our small community, that information has not been shared freely by other permit holders and I highly doubt it ever will be.

PROPOSAL 111 5 AAC 92.037.

I strongly disagree with this proposal. If AFA is concerned with this opportunity being available to as many individuals as possible, the way to rectify this is to open up more permit opportunities, not restrict people who apply multiple years in a row. Only 13 individuals applied in 2021. There are other proposals being considered at this meeting that would single-handedly meet the needs of every applicant by allowing more permits to be allocated, while simultaneously maximizing revenue to ADF&G and small businesses in rural Alaskan villages. I urge the board to keep in mind that opening up, say, 15 permit slots does not guarantee that 15 birds will be taken even though the resource can handle it. The Alaska non resident take has so far never met its quota. **Only 37.9% (29 permits available over 7 years, 11 birds exported) of the total permits issued so far have resulted in the export of a raptor.** The four year rule being proposed is pointless because the applicant pool is so low already and the odds of drawing the permit are so high already. With an already low number of people applying for a nonresident permit there is a high chance of any one of the applicants being successful in drawing a permit but not necessarily successful in capturing a raptor. Last year, despite the incredible rise in outdoor activities and permit sales nation-wide due to COVID still only 13 people applied for the Alaska non resident permit. The odds of being a successful permit winner last year with only 5 permits available was 38%. Additionally, I personally know that at least one falconer that drew a permit was in his 70's. It would be a shame for the older folks to draw a permit with such a long wait in between applying again.

The big game hunts that this proposal references where successful applicants have to wait four years before applying again is comparing apples and oranges. Hundreds to thousands of people apply for big game hunts in Alaska for a handful of permits. Non-resident falconry permit applications thus far have never numbered more than 26. The average number of applicants when you divide the numbers by 7 years is 20.7. Compared to big game draws, non-resident falconry applications are a very small number indeed. If this proposal were to go through and roughly 20 people applied per year, you would be out of applicants in short order. Additionally, this is an attempt to fix a problem that doesn't exist. There has only been one person who has applied every year and not won a permit. I crunched the numbers and the total number of individuals who have applied in the last seven years is 63. The number of people who have applied every year and won is 5 individuals. **The number of people who have won more than once is 4 out of 63 individuals over 7 years.** The number of people who have applied *once* and won is 6 individuals. Therefore, arguing that it is unfair to let someone apply every year when only **4 out of 63 individuals have won more than once in 7 years** is mathematical nonsense. Just like any lottery, your chances of winning go up the more you apply, and some people are complaining that they have never won but have not entered the lottery every year or even

multiple years. That is the very nature of a lottery system...

Proposal 112. 5 AAC 92.037.

I support this proposal. Alaska hosts healthy populations of all native raptor species found breeding there. **In addition, the landmass of Alaska is one-fifth the size of the entire lower 48 (per alaska.gov) with a very low number of resident falconers (less than 35).** Many other states in the lower 48 have much smaller resource availability and no limits (except for peregrines) on the numbers of non-resident falconers applying for take, including Texas, Kansas, Indiana, Wyoming, Minnesota, Wisconsin, Oklahoma, and Washington to name a few. Oregon, a state with a non-resident quota for example, allows 20 non-resident permits in a landmass incredibly small compared to Alaska. Biologically, Alaska would stay well below the threshold of significance in regard to raptor take if all residents and the average number (20.7) of non-residents took birds each year. Furthermore, not all residents will take birds every year and that holds very true with non residents as well. **The quota for non-resident take has never, ever been met in the 7 years of this program. In 2020 and 2021, zero birds were taken on non-resident permits.** This is not due to lack of trying. I was a permit winner in 2021 and spent 4 weeks in Alaska. I was hoping to take a goshawk and did not trap one. I have been trapping with other permit holders who also were unsuccessful in trapping and it was not due to lack of effort, time and money. Therefore, Alaska most certainly can afford, biologically, to allow unlimited take for non resident permits since the chances of success remain low. Again, this is based on biology and the actual statistics of how many birds have been taken by non-residents.

Proposal 113. 5 AAC 92.037.

I support as amended. Rather than having three different drawings for peregrine, gyrfalcon and other species, take should be unlimited for reasons addressed above: the quota for non residents has never been met and the resource is healthy and stable enough to allow unlimited take at this time. If the above proposal were to be adopted, it would force a permit holder to decide which species they were targeting before knowing their travel plans, weather and seasonal influences on these species. Alaska has already determined that the season allowed for resident falconers is safe and biologically sound. Multiple states allow non-residents to trap the same numbers and during the same time as residents. I propose a change from "issue annually: up to 5 permits for a gyrfalcon (*Falco rusticolus*); up to 5 permits for a peregrine falcon (*Falco peregrinus*); and up to 5 permits for any other raptor species listed under (f) of this section."

TO:

"Nonresident take permits for raptors shall have the same quotas as resident take.

Take is limited to two raptors either eyas or passage, hatching- year-raptors;

Include all raptors in section (f) for nonresidents."

I agree with all other portions of this proposal to clear up language and to extend the non resident trapping season to be in line with resident trapping season (Alaska Falconry Manual Part 34 - Taking of Raptors "An eyas or passage bird may be taken any day of the year.")

Proposal 114. 5 AAC 92.037.

I strongly disagree with this proposal. I was a permit winner three times and spent my time on the Seward Peninsula where the weather was fair for the months of September and half of October. However, this would most certainly not be the case into mid November. If this proposal were to be adopted a non-resident trapper may be forced to trap in winter conditions while attempting to rent the correct gear (e.g. snow machine) and combating all the other issues that may go with below freezing temperatures and snow. I stayed in Alaska from the beginning of September to the middle of October and it took me the entire time to secure a bird to export. There is no way to guarantee that a bird will be trapped quickly, thus with this proposal it restricts a non-resident's chances of securing a bird after spending thousands of dollars to take such a trip in rural Alaska.

The cost of trapping in a remote area of Alaska is extremely high and perhaps why there are low numbers of applicants for these permits to begin with. A proposal to push back and restrict trapping dates will only add to the cost of a non-resident's trip due to weather conditions, rental of snow machines, etc. Alaska is known for adverse weather conditions that can make trapping or traveling impossible. Shortening and pushing back the trapping season unfairly pushes non-residents into a shorter time frame for success and more likelihood of adverse weather.

Furthermore, if ADF&G is concerned about nest disturbance and targeting of white genetics in gyrfalcon populations they should then be restricting resident take of such birds as well. Residents are legally allowed to take eyas gyrfalcons and in addition, with a higher number of resident permits than non-resident, the pressure on white birds would be higher from residents. This is basic math. ADF&G is unfairly targeting non-residents with logic that should pertain to residents as well, if it pertains to anyone at all. Lastly, in the last seven years of non-resident take, only three gyrfalcons have been taken from natal territories by non-residents.

I would like to thank ADF&G for how wonderful they have been to deal with in terms of permits and information about local wildlife, and the many wonderful Alaskan falconers I met on my travels in Alaska who were willing to lend help in many different ways. Lastly, I would like to thank the board for taking my comments into consideration.

Submitted By
Jennifer Corrigan
Submitted On
2/14/2022 11:54:43 AM
Affiliation



PC047
1 of 1

Please support Proposal 144 and to exempt sterilized community cats from the list of species prohibited from being released into the wild.
TNVR programs are good for cats and good for communities.



PC048
1 of 1

Submitted By
Sandra Couch

Submitted On
2/14/2022 7:39:19 PM

Affiliation
self

Phone
6309223177

Email
sndrcch@yahoo.com

Address
2903 Bartlett Court
Unit 201
Naperville, Illinois 60564-4694

I ask the Board of Game to support Proposal 144 and to exempt sterilized community cats from the list of species prohibited from being released into the wild. TNVR programs will be better for the cats, better for public health, and better for the wildlife we all want to protect.



Submitted By
Nevin Dahl

Submitted On
2/9/2022 9:25:43 AM

Affiliation
Hunter

Phone
701-570-3152

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nnd@restel.com

Address
1431 125th Ave NW
Watford City, North Dakota 58854

I am writing in regards to proposal 265.

I am in favor in proposal 265 so that it would become a drawing permit rather first come first serve/ registration hunt.

Reasons:

When going on hunt like this it is always nice to hunt with a friend or family member along to hunt with and the first come first serve system does not make it likely it that would or could even happen.

The short notice from current situation does not allow much time to make work schedule arrangements and trip logistics as easy as it should be.

Lastly not everyone has the equal computer skills nor the same quality of internet service.

Respectfully,

Nevin Dahl



Submitted By
Gail Davidson

Submitted On
2/17/2022 9:03:09 PM

Affiliation

Phone
(907) 479-7127

Email
Akmtngrl@gmail.com

Address
3638 Rosie Creek Road
Fairbanks, Alaska 99709

I am writing in support of Proposal 199. Our Alaskan winter trails are shared by many types of users of all ages, motorized and non-motorized. I am personally a skier and a skijorer. I am concerned about the safety of our trails for our children and our dogs. Mat-Su trails are heavily used, but the principle applies Statewide--one user group should not be allowed to dominate multiuse trails by inhibiting the safety of other users. A 50 foot setback for traps would keep them out of reach of most users, making the trails safer for everyone. The trails would then be multiuse, rather than being owned by a minority of users.

My own personal experience involved my dog being caught in a leghold trap buried in the middle of a trail on the Tanana River. The dog was skijoring in front of me. Although I was on skis, adults and children walk on those trails and could easily have been caught. A friend had their dog caught in a snare just under the houses along the river, a place where ice fishing is popular with families.

The Alaska Trappers Association has been helpful in trying to educate both trappers and other trail users in the etiquette of sharing trails. This, however, has not been enough to prevent trappers from placing their traps in places dangerous to others. We need stronger regulations on trapping, and they need to be disseminated widely and carry consequences for non-compliance. We all live here, and we need to share our recreational spaces without endangering others.



PC051
1 of 1

Submitted By

Jackie Debevec

Submitted On

2/15/2022 3:41:50 PM

Affiliation

Phone

907-978-8955

Email

jdebevecak@gmail.com

Address

3662 Hardluck Drive
Fairbanks , Alaska 99709

Alaska Department of Fish and Game Board,

I support Proposal 144 and for Trap-Neuter-Vaccination-Return programs in general. Sterilized cats who have lived outside for periods of time and know how to take care of themselves should be allowed back into the wild instead of being caged or euthanized. This TNVR program is good for the cats and good for the community.

Please exempt sterilized cats from the list of species prohibited from being released into the wild.

Thank you, Jackie Debevec



Submitted By

Aaron DeRose

Submitted On

2/18/2022 11:44:03 AM

Affiliation

I write to oppose Statewide Regulation Proposal #267, which seeks to restrict nonresident sheep hunting in Game Unit 19C so that only resident sheep hunting is allowed. Proposal #267 should be rejected for the following reasons.

(1) Proposal #267 is bad for Alaska's businesses, jobs, and economy.

I've operated as President of an Alaskan big game outfitter business in Unit 19C for years. Our outfitting business financially supports numerous guides, assistants, and other trades and businesses involved in the hunting and outfitting industries. Our outfitting business relies on nonresident sheep hunting in Unit 19C. If approved, Proposal #267 will shut-down our business, and hurt all the businesses, trades, jobs, and livelihoods that depend on our business. Plus, other outfitters also rely on nonresident sheep hunting Unit 19C. Proposal #267 will also hurt those other outfitters, along with all the businesses, trades, jobs, and livelihoods that depend on those other outfitters. Since Proposal #267 seeks to restrict nonresident sheep hunting in Unit 19C, it will hurt all the Alaskan businesses, jobs, and livelihoods that depend on nonresident sheep hunting in Unit 19C.

Even worse, the damaging effects of Proposal #267 will spread throughout Alaska to all those who financially depend on or benefit from nonresident hunters. Nonresident hunters visiting Alaska financially support vast sectors of Alaska's economy, including industries in tourism, travel, lodging, food and beverage, shopping, hunting, and guiding. From these vast sectors of Alaska's economy, a wide-range of Alaska businesses and jobs financially depend on or benefit from nonresident hunters, including aircraft transportation, motor vehicle rentals, gas stations, hotels, motels, bed and breakfasts, grocery stores, convenience stores, liquor stores, restaurants, bars, sporting goods stores, equipment stores, clothing stores, hunting guides, outfitters, and taxidermists. Since Proposal #267 seeks to restrict nonresident hunters, it will hurt Alaska's businesses, cut jobs, and damage the economy.

(2) Proposal #267 is bad for responsible sheep management in Unit 19C.

Proposal #267 will reduce the number of outfitters operating nonresident sheep hunting in Unit 19C. As everyone knows! Individuals who have vested interests in something not only manage but protect that resource. Outfitters in 19C have managed and protected the sheep as they are vital to the health of their businesses. The State of Alaska has managed sheep using the full curl or 8 year old method for years. Outfitters have built their business models around this method and offered outfitting services accordingly. Proposal #267 has nothing to do with increasing sheep numbers and has everything to do with wrongful entitlements by a small group of Alaskans. Sheep meeting the full curl or 8 year old test are the target of all hunters. If there is no full curl or 8 year old rams then no sheep will be taken during the season. The population of sheep will increase until a sustainable population of full curl or 8 year old rams exist. Keep in mind it was not nonresident hunters that caused the sheep decline but harsh winters. The outfitters operating in Unit 19C provide responsible sheep management because their businesses depend on it.

The individuals in support of Proposal #267 should consider their impact on sheep populations. When is enough, enough? How many sheep need to be on their wall? Nonresidents are required to wait 4 years between successful hunts, why is the concerned party not suggesting residents do the same to support sheep populations. As far as funding goes, here is another area the supporting parties of Proposal #267 fail to provide money where their mouth is. Increase the price of sheep tags to reflect every other state that offers opportunities to hunt Wild Sheep. This should go for both Residents and Nonresidents. The additional revenue generated from residents would greatly assist in management and preservation of a resource they consider their own. Everyone should pay to play when it comes to utilizing a resource.

(3) Proposal #267 is bad for all sheep management state wide.

Proposal #267 if approved will accomplish one thing and one thing only. Displacement of Outfitters and Nonresidents. The demand on this resource will not go away, and the need for Outfitters to provide for their families will not stop. If Proposal #267 passes you will see sheep populations in other areas of the state feel the impact. Both Outfitters and Nonresidents will move to areas where they can operate and hunt sheep thus compounding the problem. Proposal #267 is not the answer to a low sheep population it is simply the catalyst to more

areas in Alaska dealing with a similar problem if a bad winter should hit.



PC052
2 of 2

Submitted By
Alysha Edelman
Submitted On
2/14/2022 8:33:49 AM
Affiliation

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Address
70 N Grove St
Apt 4D
Freeport, New York 11520



PC053
1 of 1

PLEASE IMMEDIATELY support Proposal 144 and for TNVR programs. WE ASK YOU TO IMMEDIATELY support Proposal 144 and to exempt sterilized community cats from the list of species prohibited from being released into the wild. THE TNVR programs are GOOD FOR CATS and GOOD FOR COMMUNITIES. I AM A LICENSED VETERINARY NURSE AND I HAVE PARTICIPATED IN TNR / TNVR CLINICS AND THEY ARE INCREDIBLE FOR ANIMALS AND ARE INVALUABLE!!! THIS MUST BE SUPPORTED!!! Thank you!



PC054
1 of 1

Submitted By

Ted Eischeid

Submitted On

2/18/2022 1:01:00 PM

Affiliation

Phone

9206292058

Email

Eischeid@mac.com

Address

410 Mellow Pl

Anchorage, Alaska 99508

Dear BOG.

I'm writing to support the modified proposal 199. I feel this proposal is a moderate solution to a growing problem, accidental capture of dogs by lethal traps near popular trails. As a former trapper I support the activity. However, as a dog owner who enjoys hunting game birds with my Labrador, I fear encounters with conibear traps and snares, so I have stopped this activity. I believe prop 199 will allow me once again to enjoy certain trails knowing that an adequate safety buffer exists. I feel 199 is a modest proposal that addresses accidental kill of canines on our more popular shared trails. Let's not allow the bad publicity of tragic deaths of our canine pets on popular trails by kill traps damage legitimate trapping. Please support 199. Thank you.



My name is Brett Ekstrand. I am a lifelong Alaskan resident of 33 years ; I currently live in Anchorage. I am an avid outdoorsman who loves to hunt and impatiently waits for hunting season to roll back around every year. I am writing this letter to you in support of proposal 138 which broadens past proposal 207 to include the youth sheep season. I also fully support proposal 139 and hope that once there is a clear definition it will be enforceable.

I look forward to sheep hunting every year, after I get done sheep hunting for the season I can't wait to get back out there again. All year I'm glued to maps and reading over harvest reports, buying new light weight gear. I have changed my lifestyle to become a more effective sheep hunter. The thing I enjoy the most about sheep hunting is the solitude, being alone in such a beautifully amazing area. My father took me hunting as a child, he taught me about hunting ethics and fair chase. One of the elements to that is not ruining someone else's hunt, there is absolutely no way a pilot can tell if the rams he has spotted are already being watched and judged by hunters on the ground. Having spent a fair amount of time in the mountains I have watched buzzing airplanes push sheep out of their normal routine and move them off from their location, ruining my experience watching them and photographing. I have heard countless peers of mine experience the same things, while recreating and even during hunting season. There are a few bad apples out there that think they are above the law and know it's hard to prove someone is spotting sheep and do it anyway. I am hopeful that proposal 139 will pass, making people think twice about breaking the law.

There is ample time all year for pilots to fly around and spot sheep leading up to hunting season there is no reason to allow the spotting of sheep during hunting season. People opposing 207 hoping to get it overturned, claim the current law makes them fly unsafely, doing maneuvers they typically wouldn't if the law was different. This a sad excuse to get the law changed in their favor allowing them to spot sheep during the season. If your uncomfortable flying your airplane in the mountains during sheep hunting season stay home.

I support proposals 138 and 139 and oppose all other proposals trying to rescind 207.

Brett Ekstrand
32-year Resident hunter of Alaska

Submitted By
Richard Ervin

Submitted On
2/18/2022 5:24:31 PM

Affiliation



PC056
1 of 1

Dear Alaska Board of Game Members,

I am writing to ask you to please support Proposal 199 that requests a 50 yard trap setback from trails in the Matsu. I frequent these trails, have 2 dogs who occassionally head into the woods, and would be devasted if one of them were maimed or killed. This happened to a friend of mine whose dog was killed in a conibear trap. A large conibear trap is extremely difficult to open once it has closed. With a struggling animal it is extremely difficult even if you do have the right equipment to open the trap. It is difficult to get any struggling animal out of any trap for that matter. I was a trapper in the past and know the dangers. Please put a 50 yard setback per Proposal 199. Thank you.



Submitted By

Bronwen Evans

Submitted On

2/14/2022 1:05:21 PM

Affiliation

Phone

6048742523

Email

bronwynnevans@hotmail.com

Address

219 James Street
Seattle, Washington 98101

I am writing in support of Proposal 144 and for TNVR programs. I please ask the Board of Game to support Proposal 144 and to exempt sterilized community cats from the list of species prohibited from being released into the wild. TNVR programs are good for cats and good for communities.

Thank you

Bronwen Evans



Submitted By

Jackson farr

Submitted On

2/18/2022 4:59:55 AM

Affiliation

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406-230-0353

Email

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Address

16 Carlson road
Nashua , Montana 59248

Please oppose 123 and 124 allowing rangefinding sights on archery equipment, and please oppose 101 and 125 allowing the use of crossbows in archery season. I am not an Alaskan resident but bowhunting Alaska has been a dream of mine for a long time and I have been saving up for that for a long time. These proposals will discouraged me and many of non residents from hunting in Alaska. 123, 124,101, and 125 do nothing to further the sport of bowhunting and ethical fair chase hunting. Have equipment that makes shooting easier doesn't guarantee ethical shots if the hunter is willing to shoot farther to where that hunter is not accurate.

Please oppose 127, allowing air rifles into the general season. This again does nothing to better hunting but this is only marketing to sell hunter more equipment we don't need. Every state should be very careful about adding huge technological hunting equipment to hunting regulations. We risk so much adding these devices, what will the non hunting public see hunters as, people enjoying the outdoors with family and friends chasing animals or people with gadgets enjoying the killing animals.

Please support 138, no fly rule for scouting for sheep. This is common sense fair chase hunting that is good for hunting as a whole.

Submitted By
Nina Faust

Submitted On
2/16/2022 4:50:41 PM

Affiliation



PC059
1 of 1

RE: Proposal 199: Areas closed to trapping.

I support Proposal 199 which would prohibit trapping within 50-yards on either side of certain listed trails and trailheads. This proposal is in response to trail users' dogs being injured or killed after getting caught in traps set close to popular multi-use trails.

This is a commonsense solution to a problem caused by some trappers who are not following ethical practices by moving away from well-used trails before setting their traps. The danger to pets and potentially to children is very real when traps are set close to well-used trails. Fifty yards is not that much of an inconvenience to trappers, but could mean the difference between life or death or injury to dogs recreating with their people and may save a child from a tragic accident in a trap.

Please pass this reasonable proposal that will help resolve this contentious issue. I would like to see this type of regulation also be applied to popular trails in the Homer area and elsewhere on the Kenai Peninsula.

Sincerely,

Nina Faust

Submitted By
Galen Flint

Submitted On
2/18/2022 9:43:29 AM

Affiliation

Phone
6502070810

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gallenflint@gmail.com

Address
2129 Sunrise Dr
Anchorage, Alaska 99508

Proposal 199, Amended.

I write in support of Proposal 199, Amended. I support any proposal that would prevent trapping and trapping accidents close to trails used by people and their dogs. I would encourage the addition of the Nandy Lake Recreation Area and the Rabbit Slough and Palmer Hay Flats area to the list.

Galen Flint



PC060
1 of 1



Submitted By
Paul Forward
Submitted On
2/18/2022 11:12:23 PM
Affiliation

Phone
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paulforward@gmail.com
Address
191 Agostino Mine Rd
PO Box 493
Girdwood, Alaska 99587

Dear BOG,

I am a lifelong Alaskan and split my time between living and working in Kotzebue and Girdwood. I have been an avid traditional bowhunter since I was 12 years old and have subsequently filled my freezer with my bow for the past 30 years, hunting in a wide variety of GMU's. Thank you for the opportunity to comment on the following proposals:

Proposals 135, 136, 137, 139: STRONGLY OPPOSE: WE MUST MAINTAIN PROPOSAL 207 (5 AAC 92.085(8))

The best decision the BOG has made in recent years is stopping the aerial scouting of sheep during the season. I am a longtime sheep hunter, have killed multiple rams with a longbow in various parts of the state and have never utilized aerial scouting in any way at all. It is completely contrary to the ethos of fair chase hunting. We go into the mountains to hunt sheep, no to find the most efficient way possible to kill them. There is no reason that a hunter cannot land in an area, put on a backpack and start hiking, looking for sheep. There are many maps and other resources available to identify good sheep habitat and there is no need to fly around looking for rams. Furthermore, most sheep hunters will admit the the most difficult thing, especially when rifle hunting is just locating a legal ram. If this is accomplished from the air, there is no way to justify the ensuing kill as fair chase. I've hunted sheep enough to understand that even for a novice hunter, it's not difficult to kill a ram with a rifle once it's been located and the vast majority of hunters who find a legal ram are easily able to get within rifle range.

In an era when all sheep biologists are telling us that sheep populations are at risk we do not need to be A) making sheep hunting even easier by allowing in season scouting and, B) further encouraging the general harrassment of sheep by airplanes. In the Chugach, Talkeetna's and Brooks Range I've repeatedly witnessed guides and private pilots scouting for sheep both in and out of the season and it often does disturb animals. If anything we need more restrictive regulations to protect our delicate sheep populations in the interest of true fair chase hunting.

Furthermore, the argument of it being unenforceable is a false one. First, while it may be true that violations have not been successfully prosecuted, it is fairly easy to obtain video and tail numbers and report them to authorities. Furthermore, many Game regulations are difficult to enforce and many game violations of all kinds go unreported. For most ethical and legal hunters the law itself is an adequate impediment to unethical/illegal behavior. There will always be those who thwart the law and they must face severe consequences when caught. Second, the authors of these proposals, themselves illustrate how effective the current law is. Multiple of them cite examples of times when they did not engage in aerial scouting because they were worried about being found in violation. This is a perfect example of the law working as it should.

The author of proposal 137 illustrates this self-contradiction well in two consecutive paragraphs. First stating that he avoided scouting a new area from the air during sheep season because he did not want to violate the law and then in the next paragraph states that it should be repealed because it's unenforceable. Isn't the best law one that is adhered to without need for enforcement?

The existing law also creates equity in the hunting world between those who can and cannot afford their plane. Those who can only afford to access an area on foot or even via a commercial transporter can be easily thwarted in their attempts to find a legal ram by guides or private pilots who can cover vast areas of country and land as close as possible to the sheep they find. Eliminating aerial scouting levels the playing field.

If hunters are only able to enjoy sheep hunting if they can locate sheep from the air, they might consider re-evaluating their ability to truly hunt, cover ground and understand sheep habitat and their commitment to true fair chase hunting. Aerial scouting, especially during the season, is utterly unnecessary and inconsistent with the basic ethos of fair chase hunting. Furthermore, in a time when sheep populations are in widespread decline throughout most of the state, we certainly do not need to be making it easier to kill and harrass sheep.



Proposals 101 & 125:

Oppose: Both of these proposals attempt to advance the status of crossbows as hunting weapons in Alaska. As a lifelong bowhunter I adamantly oppose any attempt to include crossbows in archery season. Crossbows are more akin to firearms in their basic use and have greatly expanded range over bowhunters. Allowing them in the few bowhunting seasons and areas currently available would fundamentally alter the experience of those hunts as well as creating much higher success rates. This would both adversely affect bowhunters with decreased game populations in those hunts but, more importantly would jeopardize existing and future archery opportunities. There is also no justification for expanding archery weapons hunts. Existing compound bows, with the extreme let off at full draw are very manageable for all but the truly disabled hunters. My father, for example, is almost 80 and is still able to hunt with a 50# recurve. And for those hunters who are truly disabled and truly unable to use a conventional bow, there are already provisions in place to get a waiver from a physician. Please do not jeopardize the existing archery opportunities. There is no valid reason that the vast majority of would-be crossbow hunters can't just use a conventional bow to take advantage of existing archery seasons. Please reject these proposals.

102:

Oppose: Please oppose this proposal. Shotguns and crossbows have never been classified as "primitive" and certainly do not qualify as primitive weapons under any definition I've ever heard of. As a lifelong traditional bowhunter I am very aware of what should constitute "primitive" weapons and any firearm or crossbow would definitely not qualify.

123 & 124:

Oppose: Electronic range finding sights have no place in bowhunting. There has been a constant technological creep in archery hunting and we need to prevent archery equipment from becoming overly sophisticated. The purpose of archery hunting is provide for a great challenge and lower success rates and allowing for these kinds of technological advancements in counter to the basic ethos of archery hunting.

130:

Oppose. CWD is a serious risk to all cervid populations and urine and other real animal products have been demonstrated to spread this terrible disease. Please keep them out of Alaska.

138:

Support: Spotting sheep from the air and then hunting them is in direct opposition to the basic principles of fair chase hunting. With the fixed dates, the existing regulation creates some inconsistencies such as during the youth hunt or during late season hunts that have subsequently been added. This is in the spirit of true fair chase hunting and would make sheep hunting more equitable with current regulations and with any new changes to sheep seasons that may occur in the future. There is no downside to extending the existing regulation to cover anytime there is an active sheep season.

156:

Oppose: It does not make sense to allow people to apply for a permit before they have the exemption that would allow them to legally undertake the hunt. There is no good reason why someone who feels they deserve an exemption cannot get it prior to applying for a hunt. Furthermore, if the permit awardee does not ultimately qualify for the hunt, the permit will either be wasted or there will need to be an additional and onerous process of finding an alternate permit winner. In addition, this could encourage more hunters to apply for limited archery permits, many of whom may not ultimately qualify, thus taking opportunity away from those who have put in the work ahead of time to either get an exemption or to get their archery qualification.

157:



173:

Oppose. Like many bowhunters in Alaska, the Dalton Highway corridor is a rare roadside opportunity where we can safely bowhunt without worry of being shot over or at by rifle hunters. My family has been traveling to the Dalton highway area to bowhunt for over 30 years and my brothers and I learned to hunt here due to the ability to chase caribou and sheep without fear of rifle competition and the accompanying safety issues. The existing regulation has worked without confusion for decades and there is no need to change it. I and everyone else I know who hunts that area has no issues with local subsistence hunters employing other means of hunting. It is critical for the future of bowhunting in our state to maintain the archery corridor. This is one of the only non-draw archery hunts in the state and it must remain as is.

233: Oppose. As a lifelong bowhunter and as someone who has read hundreds of pages of research published by Dr Ashby on terminal arrow performance, I feel that the existing regulation regarding archery draw weight is adequate and does not need to be changed.

Thank you so much for taking the time to read these comments.



Submitted By
Todd Fritze

Submitted On
2/16/2022 10:33:07 AM

Affiliation

Thank you for taking the time to read my comments today . I am a subsistence hunter, trapper and one who has used positioning for wolves as an effective harvest management tool.

I am against the language submitted as a definition for positioning in proposal 271.

Positioning for wolves has been one of the most effective tools hunters have in the management of our wolf populations. The speed limits that the proposed definition would make it nearly impossible for a hunter to use snow machines to approach wolves in a manner that would allow them to harvest a wolf. Most times when following wolf tracks they hear you before you see them and they begin to run. As written once a hunter saw that a wolf or wolverine had begun to run he would have to disengage his hunt. Also the idea that a hunter can get to within 300 yards is much too far in that, by the time a hunter stops get there gun out and get ready to fire ,a wolf can cover 100 yards or more now making the shot fairly uncertain and in a lot of cases impossible. Many hunters are using firearms that have a relatively short range. This is done to avoid putting large holes that decrease dramatically the value of a pelt. To effectively harvest more than one wolf from a pack repeated approaches are also needed . These are all important tools to help us manage our wolves in an area with declining moose and caribou populations. Also judging distances accurately both by hunters and enforcement is very hard to do at any speed.

At no time do I think the hitting of any animal with a snow machine should be allowed.

I would like to ask the Board to do one or two things first amend the language of the definition of positioning to read that there be no speed limits maximums or distance minimums and allow multiple approaches on wolves and wolverine.

I would also request that at least the Board postpone coming up with this definition until all the statewide advisory committees have had ample opportunity to meet and discuss what is before you. This definition has far reaching implications that can greatly affect the harvest of wolf and wolverines in many areas of the state and may greatly affect the income of many rural people that rely on the harvest of the fur as a means of income. Further more, the need to protect our moose and caribou populations from the over abundance of wolves is of the utmost importance in today's economy where the cost of store bought meat is unachievable by many rural families.

Thank you for your time.



Submitted By

Ray Gamradt

Submitted On

2/18/2022 12:47:10 PM

Affiliation

Proposals 135, 136, 137

I oppose the proposal.

Using an airplane to locate and then hunt sheep is an efficiency that puts additional strain on a resource that is presently in distress. Planes are fantastic tools in the production of killing sheep. As an avid hunter, I want every measure to be taken to preserve the *opportunity* to hunt sheep, not to improve the *likelihood of success* of those who have access to the technological advantage of an airplane. Dall sheep as a quarry deserve a more level playing field, even in years when their numbers are higher. Hunters on the ground deserve the experience of not having planes flying regularly over the heart of the mountains. And we all deserve the most ardent attempts at maintaining opportunity into perpetuity, rather than leveraging the success of some today at the expense of the resource and the hunting experience.

If the wording of 5 AAC 92.085(8) is cumbersome or not inclusive enough, as the proposal suggests, then I would favor amending the wording to be less cumbersome or more inclusive. To remove it altogether would be a step in the wrong direction. I see the existing language as being part of an iterative process of affecting positive change for the contemporary sheep hunting experience in Alaska.



Submitted By
Sabrina Garcia
Submitted On
2/17/2022 6:43:15 PM
Affiliation
Alaska Humane Society

Phone
907-205-1502
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sgarcia16@gmail.com
Address
3417 Aero Ave
Anchorage, Alaska 99517

Dear Board Members,

I am submitting a comment in support of Proposal 144 which will exempt sterilized cats from the list of species prohibited from being released into the wild. Trap-Neuter-Vaccinate-Return programs have been shown to be successful in ultimately limiting the number of feral cats and limiting the number of unwanted cats/kittens entering local shelters, many of which are already at capacity.

Currently, feral cats can only be captured and housed in shelters and/or animal control facility until they are adopted or in some cases euthanized. Many of these cats are unable to be adopted out because they are not socialized. TNR is a non-lethal technique to managing unowned, free-roaming cat populations. The cats are humanely trapped, spayed or neutered by a licensed veterinarian, ear-tipped (a universal sign showing that they have been sterilized), vaccinated (to limit disease transfer among feral cats), and returned to where they were trapped.

If left unchecked, feral cats are able to continue reproducing and increase the feral cat population in a never-ending cycle. TNVR offers a humane way to slow the population growth of feral cats which will alleviate issues surrounding feral cat populations (e.g., harm to local wildlife). TNVR also gives local shelters, who operate solely on donations, an option. If feral cats are brought in that are unlikely to be adopted, they can be returned to where they were trapped to live out their life but not contribute to the feral cat population. If feral cats are adoptable, they could stay at local shelters until they find a home.

TNVR programs have been successful in other states and countries and I believe they would be successful here in Alaska. Rule changes that do not impede TNVR programs will be better for the cats, better for public health, and better for the wildlife we all want to protect. Thank you for your consideration.



PC065
1 of 1

Submitted By
Ray Gilbertson
Submitted On
2/17/2022 10:35:19 AM
Affiliation

Phone
4066702341
Email
chiknchasr@gmail.com
Address
8600 Angus Ave.
Billings, Montana 59106

I fully support Proposition 113

Submitted By
Greg Goemer

Submitted On
2/18/2022 7:15:40 PM

Affiliation



PC066
1 of 1

I would like to comment in support of proposal 199. While I am not against trapping there are too many traps being placed in areas adjacent to public trail heads, parking pullouts, state use cabins and even private property. There definitely needs to be a buffer and while 50 yds is a start it is not nearly far enough. I own two hunting dogs and even with an e-collar & GPS collar in thick snow & alders I can't keep them in sight while hunting grouse or snowshoe hares. When released they can cover that 50 yds in no time, in fact I found one of my dogs in a trap this winter because the GPS indicated she stopped moving & I followed it to her. It's time that more regulations be enforced with set backs and prohibited areas as respect for others and common sense no longer dictates in the outdoors and there are too many users that we need a buffer for everyone to be able to enjoy the outdoors. I highly urge you to consider passing this proposal at this time.

Respectfully,

Greg Goemer



Submitted By
Bruce R Gordon
Submitted On
2/13/2022 5:25:01 PM
Affiliation

Phone
208 559 5012
Email
brucegordon2012@yahoo.com
Address
7750 W Preece Dr
Boise, Idaho 83704

My name is Bruce R Gordon and I reside in Boise, Idaho.

I am writing in support of **Proposal #265** changing RM855 to DM855.

The current process was very confusing and frustrating. After purchasing a nonresident Hunting license number 21831999, I attempted to submit for a nonresident moose hunt #RM855 in unit 22 E. This was a first come first serve registration permit done by computer submission on July 7th, 2021 at precisely 9 a.m. Alaska time - the first moment applications were accepted for this hunt and I was at my computer prepared, 30 minutes prior.

For what ever reason, because of my computer system, speed of modem or WiFi, or too many other hunters trying to apply at the same moment, I was not successful.

I respectfully request that you change this process as outlined in Proposal # 265 to a lottery draw process to ensure an equal opportunity for everyone.

Along with my support of **Proposal #265**, I ask that you please take action for this current regulatory year and change it to a draw system on July 7, 2022 so this will be in place for this year's 2022 moose hunting season.

Thank you for your consideration.



February 15, 2022

From: Karen Gordon
Fairbanks

To: Alaska Board of Game
Alaska Department of Fish and Game

Dear Board of Game Members:

I urge the Board to reject Proposal 267 which is lacking in facts, is emotionally driven, biologically and constitutionally unjustifiable. The Department erred in supporting the ACR resulting in Proposal 267 on three fronts.

- 1) It is biologically inaccurate to suggest harvest of mature rams negatively affects the population. Harvest of mature rams, no matter what the population level is, protects the herd. The full curl harvest regime, in place for about three decades, protects sheep from overharvest.
- 2) Any consideration of the subsistence hunt as a factor inherent in the justification of Proposal 267 should be disregarded because it is biologically irrelevant and therefore moot. Harvest of “any sheep” is biologically risky while harvest of mature rams is not. Even so, subsistence harvest in 19C is insignificant and has no legitimate bearing in the justification or outcome of Proposal 267.
- 3) Finally, the Department erred in overlooking a potential violation of the Constitution by ignoring how this proposal would affect the economy and well-being of the State. The fiscal outcome of Proposal 267, if passed, would cause on average the loss of \$367,000 in annual revenue to the Fish and Game Fund from nonresident hunters who will be precluded from hunting in GMU 19C. To compensate for the predicted revenue loss just from nonresident 19C sheep hunters annually, an additional 2,042 resident hunting licenses must be purchased.

Board of Game Comments

Karen Gordon

Page Two



Please see the attached spreadsheet that describes the resident and nonresident harvest and success rate in GMU 19C. Also is described are the revenues with PR match that are at risk of being forfeited should Proposal 267 be passed.

The Department has found that at the end of every hunting season, on average, half of the legally harvestable rams that we know exist are left on the mountain because they are harvested in the following years. This means that nonresidents are in no way jeopardizing the sheep population in GMU 19C (or anywhere else for that matter) such that resident success is threatened, especially given the protective full curl management regime. There are plenty of mature rams for everyone. In fact, resident success in GMU 19C is amazingly high at 36%. On average statewide sheep hunting success historically has been 27%.

To sum up, Proposal 267 provides no benefit to the resource or the state. In fact, it full of fabricated threats with no justifying data behind them AND it would result in a huge loss to the Department of about \$367,000 per year. In the end, there is no biological need to either go to permits or preclude nonresidents from hunting in GMU 19C. Please do not pass Proposal 267. It offers no benefit biologically or economically and actually violates the Constitution.

Thank you very much for your service and consideration of these comments. I apologize for the landscape perspective, but to include the readable spreadsheet this was necessary.

Sincerely,

Karen Gordon
Fairbanks

Board of Game Comments

*Karen Gordon
Page Three*

GMU 19C Sheep Harvest Data 2015 through 2019

GMU 19C Sheep Harvest Data						Average GMU 19C Sheep Harvest Data 2015-2019						
Year	Status	Successful	%	Unsuccessful	%	Total Hunters	Status	Successful	%	Unsuccessful	%	Total Hunters
2015	Resident	34	35%	69	73%	103	Resident	38	36%	61	73%	100
2015	Non Res	63	66%	25	27%	88	Non Res	68	66%	23	27%	91
	Total	97		94		191	Total	106				190
						Average Annual 19C Sheep Nonresident Contribution					Average Annual 19C Sheep Nonresident Contribution	
						Hunting License \$ 45.00					Hunting License \$ 160.00	
						Total \$ 45.00					Harvest Tag \$ 850.00	
						With P/R Match \$ 18,000.00					Total \$ 1,010.00	
						100 x \$45= \$ 4,500.00					91 x \$1010= \$ 91,910.00	
						With P/R Match \$ 367,640.00						
						Total Contributions Resident and Nonresident \$ 385,640.00						
						Resident % 5% Nonresident % 95%						



Submitted By

Sawyer Guinn

Submitted On

2/18/2022 11:27:21 AM

Affiliation

Phone

7035093913

Email

sawyer9teen@gmail.com

Address

31 Pocahontas Rd
Front Royal, Virginia 22630

Proposals considered in comment: 101, 123, 124, 125, 127, 138.

I am in opposition of proposals 101, 123, 124, 125. I do not believe that crossbows or range finding sights have a place in pre-existing archery seasons. These seasons were established as a primitive weapon seasons and allowing these technologies will increase the efficiency with which hunter's harvest game and inevitably lead to decreased opportunity for all. In response to the ethics debate surrounding these technologies I believe that the increased range the proposed technologies will empower hunter's to attempt to take game at distances effectively nullifying any potential benefit. Weapon restrictions are to take pressure off game, not to give companies the opportunity to develop products to beat the system.

I am also in opposition to proposal 127. I don't believe the use of air powered weapons enhances the experience for hunters or increases ethical harvest rates. It strikes me as a "toe-in-the-door" to lobby for future incorporation of air weapons into established restricted weapon hunts and seasons. I.e. Air bows in archery seasons.

I am in support of proposal 138. I would like to see the air scouting restriction extended to cover all open dall sheep seasons.

Additionally I would be in support of similar restrictions banning the use of aircraft for scouting of all game species during open seasons.

I am a non-resident who has never hunted, fished, or even been to Alaska. But, I certainly hope to do all of the above in my life. I believe that the above mentioned proposals will undoubtedly affect harvest rates and therefor directly affect, not only my chances, but the general public as whole will suffer a great loss of opportunity for tags that are in many cases already hard to come by. This not only takes a personal toll on individuals but will negatively affect eco-tourism revenues and conservation funding as well as establish poor precedents for future regulation changes both in and outside the state of Alaska.

Thank you for your service and consideration,

Sawyer Guinn



PC070
1 of 1

Submitted By
Sandra Halstead
Submitted On
2/18/2022 10:23:54 PM
Affiliation
Prop 199

Phone
9077267279

Email
Superstorm63@gmail.com

Address
23244 Lower Terrace st
Eagle River, Alaska 99577

This letter is intended for the Board of Game meeting on March 8, 2022. I am in favor of prop 199 which would require a 50 yard minimum setback from trailheads and specified recreational trails in the MatSu borough. I am not against trapping but believe it needs to be conducted in a responsible manner to not injure or kill a family pet.

I encourage the Board of Game to vote in favor of Prop 199.
Sandy Halstead, Eagle River AK



PC071
1 of 1

Submitted By

Nick Hamming

Submitted On

2/18/2022 1:17:17 PM

Affiliation

Phone

9078412340

Email

nickhamming@gmail.com

Address

16649 W Glenn Hwy
Sutton, Alaska 99674

Resubmittion to include name and residence in comment

My name is Nick Hamming. I grew up in the Matsu Valley. I split my time between my home in Girdwood and my home at Sheep Mountain. I am in support of Proposal 199. I believe a 50 yard trap setback is a fair compromise and in general a positive step towards reducing user conflict on Mat-Su trail systems.

Submitted By
Mary Larene Hasenoehrl
Submitted On
2/9/2022 2:15:23 PM
Affiliation



PC072
1 of 1

My name is Mary Hasenoehrl and I reside in Lewiston, Idaho

I am writing in support of proposal #265 changing RM855 to DM 855

This proposal makes it easier and fair for all residents to apply for the permits. If a hunter lives in a remote area, their internet speeds are slower.

The current process favors hunters that are wealthier and live in more populated areas.

Submitted By
Lindsey Hawkins
Submitted On
2/17/2022 9:41:11 PM
Affiliation



PC073
1 of 1

I am in full support of proposal 199. I cannot believe this is not an already well established law. Seems like the most basic form of common sense.

Submitted By
Jennifer Heaton
Submitted On
2/14/2022 6:08:08 AM
Affiliation
Best Friends Animal Society



PC074
1 of 1

I support proposal 144 and TNVR programs and hope you will consider supporting it too!

TNVR programs are good for cats and good for communities. I have seen the success of these programs first hand and we need to continue the amazing progress being made.

Thank you

Good evening,

After reviewing many of the proposals from 2020/2021, as well as those recently added, I would like to make the following comments:

Proposal 234 - Remote game cameras should not be allowed. Perhaps not as big of a concern here in AK (compared to limited watering holes in much of the lower 48 southwest), but it does serve further erode woodsmanship skills and removes the mystique of why many of us got into hunting in the first place.

Proposal 235 - Artificial light should not be permitted in a hunting situation, even if for no-closed-season small game animals. There should be at least a limited number of quiet hours out in the woods. Hunters will take poor shots and make bad shot decisions in low light and/or nighttime conditions.

Proposal 263 - Sea Otters should remain protected. Early Russian and American settlers decimated them once; leave them alone. They aren't harming anything. Trappers have a plethora of alternatives to choose from here in AK.

Proposal 101 - Crossbows should NOT be included in the definition of a bow and arrow! Crossbow manipulation and operation (scope, trigger pull, shouldering the weapon, balance/stabilization) have far more in common with a modern rifle w/suppressor than they do with a bow and arrow. The effective range of a crossbow puts it in a league of its own, and aside from being powered by potential energy stored in displaced/bent limbs, a crossbow is NOT a bow and arrow.

Proposal 102 - Primitive weapons definition should not include crossbow. Lower-48 states erred when they allowed crossbows into the archery season.

Proposal 121 - Dogs should NOT be allowed to hunt big game in AK. AK does not have the densities or populations of bear/deer like there are in many lower-48 states where dogs are allowed for big game hunting. Dogs should be allowed for use in big game retrieval, when leashed, but hunters should not seek their use for finding and tracking big game. Again, this would further erode basic woodsmanship skills of tracking and familiarity with wild animal behaviors.

Proposal 122 - I agree with Mike Harris' comments about reducing the minimum draw weight for bow and arrow equipment. A well-tuned bow and arrow, with a razor-sharp broadhead is more than capable of passing through any large game species in AK, PARTICULARLY when there is a well-placed shot. Shot placement is the most important consideration in any big game harvest.

Proposal 123 & 124 - Electronics do not belong on archery tackle. Bow and arrow set-up should not include electronic rangefinders or laser-rangefinders. Ethical kills are not dependent on the latest electronic gadget. As with previous comments, this further erodes basic woodsmanship and archery skills. Archery hunting requires close-in shooting, and an



intimate knowledge of animal behavior, cover and concealment, wind direction, etc. Electronics will cheapen the "hunting" experience, and make archery all about the kill shot, not the effort leading up to it.

Proposal 125 - Crossbows should NOT be allowed in weapons restricted hunts. Including a steel bolt that can hit a bullseye at 100+ yds has no place in archery. Modern crossbows are on an equal playing field with modern muzzleloaders, only slightly quieter.

Proposal 138 - Restrictions on spotting aircraft for Dall Sheep should be extended to include all Dall Sheep seasons and hunts, not just the Aug 10 thru Sep 20 period.

Proposal 156 - Crossbows should not be included Methods & Means Exemptions with archery equipment.

Proposal 162 - Snowshoe hares should absolutely include salvage requirements. This is basic community relations and helps keep faith with the larger public who may view hunting in an unfavorable light if animals are killed and left in the field with no effort to salvage meat.

Public relations nightmare.

Proposal 163 - Wounded big game should ABSOLUTELY count towards your bag limit. I thought this was already included in the current regulations...

Proposal 169 - This needs to be re-written. I agree with the authors sentiments as they relate to Native heritage and culture. However, several species of "white animals" exist seasonally in AK...ptarmigan, snowshoe hare, polar bear, Arctic fox...there is too much room for ambiguity as currently written.

Thank you for your consideration.

Regards,

Alex Hedman
Eagle River, AK



Submitted By
Wayne Heimer
Submitted On
2/18/2022 9:50:23 AM
Affiliation
self

Phone
9074576847

Email
weheimer@alaskan.net

Address
2540 River Song Court
Fairbanks, Alaska 99709

I support proposals 135-139, removal of regulation banning flights associated with locating Dall sheep in hunting season.

The justifications for all these proposals make sense to me. The proposal (originally #207) never did. That proposal was Board-generated to "thrown a bone" to the anti-guiding and anti-nonresident lobbies which had tied up Board process by "gaming" the public process Alaskans venerate so highly.

The original issue was not spotting from aircraft. It was banning nonresident hunting (and disadvantaging the guides who provide the legally required service. The whole business started over the apparent theft of 82 gallons of avgas (alleged to be by a guide) from a hunter who apparently intended to use it while sheep hunting (it doesn't take near that much gas to fly from the Northern Wrangells back to Fairbanks in a Super Cub). Even though everyone (including Wildlife Protection Officers) said the regulation was not enforceable, the Board of the day apparently thought the axis of process-savvy citizens who had buried the Board process with guide-negative proposals thought these Alaskans deserved something for their prolonged, passionate effort. I'm guessing the Board's assumption was that passing this ceremonial regulation wouldn't really do any harm. That was wrong.

As a result of #207, we got the Resident Hunters of Alaska (RHAK). That organization was originally formed by hunter/pilots to resist #207. It failed there, however the resulting NGO has been a legal and management distraction trading on skewed statistics and misinformation to lure resident hunters into supporting dozens of proposals and one lawsuit in the quest to disadvantage nonresident hunters (and their guides). Benefits to Alaskan resident hunters have been negligible. The original proposal (#207) was primarily ceremonial, has not positively affected management for anything, has tied up the Board process with special-interest proposals and the courts with a lawsuit over preference in trophy brown bear permits on federal land. Results have primarily divided hunters, which should be cooperators in management, to no benefit.

I recommend getting rid of the regulation because it never made any sense, has provided nothing in the way of conservation, has inconvenienced hunters, was easily circumvented by folks scouting before hunting season, and has gummed up the Board process unnecessarily. I hope that if this goofy regulation goes away, RHAK (originally formed to fight it) will follow. I support proposals 135-139.

Wayne Heimer

Submitted By

Josh Hejl

Submitted On

2/16/2022 5:37:36 PM

Affiliation

none

I support the trapping setback, proposal 199.

I live in the area and I am tired of people having to be afraid because of someone elses laziness.

Thank you.



PC077
1 of 1



PC078
1 of 1

Submitted By
Susan Helmericks
Submitted On
2/14/2022 2:12:35 PM
Affiliation
Mat valley kitties Rescue

Phone
9078417711
Email
susanhelmericks@gmail.com
Address
411 S Jerome Dr
Wasilla, Alaska 99654

I am in support of proposal 144 to allow TNR in the state of Alaska.
Please consider all the data being presented and allow sterilized cats
to live out their lives without adding to the problem. I run a cat rescue
and it would benefit the Community by having the cats sterilized and
vaccinated to stop the overpopulation problem. Please vote yes!

Founder of Mat Valley Kitties Rescue

Submitted By

Fred Hirschmann

Submitted On

2/18/2022 4:52:45 PM

Affiliation



PC079
1 of 1

Proposal 199 - Fifty-yard trapping setback from roads and trails in Matanuska-Susitna Borough

I strongly support Proposal 199 requiring a 50-yard setback for trap sets along Mat-Su multi-use trails, roads, pullouts and campgrounds. We live in Glacier View (mile 103 of the Glenn Highway) and we and many neighbors are very upset with unethical trapping methods happening in our community. These aren't local people, but roadside trappers driving up from Palmer, Wasilla and Anchorage. The past number of winters we have found leghold and conibear traps set a few feet from the driving portions of dirt roads like the AT&T Alascom Road accessing Tahnta Pass. Trap sets placed just beyond the plowed portion of the road are extremely dangerous for dogs and people recreating along the road.

Many of the pullouts along the Glenn Highway in our community also have active trap sets just a short distance beyond the pullout. Visitors from Anchorage had their dog killed by a conibear trap set twenty feet off a Glenn Highway pullout east of Sheep Mountain Lodge last winter. During our community wide spring clean-up this past May, I personally found dozens of chicken and rabbit carcasses that had been used to attract game to a trap set less than 100 feet from another Glenn Highway pullout just east of Majestic Valley Lodge. The trapper left discarded scapple blades, I assume for skinning fur bearers, right on the edge of the pullout. It was fortunate that I cleaned up these dangerous blades before they were found by some child.

I know trappers don't like to sign their traplines, but it sure would make it safer for others to know a trap could be set further down a snowmachine or snowshoe trail. Even a dog on a leash or on a skijoring or dogsledding line can get caught in a trap alongside a trail. Wolf trappers often bury their trap under a thin layer of snow right in the trail. Trails are no longer multi-use but really are only safely available to the trapper who know where the traps are set.

Ethical trappers do not have a problem with placing their traps in locations that are far less likely to inadvertently trap a pet or child.

One hundred thousand people live in the Matanuska-Susitna Borough and another quarter million come recreating from Anchorage. It's high time to make the region safer for residents, visitors and pets by requiring reasonable setbacks for trap sets.

Respectfully submitted,

Fred Hirschmann

Submitted By
Randi Hirschmann
Submitted On
2/18/2022 11:41:44 PM
Affiliation



PC080
1 of 1

To: ALASKA BOARD OF GAME

RE: PROPOSAL 199

I strongly support the Board of Game's approval of Proposal 199, which would require a 50-yard trap setback from specific, maintained multi-use trails in the Mat-Su area. Currently there are no set-back regulations governing trappers, no signage requirements and trapping can take place on or near any trail, roadway, and public/recreational area except the 6 Borough trails that now have trapping restrictions. Ethical trappers will choose to trap well away from human activity but today there are unethical trappers that don't bother to take the extra effort to place their traps away from public use areas. How many I do not know, but with the increase of dogs being injured and killed in traps, I know the problems is getting worse with each additional trapping season. I live in Glacier View and I have seen several unmarked traps just off the Glenn Hwy pullouts and trails. In the winter we cannot hike or ski with our dogs to all the great places we hike to in the summer because we have seen traps along those trails (we see them only because we are really looking for them) and we never know where all the traps are located. With a 50- yard setback, we would be able to recreate with our dogs in the winter and have the right to use these multi-use trails like everyone else and not fear our dogs will be killed in a conibear trap or caught in a snare or leghold trap. We live in Alaska and if a dog is under voice control by its owner that is all that needs to be required. If a dog is lured off trail by bait a few feet away that is the responsibility of the trapper not the dog owner. Saying a trained dog needs to be leashed on our trails is an excuse not to deal with the real problem that trappers should NOT be trapping on or near many of our trails and roadways. These trails can be shared with trappers and recreational users if you institute a 50-yard set-back rule. You are managing with simply a Code of Ethics that is not working any longer. There are just too many recreational uses in Mat-Su who also recreate with their dogs. When people's actions cause harm to others and their pets, reasonable regulations are the answer. There is no harm or undue stress placed on a trapper to have them walk 50 yards before they set their traps. Yes, trapping has always been a part of Alaska's history and always will be. But history is constantly being made with each generation. The Board of Game needs to regulate trapping in the Mat-Su Valley, with the understanding the population has increased dramatically along with its recreational users. In the past giving trappers unfettered, unregulated use of shared lands was insignificant because the land was shared by so few. But today these multi-use trails and road systems are shared annually by thousands of Alaskans and tourists. The only responsible decision is for you to regulate these shared areas so people and their pets are protected from harm. It really is a good compromised, this 50-yard set-back regulation for trappers. It's a win-win for everyone.

Sincerely,

Randi Hirschmann. 02/18/2022

Submitted By
Donna Hollon

Submitted On
2/12/2022 11:49:59 PM

Affiliation



PC081
1 of 1

My name is Donna Hollon and my community of residence is Port Orchard, Wa. I am writing in support of proposal #265 changing RM855 TO DM855. The process for applying for a non-resident moose tag is NOT fair and it is overly complicated. I believe the process is a perfect example of inequality due to age and lower socioeconomic standing. As an older woman, I am not as adept at using a computer and own only one that is somewhat reliable. I will never be able to compete with those whom are using multiple computers and/or those who have assistants or other people they are able to pay to sit at multiple computers on July 7 at 0900. A "draw" system levels the playing, or in this case the "hunting field" for all. Please help me obtain my dream of hiking the Great State of Alaska with a fair shot! Stop the discrimination against older, poorer outdoor enthusiasts! Approve proposal #265 NOW! Change it to DM 855..a draw system is fair for all. Thank-you! Donna Hollon



Submitted By
Justin Horton
Submitted On
2/16/2022 7:36:49 PM
Affiliation

Phone
9072442993
Email
hhalaskanoutfitters@gmail.com
Address
47333 Anna Leah Ave
Soldotna, Alaska 99669

Justin Horton, RG #1332

I appreciate the board reviewing Proposal 265. I submitted this proposal and am in favor of it passing.

I have two requests for the board related to this proposal:

My first request is that the board also consider making RM855 a drawing hunt for this upcoming 2022 season. This would require a special onetime drawing of tags on or about July 7, 2022. I believe the non-resident hunters interested in this moose tag would appreciate the state overseeing a fair and equal distribution of these tags as soon as possible. This would also allow for families and friends to apply as a party tag. The system instigated last year, under a registration hunt, makes friends and family going hunting together almost impossible under the current registration hunt conditions. There are currently only 10 tags issued.

My second request would be for the board to omit the language in proposal 265 that states: "**That registered guides may only submit as many applicants as there are tags allotted for the upcoming season. A hunter/ guide contract must be submitted as well. That an alternate list be established should a hunter back out for medical or personal reasons and the next eligible hunter would be contacted. If there are no alternate hunters that the tag would become available on a first come first served basis upon request. Basically, similar to how nonresident brown bear tags are issued on Kodiak.**"

After reviewing this request, I believe it will only complicate things for the local F&G office, as well as enforcement. The current guides contracting hunts in 22E have registered guides working under or with them. They will continue to recruit these additional registered guides in order to increase the number of applicants under that one business umbrella. As for the hunters that do not use their tag, that will be no different than a majority of drawing hunts. In the end it would be one less mature bull potentially harvested that season.

In closing. The area biologist, Mr. Dunker, feels the moose population can support this non-resident moose hunt and harvest can still be controlled as a drawing hunt. He also has been working on a way where the local office could directly control a fair distribution of these tags on or about July 7 of this year. After which the tag would then be conducted with all other state-wide drawing applications, during Nov 1-Dec 15, 2022. Interested hunters would then find out in late February of 2023 if they were awarded a tag for hunt that is between Sep. 1-14, 2023. Giving them 6 months to prepare. DM855 will benefit the Non-Resident hunters trying to apply for these hunts by giving them a reasonable time to make travel and personal preparations; the ability to apply as a party tag. It would also avoid concerns and issues with perceived unfairness due to managing internet site/page difficulties, internet connections, and speeds. A drawing hunt will allow F&G to conduct the process where tags are randomly awarded to non-resident applicants. It also allows contracting guides a reasonable time to prepare for successfully drawn hunters.

Again, I appreciate the board for their time and thank you for your service.

Justin Horton, RG #1332

Submitted By
Anne Houseal
Submitted On
1/8/2022 6:02:06 PM
Affiliation



PC083
1 of 1

Drop Down menu did not reveal a selection for the Board of Game, 9 Jan 2022 deadline.

Reference public comments for Board of Game Proposal 199:

Regarding area 14A HUNTER CREEK: I am against including 14A Hunter Creek into this plan as a set back for trappers. This would eliminate trapping altogether up the canyon. This is not a legal trail, has never been codified, and passes through private property of at least two land owners. Historically, ice climbers venture back into the Hunter Creek canyon a few times a year. This is rarely traveled. If it stays on your list, no trapping would even be allowed in the canyon due simply its width. Please take the "trail" off the trail list altogether.

I personally do not trap, but I am a property owner, own dogs, and I do recreate in the Mat Su Borough.

Regarding many of the other "trails", of major concern with the set backs proposed is the trail definition. Will these always be defined by uniformed practitioners wherever they go... like a primitive trail...where exactly would the setback begin? Even on more defined trails, in the winter folks will trace on foot or bike atop whatever snow machine track they find...even those made by trappers.

The proposal would have more teeth and be more understandable if the proposal was limited to a handful of well used multi use trails like the one up Lazy Mountain where you can expect someone to take their dog hiking. But when the proposal extends to so many "trails" as this, it seems clear this is a big first step effort to eliminate trapping altogether.



PC084
1 of 1

Submitted By

Kerry M Howard

Submitted On

2/16/2022 1:10:04 PM

Affiliation

Phone

(907) 789-4351

Email

kmhejira@yahoo.com

Address

17355 Glacier Highway
Juneau, Alaska 99801

Please support Proposal 144, which would exempt sterilized community cats from the list of species prohibited from being released into the wild. TNVR programs are good for cats and good for communities. I was successful involved in a small TNVR project in Colorado and ask for your support of this proposal.

Submitted By
Casandra Renee Hulse



PC085
1 of 1

Submitted On
2/17/2022 11:33:24 AM

Affiliation

Regarding Proposal 199 to the Alaska Board of Game (BOG) addressing popular multi-use trails in the Mat-Su region (Wasilla, Palmer, Big Lake, Willow, Chickaloon, Knik), I support traps being set back from these trails to protect people and pets from the current regulation which allows traps to be set on or near multi-use trails, campgrounds, roads, and pullouts from as early as September through May.

The Alaska Wildlife Alliance proposes 50-yard trap setbacks to increase public safety on popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more.

This winter alone, at least seven dogs have been caught in traps, and two of them have been killed in Southcentral Alaska.

Please protect the safety of people and pets utilizing multi-use trails in Alaska. Thank you!



PC086
1 of 1

Submitted By

Gregory Hunt

Submitted On

2/14/2022 6:18:57 PM

Affiliation

Phone

907-317-2662

Email

kodiakgoat@gmail.com

Address

1647 Fairview Road
Columbia, Kentucky 42728

I am submitting this comment in support of proposal 265 which would change the current registration moose hunt in unit 22E to a draw hunt. I support this proposal because I believe that a draw hunt is a more fair system to administer the limited number of permits. Not everyone has access to the internet at the opening of the registration due to work responsibilities or family commitments. Alaska Department of Fish and Game already issues most permits on a draw system so I wouldn't think it would be an issue to change to a draw system. I think it would also give hunters that wished to hunt together a better opportunity to draw a party tag.



PC087
1 of 1

Submitted By
Sarah Johanson
Submitted On
2/16/2022 9:23:57 PM
Affiliation
trail user

Phone
503-507-4516

Email
swjohanson@gmail.com

Address
1150 S Colony Way, Ste 3, PMB 134
Palmer, Alaska 99645

Dear Alaska Board of Game members, I just wanted to express my support of Alaska Wildlife Alliance's proposal 199, which includes a 50-yard trapping setback on popular multi-use trails in and around my area of residence and outdoor recreation. It is a very reasonable step to help mitigate trail user conflict, while allowing all to continue their practices. Thank you for considering this proposal.



Submitted By
Barbara Johnson
Submitted On
2/18/2022 11:05:42 AM

Affiliation

Phone
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February 18, 2022

To whom it may concern,

I am writing as a concerned citizen, retired teacher, and outdoor enthusiast. I fully support the amended Proposal 199 regarding trapping restrictions in the Mat-Su Valley on trails that are used heavily by the public. I worked as a teacher at Machetanz Elementary and continue to volunteer helping teachers with citizen science projects like Birds and Bogs in outdoor settings. I was relieved to know that Reflections Lake and the Wasilla Creek Trail are on the list, as well as others in the proposal, but I was dumbfounded that the Swan Lake Trail, which is very short, and the adjacent loop trail are not included in the list. These trails are regularly used by teachers, with their students, for outdoor science and cultural studies. The PE teacher also takes her students out there. I know that these trails are also used heavily by the growing population of residents who live in the adjacent homes. It does not seem appropriate or safe to have this trail open to trapping, especially considering that an elementary school regularly uses it with small children. Please include this trail, which also has a lot of culturally historic significance, in the amended Proposal 199.

I think there are other trails that also should be on the list because these areas are so heavily used by people. More and more people are getting outside and the population is increasing. It makes sense that the trapping regulations need to change to ensure safety for people and dogs. I am pleased with recognition that something needs to be done and so I am in complete support of the amended Proposal 199. Trapping is a traditional activity in Alaska, but it seems incompatible and should not be allowed in areas heavily used by the general public. The less conflict there is between trappers and other users, the less public outcry and the more we can all get along.

Respectfully,

Barbara Johnson

Submitted By
Steve Johnson
Submitted On
2/18/2022 4:58:42 PM
Affiliation



PC089
1 of 1

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To whom it may concern,

I'm commenting on the "amended Proposal 199". I fully support this proposal.

Use areas the public recreates on a regular basis are not suitable for trapping and risk dog safety. I have personally had to remove a dog from a trap almost on the trail. There is more than enough state land to avoid these situations. Proposal 199 is a good start.

The one area that isn't included is Swan Lake. I highly recommend this area be included. With the adjacent neighborhood, School (Machetanz), and high visitation from the public and school field trips using the trails, trapping needs to be eliminated or with wide buffers in this area.

I appreciate the opportunity to comment,

Steve Johnson

Submitted By
Vera Johnson

Submitted On
2/18/2022 10:28:10 PM

Affiliation

I support proposal 199 of trap setbacks of at least 50 yards in the stated recreation areas.
Thank you.

Vera Johnson



PC090
1 of 1



KAWERAK, INC.

January 3, 2021

REPRESENTING**Brevig Mission***Sitaisaq***Council***Akauchak***Diomede***Iñaliq***Elim***Neviarcuarluq***Gambell***Sivuqaq***Golovin***Chinik***King Island***Ugiuvak***Koyuk***Kuuyuk***Mary's Igloo***Iglaaruk***Nome Eskimo***Sitnasuami Inuit***Savoonga***Sivungaq***Shaktoolik***Saktuliq***Shishmaref***Kiqiqtaq***Solomon***Anjuutaq***St. Michael***Taciq***Stebbins***Tapraq***Teller***Tupqaġruk***Unalakleet***Uŋalaqtıq***Wales***Kirijin***White Mountain***Natchiqvik***ATTN:**

**Alaska Department of Fish and Game
Boards Support Section
1255 W. 8th Street
Juneau, AK 99811-5526**

Kawerak, Inc. is the regional nonprofit tribal consortium for the Bering Strait/Norton Sound region. We provide services to sixteen communities including advocating for subsistence hunting and fishing. We offer the following comments for the ADF&G; Board of Game consideration.

Kawerak is in support of the following proposal.

Proposal 190 Reauthorize brown bear tag fee exemptions.

The majority of Game Management Unit (GMU) 22 bear harvest by local residents is opportunistic. Moose and caribou are harvested as the main food source. The brown bear population across GMU 22 has risen according to ADF&G's latest bear population survey. The brown bear tag exemption fee for GMU 22 should remain in place to help offer incentive to hunters as well as to help increase harvest opportunity to an ever increasing bear population.

Kawerak is opposed to the following proposal.

Proposal 129 5 AAC 92.085. Unlawful methods of taking big game; exceptions.

Require the use of expanding (soft point) bullets for big game hunting, excluding wolf and wolverine.

Big game animals have been ethically and humanely put down with any of the various small caliber high velocity chamberings, with proper shot placement being the key to any hunting situation. Small caliber high velocity ammunition in full metal jacket (FMJ) such as a .223 Remington is more than capable of hitting the vitals of any big game animal. The kill zone on a bull moose is roughly eighteen (18") inches in diameter, bear and caribou slightly smaller. Yes, FMJ's do produce a narrow wound channel compared to expanding type ammunition, however, as long as the shot placement is in the vitals the animal will be humanely and ethically put down.

KAWERAK, INC.PO Box 948 • Nome Alaska 99762 • 907.443.5231 • www.kawerak.org**Advancing the capacity of our people and tribes for the benefit of the region.**



Documentation shows that all it takes to ethically put down any big game animal is no more than a one quarter inch (1/4") hole in the vital organs, which the .223 Remington in FMJ is more than capable of performing.

Documentation on small caliber high velocity ammunition, such as the .223 Remington in FMJ, shows that after entry into the target the bullet will often tumble or summersault thus increasing the wound channel (in some cases as much as 3/4"). The majority of rural Alaskan hunters prefer not to waste any meat (due to the high cost of store bought meat). The documentation on expanding bullets clearly shows that the use of this type of ammunition does in fact waste more meat. This is a major factor for rural Alaskan hunters when choosing what type of ammunition to use/purchase.

The proposer states there will be a slight increase in cost due to the change of bullet design. To the contrary, rural Alaskan hunters would have to switch to an entirely different higher caliber rifle in order to go hunting. In many rural communities, small caliber high velocity rifles are passed-down from either the grandfather or the father. New bigger caliber rifles would have to be purchased, and these rifles are substantially higher in cost than a smaller caliber rifle which most rural Alaskan hunters simply cannot afford. A .223 Remington in an expanding type bullet simply does not have enough weight behind the bullet to have any kind of penetration or complete pass through on any big game animal. The cost of living is very high in rural Alaska, however, small caliber high velocity ammunition is more affordable. On the opposite end, larger caliber ammunition in rural Alaska is very expensive.

This proposal as written raises a question of whether it is a simple proposal requesting a bullet change from FMJ to expanding bullets or is the proposal inadvertently requesting to restrict hunting calibers. If this proposal passes, it will inadvertently restrict big game hunting to the larger calibers as no one would use expanding bullets in the smaller high velocity calibers.

Over the years, the Board of Game has deliberated on caliber restriction numerous times and the decisions regarding proposals to limit big game hunting to the larger calibers have always failed. Bigger caliber rifles do not equate to humanely putting down any big game animal. Individual hunters can and do miss the vitals even with the bigger caliber rifles, hitting animals in other parts of the body except where they were intended.

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If you have any questions please feel free to contact VP of Natural Resources; Brandon Ahmasuk @ 907-443-4265 wk. or 907-434-2951 cell, or bahmasuk@kawerak.org. We thank you for your time and consideration.

Sincerely,

KAWERAK, INC.

Melanie Bahnke

Melanie Bahnke,

President

KAWERAK, INC.

PO Box 948 • Nome Alaska 99762 • 907.443.5231 • www.kawerak.org

Advancing the capacity of our people and tribes for the benefit of the region.

Submitted By
William Kays

Submitted On
2/18/2022 3:30:54 PM

Affiliation

Board of Game,



PC092
1 of 1

My name is Billy Kays and I am a resident of Wasilla, AK. I have lived in AK for 17 years and have guided and/or personally hunted sheep for approximately 15 yrs. I am currently a guide for Joey Klutsch of Aniakchak Guide Service and guide sheep in the Brooks Range. This letter is intended to voice my opposition to Proposal's 135,136,137 and 139. I can speak to my experience hunting sheep in the mountains pre and post prop 207. The differences are simply dramatic as far as quality of the hunt is concerned. More importantly, the example we are setting as it pertains to Fair Chase hunting standards.

The argument this is an unenforceable regulation is no argument at all as far as I'm concerned. The fact that it exists will keep your average law-abiding citizen honest about following this law. The bad actors that don't follow this law will continue to do so with or without 207 being in place. We don't gauge laws in this country on whether or not they are enforceable. If you feel so strongly that its unenforceable than you have nothing to worry about and spot away.

Trying to frame this as something that puts a pilot's safety in jeopardy due to worrying about someone reporting you spotting from the air, is in my opinion, ridiculous. It is clear to see it is simply an attempt to get back to the old ways of buzzing sheep and ruining countless hunts for other sheep hunters every year. There's no better way to have a hunt ruined, after walking countless miles, than to have a guy in a cub come and blow a group of rams you've set up on out of the country. I have personally had this happen three separate times and this law is the only thing keeping that at bay. The last couple years of peace and quiet in the mountains has been wonderful and I would love to have that continue. We hunt sheep for the solitude that only the sheep mountains can provide and to be in an area free of unnecessary cub traffic is a very special thing.

Then there's the argument of this being repealed due to there being no biological concern. I think with the current state of Dall sheep populations across the state there is a HUGE biological with doing anything that increases the odds of more sheep being harvested. I don't think it's any secret at this point that our sheep populations statewide are in a state we haven't seen since 1992. As I sit here and write this at my home in Wasilla it is currently raining. It doesn't appear things will be turning around anytime soon. Any help the sheep can get at this point is at an all-time high level of importance. If that just so happens to align with maintaining a much higher standard of what would be considered fair chase at the same time than all the better. This will be looked upon in high regard by the next generation of hunters as we lead by example in what fair chase truly means.

I would also like to include my support for Proposal 138 as I do think the verbiage should be rewritten to cover all seasons to make these restrictions fair across the board. This seems like a common-sense way to alleviate any future season changes.

Thank you for your consideration on this matter,

Billy Kays



Submitted By
Thomas Kirstein
Submitted On
2/18/2022 5:01:43 PM
Affiliation

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Proposal 151 - OPPOSE

There is long history of allowing permits to Resident and Non-Resident hunters for Big Game in Alaska. Kodiak Bear permits have been issued by drawing since 1977 for Resident and Non-Resident hunters with the management input from the Alaska Department of Fish and Game, along with the Kodiak National Wildlife Refuge. This permit drawing process works well to allocate the permits as designed so many years ago!

I ask the Board of Game to oppose this proposal because it will harm professional guiding businesses on Kodiak Island, many of which are long established small guiding businesses. I for one would be harmed seriously should such selfish considerations take place. I operate a hunting camp on the Kodiak National Wildlife Refuge and have guided since the beginning of the permit drawing allocation for Kodiak Island. The allocation of permits for Kodiak Island works as designed to allocate permits.

Consideration: The author of this proposal sights that application fees are not being paid during the drawing application period. I would suggest to the Board of Game asking the Alaska Legislature to pass legislation to establish a fee for all registration permits and drawing permits, both online and over the counter permits for all Big Game in Alaska, Resident and Non-resident. This should apply to all hunters and any permit that is issued, anytime.

Thank you for your time and efforts serving on the Board of Game!



Submitted By

Joey

Submitted On

2/18/2022 10:51:09 AM

Affiliation

self

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King Salmon, Alaska 99613

Board of Game,

My name is Joey Klutsch. I am a lifelong resident (36 yrs) of King Salmon, AK and have served on the Naknek/Kvichak Advisory Committee for many years. I am a Registered Guide and have been guiding for 18 years, and hold 3 refuge special use permits, one in Arctic Refuge and 2 in AK Peninsula National Wildlife Refuge. I am a Bristol Bay commercial fisherman as well, during summer months. I would like to note, especially for the purpose of my comments, that in addition to being a hunting guide, I am also a resident hunter and subsistence user.

Proposals 135, 136, 137, 139: Oppose

I would like to address multiple proposals, starting with Proposals 135, 136, 137, and 139, all of which are very similar and in one way or another aim to repeal Proposal 207 [from Aug 10-Sept 20 aircraft may not be used by or for any person to locate Dall sheep for hunting or direct hunters to Dall sheep during the open sheep hunting season....]

As both a sheep guide/outfitter, working in the Brooks Range, and someone personally hunts sheep as a resident hunter going on almost 20 years (for both guiding and personal hunting), I can think of no single regulation that has more improved the quality of experience since I started. I remember, prior to the passing of 207, when it was common to see aircraft, mainly super cubs, droning around mountain tops aggressively looking for sheep, throughout the sheep hunting season. Often times I would hike on foot for 3 days, to get to a place where I wanted to hunt, or hunt with a client, only to have a pair of aircraft fly in the next day and buzz around the mountain tops, usually with complete disregard or at to the fact that someone was or may be already hunting near there. In addition to disturbing the animals, it was just plain annoying and extremely detrimental to the quality of experience. And not just for guided hunters, but for other resident hunters as well, the majority of whom cannot afford their own personal aircraft to use on personal hunts. Since the passing of 207, I rarely see people flying sheep during season. Sure, it happens once in a while, but compared to pre-207, when it was common place, it is MUCH better now, and far more enjoyable for all user groups who chose to fair chase hunt.

Opponents of 207 all use unenforceability as the crux of their arguments. This same argument can easily be made against many of our regulations, and is not a valid. Since when is the enforceability of a regulation the determining factor on whether or not that regulation should be in place? The premise of unenforceability is simply flawed. Because something is difficult to enforce should not mean that we do not have it in regulation, and it does not mean that it is not the RIGHT thing to do. When something is written in regulation, the vast majority of people will abide by that regulation, because they want to do the right thing, and in fact you don't see nearly as many people searching for sheep with their aircraft during the hunting season as we used to prior to the passage of 207.

Another argument that many people use against 207 is that they will get wrongly cited for spotting sheep when they are in fact doing other perfectly legal activities. These include but are not limited to making multiple passes over a landing site or circling while looking for a safe place to land, flying through sheep country to get to a spot to hunt, or even that they will "get in trouble for looking out the window of the plane at game as they fly by, just to name a few. I don't believe this for an instant. It is obvious to tell the difference between someone flying up a valley looking for a landing place, or getting from point A to point B, and someone who is blatantly circling mountains at the elevation in which sheep are primarily found, blatantly looking for sheep. ***The people who are citing these reasons for repealing 207 are the very people who hunt sheep primarily by the use of aircraft to spot and find them. It is simple as that.***

Then there is the biological side of the equation. Right now, in Alaska sheep populations are struggling in many areas. Die offs have caused sheep populations to fall in several ranges, and it will be some time before they come back. These die offs are well known at this point. Why would we want to allow use of aircraft to spot sheep during season, which essentially makes sheep hunting much easier, when many sheep populations are struggling? We do not need to make sheep hunting easier. People should hunt them fair chase, and earn the mountain, which is part of what makes sheep hunting so great and special.

Finally, I would argue that 207 allows for great opportunity to harvest sheep for all users. You simply do not need to spot sheep from the air to hunt them. Myself, and the many other people I know who hunt sheep fair chase without spotting them from an aircraft, have great success harvesting rams. Furthermore, the quality of experience for all users has greatly improved, residents and guides alike.

Proposal 138: Support



PC094
2 of 3

I am in full support of proposal 138, which broadens the original 207 proposal to include ALL sheep seasons, notably the August 1-5 youth season. 207 should have cover all sheep seasons. 207 creates a better quality of experience for everyone. I think it is also important to teach fair chase ethics to our youth hunters, and show them that you can hunt sheep without spotting them from an aircraft.

Proposal 271: Oppose

I would like to also address proposal 271. I am strongly opposed to 271. I hunt wolves in GMU 9, which is a predator management area where utilizing a snowmobile to "position" before shooting is legal and in fact the best method (the only effective method) to hunt wolves in winter. If 271 were to pass, the manner in which I (and everyone else) hunt wolves in the winter, utilizing snowmobiles to pursue and position, would no longer be legal. **It is impossible to approach a wolf within 300 yards while going 15 mph or less. SIMPLY IMPOSSIBLE.** While I believe the intent of 271 with regards to caribou is a good thing (running caribou on a snowmobile is most certainly bad), 271 absolutely should not apply to wolves. While you may be able to slowly put up to caribou on a snowmobile and eventually, they will stop, allowing for a clean shot, you certainly can never get away with this method with wolves. There is a big difference between positioning with the two species.

Wolves run (VERY FAST) when approached, as soon as they hear, see or smell you coming, often from a mile away or more. The only way to harvest them effectively is to cut their tracks, or spot them, and then to pursue them on the snowmobile as fast as possible, which often takes many miles before you can close within range, come to a complete stop, and shoot. Even then, the number of pursuits that end in a successful harvest are not high, and the number of hunting trips that end unsuccessfully are much more than the number that end with a harvest. It is simply very difficult to close within range even on a fast-moving snowmobile. I can attest to this, having spent countless thousands of miles over the course of the last 20 plus years, actively searching for and pursuing these predators, wearing out several snowmobiles in the process. I spend a great deal of time hunting wolves in this manner each winter in GMU 9, where it is legal to do so. If 271 passes, it will no longer be possible to effectively hunt them. The only other means to harvest wolves effectively in the winter will be trapping (which I also do), or hunting them with special permit in an aircraft in areas where it is legal to do so. In predator management areas such as GMU 9 and 17, where there is a large population or arguably an overabundance of wolves, and extremely liberal seasons and bag limits on them, there is no reason to take away the only truly effective means of hunting them, which is using a snowmobile to pursue them. Although I believe the intent of 271 is not aimed to take away this method of harvest, this is PRECISELY what it will do. **You absolutely cannot approach a wolf within 300 yards at only 15 miles per hour and have any hope of harvesting it.** There are many wolves, and it is very important for us to be able to harvest them, not only because it is the only truly effective way to hunt them in many areas, but because harvesting wolves helps the local caribou and moose populations. On good winters I have personally been able to take up to 7 -10 wolves in this manner, which helps the caribou and moose in no small way. Other hunters have been similarly successful.

I urge you to reconsider proposal 271 and exempt wolves in predator management areas where it is currently legal to pursue them with a snowmobile. While it may be possible to slowly approach caribou at under 15 mph, you simply can not get away doing the same thing with wolves. They are too smart, too wary and too fast.

Proposal 151: Oppose

Finally, I would like to comment of proposal 151. This is nothing more than another move by Resident Hunters of Alaska to reduce nonresident allocation and is a part of their concerted effort to pick away at and further restrict guided hunting. It does not benefit resident hunters. It only aims to hurt small guiding businesses.

If a guide has a hunter booked for a Kodiak bear hunt and that hunt has submitted his permit application, but then is forced to cancel due to something like a death in the family, or if the hunter gets ill or injured, a guide should be able to return that hunters deposit and book another hunter to take his place, as per the state required hunt contract. If he is not able to do this, then the hunter is out of his deposit, and the guide is short a client. It is bad for both the outfitter and the client. It is important, critical in fact, for guides to be able to replace hunters. If 151 is passed, then guides will no longer be able to do this, and it will be very detrimental.

The next reason in the pure economic benefit. On average, Kodiak brown bear hunts bring some of the highest hunt prices of any species in the state. Most of this goes back into the Alaskan economy, and the economy of Kodiak especially. Hotels, air taxis, sporting good stores, restaurants, you name it, derive income from Kodiak bear hunters. Furthermore, and most importantly, the vast majority of guides, outfitters, packers and other employees associated with a guiding operation are Alaskan Residents, especially on Kodiak hunts. This is a major source of income for them.

There is also the huge economic benefit to the State of AK, through sales of non-resident hunting licenses and tags, etc, and the Pittman-Robertson Act Funding. This is considerable and can not be ignored. The undersubscribed permits which go to guided non resident hunters provide a tremendous amount of money to the state of Alaska

Thank you for taking the time to consider my comments.

Joey Klutsch

Registered Guide 1277



PC094
3 of 3

Submitted By
John Koltun

Submitted On
2/18/2022 1:26:31 PM

Affiliation



PC095
1 of 1

I would like to express my support for proposal 199 limiting the setting of traps to outside a 50 yard corridor from established trails. I understand that most trappers are ethical and responsible. However there are those that cannot find it within themselves to consider other users of these trail systems and risk the lives of pets and children who may venture across traps that are set adjacent to or near trails. I do not believe the restrictions set forth will adversely affect any ethical trapper and therefore would not obstruct the pursuit of this traditional method of harvest.



Submitted By
Lance Kronberger
Submitted On
2/18/2022 12:48:29 PM
Affiliation

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Proposal 147 - Oppose: This proposal has very little upside and many negative unforeseen consequences that will occur.

Proposal 151 - Oppose: This proposal provides no benefit to anyone, and is a vindictive proposal from one user group toward another user group. If passed this proposal would do away with a system that has worked just fine for many years.

Proposal 241 - Oppose: Adds no conservation value what so ever.

Submitted By
Wayne Kubat
Submitted On
2/18/2022 9:24:27 PM
Affiliation
self



PC097
1 of 2

Proposal 130 – I support prohibiting commercially imported urine. I would like to see an amendment that would allow hunters in the field in Alaska to be able to use urine they collected themselves for locally harvested animals.

Proposals 135 – 137: I support proposals 135 - 137 to rescind the current restriction on spotting sheep from August 10th – Sept. 20th, that has been in effect since about March 2015. It goes way too far and is very punitive towards and singles out aircraft users. I 1000 % agree that anyone who uses aircraft to locate and access hunting areas, should be courteous and respectful to hunters on the ground. They should also maintain proper distances so as to refrain from harassing game. The definition of harass is: to repeatedly approach an animal in a manner which results in the animal altering its behavior.

Short of rescinding the current regulation, I would ask the board to consider the following language: 5AAC 92.085 (8) a person who has been airborne may not take or assist in taking a big game animal until after 3:00 a.m following the day in which the flying occurred, and from August 10 – September 20, aircraft or any mechanical powered equipment may not be used to make multiple, consecutive approaches near any sheep or group of sheep. [BE USED BY OR FOR ANY PERSON TO LOCATE DALL SHEEP FOR HUNTING OR DIRECT HUNTERS TO DALL SHEEP DURING THE OPEN SHEEP SEASON, HOWEVER, AIRCRAFT OTHER THAN HELICOPTERS MAY BE USED BY AND FOR SHEEP HUNTERS TO PLACE AND REMOVE HUNTERS AND CAMPS, MAINTAIN EXISTING CAMPS, AND SALVAGE HARVESTED SHEEP] This is similar to language in Big Game Commercial Services Board Regulation 12 AAC 75.340 (c) (10), that all guides have to adhere to for all species.

We already have harassment laws. Enforce them instead of just passing more regulations that are unenforceable. Multiple close passes are mostly what is disruptive to sheep and sheep hunters on the ground. Most hunters have cameras on their cell phones that can capture and document harassment. Proving whether you are looking at or are spotting sheep from further distances, is much harder, and perhaps unenforceable.

There has been substantial testimony that spotting sheep from aircraft is unethical. I think that depends largely on what your definition of spotting is. Small white dots that can most likely be identified as sheep, can be spotted from a plane while 2-3 miles away and further under good conditions. Even this is considered spotting and is forbidden from August 10 – September 20th under the current regulation. Many proponents of the current regulation are airplane haters who don't fly themselves and are jealous of those who do. Granted, some may have had bad experiences, but it seems pretty darn ridiculous and discriminating to me, that it can be ethical for one user group to cruise a bay or shoreline glassing for animals in a yacht with accommodations equivalent to a 5-star hotel, spotting something, and immediately pursuing it by dropping a skiff and maybe even unloading a 4-wheeler, when another group is unethical when they have to wait a day to even start hunting, and aren't even allowed to look for white spots a mile or two or even 5 miles away, during the entire general hunting season!! And how is it ethical for the Board of Game to treat one specific user group so punitive and differently?

Many pilots wear multiple hats at the same time; sheep hunters, moose hunters, goat hunters, bear hunters, tour guides and flight seeing, hauling supplies, ecotourism, trying to find a place to hunt and camp away from others, or just enjoying a fun day of flying and seeing new country. The current regulation casts much too broad of a net and makes any pilot operating in the mountains doing any of the above activities, suspect of spotting sheep. It's kind of like targeting king Salmon but using a small mesh gill net that catches everything.

Because pilots have a large investment in a plane, it puts many pilots on the defensive, and takes away from an otherwise awesome outdoor experience. The current regulation also wastes wildlife trooper time investigating.

Mountain weather can be pretty nasty. Flying is largely contingent upon decent weather and many pilots like myself, pack our gear and gas our plane to have it ready for when a decent weather system arrives. If that happens to be after August 10th, why is it asking too much to expect to be allowed to do high level and distant reconnaissance to look for landing areas, other camps and distant sheep in the area, without having to constantly look over your shoulder for being suspect of a violation?

There has been substantial testimony that the current regulation has been effective at reducing flying activity in the mountains during sheep season and improving the overall experience of hunters. Maybe – but how can they prove this? Sheep populations have plummeted in many areas and that could also largely explain less flying activity. Some outfitters in areas that still have healthy sheep populations, are reporting more flying than ever. And, just because it works, doesn't make it reasonable, fair or right.

This regulation has caused a lot of division amongst the hunting community. Shortly afterwards and as a direct result of the passage of this regulation, a special interest resident hunter group formed that has caused more contention and conflict among various hunting and conservation groups, than I have ever before seen in Alaska in the 46 years that I have lived here. Currently, the Vice President of this group, with support from the group, are suing the state of Alaska and Board of Game on allocation of Kodiak Brown bear. Before the dust settles, multiple hundreds of thousands of dollars will have been spent dividing hunters, instead of promoting conservation. Is less activity in the mountains – if that is even in fact the case - worth that cost? Certainly not to me!

As a pilot, I fear the current regulation is just the start of further demonization of those who access remote areas by bush aircraft. All you have to do is look at testimony from some of those who oppose proposals 135-137. Please delete the current reg, and instead put some teeth into enforcing and educating the public concerning existing harassment laws. Maybe something could be added to the game regulations to accomplish this. Short of this, at least consider adopting proposal 139, or some other reasonable and common-sense definition for spotting.

Proposal 138: I oppose Proposal 138 for the same reasons that I support proposals 135 – 137.

Proposal 139: I support proposal 139, but prefer proposals 135 – 137. The new language in Proposed in 139 – "aircraft may not be used to make multiple, consecutive approaches near any sheep or group of sheep - is a much more common sense and reasonable alternative, than the current regulation.

Proposal 151 – I strongly oppose proposal 151. This is a RAK proposal that is primarily punitive against guides and that improves



nothing.

Proposal 168 - I strongly oppose proposal 168. This is another RHAK proposal that is primarily punitive against guides and improves nothing.

Proposal 241 - I strongly oppose proposal 241. This is yet another RHAK proposal that is primarily punitive against guides and improves nothing.

Proposal 247 – I oppose this proposal. Predation control is sometimes necessary to establish healthy prey populations by managing predator and prey ratios.

Proposal 267 – I oppose this proposal. It is strictly allocative and shouldn't have even been considered.



PC098
1 of 1

Submitted By

Tara Lampert

Submitted On

2/17/2022 11:03:39 AM

Affiliation

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I'm writing in support of Prop 199 to introduce a 50 yard set back for traps from high, multi-use areas.

Trapping in and of itself is quite harsh (live traps would be much more humane); however, if folks are going to trap wild game, it would be best to have these traps regulated a bit off further from areas where families and their pets recreate to experience the wilderness of Alaska. An innocent pet should never have to lose their life in a trap meant for wild animals.



Submitted By

Zachary Larsen

Submitted On

2/17/2022 4:57:11 PM

Affiliation

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Regarding proposals 123 and 124, range finding sites go well beyond the intent of what archery seasons are means to be and should be kept out of archery specific hunts.

Regarding proposals 101 and 125, crossbows absolutely should not be allowed in archery seasons for any hunters. They truly are not a bow and go well beyond the intended and necessary limits of archery equipment which are what supporters the logic for even having a separate archery season during key seasons and separate from general season hunts when a crossbow could be used along side rifles etc.

regarding proposal 138, a no fly rule during sheep hunts for the purposes of scouting or locating sheep is necessary to maintain fair chase and should be upheld.

Thank you very much for allowing the Oporto comment.

Sincerely,

Zachary Larsen, former Alaskan fishing guide and future archery season big game hunter in the great state of Alaska.



Submitted By

Anne Lee

Submitted On

2/18/2022 3:12:37 PM

Affiliation

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I am writing in support of Proposal 199 Though I live in southeast, I have had one dog caught in a snare around her neck which I was successful in freeing her from with minutes to spare. I also came across a dog standing still in a neck snare which I was again successful in removing. Both of these instances were on a trail approximately 75 yards the Blind Slough Rec Area.



My name is Michael Litzen owner and operator of Litzen Guide Service a guided hunting business and air taxi. My Master guide license number is 129 and my transporters license is 647. This coming August will be my 41st consecutive year of flying and guiding sheep hunters in the Western Alaska Range. I own a lodge and 5 acers in the Northeast corner of GMU 19-C. In addition to my guide work, I have been a F&G survey pilot for 38 years and have flown projects in many parts of the state for many Alaskan species. I have flown as a spotter plane for sheep captures and lambing mortality studies around Southcentral Alaska and trend counts for sheep GMU 19-C. Thank you for your service to the board and for taking the time to hear my comments.

I want to share my strong objections to the several proposals that seek to water down or repeal proposition 207. When proposition 207 was first being discussed, I had serious concerns. On the upside I did look forward to the more peaceful sheep hunting and better experience for the sheep hunters to not have Super Cubs buzzing around the sheep, but I thought I would be limited in how I might get my clients in position to have a good chance at harvesting a legal ram. After all, I had always been one of those “airplane guys”, how was I going to be able to manage it? After thinking it through and putting the first season with 207 into practice, I became a firm believer and supporter of proposition 207. In my area it cut the sheep scouting with planes during the season to nearly nothing. Over the years of living with 207 I have only had one incident of an airplane scouting sheep during the season that I could prove and that was by one of the founding members of RHAK. When I confronted him in the field about it, he was not very pleased with me and left the next morning. Proposition 207 has had the positive effect of an all-around better sheep hunting experience for all hunters that I had hoped and that it was intended to provide.

I'm however against any action to extend 207 into the youth or subsistence sheep season. Statistics show that the youth hunters have been small in numbers so I would not expect that some scouting then would significantly affect that hunt especially considering the more general surveys one would do days away from the general season. Resident hunters and guides need that time to do some looking around to see where they might do their sheep hunting. I THINK PROPOSITION 207 IS FINE JUST THE WAY IT IS.

The next proposal I would like to comment on is proposition 267. I'm strongly opposed to passing this proposal. I believe it seeks to take advantage of the lower sheep population that now exists in 19-C to advance a self-serving agenda. I started my guide career in 19-C in 1981. All through the 1980s sheep were very abundant. I was there in the early 1990s when extremely early and harsh winters crushed the sheep population all though the Alaska Range. No action by the F&G was taken then to close or change the season in any way and the population came back strong. These kinds of cycles happen throughout history and with a full curl management strategy no action by the F&G is needed.



To put 19-C on permits or to close it would not achieve any meaningful biological objective. Protecting some rams with a closure would not grow the population of sheep. All that would do is shift resident and guide sheep hunting pressure to other parts of the state that are already being fully utilized creating a problem there. The effect would be to limit resident sheep hunting opportunity.



Submitted By

Mark Luttrell

Submitted On

2/18/2022 3:44:53 PM

Affiliation

Alaskans FOR Wildlife, and member Alaska Wildlife Alliance

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I fully support proposal 199 which would create a 50 yard setback on popular MSB trails. I've had a dog caught in a snare and I recently watched the grief of a family who's dog was crushed in a connibear near me. It's horrendous. 50 yards is barely enough.

If trappers want to brighten their statewide image, supporting this is a good start.



To whom it may concern,

I, Michael Makar, am a resident of the state of Alaska since 1974. I have hunted Dall Sheep every year that I have been able. Since my first sheep hunt, I have personally witnessed a substantial decline in sheep numbers. I have also witnessed an increase of hunting pressure to the general season Dall Sheep. Many years ago I recognized that there needs to be a limit on the number of non-resident sheep hunters allowed to hunt in Alaska. We all need to make compromises to make a healthy population again. I have not harvested a sheep since 2008 to do "My Part" and will continue to enjoy the hunt without the harvest with the hope that someday my kids and their children will have opportunities to hunt Dall Sheep.

I strongly support Proposal 267 to limit the non-resident hunting pressure on Dall Sheep.

I support Proposal 151
I support Proposal 241

Thank You, Mike Makar

Submitted By

Anthony Marchini

Submitted On

2/16/2022 1:30:28 PM

Affiliation



PC104
1 of 1

I would like to take this time to comment on proposal #267. I am a born and raised Alaskan (growing up in Glennallen) I am apposed to this proposal for a number of reason. While I do guide in the falls most years I am first and foremost a hunter for myself, both to provide for my family and the enjoyment that I get from being in nature. 1) closing or making this area a draw only will just move the pressure that sheep hunting causes to different areas in the state. This will just drive more hunters into the Wrangell, Brooks, Whites ect. This does not fix the problem. The current population issues are that of nature and of timing. Record snow falls 8-10 years ago that had very low lamb survival rates coupled with recent hard winters that caused mature ram fatalities of a small number of animals in that age class already. If it is thought that hunting pressure is the reason that numbers are on decline then a more statewide approach must be made. Removing the bulk of the open area in the Alaska Range is going to have effects for the entire state. Nature and animals are cyclical, ebb and flow, up and down. There were large sheep declines in the 90's followed but large population spikes in the 2010's. A drastic change in management in my opinion would have downstream effects.

2). I believe that the statistics associated with this proposal are in some manners misleading. Most educated residents know that there has been a large mature ram die off in 19C and therefore have not hunted it the past few years. I know myself I have looked into other ranges to chase my quarry personally. I would hate to see even more pressure moved into other areas of the state when it is not necessarily needed currently. There has not been a population study done by F&G for two years. While it is known that numbers are down in some manner a true sense for what that looks like is not known as a sheep count hasn't been done since 2019.

3) closing or making 19C draw doesn't magically make more harvestable sheep. Lambs and ewes are not effected by sheep hunting season. This is just a temporary appearance of a fix that has no long term benefit. The past 3 years I have averaged 30-40 days in the field with the majority of those days spent in the mountains chasing sheep both for myself and clients. In 19c the past two years I have seen a large number of sub legal rams in the 5-7 age class and a tremendous lamb survival rate personally. Lamb survival in recent years from my observation is >75%. On average 3/4 ewes have lambs with them. Two years ago it was over 80% in my observation. While I am a hunter, I also like to look to my future and how the resource is fairing overall. If 19C was to close for 2 years and then open again in 2024 the madhouse and pressure that would happen over there would not make for a good experience for anyone resident or non.

Lastly and not directly related to prop 267 I would also like to **NOT** see the repeal of 207. I have a supercub and use it. I do however like the fact that while I am out sheep hunting I am not seeing any planes "pounding" the animals from the air during season. I have been impressed for the most part on how the air traffic has also gone to nil in the areas I frequent during open sheep season. This adds to the overall wilderness experience that I am looking to have while out in the woods



Submitted By
Kori Marchowsky
Submitted On
2/17/2022 9:45:58 PM

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Resident

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I express my full support for the trapping restrictions as described in Amamded Proposal 199. Please approve this proposal which helps to protect many ways of life of Alaskans who live off this great land. There are places for everyone, including trappers. But there are places where others should be free to enjoy our great spaces as well, without risk of losing their animal in a trap. Thank you for considering my comment and the values that are important to me, my family and my community.



Submitted By

Joe Mathis

Submitted On

2/16/2022 8:31:23 AM

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I'm commenting on proposal number 265.

I found it very difficult to obtain a moose hunt last year, specifically in Unit 22E. The current regulations made it impossible for me to acquire a non-resident moose tag. I live in a rural area in Alabama that does not provide fast internet service, so having slow internet service WAS NOT to my advantage. By the time I was in the first stages of the process, the tags were already taken. This was extremely frustrating.

I have planned accordingly for such a moose hunt but with it all ending because THE INTERNET was THE ISSUE. Really! There has to be a better way for non-residents to have the same access advantage to acquiring a moose tag. A "race to get a tag" should never be an option when everyone does not have the same speed of internet in the world. A drawing for a moose hunt allowing for a more logical time frame to apply for a draw would make more sense and be more reasonable than the existing registration process.

Internet advantage should never be a deciding factor in who gets a tag.

I appreciate the opportunity to express my concerns.

Thanks,

Joe Mathis

Submitted By
Melissa McCombs
Submitted On
2/16/2022 12:09:15 PM
Affiliation



PC107
1 of 1

I am asking the Board of Game to support Proposal 144 and for TNVR programs; TNVR programs are good for cats and also for communities and my local area has had a lot of success when the program is supported. Alley Cat Allies is an organization that provides great information and resources of the importance of TNVR programs.



Submitted By

Sari McConnell

Submitted On

2/14/2022 10:28:21 AM

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Hi! I am writing to support Proposal 144 and TNVR programs. I ask that the Board of Game also supports Proposal 144 and to exempt sterilized community cats from the list of species prohibited from being released into the wild.

I have worked here in Los Angeles with TNVR/ Community Cat programs for a few years now, and they really work. One instance is of an elderly lady near me who was overrun with cats and kittens - a neighbor had dumped some cats that she fed, and of course they bred and grew in numbers very quickly. It was not a good situation until a local TNR group stepped in, fixed & vaccinated all the cats and kittens, adopted out the ones they could, and returned the older cats to the property. I go there every day to feed these cats. There has not been any bird killings so far as I am aware. The neighbors are happy that the situation has been resolved successfully in this way. No nighttime fighting or yowling. These cats are healthy and happy where they are. The alternative would have been to euthanize them all - which is horrifying.

So long as someone in the community is on board to feed and watch out for TNVRed community cats, it is absolutely an excellent way to deal with these cats, and I hope that Alasks will allow this to happen. It is win-win.

Submitted By
Erin McDonald CVT
Submitted On
2/14/2022 6:52:53 AM
Affiliation



PC109
1 of 1

Make it a go for Proposal 144. Support trap neuter vaccinate return procedures for these felines. Scientifically proven to work.



Submitted By

Lauren McGough

Submitted On

2/15/2022 5:48:51 PM

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I would like to address Proposals 108 - 114.

Proposal 108: I support this proposal if amended to say: "Taking of eyases for non-residents statewide of any species of raptor legally allowed to be taken in Alaska, up to five permits for taking, transporting, or possessing a passage raptor for falconry; up to ten permits for taking, transporting, or possessing an eyas raptor for falconry legally allowed to be taken from May 1- July 20."

Reason Take by Alaska resident falconers is of no significance biologically for any species of raptor. Hence, take of up to 15 raptors by non-resident falconers would also be of no biological significance. Additionally, although the Alaska Falconers Association (AFA) claims that it is difficult to tell eyas peregrines and gyrfalcons apart, this is NOT the case in practice. Adult raptors aggressively defend their nests and adult birds would be seen on site defending the nest. The coloration on chicks also differs significantly. Gyrfalcon chicks have grey beaks, ceres (the fleshy area above the beak) and feet while peregrines possess very pink beaks, ceres and feet. Identifying gyrs and peregrines at any age is not an issue.

Proposal 109: I strongly disagree with this proposal

Reason: AFA falsely claims "Alaska raptors that are commonly used for falconry (except Gyrfalcons) are readily available to falconers in the continental United States"

Gyrfalcons are readily available to falconers in all states in this country. They are bred in captivity as commonly as peregrines, goshawks, harris hawks and a multitude of other species. In addition, multiple other states allow take of gyrfalcons including Washington, Oregon, Idaho, Montana, Wyoming, North Dakota, and others. Alaska is not the only state that allows take of this species that AFA claims to be "uncommonly available." They are wrong on this account both in terms of birds available for take in multiple states in the wild and from captive breeding projects.

Proposal 110: I strongly disagree with this proposal

Reason: AFA is using verbiage that directly contradicts what they are proposing. They propose to "extend" the non-resident season from Aug 15-Oct 31 to Sept 15-Nov 15. This season they are proposing would be 15 days SHORTER. If this proposal were to be adopted a non-resident trapper may be forced to trap in winter conditions, combating all the issues that may go with below freezing temperatures and snow. This proposal restricts a non-resident's chances of securing a bird after spending thousands of dollars to take such a trip in rural Alaska. Alaska is known for adverse weather conditions that can make trapping or traveling impossible. Shortening and pushing back the trapping season unfairly pushes non-residents into a shorter time frame for success and more likelihood of adverse weather. In the last seven years of non-resident take, only three gyrfalcons have been taken from natal territories by non-residents.

Proposal 111: I strongly disagree with this proposal

Reason: Only 13 non-residents applied for a permit to trap in 2021. The Alaska non-resident take has so far never met its quota. Only 37.9% (29 permits available over 7 years, 11 birds exported) of the total permits issued so far have resulted in the export of a raptor. The four year rule being proposed is pointless because the applicant pool is so low already and the odds of drawing the permit are so high already. With an already low number of people applying for a nonresident permit there is a high chance of any one of the applicants being successful in drawing a permit but not necessarily successful in capturing a raptor.

The big game hunts that this proposal references where successful applicants have to wait four years before applying again is comparing apples and oranges. Hundreds to thousands of people apply for big game hunts in Alaska for a handful of permits. Non-resident falconry permit applications thus far have never numbered more than 26. The average number of applicants when you divide the numbers by 7 years is 20.7. If this proposal were to go through and roughly 20 people applied per year, you would be out of applicants in short order. Additionally, this is an attempt to fix a problem that doesn't exist. The total number of individuals who have applied in the last seven years is 63. The number of people who have applied every year and won is 5 individuals. The number of people who have won more than once is 4 out of 63 individuals over 7 years. The number of people who have applied *once* and won is 6 individuals. Therefore, arguing that it is unfair to let someone apply every year when only 4 out of 63 individuals have won more than once in 7 years is baseless.

Proposal 112: I support this proposal

Reason: Alaska hosts healthy populations of all native raptor species found breeding there. In addition, the landmass of Alaska is one-fifth the size of the entire lower 48 (per alaska.gov) with a very low number of resident falconers (less than 50, per ADF&G). Many other states in the lower 48 have much smaller resource availability and no limits (except for peregrines) on the numbers of non-resident falconers applying for take, including Texas, Kansas, Indiana, Wyoming, Minnesota, Wisconsin, Oklahoma, and Washington to name a few. Oregon, a state with a non-resident quota for example, allows 20 non-resident permits in a landmass incredibly small compared to Alaska. Biologically, Alaska would stay well below the threshold of significance in regard to raptor take if all residents and the average number (20.7) of non-residents took birds each year. Furthermore, not all residents will take birds every year and that holds very true with non residents as well. The quota for non-resident take has never been met in the 7 years of this program. In 2020 and 2021, zero birds were taken on non-resident permits. That wasn't from a lack of trying - my close friends that were drawn spent a lot of time and money those years in an attempt to trap a raptor and were unsuccessful. Alaska most certainly can biologically afford to allow unlimited take for non resident permits since the chances of success remain low.

Proposal 113 I support this proposal as amended below. Rather than having three different drawings for peregrine, gyrfalcon and other species, take should be unlimited for reasons addressed above: the quota for non residents has never been met and the resource is healthy and stable enough to allow unlimited take at this time. If the above proposal were to be adopted, it would force a permit holder to decide which species they were targeting before knowing their travel plans, weather and seasonal influences on these species. Alaska has already determined that the season allowed for resident falconers is safe and biologically sound. Multiple states allow non-residents to trap the same numbers and during the same time as residents. I propose a change FROM "issue annually: up to 5 permits for a gyrfalcon (*Falco rusticolus*); up to 5 permits for a peregrine falcon (*Falco peregrinus*); and up to 5 permits for any other raptor species listed under (f) of this section."

TO: "Nonresident take permits for raptors shall have the same quotas as resident take. Take is limited to two raptors either eyas or passage, hatching- year-raptors; Include all raptors in section (f) for nonresidents."

I agree with all other portions of this proposal to clear up language and to extend the non resident trapping season to be in line with resident trapping season (Alaska Falconry Manual Part 34 - Taking of Raptors "An eyas or passage bird may be taken any day of the year.")

Proposal 114: I strongly disagree with this proposal.

Reason: If this proposal were to be adopted a non-resident trapper may be forced to trap in winter conditions while attempting to rent the correct gear (e.g. snow machine) and combating all the other issues that may go with below freezing temperatures and snow. This proposal restricts a non-resident's chances of securing a bird after spending thousands of dollars to take such a trip in rural Alaska.

The cost of trapping in a remote area of Alaska is extremely high and perhaps why there are low numbers of applicants for these permits to begin with. A proposal to push back and restrict trapping dates will only add to the cost of a non-resident's trip due to weather conditions. Shortening and pushing back the trapping season unfairly pushes non-residents into a shorter time frame for success and more likelihood of adverse weather.



Submitted By

Grant McGregor

Submitted On

2/16/2022 4:11:04 PM

Affiliation

I oppose proposition 137. I believe that flying to locate sheep between August 10th and September 20th should remain restricted. I am a life long Alaskan, a sheep hunter, and pilot and having this restriction in place has not limited my harvesting or those I am associated with harvesting of sheep. In my opinion it promotes fair chase hunting. Since this measure was inforced I have personally watched the amount of air traffic reduce during hunting season which helps hunters who are in the field not have the sheep they are pursuing disturbed or spooked. It is incredibly frustrating to be in the middle of a hunt and have a pilot or multiple pilots spot and fly (possibly disturbing) the sheep you are stocking. As the writer of proposition 137 said, residents may only get one week to pursue sheep due to work restrictions and I personally am in that category. I get one opportunity to hunt sheep each year and my time off work is limited but I feel more confident in my ability to find sheep on the ground during season and not having to worry about the next plane that's going to fly around the corner and disturbance and possibly spook the sheep I am after. The board made an excellent decision to pass this measure into effect years ago. Please leave it in effect for years to come.

Submitted By

Grant McGregor

Submitted On

2/16/2022 5:13:27 PM

Affiliation

I support proposition 213. Federal restrictions have reduced the area to hunt tier 1 caribou and moose. Those hunting tier 1 caribou should not be restricted to hunting moose in unit 13. As someone who had hunted the area for a decade I have personally seen the caribou quota go down, the competition and number of hunters go up, and the huntable land go down. Please allow tier 1 hunters to hunt moose outside of unit 13.



Board of Game members,

My name is Wynn McKinnis and I am from Palmer, Alaska. I would like to address Proposition 199, which restricts trapping on certain Mat-Su Valley trails. I oppose this proposition. I have been trapping for seven years and have a small business related to this hobby. I desire that future generations are able to participate in this tradition with the freedom that I have had. I do not support this proposition, not because of its restricting nature, but because of its origins. The Alaska Wildlife Alliance is anti-trapping and against “extreme forms of wildlife management.” This includes effective management solutions such as aerial wolf hunting and other predator control programs. The motto for this group is to “Let nature run wild.” As you no doubt already know, this approach to wildlife management results in dead zones and dramatic fluctuations in both predators and prey. Keeping predators and prey in check ensures that all alaskans have the opportunity to utilize both groups to their maximum potential. That being said, I am greatly concerned that this proposition is a facade, exploiting public concern about pet safety to advance this anti-science approach to wildlife management.

To my knowledge, none of the trails listed in the revised proposition have had recent instances of pet/trapper conflicts. That says to me that this proposition should not be taken at face value. If pet safety was the real issue, this proposition would focus on the trails that have had past conflicts. I encourage the board to vote this proposition down and start fresh with a proposition drafted by a group without ulterior motivations.

If the Board of Game decides that it is in the best interest of the State of Alaska to approve this proposition, I do have one suggestion. Gold mint trail to mint glacier should be taken off the list of trails. I have trapped extensively for the last four years up this valley from November to May. I have never seen another person past mile 1.5. The trail typically ends at the first beaver pond on your right, with no defined trail from there on. Pet safety is not of concern on gold mint trail. Thank you for the opportunity to state my opinion. I hope you will consider my reasoning. I would've like to give my testimony in person but am unable to due to work.

Thanks again,
Wynn Mckinnis



Submitted By
Tom Meacham

Submitted On
2/18/2022 10:25:19 AM

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self

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My wife and I support the adoption of Proposal 199. This proposal would resolve conflicts between trappers and other recreational users of identified public trails and recreational sites by establishing a "no-trap" buffer between these uses. Ethical trappers usually respect other outdoor users, but without an enforceable boundary, there will always be lapses. This proposal will enact minimal trapping ethics into law, and is long overdue. Please adopt Proposal No. 199. Thank you.



Subject: Comment on Proposal 199

I'm trying to submit this comment via your online form. However, there's a technical difficulty: for 15 minutes it has not been transmitted, nor have I received a confirmation email.

My name, address, and contact info are below. I am a retired biologist (I have no affiliation) and a user of trails.

I strongly support the proposal to keep traps at least 50 yards away from trails, campground premises, road pull-outs, and commonly used roads. At all times of year, these places are used by the public, including by their dogs. Dogs (and occasionally people) go into the brush or woods next to trails. The regulations need to protect people who are pursuing recreation in Alaska's outdoors-- not just our trappers!

Thank you for the opportunity to comment.

--Vivian

Vivian Mendenhall, PhD
Anchorage, AK 99516, USA



PC115
1 of 1

Submitted By
doretta miller

Submitted On
2/14/2022 8:01:21 AM

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please support proposition 144,the trap neuter release progfrm for cats thanks

Rebuttal to Proposal 144 which requests the Board exempt "sterilized community cats" from the list of species prohibited from release into the wild per 5AAC 92.029 (b). Comments below are to specific quotes (*italicized, highlighted*) in said proposal with page numbers appended to each quote:

"Based upon this section, there is evidence to suggest that cats: (1) is (are) capable of surviving in the wild in Alaska and (6) is captured from the wild for use as a pet." (p. 2)

Items (3), (4) and (5) from this section likewise apply to domestic cats, but Prop. 144's author didn't see fit to mention this for some reason. Refer to Prop. 145 or to 5AAC 92.029 (b).

Also, it seems unclear whether the author of Prop 144 understood that the aforementioned list is of domestic species which may NOT be released in the wild BECAUSE they meet the listed criteria--for example because (1) a species is capable of surviving in the wild in Alaska, releasing it is prohibited.

"Working with AACC, Mojo's Hope has helped rescue, rehabilitate, and rehome over 35 cats in one isolated area. Most of these cats were either trapped or caught, then vetted, spayed/neutered, rehabilitated, and rehomed..." (p.3)

"Most"--TNR practitioners tend to obfuscate the facts of this issue by omission and imprecision. Analyses/modeling of TNR efforts throughout the US and Canada found that TNR "success" rate was a mean of < 1% (range 0.7%-3.7%).

The remaining 96.3%-99.3% of said "colonies" were neither trapped, vaccinated nor neutered.

<http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0192139>

Another omission--an egregious one--is that the proposal makes no mention of invasive felines' deleterious impact on public health and native biodiversity. TNR practitioners seem to operate as if *Felis catus* is the only species that matters.

Secondly, the author of Prop. 144 admits the remaining cats in her example were illegally released:

"Another area of town, 24 cats were trapped, all were vetted, spayed/neutered and out of the 24, 19 went up for adoption and five were returned to site." (p.4)

Again, this is in direct violation of 5AAC 92.029. Should those who flout state regulations have a voice in modifying them? And as demonstrated in Prop. 145, those five unconfined cats will continue to destroy an estimated 400 native mammals and birds annually for the remainder of their lives.

Also, "*went up for adoption*" doesn't necessarily mean they were actually adopted.

"...the term “community cats” reflects the reality that for these cats, “home” is within the community rather than in an individual household." p. 6

F. catus' home is not North America--it was bred from an Old World species (*F. sylvestris*) and brought here by human agency. Interestingly, we don't call invasive common and Norway rats "community rodents". We call them *invasive species*, and rightly so. *Rattus* spp. are recognized by the IUCN as the only invasive terrestrial vertebrates more destructive than *F. catus*. It's highly illogical (to say nothing of irresponsible) to argue it's somehow our community's burden to perpetuate invasive, reflex-killing disease vectors in our environment just because a small vocal minority of people are "fond" of them. The responsible--and in Alaska the only legal--options are to keep them confined or eradicate them. That some people find them 'cuter' than rats isn't a viable basis on which to predicate public health policy and environmental stewardship.

"They have three options:

"1. Trap-And-Remove (i.e., Catch-and-Kill): Cats are trapped, brought to a shelter, and, because most are not socialized to people and are unadoptable, killed. Any remaining cats in the area quickly breed to capacity, or new cats move in to take advantage of the newly available resources." p.6

This is inaccurate and/or dishonest: it refers to the so-called "vacuum effect", which doesn't apply to artificial aggregations of animals subsidized by human feeding. The cats are there because they're fed. Stop feeding them and they disperse. An analogous situation has been observed near the pink salmon hatchery in Kitoi Bay (Kodiak). As long as returning hatchery salmon are present, large numbers of brown bears are attracted to the hatchery site. Once the salmon are gone, the bears disperse.

Also, cats are non-hierarchical, solitary predators, which means they're not really territorial--not with respect to food or to mates. They don't naturally form "colonies". If the "vacuum effect" had any validity with respect to these human-subsidized feeding aggregations, there would be no so-called "cat-colonies" to begin with. Where cats are not fed, there ARE no "colonies".

"2. Trap-Neuter-Return (TNR): Cats are humanely trapped, spayed or neutered, vaccinated, ear-tipped, and returned to their outdoor home where they will continue to live while keeping newcomers at bay. Over time, TNR stabilizes or reduces community cat populations by stopping the breeding cycle and preventing unwanted litters of kittens." p.6

Problem is it doesn't, and in six decades of TNR it never has. As mentioned earlier, "successful" sterilization rate in such colonies in North America ranges from 0.7%-3.7%. Mean population increase rate among feral cats (per PRO-TNR researchers F. B. Nutter and J. K. Levy) is 29% annually. A simple rate comparison demonstrates that population reduction via TNR is mathematically impossible.

To make matters worse, TNR practitioners ignore required post-inoculation quarantine periods which, depending on the anti-rabies vaccine used, are from 10 to 30 days. If inoculated animals are immediately returned to sites where they can be re-exposed after treatment, immunity is NOT effectively conveyed.

"3. Do Nothing: Cats continue to live outdoors without being spayed or

neutered, vaccinated, or provided veterinary care if injured or sick. As a result, community cat populations are not managed, public health and resident concerns are not addressed, and animal welfare implications are not considered." p. 6

Ironically, doing nothing would be an improvement, as TNR is far worse. Feral cat population increase directly correlates with the advent of TNR in the USA. Again, basic biology applies here--populations rise and fall according to food supply, whether we're talking yeast or elephants, and TNR practitioners invariably feed their colonies. See fig. 1, p. 2 in the link below:

https://wallaceacademy.academia.edu/25382290/What_Conservation_Biologists_Can_Do_to_Counter_Trap-Neuter-and_Return_Response_to_Longcore_et_al?email_work_card=view-paper

"The methods of catch and kill are not reducing the population and also has hindered the process of rehabilitating those with adoption possibilities." p.6

A PhD dissertation by Inbal Brickner (Brickner/Yom Tov, Hebrew University of Jerusalem, 2003) including an unpublished study by the Israeli Natural Resources and National Parks Authority, found that a strategy of sustained hunting by NRNPA Rangers and licensed civilian hunters achieved 90% feral cat population reduction in one wildlife reserve in only five years (1997-2001). In more than six decades no TNR program on earth has come within two orders of magnitude of this success. In fact, TNR has never been scientifically proven to eliminate feral cat populations anywhere.

Some critics have characterized TNR as a "euthanasia avoidance scheme" rather than a cat population reduction scheme. As for eradication "*hindering the process of rehabilitating (cats) with adoption possibilities*", touting "adoption" as a solution for stray/feral cat overpopulation is as unrealistic as TNR itself. In the last two decades only one-third of US households owned even one cat.

On the other hand, the International Union for the Conservation of Nature has documented 87 successful cat eradication programs, mostly but not exclusively on islands.

[\(PDF\) A Review of Feral Cat Eradication on Islands \(researchgate.net\)](https://www.researchgate.net/publication/25382290/A_Review_of_Feral_Cat_Eradication_on_Islands)

"TNR is recognized worldwide as the most effective, sustainable, and humane approach to community cat management." p.6

The only organizations "recognizing" this are extremist advocacy groups and grifters like Animal Best Friends Society, HSUS and Alley Cat Allies. Conservationist and public health organizations condemn it. Even PeTA

denounces TNR as inhumane and ineffective.

In a time when false narratives are routinely foisted on the American public for fun and profit, it's hardly surprising that science denial and other absurdly false narratives are promoted by unscrupulous and/or misguided people. Despite four decades of TNR in North America the stray/feral cat population continues to increase by about 29% annually. After six decades of TNR in the UK the stray/feral cat population has more than doubled.

To tout TNR as "effective and humane" is to ignore the reality that it subjects cats to stressful handling and veterinary procedures followed by abandonment-post-spay/neuter protocols, such as monitoring for surgical infections, and quarantines after rabies vaccinations are almost never followed.

"Cities and shelters across America have stopped using the Catch-and-Kill approach because it is expensive, time-consuming, and ineffective." p. 6

Euthanasia injections cost from \$50 to \$150 per cat depending on region. Death from the injection is nearly instantaneous. The costs of sheltering, feeding and medically treating the animals don't apply. Cost of incinerating carcasses is minimal.

Euthanasia is far less "time-consuming" than TNR where associated costs continue for the life of the cat. Indeed, inefficacy of trap/destroy efforts reflects the trapping aspect, for the same reason TNR is itself ineffective. Cats tend to be trap-shy at best, particularly after being previously trapped. Live-trapping cats is time-consuming and often difficult--it forms a 'bottleneck' in any effort to "manage" stray/feral cat populations. This is why we advocate in Prop. 145 that cats be designated a deleterious exotic species and eliminated from our environment through sustained hunting per 5AAC 92.990 (21), 5AAC 92.029 (b), (d), (h) and AS 16.05.940. Indeed, nearly all the "negative" aspects of trap/destroy likewise apply to TNR with the exception that after a relatively painless injection the cats don't wake up.

"The good news is this group regularly traps, sterilizes, and vaccinates cats and kittens who are good candidates for socialization and adoption, which does help reduce the number of breeding cats in the community." p.7

Except that it doesn't. For some reason TNR advocates are quite willing to argue that euthanizing cats creates a "vacuum" whereby new cats can enter a population from elsewhere while simultaneously maintaining a clearly contradictory and illogical position that removing cats from the environment and socializing them for "pets" does not. Of course, they have never offered any evidence to support this specious claim.

"Every animal impounded at a shelter requires expenses for housing, sanitation, comfort, medical care, and, especially for community cats, euthanasia. Once a shelter stops taking in feral cats, and their population is stabilized or reduced, fewer animals enter the shelter and fewer expenses are incurred." p.8

Again, why does TNR supposedly reduce shelter expense and overcrowding, but euthanasia does NOT? The primary flaws in this argument are:

- (1) After four decades of TNR, most shelters are still overcrowded with unwanted cats to where they can no longer accept more.
- (2) The claim of "reduced shelter intake", long used by TNR advocates as "proof" of TNR efficacy, does NOT reduce feral cat numbers in our environment. Such "logic" is predicated on a tautology: "*Our shelter intake is reduced because we're no longer taking in cats.*"

That Prop. 144 remains utterly SILENT on the issues of public health and biodiversity in its advocacy speaks volumes for the myopia and destructive irresponsibility of TNR generally, and this proposal specifically.

A Case of Letting the Cat out of The Bag—Why Trap-Neuter-Return Is Not an Ethical Solution for Stray Cat (*Felis catus*) Management (nih.gov)

In closing, the lack of scientific acumen in TNR arguments and claims has long been a problem in attempting to engage its proponents in reasonable discussion.

After decades of biologists and conservationists reminding TNR advocates there was no supporting science to their claims, two of the worst propagandists of their movement--Daniel Spehar and Peter Wolf--attempted to promulgate some "research", and with the help of "Animals Best Friends Society funding (and what passed for "peer review" by mostly anonymous reviewers) manage to get two "research papers" published in the journal "Animals". Note--neither Spehar nor Wolf are biologists.

Since Prop. 144's author included links to the aforementioned papers attached to, and in support of, her claims, we have included rebuttals to both Spehar/Wolf papers by Rick Sinnott, Certified Wildlife Biologist for the State of Alaska. Said rebuttals were first published by the American Bird Conservancy:

<https://www.trapneuterenclose.com/static/img/tnr-study-review.pdf>



https://abcbirds.org/wp-content/uploads/2020/03/Sinnott-2019_Citizen-science-or-pseudoscience_Response-to-Spehar-and-Wolf-2018.pdf

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Submitted By

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Submitted On

2/17/2022 9:19:28 AM

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Proposal I08:

Summary: Allow non residents "up to five permits for taking, transporting, or possessing an eyas Northern Goshawk for falconry statewide, and up to five permits for taking, transporting, or possessing an eyas Peale's Peregrine from units 1-4, for falconry by a nonresident"

- The AFA (Alaska Falconer's Association) has decided to offer us limited eyas take on one hand, but with very strict restrictions on both eyass and current passage take on the other that is laid out in Proposals 109,110,111.
- Only allowing units 1-4 in a small southern portion of the state, not exclusive to "Peale's Peregrines".
- Exclusion of Gyrfalcon take is based on unfounded claims and or proof by the AFA (Alaska Falconer's Association), which paints non-resident falconers in a negative and criminal light as referenced in their Proposal 110. The AFA maintains the reason for restriction of take to units 1-4, is due to the fact it is difficult for falconers to differentiate between Northern Goshawks, Peale's Peregrine, and Gyrfalcon eyries and eyasses. Experienced falconers can clearly tell the difference.
- We conclude that it is much more difficult to differentiate a Peal's peregrine and a Anatum Peregrine being both peregrines and much easier to see the difference between a Peregrine falcon and a gyrfalcon.
- This excuse to only allow take in units 1-4 is a very weak argument at best.
- Proposal 113 allows 5 Northern Goshawks 5 Peal's Peregrine.e and 5 Gyrfalcon"s either a eyass or a passage raptor statewide as is offered for residents.
- **We do not support proposal 108** and ask that you consider Proposal 113

Proposal I09:

MICROCHIPPING. "All wild caught live gyrfalcons exported from the state by a nonresident must be microchipped and the microchip must be registered with an internationally recognized microchip registry such as (Petlink)"

- AFA claims that microchipping is "overburdensome", and should only be required for non-resident take.
- AFA shows great concern for protecting what they claim are "highly valuable" Gyrfalcons, yet only the ones taken by non-resident falconers.
- It is clearly stated that the entire lower 48 (Non Residents) can only export up to 5 Gyrfalcons annually, and being wild caught these birds cannot be sold/bartered. Said value of these birds is not monetary
- The AFA is using a poor excuse to exclude themselves from the microchip requirement, which is a regulation they brought onto themselves at the 20172018 Game Board meeting. If the microchip process is "overburdensome", as they say, it is a burden they wish only non-residents to endure.
- **We do not support 109** and ask that you continue to microchip all falcons required so they can be tracked inside and outside the state.

Proposal 110:

Summary: Delay of Non-Resident Passage Take Season to a potentially dangerous time frame.

Currently the non-resident passage take time frame is from August 15-October 31st. The AFA is requesting a DELAY of that time frame (billed falsely as an •extension') to the dates of September 15 - November 15.

In 2017/18, the proposed start date of September 5th, was denied due to deadly weather concerns and the dangers ii posed lo non-residents.

The AFA claims this is to ·reduce the disturbance of nesting sites", and better align the time taking with the dispersal timing of Gyrfalcons from their "natal areas; but have no desire to change the current resident window, only non-residents.

Il should be noted, currently an Alaskan resident can take up to 2 Gyrfalcons a season, within the current time frame.

They do not propose to restrict themselves out of these concerns.

Concerns for white Gyrfalcon harvesting is totally unfounded and backed with no facts since its only residents who are allowed to climb nest and hand pick a white gyrfalcon. Non residents do not climb or disturb nest.

Less than 5 white gyrfalcons have been taken for nonresident draw the first 5 years and most have been either Grey or Silver in color.

Concerns of disturbing the nest sites are overblown. In the last 5 years an average of 2 Gyrfalcons a year were taken by non-residents, and of the 10 total, only 3 were taken near the date of August 15th. No birds were taken direct from the nesting cliff. Non residents don't climb nest only RESIDENTS do!

Within the current timeframe starting August 15 the beginning of non resident lake, falcons are tully fledged and hard penned. There is no climbing of nests, or disturbing of nest sites by Non residents.

It should be noted Proposal 114, which is brought forward by the Alaskan Department of Fish and Game, mirrors AFA's Prop 110.

WE DO NOT Support 110 it's not safe to start the season later as was discussed at the Game Board meeting In 2017/2018.

The AFA, without any proof, using the argument that illegal falconry trade is a reason for further restricting non-resident take. They do not show the same concern for the current resident take, which paints falconers from the lower 48 as being more likely to commit criminal



activities than themselves.

The AFA promotes a false narrative, that there is a specific interest in "white Gyrfalcons".

Captive breeding within the United States, and abroad, has significantly reduced any need or existence of illegal trade. Gyrfalcons are readily available and bred within the US every year, where white F2 generation Gyrfalcon's are regularly advertised for \$4,000 or less. The AFA has chosen to portray a false concern of "illegal falcon trade" activities, in order to restrict the already very minimal non-resident take, yet shows no concerns to restrict themselves for the same reasons. The message is clear, which is that the AFA is telling their Board of Game that non-resident falconers are more likely to commit criminal activities than themselves.

WE DO NOT Support 110 it's not safe to start the season later as was discussed at the Game Board meeting in

201712018

Proposal 111

AFA proposes to Limit non resident take of raptors to one every four years. And to limit unsuccessful permittees from applying the following year. The "one in four" management system used in other areas

does NOT apply for a very limited and small number of non resident applicants. The drawing has always had less than 30 non residents apply for the 5 permits and in 2021 less than 20. Applying

once every 4 years would greatly reduce the number of applicants to almost zero after a few years.

We do NOT support Proposal 111

Proposal 114 (Alaska Game and FISH)

They propose to change season dates from August 15 start to September 15 start date

Proposal 114 is essentially the same as that offered by AFA's Proposal 114.

All my comments on proposal 110 apply to this proposal 114

As noted in my proposal 110 comments, the delay of take season makes it extremely hazardous

for a permittee which is why a similar proposal was turned down in 2017

DO NOT Support 114 it's not safe to start the season later as was discussed at the Game Board

- It should be noted Proposal 114, which is brought forward by the Alaskan Department of Fish and Game, mirrors AFA's Prop 110. in 2017/2018.

Proposal 113 (California Hawking Club)

- I ask that you pass Proposal 113 to allow the take of 5 Northern Goshawks, 5 Peale's Peregrines and 5 Gyrfalcons. For non residents statewide. Please refer to our proposal with facts to back our proposal for non resident take.
- Please consider proposal 113 as a common ground compromise which includes the 5 eyass take of Goshawks and Peales as the AFA is in support in proposal 108.

• I SUPPORT PROPOSAL 113



Submitted By

Ryan A Moglich

Submitted On

2/17/2022 3:00:06 PM

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Hello, my name is Ryan Moglich, a falconer in Nevada. I am writing in regards to the new proposed falconry regulations.

Starting with Proposal 108, proposed by the Alaskan Falconry Association (AFA). This proposal has been falsely advertised as a step in the right direction for Non Resident Take, specifically Eyass take. It needlessly prohibits Peale's Peregrine take to Units 1-4, an area where Peale's and Anatoms both reside. It also excludes Non Resident eyass Gyrfalcon take, which is currently available to Residents who can each take 2 per year, every year. Non Resident Take has no impact on wild populations, the lottery system is already limiting enough.

Proposal 109, which is another Alaskan Falconers Association Proposal, requests all gyrfalcons caught by Non Residents be microchipped. The AFA believes that only Non Residents should have these falcons micro chipped, in what they claim in their own words, is a "overburdensome" requirement. There is no impact from Non Resident Take on the wild Gyrfalcon population. No information has been brought forward to prove otherwise. These falcons taken can not be sold or bartered, their value is in their genetics for the sport of falconry and the continuation of captive breeding efforts.

Proposal 110, proposed by the AFA, asks that the Non Resident Take of passage birds be DELAYED (which is falsely billed in their words as an "extension") to the dates of September 15-November 15. Previously in 2017, the start date of September 5th was denied by the board due to weather concerns and the dangers it posed to Non Residents. While the AFA claims that this change is to "reduce the disturbance of nesting sites", they are not making the same proposal for their own take period. The most disturbing claim within this proposal, is the AFA's insinuation that non residents are a severe threat to nest white gyrfalcons through illegal trade. Neither the Alaska Fish and Game or the AFA can show any evidence to back these allegations of illegal take or trade. In the history of non resident take in Alaska how many people have been arrested/charged? Less than 5 white gyrfalcons have been taken from non residents during this time period. Gyrfalcons are readily available through captive breeding in the lower 48. The worth of these birds is for the experience of the Alaskan Wilderness, and process of obtaining your own bird. A bird that hopefully will one day contribute to the genetics of mention captive breeding projects. It costs more for an individual to travel to Alaska and obtain a Gyrfalcon (via travel costs/ lodging/ permits/ ect.) than to buy one in the lower 48. However, without the access to new genetics, captive breeding of Gyrfalcons may be in a dire state generations from now. There is no need to restrict the already minimal access Non Residents have to wild take in Alaska, it should be encouraged and widened. It is disappointing and sad that Alaskan Falconers have backed a proposal that paints the falconers in the lower 48 as criminal, in order to keep certain resources only for themselves.

Proposal 111, an AFA proposal, seeks to employ a "one in four" management system. This does not apply for the very limited and small number of non residents applicants annually. The drawing has always had less than 30 non residents apply for the 5 permits, and in 2021 the number was less than 20 applicants. Applying once every 4 years management would greatly reduce the number of non residents applying to near zero after a few years. With a non resident take limit of 5 being so minimal, there is no point to further restrict such a low number of applicants.

Finally, I'd like to voice my support for Proposal 113.

Proposal 113 (California Hawking Club)

Summary: This proposal will amend and eliminate unnecessarily restrictive and complicated regulations by simply defaulting the non resident take conditions to those of all resident falconers as currently outlined in the Alaska Falconry Manual.

Under the new proposed regulations:

A non resident falconer would be able to take a raptor under the exact same standards, procedures, and conditions as a resident falconer. This allows that an eyass or passage bird may be taken any day of the year.

The maximum annual number of permits would be increased from 5 to 15.

To better manage the take of the gyrfalcon and the peregrine falcon, the permits would be allocated in 3 separate groups:

5 permits for a gyrfalcon, 5 permits for a peregrine falcon and 5 permits for any other legally authorized raptor.

The benefits of these proposed regulations include:

An increased chance of obtaining a permit for the raptor of one's choice.

The full year opportunity for planning and making a trip to Alaska for capture.

Access for capture of passage raptors during times of the year that is not life-threatening to the permittee.

Access to evass raptors.

I believe Proposal 113 is reasonable to Alaskan Residents and Non Residents. Falconry is a "Non Impact" sport on the wild populations. So while it is regulated it certainly shouldn't be needlessly restricted, because a few individuals want to keep their playground all to themselves. There are already built in benefits for Alaskan Residents regarding Wild Take. The further restrictions being proposed are unfounded, and poorly backed. The United States has a great history of wild take, and conservation. I humbly ask the Alaskan Game Board consider this in their decisions going forward. Proposal 113, is not asking for every right the Alaskan Resident Falconers have in regards to Wild Take. We are asking for reasonable availability, the same courtesy Alaskan Falconers are afforded in many states within the lower 48. We are asking that we be given reasonable regulations that are based on facts, not unfounded claims.



Submitted By

Caitlin L Montalbo

Submitted On

2/14/2022 2:53:00 PM

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I am a strong Proponent of Proposal 144 as it will facilitate the "return" portion of the trap-neuter-vaccinate-return (TNVR) and help control our wild cat population in Anchorage. It is so important that we do our part to humanely reduce the existing stray population and keep them healthy.

Submitted By
Dan Montgomery

Submitted On
1/7/2022 11:54:19 PM

Affiliation
Guide, APHA, Mat-Su A/C member



PC120
1 of 1

Thank you Chairman Hoffman and board members for this opportunity to submit written comments.

I'm listing all of the proposals that I support and oppose below and I will comment on some of them after that.

Support: 6, 7, 8, 9, 10, 11, 12, 13, 14, 21, 23, 24, 25, 26, 27, 29, 34, 51, 54, 55, 70, 72, 73, 86, 90, 92, 93, 95, 96, 97, 197, 202, 204, 205, 209, 213, 219 and 226.

Oppose: 1, 2, 3, 4, 5, 16, 17, 18, 19, 28, 30, 52, 53, 56, 57, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 74, 75, 78, 80, 81, 82, 83, 84, 85, 87, 88, 89, 91, 94, 98, 99, 198, 199, 206, 207, 214, 216, 217, 218, 220 and 228.

Proposal 29: Support. I submitted this proposal and I think it is very important to have this management tool especially in sub unit 9E to stop the destruction of salmon runs in these small streams.

Proposal 70: Support. Our A/C submitted this proposal and I strongly support it. I believe there is a abundance of both Black bear and Brown bear in this unit and I disagree with the Department that there maybe a conservation concern with Brown bear if this were implemented. Much of this unit is heavily timbered and very difficult to hunt bears in without using bait. There has been the same season in unit 16 for years and there hasn't been any user conflicts that I'm aware of and nobody has ever been attacked at a bear bait station. I strongly recommend you pass this proposal.

Proposal 86: Support. Our A/C submitted this proposal and I strongly support it. When this area went to draw permit in 2008 under any ram there were very few permits issued and the departments management goal was to have more older class rams in the population. With management change over they decided they were going to manage them like caribou or moose and that they had a surplus of males and they vastly increased the permits. They haven't increased the population of old males or males at all or the overall population in this area and that was the reason for this area to go to draw permits in the first place. The Department hasn't followed their own management plan. This area should go back to full curl harvest.

Proposal 219: Support. This is a good idea to add 13D to the active IM management plan. I don't believe it should have been used as a control area when the plan was first put in place. There is a high population of wolves in 13D and I have witnessed wolf predation numerous times on sheep and moose calves in this area. I have hunted this area for over 30 years and have seen both the sheep and moose population decline in that time.

Proposals 28: Oppose. I don't think this is necessary to increase the bag limit for residents. Most residents shoot one brown bear in their lifetime. It may increase the harvest of sows because the hunters might be less selective if they can hunt every year.

Proposal 206: Strongly Oppose. Having the season open earlier for residents is totally unnecessary and would completely disrupt the hunt for non-residents. Bears are very sensitive to human scent and will vacate an area completely if they smell you. There is low participation by residents because of access difficulty and their harvest remained low even in spring of 2020 when there was no non-resident hunting at all. Having a separate season for non-residents isn't necessary either as they have plenty of access to the resource as is.

Proposal 214: Strongly Oppose. This would eliminate all non-resident hunting for moose in unit 13 and has no reason for doing so. There is a very low harvest by non-residents and there are very few permits issued in each subunit.

Thank you for your service to this state.

Dan Montgomery



Submitted By
Linda Morning

Submitted On
2/17/2022 10:06:46 AM

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I support Proposal 199 to have a "50-yard trap setbacks to increase public safety on popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more. Currently, it is legal for traps to be set on or near multi-use trails, campgrounds, roads, and pullouts from as early as September through May. " This September through May designation severely limits the safety of people using these spots to recreate with dogs and small children. I had a dog caught in a connabear trap in a rural housing area about 12 years ago. She was fortunate, that by a miracle, the trap did not kill her instantly and we were able to free her from it. I was on an abandoned oil well road that was used by the two housing developments that had sprung up after the well was abandoned and only one of hundreds of dog walkers who used this safe area to run their dogs off leash. This trap was baited and waiting for WHAT???? This was a housing area and we were visited by moose and an occasional porcupine. There was no way to find out who set this trap and no one to hold accountable so it just gets overlooked. Believe me, I am terrified of the hidden dangers that are allowed for no reasonable reason. It's a lazy trapper or an ignorant one that places traps in multi-use areas where people run dogs off leash. There are limited areas now to do that and we deserve a reasonable assurance that ADF&G recognizes our needs as well as the trappers. I would be interested to know if trappers have been surveyed to find out how many traps that they place in these multi-use areas have been successful in trapping anything besides a dog or small human. I am not against trapping but I am against the ignorant and dangerous use of traps that people and dogs can access so easily.

Submitted By
John Morton

Submitted On
2/18/2022 12:40:01 PM

Affiliation



PC122
1 of 1

I support Proposal 199. It is absolutely a no-brainer to prohibit trapping within 50 yards of popular multiple use trails in the MatSu. The MatSu and Anchorage bowl is no longer the last frontier. More than half of all Alaskans live in this area with high use by tourists. Trapping by a few individuals who are too inconsiderate and unethical to move a few yards off a public trail should neither dictate the well-being of dogs out for a romp with their owners nor threaten the well-being of other trappers who are willing to put a little more effort into a recreational pastime. This proposed action is a very rational and pragmatic response to an urbanizing landscape.

Submitted By
Michael Mraz

Submitted On
2/18/2022 3:11:25 PM

Affiliation



PC123
1 of 1

AK Board of Game Members, I am a Alaskan living in Anchorage, but recreate in Mat-Su and Kenai peninsula with friends and dogs all year long. **I am writing to support Proposal 199** which requests 50 yard trap setbacks on more than 200 multiuse trails in Mat-Su. This should be a bare minimum distance for setbacks in my opinion. I had a friend who lost her dog from a trap recently near a trailhead In Seward and it concerns me that this could happen in Mat-Su area too. I believe Prop 199 to be a more humane, safe and reasonable rule than what is currently in place for trapping in the Mat-Su region. Thank you for your consideration. Michael Mraz



I was unable to submit my comments on the online form so I am submitting them below:

I am a guide on Kodiak Island and have guided for 45 years and have lived on Kodiak Island for 65 years. I am strongly opposed to Proposal 151. There needs to be a mechanism in place to deal with unused or cancelled permits, and making these permits available on an over-the-counter basis is the only sensible and logical method to make sure all permits are used. When the permit system was first put in place, one of the basic tenets was to ensure as many hunting opportunities to as many hunters as possible. Thus, the restrictions on holding multiple permits in one year and the restriction on applying for a permit in the same area in consecutive years. It allowed for more hunting opportunities for more hunters. The over-the-counter registration system for filling unused or cancelled permits is simply another tool to fulfill that basic tenet. I am also opposed to Proposal 241. 2DK (2nd Degree Kindred) hunters should remain in the resident draw. Thank you very much.

--

Mike Munsey
Munsey's Bear Camp



Submitted By
WILLIAM MURPHY
Submitted On
2/17/2022 11:10:47 AM
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Dear Board Members

Thank you for allowing me to comment on non-resident take of Alaskan raptors. I would like to endorse Proposal 113. First, I would like to point out that the number of raptors considered for capture is infinitesimally small, and that the number actually taken is even smaller. I also understand that there is concern expressed by some for the possibility of illegal activity. I believe that anyone breaking the law should be prosecuted to the full extent, but I would contend that anyone willing to go through the time and expense of traveling to Alaska to obtain a single bird is at very low risk for criminal activity. A simple solution to game management, once the number of available raptors is determined, is to have the same limitations for in-state and out-of-state falconers for the process of obtaining a bird. I imagine that most hunting and fishing seasons are identical for locals and non-residents, and procedures would be simplified if falconry were the same.

Thank you for considering my thoughts.

William Murphy



Submitted By
Richard (Dick) Musser
Submitted On
1/9/2021 1:46:24 PM
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3920 West Cedar Rd.
Vale, Oregon 97918

Dear Board of Game: My comments are for the 2021 Falconry Proposals, 108-114, on pages 115-131 in the proposal booklet. By way of introduction I was an Alaskan resident and falconer in your state between 1974-2001. I was a Univ. Prof. for the Univ. of Alaska, Anchorage-Mat-Su, retiring in 1995. I am a founding member and first vice-president of the Alaska Falconers Association which was established in 1979, and am now one of three Honorary members. Germane to my comments is the definition of falconry: "The hunting of wild quarry, in its natural state, via trained raptors." Additionally, that wildlife management is being conducted within, "The North American Model of Wildlife Conservation." Please recognize that the Alaska Falconers Assoc. is not asking for access to additional wildlife---and that the proposals that ask for additional raptors is done at the request of lower 48 falconers. I ask that the BOG keep in mind that the intent of the proposals that ask for additional raptors, is not solely about raptors---but is one of only a very few methods of taking live wildlife and turning it into profit (deer, moose, and bears are next). These proposals that ask for more raptors aren't solely connected to falconry, they are about breeding and selling Alaskan wildlife---turning Alaskan gyrfalcons into a, "A situation like in China, where baby tigers, bred in captivity, can be petted by eco-tourists; but when these baby tigers become too old and dangerous, they are killed and their hides sold." Also please note that the American Falconry Conservancy is a party to a federal lawsuit in California that's attempting to allow the commercial use of wildlife, especially raptors.>Many falconry related groups have, of late, been infiltrated by those commercial entities that wish to profit from the sale of wildlife, and the avenue for this wildlife (where money can be made) is by accessing Alaskan gyrfalcons. peregrines, and goshawks. Proposal 108---OPPOSE---the request for eyasses are because they are easier to breed, not because they are superior falconry birds. Propsal 109---SUPPORT---Peoposal 110---SUPPORT. Proposal 111---SUPPORT. Proposal 112---OPPOSE---this is an effort to take commercial numbers of wildlife for profit. Proposal 113---OPPOSE---Alaskan falconry raptors are ostensibly taken for hunting. But the BOG, once the wildlife has departed Alaska, has no way to determine whether a raptor taken for falconry is actually used as regulations intended. I am convinced that nine of the last ten raptors taken by non-resident falconers are not being used for hunting, but are kept secure (not hunted) for transferring to breeding permits two years after capture. The intent of this take is profit, not hunting with birds---please do not allow this. Proposal 114---SUPPORT---It only makes sense not to disturb nesting birds. Additional comments: The BOG may wonder why there is so much interest in falconry---the interest isn't in falconry, the interest is in making money by commercial breeding/trafficking of raptors. If these proposals are allowed, there will be more gyrfalcons in captivity, than in the Alaskan wilds---which is the same case with tigers in the US, a very sad commentary. I first commented to the AKBOG on falconry regulations, in person, in 1984. Since that time I've been impressed at how well the BOG watches out for Alaska's wildlife. Thank you for allowing me to comment.



United States Department of the Interior

NATIONAL PARK SERVICE

Interior Region 11 • Alaska
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:

Mr. Stosh Hoffman, Chairman
ATTN: Alaska Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Hoffman:

The National Park Service (NPS) appreciates the opportunity to comment on Statewide proposals being considered by the Alaska Board of Game (Board). Below are our recommendations on proposals that affect or have the potential to affect NPS areas. We recognize and support the State's primary stewardship role in wildlife management, while ensuring that federal laws and regulations applicable to the NPS are upheld.

Proposal 108, 110- 113: NPS Recommendation: Oppose

As we have commented in past letters to the Board, taking raptors is prohibited on NPS-managed lands (36 CFR 13.42 (j)). If the Board adopts any of these proposals, NPS lands should be excluded.

Proposal 121, 232: NPS Recommendation: Oppose

Proposal 121 would allow the use of dogs to hunt big game. Proposal 232 would allow the use of dogs to recover wounded furbearers. Except for black bears, the use of dogs to hunt big game or fur animals is currently illegal under State regulations. The NPS continues to support the State's restriction on this activity to protect wildlife populations from disease, injury, and harassment. If the Board adopts any of these proposals, we request NPS lands be excluded.

Proposal 130: NPS Recommendation: Support

We support this Alaska Division of Fish and Game (ADF&G) proposal to prohibit the use of urine from any species of the deer family as bait or scent lure. Adoption of this proposal will help prevent introduction of Chronic Wasting Disease (CWD) and keep Alaska CWD-free.

Proposal 133: NPS Recommendation: Oppose

This proposal would add bow and arrow as a legal method for hunting beaver under a trapping license. NPS regulations define a trap as "a snare, trap, mesh, wire or other implement, object or mechanical device designed to entrap or kill animals other than fish." Free-ranging furbearers may not be taken on NPS lands under a trapping license with harvest methods that don't fall within that definition, such as a firearm or bow and arrow. Further, methods of harvest that cause pelt damage are not consistent with the



intent of trapping under a trapping license. If the Board adopts any of these proposals, NPS lands should be excluded.

Proposal 162: NPS Recommendation: Support

We support this ADF&G proposal to establish salvage requirements of the meat or hide for Alaska hare. Alaska hares warrant this increased level of protection given lack of reliable population data and concern for their population status. In addition, adoption of this proposal may help prevent overharvest.

Proposal 173: NPS Recommendation: Oppose

The NPS opposes this proposal which would repeal the Dalton Highway Corridor Management Area (DHCMA). While there is overlap between AS 19.40.210 and 5 AAC 92.530(7), there are significant differences. Of primary interest is that 5 AAC 92.530(7b) closes the corridor to hunting, except by bow and arrow. The Arctic has low productivity and the closure of the corridor to hunting with firearms has helped ensure population viability of numerous wildlife populations in the region. Repealing the DHCMA could be detrimental to big game populations in the area, as well as to the long-term hunting opportunities.

Proposal 193: NPS Recommendation: Support

We support this ADF&G proposal to establish a Muskox hunt in Game Management Unit (GMU) 26A. If passed, it would allow GMU 23 residents from Point Hope the opportunity to harvest muskox from the Cape Thompson population. The 2020 abundance census completed by ADF&G and NPS indicates that portion of the Cape Thompson Muskox population in GMU 26A can support this additional hunt. The other portion of the Cape Thompson population resides in GMU 23 and supports a limited number of NPS federal permits and State Tier II permits.

Proposal 230: NPS Recommendation: Oppose

This proposal would change the definition of “full-curl horn” for Dall Sheep, leading to increased harvests. NPS opposes this proposal due to a decline in sheep populations in many areas of the State, including in such NPS units as Gates of the Arctic National Park and Preserve, Yukon-Charley Rivers National Preserve, and Western Arctic National Parklands (WEAR). Park population estimates are and have been extremely low. Currently, harvest is completely closed in WEAR due to the low population in the park. Due to this population decline, it is not prudent or biologically warranted to liberalize hunting anywhere in the state. If the Board adopts this proposal, NPS lands should be excluded.

Proposal 231: NPS Recommendation: Oppose

Proposal 231 would change the definition of **edible** meat for cranes, geese, and swans. In 2017, the Native Caucus of the Alaska Migratory Bird Co-Management Council (AMBCC) submitted a proposal to increase salvage requirements on large game birds to reduce wanton waste. The proposal received wide support from multiple state and federal advisory councils. The proposal was adopted with modification by the Board. Proposal 231 would revert to minimal salvage requirements, increase the probability of wanton waste, and unravels the progress made by AMBCC to help conserve migratory birds and support local subsistence users. For these reasons the NPS opposes this proposal. If the Board adopts this proposal, NPS lands should be excluded.

Proposal 234: NPS Recommendation: Oppose



This proposal would allow the use of stationary game cameras that transmit photos wirelessly. Remote installations such as game cameras are illegal in NPS areas regardless of any change to State regulation. In addition, NPS opposes the use of wireless information to facilitate hunting as it violates fair chase principles. If the Board adopts this proposal, NPS lands should be excluded.

Proposal 235: NPS Recommendation: Oppose

This proposal would allow the use of artificial light while hunting in GMU's that have no closed seasons or bag limits for small game. The use of artificial light has the potential to negatively impact the natural abundance, behavior, distribution, and ecological integrity of all native wildlife, including small game, and violates fair chase principles. If the Board adopts this proposal, NPS lands should be excluded.

Proposal 245: NPS Recommendation: Oppose

NPS opposes this proposal that would eliminate the requirement to salvage rib meat on the bone of moose, caribou, and bison. If passed, this proposal would lead to wanton waste of rib meat and would be out of compliance with existing State salvage requirements. If the Board adopts this proposal, NPS lands should be excluded.

Proposal 261 and 262: NPS Recommendation: Oppose

Both Proposal 261 and 262 would reauthorize resident tag fee exemptions for brown bear. NPS has new research on the density and harvest of bears in and around Gates of the Arctic National Park and Preserve (GAAR) (Schmidt et al 2021, JWM). Notably, GAAR bears had the oldest average age of harvest, average harvest had increased from the period 1998-2007 to 2008-2017, and the density of bears was low and potentially decreased between the surveys. Considering the low productivity of the bear population in this area, NPS is opposed to this proposal, which would liberalize bear harvest in an area we have biological concerns.

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 me or Mary Hake, wildlife biologist and liaison to the Board of Game at mary_hake@nps.gov.

Sincerely,

JENNIFER
PEDERSON
WEINBERGER

Digitally signed by
JENNIFER PEDERSON
WEINBERGER
Date: 2022.02.14 12:22:52
-09'00'

Jennifer Pederson Weinberger
Acting Associate Regional Director, Resources

cc:

Superintendents, National Park Service, Alaska Region
Regional Director, National Park Service
Executive Director, Alaska Board of Game, ADF&G
Regional Director, U.S. Fish and Wildlife Service

NORTH SLOPE BOROUGH

Department of Wildlife Management

P. O. Box 69

Barrow, Alaska 99723

Phone: Central Office : (907) 852-2611 ext. 350

or: (907) 852-0350

FAX: (907) 852 0351

Arctic Research Facility: (907) 852-0352



RAYNITA "TAQULIK" HEPA, DIRECTOR

18 February, 2022

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 25526

Juneau, AK 99802-5526

RE: Comments on proposal numbers: 172 &173 before the State Board of Game (BOG)

To the Alaska Board of Game:

The North Slope Borough (NSB) Department of Wildlife Management would like to provide written comments to the Alaska Board of Game for the Statewide meeting on proposal numbers; 172 &173. We have attached language using the BOG proposal format that we believe will provide clarification requested in Proposal 172. We oppose Proposal 173 and believe the codified regulation 5 AAC 92.530(7) is not redundant and is necessary to be included in the hunting regulations for public reference. The language provided by us will help to clarify any confusion that may exist.

Sincerely,



Brian Person

Senior Wildlife Biologist

Department of Wildlife Management

ALASKA BOARD OF GAME
REGULATION PROPOSAL FORM | 2020-2021 MEETING CYCLE
Send completed form by May 1, 2020 to:
PO BOX 115526, JUNEAU, ALASKA 99811-5526
FAX (907) 465-6094 or EMAIL dfg.bog.comments@alaska.gov



PC128
2 of 5

BOARD OF GAME REGULATIONS

Game Management Unit (GMU) 20 and 24, 25, and 26

X Hunting X Subsistence
X Trapping Other _____

Does the proposed change affect residents or nonresidents?

X Resident X Nonresident

Which meeting would you like to submit your proposal to?

Central & Southwest Region (GMUs 9, 10, 11, 13, 14A, 14B, 16 & 17) **Statewide Regulations – 5 AAC Ch. 92 provisions & 98.005 (see list on page 4).**

Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. The board will reject multiple or confusing items.

1. Alaska Administrative Code Number 5 AAC: 92.0530 Regulation Book Page No:

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

Clarification is needed, as there is confusion within state government and the public regarding which activities and methods of access are legal within the DHCMA. This proposal seeks to clarify those activities and methods, and to distinguish travel by non-hunting North Slope residents and others from prohibited uses by hunters within the DHCMA. It would eliminate law enforcement issues arising from the present confusion relating to resident use of the seasonal community access roads permitted and constructed by the North Slope Borough.

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

[5 AAC 92.0530]

5 AAC 92.540(XXX)

The Dalton Highway Controlled Use [MANAGEMENT] Area:

(A) the area consists of those portions of Units 20 and 24, 25, and 26 extending five miles from each side of the Dalton Highway, including the drivable surface of the Dalton Highway, from the Yukon River traveling north to Deadhorse to the intersection at



- (B) the area within the Prudhoe Bay Closed Area is closed to the taking of big game; the remainder of the Dalton Highway **Controlled Use** [MANAGEMENT] Area is closed to hunting and open to trapping; however big game, small game, and fur animals may be taken in the area by bow and arrow only, and small game may be taken by falconry;
- (C) no off-road [MOTORIZED] vehicle, as defined in 5 AAC 92.004(c), may be used to transport [HUNTERS] individuals actively engaged in hunting [,HUNTING GEAR OR PARTS OF GAME], within the Dalton Highway Corridor **Controlled Use** [MANAGEMENT] Area, except that
- i) Off-road [LICENSED HIGHWAY] vehicles may be used on the following roads: (1) Dalton Highway (2) Bettles Winter Trail during periods when the Bureau of Land Management and the City of Bettles announce that the trail is open for winter travel, (3) Galbraith Lake Road from the Dalton Highway to the BLM campground at Galbraith Lake, including gravel pit access road when the gate is open, (4) Toolik Lake Road, excluding the driveway to the Toolik Lake Research Facility, (5) the Sagavanirktok River boat launch at the DOT camp at Dalton Highway milepost 305.6 (6) Wiseman Village Road, (7) any constructed roads and Community Winter Access Trails to Anaktuvuk Pass, Nuiqsut, Utqiagvik, Atqasuk, and Wainwright during the periods when the Bureau of Land Management and the North Slope Borough announce the road or trail is open for winter travel [THE SAGAVANIRKTOK RIVER ACCESS ROAD TWO MILES NORTH OF PUMP STATION 2, AND (6) and (8) any constructed roadway or gravel pit, within one [ONE-QUARTER] mile of the Dalton Highway, that does not have a locked barrier; [(II) AIRCRAFT AND BOATS MAY BE USED;] [(III) A SNOWMACHINE MAY BE USED TO CROSS THE MANAGEMENT AREA FROM OUTSIDE THE MANAGEMENT AREA TO ACCESS LAND ON THE OTHER SIDE OF THE MANAGEMENT AREA]; [(IV) GAME MAY BE TRANSPORTED BY MOTORIZED VEHICLES UNLESS PROHIBITED BY STATUTE;]
- (D) any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the Dalton Highway Corridor **Controlled Use** [MANAGEMENT] Area;
- (E) a snowmachine may not be used for hunting within the Dalton Highway Corridor Controlled Use Area or to access areas outside the corridor to hunt big game or to transport big game hunters, big game hunting gear, or parts of big game, except that
- (i) a snowmachine may be used by a person who must traverse land in the highway corridor to travel to or from private property that has an established history of use as a homestead, or to a residence in Nuiqsut, Anaktuvuk Pass, Kaktovik, Utqiagvik, Atqasuk, Wainwright, Point Lay, or Point Hope;
- (ii) a snowmachine may only be used if that use begins and ends outside the corridor;
- (F) aircraft and boats may be used.

Submitted By: North Slope Borough Department of Wildlife Management
Individual or Group



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4 of 5

P.O. Box 69	Barrow, Alaska	99723
Address	City, State	ZIP Code
(907) 852-0350	Brian.Person@north-slope.org	
Home Phone	Work Phone	Email

92.051 Discretionary Trapping Permit Conditions & Procedures

ALASKA BOARD OF GAME Statewide Regulations Schedule ~ 5 AAC Chapters 92 and 98

General Provisions & Definitions:

- 92.001 Application of this Chapter
- 92.002 Liability for Violations
- 92.003 Hunter Education and Orientation Requirements
- 92.004 Policy for Off-Road Vehicle Use for Hunting and transporting game.
- 92.005 Policy for Changing the Board of Agenda
- 92.008 Harvest Guideline Levels
- 92.009 Policy Obstruction or Hindrance of Lawful Hunting or Trapping
- 92.990 Definitions

- 92.052 Discretionary Permit Hunt Conditions and Procedures
- 92.057 Special Provisions for Dall Sheep Drawing Permit Hunts
- 92.061 Special Provisions for Brown Bear Drawing Permit Hunts
- 92.062 Priority for Subsistence Hunting; Tier II Permits
- 92.068 Permit Conditions for Hunting Black Bear with Dogs
- 92.069 Special Provisions for Moose Drawing Permit Hunts
- 92.070 Tier II Subsistence Hunting Permit Point System
- 92.071 Tier I Subsistence Permits
- 92.072 Community Subsistence Harvest Hunt Area and Permit Conditions

Licenses, Harvest Tickets, Reports, Tags, & Fees:

- 92.010 Harvest Tickets and Reports
- 92.011 Taking of Game by Proxy
- 92.012 Licenses and Tags
- 92.013 Migratory Bird Hunting Guide Services
- 92.018 Waterfowl Conservation Tag
- 92.019 Taking of Big Game for Certain Religious Ceremonies

Permits:

- 92.020 Application of Permit Regulations and Permit Reports
- 92.028 Aviculture Permits
- 92.029 Permit for Possessing Live Game
- 92.030 Possession of Wolf Hybrid and Wild Cat Hybrids Prohibited
- 92.031 Permit for Selling Skins, Skulls, and Trophies
- 92.033 Permit for Science, Education, Propagative, or Public Safety Purposes
- 92.034 Permit to Take Game for Cultural Purposes
- 92.035 Permit for Temporary Commercial Use of Live Game
- 92.037 Permit for Falconry
- 92.039 Permit for Taking Wolves Using Aircraft
- 92.040 Permit for Taking of Furbearers with Game Meat
- 92.041 Permit to Take Beavers to Control Damage to Property
- 92.042 Permit to Take Foxes for Protection of Migratory Birds
- 92.043 Permit for Capturing Wild Furbearers for Fur Farming
- 92.044 Permit for Hunting Bear w/the Use of Bait or Scent Lures
- 92.047 Permit for Using Radio Telemetry Equipment
- 92.049 Permits, Permit Procedures, and Permit Conditions
- 92.050 Required Permit Hunt Conditions and Procedures

Methods & Means:

- 92.075 Lawful Methods of Taking Game
- 92.080 Unlawful Methods of Taking Game; Exceptions
- 92.085 Unlawful Methods of Taking Big Game; Exceptions
- 92.090 Unlawful Methods of Taking Fur Animals
- 92.095 Unlawful Methods of Taking Furbearers; Exceptions
- 92.100 Unlawful Methods of Hunting Waterfowl, Snipe, Crane
- 92.104 Authorization for Methods and Means Disability Exemptions

Intensive Management and Predator Control:

- 92.106 Intensive Management of Identified Big Game Prey Populations
- 92.110 Control of Predation by Wolves
- 92.115 Control of Predation by Bears
- 92.116 Special Provisions in Predation Control Areas

Possession and Transportation:

- 92.130 Restrictions to Bag Limit
- 92.135 Transfer of Possession
- 92.140 Unlawful Possession or Transportation of Game
- 92.141 Transport, Harboring, or Release of Live Muridae Rodents Prohibited
- 92.150 Evidence of Sex and Identity
- 92.151 Destruction of trophy value of game required in specific areas.



- 92.160 Marked or Tagged Game
- 92.165 Sealing of Bear Skins and Skulls
- 92.170 Sealing of Marten, Lynx, Beaver, Otter, Wolf, and Wolverine
- 92.171 Sealing of Dall Sheep Horns

Use of Game:

- 92.200 Purchase and Sale of Game
- 92.210 Game as Animal Food or Bait
- 92.220 Salvage of Game Meat, Furs, and Hides
- 92.230 Feeding of Game
- 92.250 Transfer of Musk Ox for Science and Ed. Purposes
- 92.260 Taking Cub Bears & Female Bears with Cubs
Prohibited

Emergency Taking of Game:

- 92.400 Emergency Taking of Game
- 92.410 Taking Game in Defense of Life or Property
- 92.420 Taking Nuisance Wildlife

Game Management Units:

- 92.450 Description of Game Management Units

Antlerless Moose Reauthorization:

- 98.005 Areas of Jurisdiction for Antlerless Moose Seasons

Submitted By
Kristin O'Connor
Submitted On
2/18/2022 11:06:38 AM
Affiliation



PC129
1 of 1

To Whom It May Concern,

I have been made aware of Proposal 199 Ammended. I support it, but would like to offer some insight into the useage of Swan Lake "Quggesh" Boardwald and Loop Trail located in Wasilla. This trail should be included in the proposal. The description of the trail from the Greatland Trust's website states "A trail to the north takes you on a 1-mile upland loop through a beautiful birch forest, with more views from the bluff out into the Refuge. The area is also the location of a former Dena'ina village site and holds cultural significance. The area is called *Quggesh*, which means swan." This trail is also located in a new subdivision and gets a lot of use from families in the neighborhood.

I am a teacher at Machetanz Elementary School. My class, and many others, use this trail on a weekly basis to extend our learning to the outdoors. Outdoor studies are an integral part of our school philosophy. We waited 7 years to get this trail built so that we could have access to a nature trail. The kids look forward to our weekly outings. They make observations, learn about the unique flora and fauna of our area, conduct nature studies, and enjoy just being in nature. There are borough supported archealogical digs going on just off the main trails as well, and many more that have been identified but not excavated.

Please put the Swan Lake "Quggesh" trail on the list as part of this proposal.

Thank you,

Kristin O'Connor

K/1 Teacher

Machetanz Elementary School



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Statewide Regulations

March 4-11, 2022

Fairbanks, Alaska

Office of Subsistence Management (OSM)



United States Department of the Interior
Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

In Reply Refer To:
OSM.22016.LG

FEB 07 2022

Mr. Stosh Hoffman, Chairman
Attention: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Hoffman:

The Alaska Board of Game (Board) is scheduled to meet March 4-11, 2022, to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Statewide Regulations. We have reviewed the 125 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our recommendations on the 2021-2022 supplemental proposals are enclosed. Our recommendations on the original 2020-2021 proposals were previously submitted.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822 or george_pappas@fws.gov, with any questions you may have concerning this material.

Sincerely,
Sue Detwiler

A handwritten signature in black ink that reads "Sue Detwiler".

Assistant Regional Director
Office of Subsistence Management

Enclosure

cc: Anthony Christianson, Chair, Federal Subsistence Board
Office of Subsistence Management



Chairs, Subsistence Regional Advisory Councils
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record

PROPOSAL 193 – 5 AAC 85.050. Hunting seasons and bag limits for musk oxen.

Establish a hunt for muskox within a portion of Unit 26A.

Current Federal Regulations:**Unit 26A—Muskox***Unit 26A**No Federal open season*

Is a similar issue being addressed by the Federal Subsistence Board? Yes, currently there is a wildlife proposal (WP22-55). WP22-55 proposes to establish a muskox hunt in Unit 26A west of Admiralty Bay and the Alaktak River following 155 west longitude south to the Unit 26A border with a harvest limit of 1 muskox and an open season of Aug. 1 – Mar. 15.

Impact to Federal subsistence users/wildlife: This proposal would provide Federally qualified subsistence users opportunities to harvest muskox. While it is not known what effect the harvest would have on the Unit 26A muskox population, the hunt is not expected to have a detrimental effect because the muskox population has been immigrating into and growing within Unit 26A. In 2020, the population of muskoxen was estimated to be 685, which is an increase from 342 muskoxen in 2011 (Hughes 2016, 2020 pers. comm., NPS 2017).

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 193 **with modification** to align the hunt area boundary with the proposed Federal hunt area boundary.

Rationale: This proposal provides additional harvest opportunity to Federally qualified subsistence users without risking the long-term viability of the muskox population. Alignment of the State and Federal hunt area boundary reduces regulatory complexity and user confusion.

Literature Cited

Hughes, L.J. 2016. Units 23 and 26A muskox. Chapter 3, Pages 3-1 through 3-19 [In] Harper, P., and L.A. McCarthy, editors. 2015. Muskox management report of survey-inventory activities 1 July 2012-30 June 2014. Alaska Department of Fish and Game. Species Management Report ADF&G/DWC/SMR-2015-2, Juneau, AK.

Hughes, L.J. 2020. Wildlife biologist. Personal communication: e-mail. Arctic Inventory and Monitoring Network. National Park Service. Nome, AK.

NPS. 2017. State of the park report for Cape Krusenstern National Monument. State of the Park Series No. 44. National Park Service, Washington, DC.

PROPOSAL 230 – 5 AAC 92.990(a)(30). Definitions. Change 5 AAC 92.990 “full-curl horn” of a male (ram) Dall sheep from “at least eight years of age” to “at least seven years of age” as determined by horn growth annuli.

Current Federal Regulations:

§ 100.25(a) Definitions. The following definitions apply to all regulation contained in this part:

Full curl horn means the horn of a Dall sheep ram; the tip of which has grown through 360 degrees of a circle described by the outer surface of the horn, as viewed from the side, or that both horns are broken, or that the sheep is at least 8 years of age as determined by horn growth annuli.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: This proposal will increase harvest opportunity for Federally qualified subsistence users. However, if approved, this proposal would increase the hunting pressure on 7-year-old Dall sheep rams, potentially causing conservation concerns and hampering management. The existing regulation is based on a conservative approach suggesting once sheep are eight years old, their chances of surviving each additional year is much lower. Harvesting older, full-curl rams (8+ years old) allows younger rams in their prime to continue breeding (ADF&G 2017). This regulation is to assure that some older class and genetically robust rams are available for breeding each year. Some 7-year-old rams are likely already mistakenly taken due to reaching full curl earlier and miscounting of the horn growth annuli in the field. Adoption of this proposal would also misalign Federal and State regulations, creating user confusion.

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

Rationale: Maintaining the current regulation will help assure sustainable and continued harvest opportunity for Federally qualified subsistence users by assuring a good breeding population of rams and allowing for effective, conservative sheep management.

Literature Cited

ADF&G (Alaska Department of Fish and Game). 2017. Dall sheep hunting full-curl identification guide. ADF&G, Division of Wildlife Conservation.

http://www.adfg.alaska.gov/static/hunting/dallsheephunting/pdfs/dall_sheep_hunting_full_curl_identification_guide.pdf



PROPOSAL 239 – 5 AAC 92.050. Required permit hunt conditions and procedures.

Require all resident registration permit hunts be available for application online.

Current Federal Regulations: None

Relevant Federal Regulation:

§100.25(a) Definitions:

Registration permit means a permit that authorizes hunting and is issued to a person who agrees to the specified hunting conditions. Hunting permitted by a registration permit begins on an announced date and continues throughout the open season, or until the season is closed by Board action. Registration permits are issued in the order requests are received and/or are based on priorities as determined by [50 CFR 100.17](#) and [36 CFR 242.17](#).

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal may decrease opportunity for Federally qualified subsistence users by increasing competition. Any resident of Alaska would be able to obtain any registration permit online rather than requiring a special trip to the area to receive some permits in person. Permits that are distributed in this manner are an attempt to limit the people who receive them to people who live within the hunt area. This is typically done because there is a conservation concern with the species being permitted.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 239.

Rationale: This proposal would increase competition for Federally qualified subsistence users. Conservation concerns exist for this proposal, as it precludes a method of reserving harvestable animals for local residents and limiting harvest without resorting to a Tier II permit hunt.

PROPOSAL 245 – 5 AAC 92.220. Salvage of game meat, furs, and hides.

Eliminate the requirement to salvage rib meat on the bone for moose, caribou, and bison.

Current Federal Regulations:

§100.25(a) Definitions:

Edible meat means the breast meat of ptarmigan and grouse and those parts of caribou, deer, elk, mountain goat, moose, musk oxen, and Dall sheep that are typically used for human consumption, which are: The meat of the ribs, neck, brisket, front quarters as far as the distal (bottom) joint of the radius-ulna (knee), hindquarters as far as the distal joint (bottom) of the



tibia-fibula (hock) and that portion of the animal between the front and hindquarters; however, edible meat of species listed in this definition does not include: Meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, and incidental meat reasonably lost as a result of boning or close trimming of the bones, or viscera. For black bear, brown and grizzly bear, “edible meat” means the meat of the front quarter and hindquarters and meat along the backbone (backstrap).

§100.26(h) Removing harvest from the field.

(1) *You must leave all edible meat on the bones of the front quarters and hind quarters of caribou and moose harvested in Units 9, 17, 18, and 19B prior to October 1 until you remove the meat from the field or process it for human consumption.*

(2) *You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of moose harvested in Unit 21 prior to October 1 until you remove the meat from the field or process it for human consumption.*

(3) *You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of caribou and moose harvested in Unit 24 prior to October 1 until you remove the meat from the field or process it for human consumption. Meat of the front quarters, hind quarters, or ribs from a harvested moose or caribou may be processed for human consumption and consumed in the field; however, meat may not be removed from the bones for purposes of transport out of the field.*

(4) *You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of caribou and moose harvested in Unit 25 until you remove the meat from the field or process it for human consumption.*

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would make it easier for Federally qualified subsistence users to harvest and transport wildlife under State regulations. This requirement was put in place so law enforcement could tell if all legally required meat was salvaged and to aid in keeping meat from spoiling in the field. Not having to pack the rib cage of a moose or caribou out of the field would make it much easier for Federally qualified subsistence users to transport their harvest, especially if any foot travel is involved. This proposal would have no impact on moose or caribou populations.

Adopting this proposal would misalign Federal and State hunting regulations for moose and caribou, increasing user confusion and regulatory complexity. Specifically, it would make Federal regulations more restrictive than State regulations in Units 19B, 21, 24 and 25. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 245.

Rationale: This proposal would make it easier for Federally qualified subsistence users to transport their harvest out of the field with no impacts on the wildlife populations.

PROPOSAL 249 – 5 AAC 85.045(a)(5). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C.

Current Federal Regulations:

Unit 7 – Moose

Unit 7, that portion draining into Kings Bay - Federal public lands are closed to the taking of moose except by residents of Chenega Bay and Tatitlek No open season.

Unit 7, remainder - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only Aug. 10-Sep. 20.

Unit 14C – Moose

No Federal open season

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: These comments apply only to Unit 7.

The harvest of cow moose would provide additional harvest opportunity for Federally qualified subsistence users, although opportunity would be limited as this is a drawing permit hunt. Reauthorizing the antlerless moose season provides management flexibility for ADF&G to manage the Unit 7 moose population at a sustainable level to reduce habitat degradation and moose-vehicle collisions. Limiting the number of permits issued based on current population metrics prevents overharvest in the Twentymile/Portage/Placer hunt area.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 249.

Rationale: This proposal would provide limited additional opportunity for Federally qualified subsistence users to harvest moose in Unit 7 and provides management flexibility to sustainably manage this moose population.

PROPOSAL 252 – 5 AAC 85.045(a)(13). Hunting seasons and bag limits for moose.
Reauthorize the antlerless moose seasons in Unit 15C.

Current Federal Regulations:

Unit 15 – Moose

<i>Unit 15A - Skilak Loop Wildlife Management Area</i>	<i>No open season.</i>
<i>Units 15A, remainder, 15B, and 15C - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only</i>	<i>Aug. 10- Sep. 20.</i>
<i>Units 15B and 15C - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai NWR Refuge Manager is authorized to close the October-November season based on conservation concerns, in consultation with ADF&G and the Chair of the Southcentral Alaska Subsistence Regional Advisory Council</i>	<i>Oct. 20- Nov. 10.</i>
<i>Unit 15C - 1 cow by Federal registration permit only</i>	<i>Aug. 10- Sep. 20.</i>

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Proposals WP22-30/31 request lengthening the moose season in Unit 15 from September 15 to September 25, which would align with the recently changed State season.

Impact to Federal subsistence users/wildlife: The harvest of cow moose (mostly through DM549) would provide additional harvest opportunity for Federally qualified subsistence users and would help remove moose to reduce human-wildlife conflicts in the area. Reauthorizing the antlerless moose season provides management flexibility for ADF&G to manage the Unit 15C moose population at a sustainable level to reduce negative human-moose encounters and moose-vehicle collisions. The most recent population estimate concluded the moose density in Unit 15C is quite high at approximately 3 moose/mi², indicating the moose population can withstand some cow harvest. OSM expects ADF&G will manage both the drawing and targeted hunts within sustainable harvest levels.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 250.

Rationale: This proposal would allow additional opportunity for Federally qualified subsistence users to harvest moose in Unit 15C. Since there is no conservation concern for this population and their density is high, cow harvest is warranted.



PROPOSAL 253 – 5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose. Reauthorize the resident antlerless moose season in Unit 18

Current Federal Regulations:

Unit 18 – Moose

Moose: Unit 18, that portion east of a line running from the mouth of the Ishkowik River to the closest point of Dall Lake, then to the east bank of the Johnson River at its entrance into Nunavakanukakslak Lake (N 60°59.41' Latitude; W 162°22.14' Longitude), continuing upriver along a line 1/2 mile south and east of, and paralleling a line along the southerly bank of the Johnson River to the confluence of the east bank of Crooked Creek, then continuing upriver to the outlet at Arhymot Lake, then following the south bank east of the Unit 18 border and then north of and including the Eek River drainage - 1 antlered bull by State registration permit; quotas will be announced annually by the Yukon Delta National Wildlife Refuge Manager

Sep. 1-30.

Federal public lands are closed to the taking of moose except by residents of Tuntutuliak, Eek, Napakiak, Napaskiak, Kasigluk, Nunapitchuk, Atmautlauk, Oscarville, Bethel, Kwethluk, Akiachak, Akiak, Tuluksak, Lower Kalskag, and Kalskag

Sep. 1-30.

Unit 18, south of the Eek River drainage and north of the Goodnews River drainage - 1 antlered bull by State registration permit

Sep. 1-30.

Unit 18, Goodnews River drainage and south to the Unit 18 boundary - 1 antlered bull by State registration permit

Or

1 moose by State registration permit

A season may be announced between Dec. 1 and the last day of Feb.

Unit 18, remainder - 2 moose, only one of which may be antlered. Antlered bulls may not be harvested from Oct. 1 through Nov. 30

Aug. 1-Apr. 30

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Proposal WP22-42, requesting the increase of the moose harvest limit from 2 to 3 moose in Unit 18 remainder is currently being considered by the Federal Subsistence Board.

Impact to Federal subsistence users/wildlife: This proposal will increase harvest opportunity for Federally qualified subsistence users. This proposal, if approved, could help reduce a moose population that far exceeds management objectives and is potentially surpassing the carrying capacity of its habitat.

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

Rationale: This proposal would allow for additional opportunity for Federally qualified subsistence users to harvest moose in this unit, provide management flexibility, and there are no conservation concerns due to the high density of moose in Unit 18 remainder.

PROPOSAL 254 – 5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during February in a portion of Unit 19D.

Current Federal Regulations:

Unit 19D—Moose

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

OR

Sept. 1 – Sept. 30

Unit 19D, remainder of the Upper Kuskokwim Controlled Use Area—1 bull;

Sept. 1 – Sept. 31

Dec. 1 – Feb. 28

OR

Unit 19D remainder—1 antlered bull;

Sept. 1 – Sept. 30

Dec. 1 – Dec. 15

OR

Unit 19—Rural residents of Lime Village only—No individual harvest limit, but a village harvest quota of 28 bulls (including those taken under the State Tier I system). Reporting will be by a community reporting system.

July 1 – June 30

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose. It is not expected to have a detrimental effect on the Unit 19D moose population. This proposal is consistent with the Unit 19 moose management plan (Peirce 2018), which states population management objectives are to maintain a moose population of 10,000 – 14,000 observable moose, providing for a harvest not to exceed 650-1200 moose each regulatory year.

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

Rationale: Cow harvest is warranted based on declining twinning rates. It also provides additional harvest opportunity to Federally qualified subsistence users without risking the long-term viability of the population.

Literature Cited

Peirce, Joshua, M. 2018. Moose Management Report and Plan, Game Management Unit 19: Report Period 1 July 2010–30 June 2015, and Plan Period 1 July 2015–30 June 2020. Pages 3-4. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018-22, Juneau, AK.

PROPOSAL 255 – 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose seasons in Unit 20A

Current Federal Regulations:

Unit 20A – Moose

Moose: Unit 20A - 1 antlered bull

Sep. 1-20

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal will increase harvest opportunity for Federally qualified subsistence users. There are no conservation concerns for reauthorizing the antlerless moose season since the current moose population is within management objectives.

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

Rationale: This proposal would allow additional opportunity for Federally qualified subsistence users to harvest antlerless moose in this unit and provide management flexibility. This proposal is not expected to create a conservation concern for the moose population.

**PROPOSAL 258 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.**

Reauthorize a winter any-moose season during March in a portion of Unit 21D.

Current Federal Regulations:**Unit 21D—Moose**

<i>Unit 21D—Koyukuk controlled Use area—1 bull by State registration permit; 1 antlerless moose by Federal registration permit (FM 2106) if authorized by announcement by the Koyukuk/Nowitna/Innoko NWR manager. Harvest of Cow moose accompanied by calves is prohibited. A harvestable surplus of cows will be determined for a quota.</i>	<i>Sept. 1 – Sept. 25</i>
<i>OR</i>	
<i>1 antlered bull by Federal registration permit (FM 2106) if there is no Mar. 1–5 season and if authorized by announcement by the Koyukuk/Nowitna/Innoko NWR manager and BLM Central Yukon field office manager.</i>	<i>Apr. 10 – April 15 season to be announced</i>
<i>Unit 21D, that portion south of the south bank of the Yukon River, downstream of the upriver entrance to Kala Slough and west of Kala Creek—1 moose by State registration permit.</i>	<i>Aug. 22 – Aug. 31</i> <i>Sept. 5 – 25</i>
<i>Antlerless moose may be taken only during Sept. 21–25 season if authorized jointly by the Koyukuk/Nowitna/Innoko NWR manager and the BLM Central Yukon field office manager</i>	<i>Mar. 1 – Mar. 31 season may be announced</i>
<i>Antlerless moose may be harvested during any of the winter seasons.</i>	
<i>Harvest of cow moose accompanied by calves is prohibited.</i>	
<i>OR</i>	
<i>Unit 21D remainder—1 moose by State registration permit. Antlerless moose may be taken only during Sept. 21 – 25 and the Mar. 1 – 5 season, if authorized jointly by the Koyukuk/Nowitna/Innoko NWR manager and BLM Central Yukon Field Office Manager. Harvest of cow moose accompanied by calves is prohibited. During</i>	<i>Aug. 22 – 31</i> <i>Sept. 5 – Sept. 25</i> <i>Mar. 1 – Mar. 5 season to be announced</i>

the Aug. 22 – Aug. 31 and Sept. 5 – Sept. 25 season, a State registration permit is required. During the Mar. 1 – 5 season, a Federal registration permit (FM 2107) is required.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: This proposal will provide Federally qualified subsistence users continued opportunities to harvest moose. It is expected to help stabilize the moose population in Unit 21D. This proposal is consistent with the Unit 21D moose management plan (Stout 2018), which calls for a population objective of 9,000–10,000 observable moose and providing for a harvest of moose not to exceed 700 moose or 7% of the annual moose population estimate each regulatory year.

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

Rationale: This proposal provides additional harvest opportunity to Federally qualified subsistence users without risking the long-term viability of the moose population.

Literature Cited

Stout, Glenn, W. 2018. Moose Management Report and Plan, Game Management Unit 21D: Report Period 1 July 2010-30 June 2015, and Plan Period 1 July 2015-30 June 2020. Pages 3-4. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018-5, Juneau, AK.

PROPOSAL 259 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.
Reauthorize a winter any-moose season during part of February and March in Unit 21E.

Current Federal Regulations:

Unit 21E – Moose

Unit 21E—1 moose; however, only bulls may be taken from Aug. 25 – Sept. 30. During the Feb. 15 – Mar. 15 season a Federal registration permit (FM2104 or FM2105) is required per household. The permit conditions and any needed closures for the winter season will be announced by the Innoko NWR manager after consultation with the ADF&G Area Biologist and the Chairs of the Western Interior Alaska subsistence Regional Advisory Council and Grayling Anvik Shageluk Holy Cross Advisory Committees. Moose may not be taken within one-half mile of the Innoko or Yukon River during the winter season.

*Aug. 25 – Sept. 30
Feb. 15 – Mar. 15*

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: This proposal will provide Federally qualified subsistence users continued opportunities to harvest moose. It is not expected to have a detrimental effect on the Unit 21E moose population. This proposal is consistent with the Unit 21E moose management plan (Peirce 2018), which calls for a population objective of 9,000-11,000 moose and providing for a harvest of moose not to exceed 360 moose or 4% of the annual moose population estimate each regulatory year. Currently there is approximately 200 moose harvested every year.

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

Rationale: This proposal provides additional harvest opportunity to Federally qualified subsistence users without risking the long-term viability of the moose population.

Literature Cited

Peirce, Joshua, M. 2018. Moose Management Report and Plan, Game Management Unit 21A and 21E: Report Period 1 July 2010–30 June 2015, and Plan Period 1 July 2015–30 June 2020. Pages 2-3. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018-21, Juneau, AK.

PROPOSAL 260 – 5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in the western portion of Unit 26A.

Current Federal Regulations:

Unit 26A

Unit 26A—That portion of the Colville River drainage upstream from (and including) the Anaktuvuk River drainage—1 bull.

QR

Unit 26A—that portion of the Colville river drainage upstream from (and including) the Anaktuvuk River drainage—1 moose; however, you may not take a calf or cow accompanied by a calf.

OR

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

OR

Unit 26A remainder—I bull. Aug. 1—Sept. 14



Is a similar issue being addressed by the Federal Subsistence Board? Yes, currently there is a wildlife proposal (WP22-54). WP22-54 proposes to move the boundary for Unit 26A—that portion west of 156°00'W. longitude excluding the Colville River drainage, east to follow the Alaktak River from Admiralty Bay to 155°00'W. Longitude.

Impact to Federal subsistence users/wildlife: This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose. It is not expected to have a detrimental effect on the Unit 26A moose population.

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

Rationale: This moose population is sparse in an area with marginal habitat. Many of the moose moving through the area are transient. Harvest of antlerless moose harvest within this area is minimal with only 5 being reported since 2005. This proposal provides additional harvest opportunity to Federally qualified subsistence users without risking the long-term viability of the moose population.

PROPOSAL 261 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions. Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska

Current Federal Regulations:

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

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

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: It is unlikely there would be any impact on the brown bear population if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

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



PROPOSAL 262 – 5 AAC 92.015. Brown bear tag fee exemptions. Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A

Current Federal Regulations:

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

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

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: It is unlikely there would be any impact on the brown bear population if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

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

PROPOSAL 269 – 5 AAC 85.025(a)(5). Hunting seasons and bag limits for caribou.

Create a tiered hunt structure and open a hunt for the Unimak Island caribou herd.

Current Federal Regulations:

Unit 10—Caribou

*Unit 10, Unimak Island only—1 bull by Federal registration permit. Aug. 1-Sep. 30.
Federal public lands are closed to the taking of caribou except by residents of False Pass*

Is a similar issue being addressed by the Federal Subsistence Board? Yes, currently there is a wildlife proposal (WP22-38b). WP22-38b proposes to close Federal public lands in Unit 10, Unimak Island only to caribou hunting except by Federally qualified subsistence users unless the caribou population estimate exceeds a population threshold.



Impact to Federal subsistence users/wildlife: The proposal will provide Federally qualified subsistence users continued opportunities to harvest caribou in Unit 10, Uimak Island. It is not expected to have a detrimental effect on the Unit 10, Uimak Island caribou, but may help stabilize the population within sustainable levels and prevent drastic population fluctuations, which have occurred in the past.

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

Rationale: A tiered hunt system can be used to help maintain the Uimak caribou herd population within sustainable levels and harvest opportunity for subsistence users. As of 2018, the estimated population for the Uimak Caribou Herd was 413, with a high bull:cow ratio (78 bulls:100 cows), indicating that there may be additional animals available for harvest (Crowley 2019, pers. comm.). This proposal provides additional opportunity to Federally qualified subsistence users without risking the long-term viability of the caribou population due to the tiered hunt structure. OSM hopes State and Federal managers will work together on administering this hunt.

Literature Cited

Crowley, D. 2019. Wildlife Biologist. Personal communication: e-mail: ADF&G. King Salmon, AK.

PROPOSAL 270 – 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose. Open an antlerless moose hunt in a portion of Unit 20E.

Current Federal Regulations:

Unit 20E — Moose

Unit 20E, that portion within Yukon-Charley Rivers National Preserve - 1 bull Aug. 20-Sept. 30.

Unit 20E, that portion drained by the Middle Fork of the Fortymile River upstream from and including the Joseph Creek drainage - 1 bull Aug. 20-Sept. 30.

Unit 20E, remainder - 1 bull by joint Federal/State registration permit Aug. 20-Sept. 30.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal will increase harvest opportunity for Federally qualified subsistence users by allowing opportunities to harvest antlerless moose. This would increase the harvest pressure on a growing moose population. Moose densities along the Taylor Highway in southern Unit 20E have doubled since 2005 from .68 moose/mi² to 1.36 moose/mi². The cow segment of the population grew at an estimated 5.8% per year while the bull segment of the population, which is limited by higher natural mortality and harvest, grew at half the rate.



Adoption of this proposal would further the misalignment of Federal and State regulation potentially increasing user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

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

Rationale: This proposal would allow additional opportunity for Federally qualified subsistence users to harvest antlerless moose in this unit and provide management flexibility. The moose population in the southern portion of Unit 20E is growing. Having the management flexibility to control the cow segment of the population will allow for a targeted approach for maintaining a healthy population below carrying capacity of the habitat while allowing more harvest opportunities for Federally qualified subsistence users. Conservation concerns are mitigated as this would be a drawing permit hunt with a limited number of permits that could be adjusted annually based on population status.



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503



In Reply Refer to:
FWS/IR11/20139

DEC 11 2020

Mr. Stosh Hoffman, Chairman
Attention: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
Juneau, Alaska 99811-5526

Dear Chairman Hoffman:

The Alaska Board of Game (Board) is scheduled to meet at to be determined dates to deliberate proposals concerning changes to Statewide regulations governing hunting and trapping of wildlife. We have reviewed the 90 proposals the Board will be considering at this meeting.

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

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, Office of Subsistence Management, State Subsistence Liaison, 907-317-2165 or george_pappas@fws.gov, with any questions you may have concerning this material.

Sincerely,

Sue Detwiler
Assistant Regional Director
Office of Subsistence Management

Enclosure

cc: Chair, Federal Subsistence Board
Deputy Assistant Regional Director, Office of Subsistence Management
Policy Coordinator, Office of Subsistence Management
State Subsistence Liaison, Office of Subsistence Management
Wildlife Division Supervisor, Office of Subsistence Management
Subsistence Regional Advisory Council Coordinators,
Office of Subsistence Management
Chair, Southeast Alaska Subsistence Regional Advisory Council
Chair, Southcentral Alaska Subsistence Regional Advisory Council
Chair, Kodiak/Aleutians Subsistence Regional Advisory Council
Chair, Bristol Bay Subsistence Regional Advisory Council
Chair, Yukon Kuskokwim Delta Subsistence Regional Advisory Council
Chair, Western Interior Alaska Subsistence Regional Advisory Council
Chair, Seward Peninsula Subsistence Regional Advisory Council
Chair, Northwest Arctic Subsistence Regional Advisory Council
Chair, Eastern Interior Alaska Subsistence Regional Advisory Council
Chair, North Slope Subsistence Regional Advisory Council
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,
Alaska Department of Fish and Game
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Statewide Regulations

March 12-19, 2021

Fairbanks, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 130 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.

Prohibit the use of deer or elk urine as bait or natural scent lures.

Current Federal Regulations:

§ 25(a) Definitions. The following definitions apply to all regulations contained in this part:

Scent lure (in reference to bear baiting) means any biodegradable material to which biodegradable scent is applied or infused.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal could benefit wildlife populations by preventing the infection and spread of chronic wasting disease (CWD). While CWD has not been detected in Alaska, preventing disease is much easier than mitigating its spread once detected. This proposal could burden subsistence users who would no longer be able to use cervid urine as a scent lure.

Of note, the definition for scent lure under Federal subsistence hunting regulations pertains only to bear baiting and contains no prohibition on any cervid urine. As such, cervid urine can be used as a scent lure under Federal subsistence hunting regulations. Adoption of this proposal would result in misalignment between State and Federal regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

Rationale: OSM supports preventing the transmission of disease to maintain healthy wildlife populations. However, to be truly effective, a similar proposal needs to be submitted to the Federal Subsistence Board.

PROPOSAL 131 – 5 AAC 92.210. Game as animal food or bait.

Allow the use of game bird wings and backs to be used for trapping bait.

Current Federal Regulations:

§ 100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations

(j)(1) You may not use wildlife as food for a dog or furbearer, or as bait, except as allowed or in §100.26, §100.27, or §100.28, or except for the following:

(i) The hide, skin, viscera, head, or bones of wildlife;

(ii) The skinned carcass of a furbearer;



(iii) Squirrels, hares (rabbits), grouse, or ptarmigan; however, you may not use the breast meat of grouse and ptarmigan as animal food or bait;

(iv) Unclassified wildlife.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: While the Board does not have authority over edible meat requirements for migratory birds, including swans, geese, and cranes, it does have authority over what can be used as trapping bait. Currently, Federal and State regulations do not permit using animal parts that are required for human consumption as bait. This proposal would result in misalignment of State and Federal regulations, which could result in user confusion and regulatory complexity. While using wing and back meat as bait may benefit some Federally qualified subsistence users by providing additional options for bait, others may view it as wasteful. No effects to wildlife populations are expected from this proposal.

Additionally, the edible meat salvage requirement under Federal migratory bird regulations recently changed to include the meat from the breast, back, thighs, legs, wings, gizzard, and heart of all migratory birds. While this requirement is more restrictive than State regulations, subsistence users supported restricting themselves to better align with traditional subsistence uses of migratory birds. Most subsistence users desire to utilize more of the bird for human consumption.

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

Rationale: This proposal requests allowing meat required to be salvaged for human consumption to be used as trapping bait. It would also misalign Federal and State regulations, creating user confusion and regulatory complexity.

PROPOSAL 132 – 5 AAC 92.990. Definitions. 5 AAC 92.210. Game as animal food or bait.

5 AAC 92.220. Salvage of game meat, furs, and hides.

Allow bird wings and parts to be used for trapping.

See comments for Proposal 131.

PROPOSAL 170 – 5 AAC 92.450. Description of game management units.

Modify the Unit 1C and Unit 4 boundaries.

Current Federal Regulations:

§ 100.26 Subsistence taking of wildlife

(n)(l)(iii) Unit 1C consists of that portion of Unit I draining into Stephens Passage and Lynn Canal north of Cape Fanshaw and south of the latitude of Eldred Rock including Berners Bay,

Sullivan Island, and all mainland portions north of Chichagof Island and south of the latitude of Eldred Rock, excluding drainages into Farragut Bay.

(n)(4)(i) Unit 4 consists of all islands south and west of Unit 1C and north of Unit 3 including Admiralty, Baranof, Chichagof, Yakobi, Inian, Lemesurier, and Pleasant Islands.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: If this proposal is adopted, Federally qualified subsistence users would need to abide by the State Unit 1C regulations on Pleasant and Porpoise islands. However, as these islands are part of Tongass National Forest, Federally qualified subsistence users could continue hunting on these islands under the Federal subsistence hunting regulation for Unit 4. As Unit 1C has a black bear season, whereas Unit 4 does not, adopting this proposal would increase harvest opportunity for black bear by Federally qualified subsistence users on Pleasant and Porpoise islands under State regulations.

Adopting this proposal would result in more conservative State regulations for deer on Pleasant and Porpoise Islands. While ADF&G cites conservation concerns and unsustainable harvest for deer on these islands under the current Unit 4 regulations, including harvest by Federally qualified subsistence users under Federal regulations, Federal regulations and harvest would not be affected by this proposal.

Adoption of this proposal would result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

Rationale: This proposal would misalign State and Federal unit boundaries for Units 1C and 4, creating user confusion and regulatory complexity. A similar proposal would need to be adopted by the Federal Subsistence Board to fully address the conservation and overharvest concerns for deer stated by the proponent, ADF&G.

PROPOSAL 171 – 5 AAC 92.450. Description of game management units.
Divide Unit 19A into two subunits.

Current Federal Regulations:

§ 100.26 Subsistence taking of wildlife

(n)(19)(i)(A) Unit 19A consists of the Kuskokwim River drainage downstream from and including the Moose Creek drainage on the north bank and downstream from and including the Stony River drainage on the south bank, excluding Unit 19B.



Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: No impact to Federally qualified subsistence users or wildlife is expected from adopting this proposal.

Adoption of this proposal would result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

Rationale: This proposal would misalign State and Federal unit boundaries for Unit 19, increasing user confusion and regulatory complexity.

PROPOSAL 173 – 5 AAC 92.530(7). Management areas.

Repeal the Dalton Highway Corridor Management Area.

Current Federal Regulations:

§ 100.26 Subsistence taking of wildlife

(20)(ii)(C) You may not use firearms, snowmobiles, licensed highway vehicles or motorized vehicles, except aircraft and boats, in the Dalton Highway Corridor Management Area, which consists of those portions of Units 20, 24, 25, and 26 extending 5 miles from each side of the Dalton Highway from the Yukon River to milepost 300 of the Dalton Highway, except as follows: Residents living within the Dalton Highway Corridor Management Area may use snowmobiles only for the subsistence taking of wildlife. You may use licensed highway vehicles only on designated roads within the Dalton Highway Corridor Management Area. The residents of Alatna, Allakaket, Anaktuvuk Pass, Bettles, Evansville, Stevens Village, and residents living within the Corridor may use firearms within the Corridor only for subsistence taking of wildlife.

Note: The exact same regulation is found in: (24)(ii)(A); (25)(ii)(A); and (26)(ii)(B)

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: A repeal of the Dalton Highway Corridor Management Area (DHCMA) would have a significant impact on Federally qualified subsistence users living within the DHCMA and residents of Alatna, Allakaket, Anaktuvuk Pass, Bettles, Evansville, and Stevens Village, as they currently can use snowmobiles and firearms to take wildlife within the DHCMA. If this proposal is adopted, competition with other Alaska residents would increase and would likely result in lower success rates and decreased opportunity for local subsistence users.



Caribou populations from the Teshekpuk Caribou Herd (TCH), Western Arctic Caribou Herd (WCH), and the Central Arctic Caribou Herd (CACH) have ranges that overlap the DHCMA. Repeal of the DHCMA is not recommended as this would increase the disturbance from hunting pressure on caribou and other wildlife populations.

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

Rationale: Repealing the DHCMA may create a conservation concern for caribou and other wildlife due to increased access and disturbance from snowmachines and firearms. Retaining the DHMCA allows caribou to move more freely with less disturbance during migration, and provides better opportunity and a rural subsistence priority for Federally qualified subsistence users.

PROPOSAL 174 – 5 AAC 85.045(a)(1). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 1C.

Current Federal Regulations:

Unit 1C–Moose

<i>Unit 1C—that portion south of Point Hobart including all Port Houghton drainages—1 antlered bull with spike-fork or 50-inch antlers or 3 or more brow tines on one side, or antlers with 2 brow tines on both sides, by State registration permit only</i>	<i>Sep. 15-Oct. 15.</i>
<i>Unit 1C, remainder, excluding drainages of Berners Bay—1 bull by State registration permit only</i>	<i>Sep. 15-Oct. 15.</i>
<i>Unit 1C—Berners Bay—1 bull by drawing permit</i>	<i>Sep. 15-Oct. 15</i> <i>(will be announced starting in 2019).</i>
<i>Only one moose permit may be issued per household. A household receiving a State permit for Berners Bay drainages moose may not receive a Federal permit. The annual harvest quota will be announced by the USDA Forest Service, Juneau office, in consultation with ADF&G. The Federal harvest allocation will be 25% (rounded up to the next whole number) of bull moose permits</i>	

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Both antlerless moose seasons in Unit 1C are by draw permit only and ADF&G has the management authority to determine how many permits to issue each year. As Unit 1C moose populations do not currently support any antlerless harvest, ADF&G has indicated no permits will be issued this year. Therefore, no impacts to Federally qualified subsistence users or wildlife are expected from adoption of this proposal.

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

Rationale: While the Unit 1C moose populations do not currently support any antlerless moose harvest, reauthorizing these draw permit-only seasons maintains management flexibility for ADF&G to provide more harvest opportunity in the event that populations increase to a level warranting antlerless harvest.

PROPOSAL 175 – 5 AAC 85.045(a)(3). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose hunt in Unit 5A, Nunatak Bench.

Current Federal Regulations:

Unit 5A–Moose

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

Nov. 15-Feb. 15.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users, although this hunt has not occurred in recent years due to a low moose population. If this proposal is adopted, Federal and State regulations would maintain alignment, decreasing regulatory complexity and user confusion.

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

Rationale: While the Nunatak Bench moose population does not currently support any antlerless moose harvest, reauthorizing this quota-managed hunt maintains management flexibility for ADF&G to provide more harvest opportunity in the event that the population increases to a level threatening habitat damage and warranting antlerless harvest.

PROPOSAL 176 – 5 AAC 085.045(4). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 6C.

Current Federal Regulations:

Unit 6C–Moose

Unit 6C—1 antlerless moose by Federal drawing permit only

Sep. 1-Oct. 31.

Permits for the portion of the antlerless moose quota not harvested in the Sep. 1-Oct. 31 hunt may be available for redistribution for a Nov. 1-Dec. 31 hunt.



Unit 6C—1 bull by Federal drawing permit only

Sep. 1-Dec. 31.

In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose may not receive a Federal permit. The annual harvest quota will be announced by the U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits.

Federal public lands are closed to the harvest of moose except by federally qualified users with a Federal permit for Unit 6C moose, Nov. 1-Dec. 31

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users, although this hunt has not occurred in recent years because the antlerless moose quota has been met under Federal regulations. As this hunt is closely managed by a joint State/Federal harvest quota, no impact to the moose population is expected if this proposal is adopted.

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

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users. While the Unit 6C moose population does not currently support additional antlerless moose harvest under State regulations, reauthorizing this season maintains management flexibility for ADF&G to provide more harvest opportunity in the event that the available antlerless harvest quota is not met under Federal regulations or if warranted by population or habitat conditions.

PROPOSAL 177 – 5 AAC 85.045(5). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C.

Current Federal Regulations:

Unit 7–Moose

Unit 7, remainder--1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only Aug. 10-Sep. 20.

Unit 14–Moose

No Federal open season

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users, although opportunity is limited as this is a drawing hunt with a limited number of permits. These hunts are closely managed through permit numbers, which ensures sustainable harvests. These antlerless hunts also help reduce over-browsing of habitat and moose-vehicle collisions.

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

Rationale: No conservation concerns exist as the antlerless hunt is closely managed through permit numbers; these hunts also provide additional hunting opportunity.

PROPOSAL 181 – 5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.
Reauthorize the resident antlerless moose season in Unit 18.

Current Federal Regulations:

Unit 18–Moose

Unit 18—south of the Eek River drainage and north of the Goodnews River drainage—1 antlered bull by State registration permit. Sept. 1-30.

Unit 18--Goodnews River drainage and south to the Unit 18 boundary--1 antlered bull by State registration permit Sep. 1-30.

OR

1 moose by State registration permit A season may be announced between Dec. 1 and the last day of Feb.

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

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The Unit 18, remainder moose population is very high, continues to grow and can support additional harvest. While the Goodnews River drainage moose population can support some additional harvest, the antlerless moose season can be closed by Emergency Order if needed, and the quota has not been met in recent years.

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

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users, and these moose populations can withstand additional harvest.

PROPOSAL 182 – 5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.
Reauthorize a winter antlerless moose season during February in a portion of Unit 19D.

Current Federal Regulations:

Unit 19D–Moose

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

Unit 19D-remainder of the Upper Kuskokwim Controlled Use Area—1 bull Sep. 1-30.

Dec. 1-Feb. 28.

Dec. 1-15.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The Unit 19D moose population is exhibiting signs of nutritional stress as evidenced by low twinning rates, warranting antlerless harvest to help stabilize the population and curtail over browsing of habitat.

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

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users, and this moose population warrants additional harvest.

PROPOSAL 186 – 5 AAC 85.045(a)(19)(B). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during March in a portion of Unit 21D.

Current Federal Regulations:

Unit 21D–Moose

*Unit 21D, that portion south of the south bank of the Yukon River,
downstream of the up-river entrance of Kala Slough and west of Kala
Creek—1 moose by State registration permit.*

Antlerless moose may be taken only during Sept. 21 - 25 season if authorized jointly by the Koyukuk/Nowitna/Innoko NWR manager and BLM Central Yukon field office manager

Antlerless moose may be harvested during any of the winter seasons. Season may be announced.

Harvest of cow moose accompanied by calves is prohibited.



Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The Kaiyuh Flats moose population is growing rapidly and can support additional harvest.

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

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users. A harvestable surplus of moose exists in Kaiyuh Flats area of Unit 21D, and additional cow moose harvest may help this population grow at a more sustainable rate.

PROPOSAL 187 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.
Reauthorize a winter any-moose season during part of February and March in Unit 21E.

Current Federal Regulations:

Unit 21E–Moose

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

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

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The moose population in Unit 21E is growing, beginning to show signs of nutritional stress, and can support additional harvest.

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

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users. A harvestable surplus of moose exists in Unit 21E, and additional harvest may help stabilize the population and prevent overutilization of the habitat.

PROPOSAL 188 – 5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.
Reauthorize the antlerless moose season in the western portion of Unit 26A.



Current Federal Regulations:

Unit 26A—Moose

Unit 26A—that portion west of 156°00' W longitude excluding the Colville River drainage—1 moose, however, you may not take a calf or a cow accompanied by a calf July 1-Sep. 14.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. However, Federally qualified subsistence users would still be able to harvest antlerless moose under Federal subsistence regulations if this season is not reauthorized under State regulations. While the moose population is very sparse in this area, hunting pressure and harvest is extremely low, minimizing conservation concerns.

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

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users, and low harvest pressure minimizes conservation concerns.

PROPOSAL 189 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska.

Current Federal Regulations:

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

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

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: It is unlikely there would be any impact on the brown bear population if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

Rationale: There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted, it would continue the tag fee exemption, which eliminates the requirement that



Federally qualified subsistence users purchase a \$25 tag before hunting brown bears in these units. This decreases costs and maintains opportunity for Federally qualified subsistence users.

PROPOSAL 190 – 5 AAC 92.015. Brown bear tag fee exemptions.

Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A.

Current Federal Regulations:

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

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

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: It is unlikely there would be any impact on the brown bear population if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

Rationale: There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted, it would continue the tag fee exemption, which eliminates the requirement that Federally qualified subsistence users purchase a \$25 tag before hunting brown bears in these units. This decreases costs and maintains opportunity for Federally qualified subsistence users.



Submitted By

Nicholas Orr

Submitted On

1/5/2021 10:07:41 PM

Affiliation

I am against proposal #170 as it creates yet another area of unequal hunting rights among Alaskans. The proposal suggests that potential harvest under current regulations is unsustainable, but since ADFG cannot limit federally qualified users--who can essentially harvest unlimited deer by using designated hunters--they instead suggest that non-federally qualified subsistence users bear the conservation burden instead.

ADFG suggests that low recent (RY2014 – RY2018) harvest numbers indicate that Pleasant Island belongs in Unit 1 and that mild winters are causing deer to disperse to the mainland. I disagree, as the harvest numbers from RY2009 – RY2013 were much better (and I suspect that harvest numbers prior to the severe 2007 winter were also robust). Furthermore, the low harvest numbers are likely due to a significant wolf presence on Pleasant Island. I would say it's common knowledge among trappers who target wolves in northern southeast (or at least among Juneau wolf trappers) that Pleasant Island has experienced a dramatic increase in wolf numbers during the same time period (RY2014 – RY2018). The same dramatic decrease in harvest -- coincidentally during the same time period -- has occurred on Douglas Island (Juneau) for precisely the same reason: a dramatic increase in wolves.

If a sustainable harvest of deer on Pleasant Island is the goal, lowering bag limits or moving Pleasant Island from Unit 4 to Unit 1 isn't going to have any effect since the current harvest is already close to or equaling zero in recent years. Instead, encourage and support Gustavus based wolf trappers. As for the reclassification of Pleasant Island opening a black bear hunt in Unit 4, this can be addressed by adding black bear regulations to Unit 4 during the next cycle for southeast Alaska.

Submitted By

Nicholas Orr

Submitted On

1/7/2021 10:50:20 PM

Affiliation

I support the passage of proposal 161. There is limited meat in between deer ribs. I have weighed trimmed strips from deer that I have taken and the weight comes out to less than 1lb. There is more meat in each of the following (salvage of which is not required): the diaphragm, the heart, the stomach lining (flank). The proposal is correct in that this would help limit time at a kill site in areas with brown bears, which is common sense and a reasonable trade off for the limited meat that would not be salvaged. I would also point out that rib meat is not required to be salvaged by any other state.



Submitted By
Sarah M Osborne
Submitted On
2/18/2022 1:32:50 PM
Affiliation

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Hi I'm writing in regards to trapping on MatSu area trails. I think that the State should disallow trapping on popular trails. Trapping is a long time Alaska tradition and should be allowed, but the trappers should not expect to have carte blanche to place traps anywhere they like, without consideration of the impact on other trail users. Aside even from the leash law debate (and concern over traps killing pets) traps can catch people and children too, when they become covered by snow or are unattended by their owners for long periods of time. I think it's kind of ridiculous that you can pretty much set up a dangerous trap wherever you want, without regard to human or animal life! I don't think trapping should be banned, but like other uses of public land, it should be regulated such that all users can have a share in the resource.

Typically, users of the close to town popular trails are using the trails to exercise, and thus by the nature of human powered endeavors, are somewhat limited in the distances they can travel. Trapping, on the other hand, is a way of life, and (though it makes little actual economic sense in the current age) is a way of earning income. It has been historically practiced by the rural or remote Alaskan as a way to fund a particular lifestyle, or earn a living. Because most trappers used motorized vehicles to set and monitor their trap lines, they don't need to have trails that are close to town or close to a trailhead. At 30mph on a snowmachine you can get beyond where most recreationalists travel in a matter of minutes. Therefore, human powered users should have priority for closer trails, while trappers can have their run of areas that are farther away and less populated.

Perhaps in addition to a regulation, the State could start a public education campaign, wherein trappers are educated on what is considered ethical and appropriate and why they should follow rules and/or ethical trapping practices. I have a neighbor and good friend who used to run a trapline near our house. He would always tell us when he baited, post signs, and start his line well beyond where our property was and where our dog would wander. Another local trapper in chickaloon trapped on the popular King River and Permanent Trails, and put up signs right along the trail warning users that traps were nearby. My dog never got into any of their traps because I knew there were traps there and could keep my dog safe. But trapping in super popular residential areas like Wendt Road and GPRA, without any signs or warnings, that should not be allowed! I don't know the ins and outs of borough code and state law, but I do know that things are not working as they are.

Seems a shame for the two user groups to be so in conflict with each other, when the dog human partnership is as ingrained in Alaska culture as trapping is...especially since prior to the common availability of snowmachines (and the birth of the "urban trapper" who does it for fun and identity) traplines were set and maintained by teams of dogs.

Specific areas that should be disallowed:

GPRA

Archangel Rd

Moose Range from Wendt to Jonesville

Hunter Creek Access to Knik River/Glacier (this area is huge and open, so a setback of half mile from the main trail would probably save most dogs)

Crevasse Moraine/Kepler Bradley/Kin Win

Matanuska River Park

This still leaves a huge area of Southcentral Alaska for trappers to use (Willow side of Hatcher Pass, Purinton Creek, Permanent/Kings River, Ruby Lake, Pinochle/Victory, all of the drainages near Eureka/Sheep Mountain. On the south side they could have Jim Creek, Maud Road, Maud Plumley, Matanuska Peak trail, and drainages east such as Carpenter and Coal). These areas are more often used by motorized users who tend to not bring pets, they are generally on the road system so the 'urban trappers' can trailer their snowmachines/sideby side trail destruction machines there, and are also close to rural communities where trappers can live an anachronistic lifestyle if they should choose.



I don't really see why this is such a hard decision, as opposing user groups share turnagain and hatcher passes (snow machiners vs backcountry skiers)...Also, on a separate tangent- the State regulates subsistence hunting and fishing, with specific areas where those activities occur, and who can participate, based on their residence and living style. Why couldn't trapping be the same? if you are living a subsistence lifestyle in a subsistence area (such that trapping isn't just a hobby-ie sport trapping vs subsistence trapping) then you can trap wherever you want within your area. if you are "sport trapping" then you can't trap in the recreational areas and have to follow setback and signage rules in others...it doesn't seem like rocket science to just divide up the competing non compatible uses into user areas!!

I think the real answer is politics and the fact that Alaska is very politically conservative and divided on party lines, so I don't know why I'm even wasting my time writing this letter but I'm tired of plowing and needed a break anyway. PS in terms of demographics I live off grid in the back of beyond and am surrounded by trappers and motorized users and we all get along because we are not total [REDACTED].
(insert shrug here)

Submitted By
Jennifer Padelford
Submitted On
2/18/2022 2:52:32 PM
Affiliation



PC133
1 of 1

Please please pass proposal 144 and allow cats who have been spayed/neutered to return to their outside homes. This type of program, (TNR) has been successful in Minnesota since 1972, and other U.S. states and countries. There is no need to murder innocent annimals because we have a people problem, not an animal problem. Thank you.



PC134
1 of 1

Submitted By
Sylvia & Marius Panzarella

Submitted On
2/18/2022 1:42:49 PM

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Self

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We are writing in support of Proposal 144 TNVR. It is such a wonderful proposal that is a compassionate and common sense approach. It encourages knowledgeable people to help the situation right itself. If you really want to improve things, pass this proposal.

Sylvia & Marius Panzarella



Spencer Pape

Proposal 267 (ACR-4)

Limit or restrict all non-resident sheep hunting in 19C

Strongly oppose

The way the proposal is written favors one user group. A more detailed and more recent population survey should be taken before limiting or restricting sheep hunting opportunities.

Please excuse the extensive use of article quotations, but I believe it is all salient information and applicable to this topic. I spend over 50 days a year in 19C and have since 2012. I believe 19C is experiencing an event similar to that in the western Brooks Range in 2013. From the article 'Dall's Sheep News' from 2017 on the ADF&G website: "The western Brooks Range population, which is at the very edge of Dall's sheep range on this continent, has experienced a recent, rapid and significant decline in sheep numbers. The weather plays a major role in driving sheep populations, and severe winter conditions in 2013 persisted into May where snowpack in some areas was three times the average. The western Brooks range sheep population experienced significant mortality across age and sex classes (including mature rams)."

Also from the article: "Current management strategies have maintained a consistent, long-season, general-harvest sheep hunt in Alaska for many decades. Issues do exist, but long-term data sets indicate that sheep populations are doing well, and hunters are largely successful. The Alaska Department of Fish and Game (ADF&G) hopes the current broad opportunities for sheep hunting will continue well into the future.

Sheep hunting opportunities are stable from a biological standpoint, sheep harvest management in Alaska has been successful. In Interior Alaska (the area with the majority of Alaska's sheep range and the largest percentage of the sheep), sheep managers' report that, by and large, the way hunts have been structured and managed has resulted in stable opportunities and hunter success. In 2016, 2,345 hunters reported hunting sheep in Alaska, with a reported harvest of 797 animals. The majority of this take was from the general season hunt which has been in place for decades and provides all hunters with an opportunity to harvest a sheep.

Hunting management and regulation are needed to prevent harvest from exceeding the recruitment of new animals into a population. When areas have heavy hunting pressure and face increased limitations, one way to keep opportunity open for more people is for managers to limit the sex or age class of the animals available for harvest. For example, the spike/fork-50-inch regulation for moose hunting has allowed more people to hunt moose for a longer season, while keeping harvest at sustainable levels. **Full-curl management is a similar approach to preserve sheep hunting opportunity while conserving sheep. Limiting harvest to older full-curl rams ensures that the population's productivity is not affected by harvest. Compared to the harvest of other ungulates, the harvest rates of sheep in Alaska are low and expected effects of human take on sheep populations is accordingly, negligible (emphasis added).**

Some people refer to the good old days of sheep hunting as though there were significantly more sheep in the past. However, sheep populations fluctuate both over the long term and within the short term. There were times when the various sheep populations in Alaska were higher and lower than they are now. A timeline history of sheep season lengths presented on page seven reflects those fluctuations. It may surprise some people to know that there were three sheep season closures – no sheep season at all – in the early 1940s."

The Dall's sheep resource should be available to all user groups. Without non-resident hunters the state of Alaska will lose out on necessary funds. The Federal Aid in Wildlife Restoration Act, often referred to as the Pittman-Robertson Act, provides funds to state fish and wildlife agencies and territories for wildlife management and research, and funds projects to restore, conserve, and enhance wildlife populations and their habitats. This is one of the biggest assets to helping regulate and maintain Dall's sheep populations. The amount of dollars available through this matching program is greatly increased by allowing nonresident hunting. Dall's sheep populations are cyclical. Since the early 1900s record keeping has proven that. Studies have shown that when sheep numbers are high more hunters go to the field and when sheep numbers are low fewer hunters go to the field. If and when surveys prove that the sheep population is on the brink, then close the season completely. Don't limit it to one user group. This is precisely the decision that was made in the 1940s, when this issue was raised. Per the information on the ADF&G website, 'Dall's Sheep News', paragraph 3: "From a biological standpoint, sheep harvest management in Alaska has been successful." In this management plan a full curl regulation exists that helps preserve sheep hunting opportunities. With the current management plan and a stretch of mild winters, the Dall's sheep population will rebound. Time has proven this.

Respectfully,
Spencer Pape

Spencer Pape

www.lakeclarke.com

Submitted By
Tyann Payne

Submitted On
2/17/2022 7:09:26 PM

Affiliation

I support proposition 199, for safe trails for all.



PC136
1 of 1



Submitted By
Mary Pemberton
Submitted On
2/16/2022 9:19:47 AM
Affiliation

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Chugiak, Alaska 99567

To the Board of Game:

I am writing in support of Proposal 199 requiring a 50-yard setback for certain multi-use areas of the Mat-Su, particularly the Rabbit Slough area, which has become far more used by people looking to recreate in recent years. Years ago, one of my dogs sniffed out a snare that was perhaps 30 feet off the road going to the boat launch. My dog was not injured but this left me wary of the area. Please approve these setbacks. These areas in recent years are becoming more heavily used, especially the Reflection Lake area, and need to be tailored to a wider variety of users.



Submitted By
Chris Perry

Submitted On
2/18/2022 10:22:37 PM

Affiliation

BOG proposal 199 public comment

Please enter my public comment

on Board of game proposal 199 accepting a trapping trail setback distance for easements and existing high use trails.

I have lived in alaska for 39 years and enjoy the backcountry and wilderness of the state. Please support BofG proposal 199 pertaining to trail setbacks for trapping in Matsu and all other parts of the state. My dog was trapped within 20 feet of a trail side(within the 60' centerline easement) of a summer road and winter trail. I have used this road/trail for 39 years for summer and winter recreation. 2 weeks later another dog was trapped about 200 feet from the same location by a different trapper. That dog spent three days in the trap before being released. There was a 3 foot deep recess in the snow where that poor dog lay waiting for help. After the dogs release and return home, the dog's owner waited for the trapper to return to his truck, where he screamed at her to keep her dog home. Her property line was less than 100 yards from the trap location. My dog has very good voice control, and the fact that my dog can't be 20' away from me on any public use trail without a chance of dying in a conibear trap is unacceptable. I don't think this was the intent of the trappers' code of ethics. Furthermore, for me not to be able to identify whose trap did this to my dog is also unexceptable. There was trespass trapping in the area with traps set and abandoned on private property, again by an unidentified owner. Again a misinterpretation of the code of ethics is all I can presume. Two of these dogs where trapped on private property abutting my property with large parcels in this subdivision. I have to assume that traps can be put within the easement and up to the very start of my property without any signage. I have trouble understanding how 1 trapper can, with his interpretation of "code of ethics" is allowed to close an entire trail system to traditional users for potentially 8 months of the year and then abandoning armed traps in the area with no possible way to be held responsible.

Since the beginning of 2021, there have been 7 dogs trapped, that I know of, within 5 miles of my place, including the 2 dogs already mentioned. Four of these dogs were trapped within 20 feet of the trailside. One of the trappers only checks his traps once a week. When does this become cruelty to animals? Clearly there is a different understanding of the trappers' code of ethics than my understanding here. Clearly the trappers' code of ethics is open to one's own interpretation, and the rest of the residents of Alaska have to live with it. Yes, there are very responsible trappers and many people around the state who are solely dependent on the trade for subsistence and livelihood. I don't want Alaska to "turn into California" either, but does that mean we have to live with fear of losing our pet's life if we step off the trail anywhere in the state, because someone interprets ethics differently than most people do?

I try to compare and rationalize some of this, for instance: for me to put subsistence crab pots in Kachemak Bay, I need to register them, mark my gear with name and address, and adhere to strict reporting requirements. I wish we had only a code of ethics to adhere to. If I should leave a pot after season closure or out of legal area, be sure I will be ticketed and fined accordingly. I dont think I am endangering anyone by putting my gear where it is, but I am held to much higher standards and regulation.

I met a trapper in the area last week. I would estimate he had around \$75,000 worth of equipment: truck, a couple snogos, trailer and sleds to get him to his trapping location, It's sad he couldn't go just another couple hundred yards to get off public use trails to set his gear. I do understand, nowadays, with fat tire bikes and extreme backcountry athletes, a snogo trail is a highway to the wilderness. We are not asking for all of Alaska be trap free, just an ethical setback distance from existing easements and higher use backcountry trails. Marking ownership of traps is the only way to demand trappers are held to a code of ethics and ethical trapping, and all trappers should be held to these standards.

Please vote to establish at least 100 yard setbacks from easements and existing higher use trails and trailheads. This seems like a reasonable request to help reduce conflicts between user groups.

thank you for your time and consideration.

Chris Perry

Submitted By
Colleen M Peterson

Submitted On
2/17/2022 1:10:43 PM

Affiliation



PC139
1 of 1

I fully support Proposal 199 trap setback from trails in the Mat-Su Region. I have been running my hunting dogs on the local trails for over 30 years and although I personally have never encountered a trap or snare, many of my friends have. This subject came up before Matanuska Borough a couple years ago and they banned trapping within 50 yards in Cravasse, Lazy Mtn and other local multi-use trails.

It is time for the BOG to do the same. Trapping should not be allowed in populated areas period.

I would like to see a 1/4 mile setback. But 50 yards is a start. There also should be a sign that indicates traps are set in /near the area.

Thank you for your consideration

Colleen Peterson



Submitted By
Candace Paige Petr
Submitted On
2/18/2022 4:35:31 PM
Affiliation

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Anchorage , Alaska 99507

Alaska Board of Game Members:

My name is Paige Petr. I moved to Anchorage almost 20 years ago thinking I would stay for "a couple years." I love Alaska, it is my home. I'm writing to support Proposal 199 which requests 50-yard trap setbacks on more than 200 multi-use trails in the Mat-Su area. I understand this distance is considered a "reasonable compromise" between user groups in other areas of Alaska.

Trail-users with dogs are a large stakeholder group for Mat-Su area trails, which is why it's difficult to understand how it is legal for traps to be set on or near multi-use trails, campgrounds, roads and pullouts. The Mat-Su Valley (and Southcentral Alaska generally) is growing rapidly. There are many more people (including tourists) and dogs using these trails, campgrounds, roads and pullouts and the consequences are too great to not set traps back at least 50 yards.

I am a dog owner and have covered hundreds of miles on foot, bike and skis with my various dogs over the last 20 years. This issue became deeply personal when a dear friend lost her pet in a deadly conibear trap last month on a trail in Seward. The trap was not far from a well used trailhead and was baited by a scent that proved irresistible to her dog. Losing essentially a family member in such a horrific way has been traumatic to say the least.

Please approve Proposal 199 and 50-yard trap setbacks on more than 200 multi-use trails in the Mat-Su area. I believe this is a more humane, safe and reasonable rule than what is currently in place for trapping in the Mat-Su area.

Thank you for your consideration.

Respectfully,

C. Paige Petr

Submitted By
Paula Phillips
Submitted On
1/9/2022 11:51:25 AM
Affiliation

I support the 50 yard setback for trapping. Prop 199



PC141
1 of 1



Submitted By

Amanda Piatt

Submitted On

2/18/2022 1:27:18 PM

Affiliation

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My name is Amanda Piatt. I am a lifelong Alaskan and grew up in Palmer. I split my time between my home in Girdwood and at Sheep Mountain. I am in support of Proposal 199. While I don't personally trap, I come from a family that does. I believe a 50-yard trap setback is a fair compromise between trappers and those of us that enjoy these trails with our children and pets. Proposal 199 is a positive step towards public safety and reducing user conflict on Matsu trail systems.

Submitted By
Denise Piatt
Submitted On
2/18/2022 1:49:55 PM
Affiliation



PC143
1 of 1

My name is Denise Piatt. I was raised in Anchorage and have lived in Palmer/Wasilla for the last 30 years. I am in support of Proposal 199. I am not against trapping but believe current regulations fall short of protecting all trail user groups. A 50-yard trap setback on Matsu trails is a fair compromise and important step towards public safety.

Submitted By
Michael Piatt

Submitted On
2/18/2022 1:45:37 PM

Affiliation



PC144
1 of 1

My name is Michael Piatt. I am a lifelong Alaskan and have lived in Palmer/Wasilla for the last 30 years. I am in support of Proposal 199. I've trapped throughout my life. I believe a 50-yard trap setback on Matsu trails is a fair compromise and important step towards public safety.



Submitted By
Cabot Pitts
Submitted On
2/18/2022 6:45:48 AM
Affiliation
Resident

Dear Board of Game Members,

My name is Cabot Pitts, I am a resident and currently reside in Palmer, Alaska. I have been a resident of Alaska since 2010 and run and operate Alaska Wild Wind Adventures a big game hunting outfit that operates on the Alaskan Peninsula and within the Wrangell St. Elias mountains. I currently hold commercial operating concession permits with the National Park Service in both areas, along with other stateland and BLM operating permits in surrounding areas. Since 2007, I have had the opportunity to personal hunt and big game guide all over the state. In these comments I would like to address my concerns with a handful of current proposals regarding to what the Board of Game has referred to in the past as "proposal 207 – making it illegal to spot and locate Dall Sheep during the dall sheep hunting season of August 10- September 20"; specifically proposals 135,136, 137, 138 and 139. Proposals 135, 136, 137 are referencing the repeal of the current "207" restrictions and proposal 138 is broadening "207" coverage, proposal 139 is rewording the current "207". I will explain my concerns below.

I have averaged over 250-270 days a year in the field personal hunting and guiding since I first came up to Alaska in the early 2000's. This has given me a great perspective on the effort level of hunters (resident and nonresident) on the mountain and the quality level of the hunts that take place in the areas that I frequent in the state, in this case referring specifically to Dall Sheep hunting prior to and after proposal 207 was enacted in 2015.

I am a pilot and have held my pilots license since 2010 and use my airplane and other part 135 operators in my guiding operations to access the back country and support my operation, guides and hunters in the field. I can easily say that proposal 207 has not affected my personal hunting, guiding or outfitting business in any negative way. It has actually had the opposite effect while out hunting, by making it more enjoyable for all user groups in the mountains, where I have noticed less disturbance of light aircraft buzzing the hillsides while dall sheep season is open.

I would define myself as an ethical fair chase hunter, yet also use airplanes to access the back country, but I do not use aircraft to locate game during any open season. I know that the definition of fair chase can be interpreted differently across the spectrum depending on the hunter, but in my opinion this term fair chase has been stretched over the years, specifically by the majority of hunters that seem to have to use their airplanes to spot and locate game during any hunting season.

Current proposal 135 and 137 have similar statements saying that there are supposed caveats to the current 207 ruling; "that make a pilot act in unsafe ways they may not normally over fears of being turned in for spotting sheep(proposal 135)" OR "we do not need to restrict or limit the way a pilot should be able to fly and cause unnecessary risks to be placed upon them creating more danger than they already face(proposal 137)". These statements made are just false, as when one is going through basic pilot training, we are taught at this beginning level to maintain all control of your airplane when it comes down to making decisions on safety, maneuverability, and safe areas to land. The pilot is in control and makes the decisions. The missed issue that "207" has addressed, is the simple fact that the people in support of resending proposal 207 are not the only user groups in the field. There are boaters, rafters, hikers, subsistence users and non-hunting parties that have also taken the time off to access the mountains and are utilizing the same resources. Access is a privilege we take for granted and the opportunity to be able to hunt in Alaska is priceless and to simply say that 207 is unenforceable and creates safety risks is a front to hide behind. Not all but a big handful of specific people in this aircraft user group that are against 207 use these excuses simply because they are doing just that; **using their aircraft to spot game during season.**

The statements made in proposals 135, 136 and examples in 137 veers far from what 207 is helping enact. 207 is creating an atmosphere that is more enjoyable for everyone in the backcountry and keeping the harassment of game to a minimum (even though there are already harassment rules in effect and certain people still abuse them). Not once in the current 207 proposal is there anything stating that a pilot should alter or restrict the way one flies, especially in the terms of safety. It simply states that you cannot scout and look for dall sheep during season. So during dall sheep season instead of flying at high sheep levels, making multiple passes in back drainages, or continually doing touch and goes in areas, one simply has to take a slightly limited approach to their normal flying antics and realize that 207 is in place to increase the enjoyment and solitude of the backcountry making it better for everyone, not just one user group.

Therefore, I am in full support of proposal 138 which broadens the past proposal 207 to include all open sheep seasons. The dates of 207 should be amended to include the youth season August 1-5 and any other open season during the year. This would help with making 207 a universal blanket coverage during any open sheep season or future season and not single out a certain timeframe. The youth season is a perfect example of why 207 should be extended, as this is a time where basic fundamentals of ethical hunting are being taught and taking place. It is important to instill these ethical practices in our youth, as they are our future leaders and ambassadors of our hunting community. By allowing and teaching these unethical practices as acceptable will just make our problem worse down the road.

Since proposal 139 is looking to take away the current 207 wording, I am not in favor of it as it totally takes away the purpose of what is now in effect. I think that you can add the proposed wording of "aircraft may not be used to make multiple, consecutive approaches near any sheep or group of sheep" to proposal 207, to strengthen the current law. There has to be some sense of personal accountability when it comes to these issues in the field and dealing with different user groups.



In conclusion I would like to point out the purpose of having a Board of Game is to put the welfare of wildlife first. The second goal should be to enact rules and regulations that benefit all user groups, resident & non-resident hunters alike, hikers and sightseers. 207 achieves both these goals by putting the welfare of wildlife first, in this case dall sheep, by reducing harassment and fulfilling the true meaning of "fair chase hunting", all while creating a more enjoyable experience in the outdoors for every user group in Alaska. Lastly I would like to thank the entire board for your devoted time serving and taking the time to read my concerns with proposals 135, 136, 137 and 139; along with understanding my support for proposal 138. Let us work together to keep our heritage of ethical hunting practices moving forward in Alaska for future generations to come, thank you for your consideration.

Sincerely,

Cabot Pitts

Alaskan Resident

Submitted By
David Polashenski
Submitted On
2/17/2022 5:30:04 PM
Affiliation



PC146
1 of 1

1. I support proposal #267, limiting the number of Dall Sheep permits available to nonresidents on state land in Unit 19C. I would like this proposal to be extended state land in Unit 20A as well. In many lottery draw sheep hunts throughout the state, such as in the Tok Management Area and Delta Controlled Use area, the number of permits available for nonresidents is capped at 10%. It is long past due to implement nonresident restrictions in the general season sheep hunts in Units 19C and 20A, BEFORE conservation concerns require all hunters in these areas become limited to draw hunts.

Submitted By
Jamie Polczynski

Submitted On
2/14/2022 8:12:34 AM

Affiliation



PC147
1 of 1

Please support Proposal 144 and TNVR programs. Please exempt sterilized community cats from the list of species prohibited from being released into the wild. TNVR programs are good for cats and good for communities. Humans are the cause of the unwanted pet population and they need to be the solution.

Submitted By
Craig Price

Submitted On
1/8/2022 5:37:01 PM

Affiliation



PC148
1 of 1

Regarding Proposal 199 50 Yard setback for traps on all trails listed in this proposal. This is an ever growing contentious issue that needs to be made regulation for all trails listed. I have personally experienced my dogs walking close by my side getting caught in once a Connibear trap and another time a snare set right next to trails. I have read of this happening ever increasingly occurring with not just dogs but now humans getting caught in these traps. Going forward with more and more people recreating on these MULTI use trails it becomes imperative to follow through with this regulation. Any trapper that has an ounce of ethical integrity and common sense would know to follow this practice in proposal 199. Sadly since this is not the case as recently noted. An exchange with a boy on a snow machine being asked if he knew he was trapping right next to a multi use trail and would he please consider marking them replied, [REDACTED] I don't give an [REDACTED] what you think and there is not an [REDACTED] thing you can do about it. I don't have to identify or mark my traps and I can put them anywhere I [REDACTED] want to. When confronted with this type of mentality, or the recreational wanna be weekend trappers that read absolutely nothing regarding the easy to find information about ethical trapping. Common sense points to this type of trapping regulation is far overdue to be enacted.



Submitted By
Judy Price
Submitted On
2/14/2022 5:47:17 PM
Affiliation
Clear Creek Cat Rescue

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I am asking that the Board of Game change state regulations to support Proposal 144. Sterilized colony cats need to be removed from the list of species prohibited from being released into the wild so that Alaska has a chance to get a handle on the increasing population of homeless cats. If the goal of the State's regulations is to protect and preserve the native lands and species, then this Board must act now while there is still a chance.

I have been Rescue Coordinator of Clear Creek Cat Rescue for 14 years. In that time we have rescued more than 5000 cats, the majority of which were found outside, strays and ferals. We operate primarily from the MatSu Borough to the Kenai Borough, as well as taking cats in from villages around Alaska. We are one of the few rescues who will purposely rescue feral cats. And I would like to assure you that we have never been contacted to rescue cats from any wild area of Alaska. All of the cats were living in populated areas where the habitat has been drastically changed by people and is currently heavily populated by people.

In Anchorage as well as Wasilla and Soldotna, colonies of feral cats are found primarily in areas like trailer parks, industrial sites, and apartment complexes. They are not living in the wilderness where any native species other than voles and shrews would be heavily impacted by their presence. They are residents of land where humans have created total disruption of habitat and the sensitive native species have fled long ago. These cats are the victims of human irresponsibility and dependent upon the workings of man to survive.

The reality is that there are many thousands of homeless cats in Alaska because humans have brought them here and have been irresponsible with their care; and that needs to be dealt with in an educated and humane way. To ignore that problem or to believe that we can kill our way out of it is naive and irresponsible. Shelters all over the state have been euthanizing cats for decades and we are nowhere closer to controlling the population than we were 50 years ago. In fact, the number of homeless and feral cats has greatly increased. Although there are more cats being rescued, taken to public shelters or taken in by rescue groups, this problem gets worse every year and will not go away by killing. The only humane and rational method of moving toward control is to allow trap-neuter-vaccinate-return (TNVR).

Because TNVR has been outlawed through the State Board of Game regulation, there are few humane ways to deal with feral cats. Which means that most feral and stray cats are left in place to continue to produce thousands of kittens a year. A few will be trapped and taken to local shelters to be killed, but generally people would rather not rescue a cat whose outcome is certain death. So they do nothing. Most rescue groups also avoid cats who may be feral because without the TNVR option, ferals are not easy to adopt out and they become long term residents, taking up foster space for months or even years. So the feral cats, along with the lost and abandoned ones who have sought refuge with the ferals, are left to continue to reproduce and create yet more feral cats. If Rescue groups have only the near impossible option of finding family homes for the feral cats or killing them, they will choose to do nothing. And so the maddening cycle continues.

On the other hand, if TNVR was a tool that Rescue groups and shelters had to work with, the whole dynamic could change. I will try to explain how that would work in the real world.

If we knew that we had the option to return ferals to their homes after being altered and vaccinated, we would be free to trap and rescue whole colonies of cats that otherwise would be ignored. In my experience, approximately 80% of cats that are trapped outside who are perceived to be feral are actually friendly family cats who have been abandoned or lost. Knowing this, we can take the chance of trapping the whole colony because we know that most of the cats will be adoptable to family homes. With that majority of non-feral cats removed from the group, the remaining true ferals could be sterilized, vaccinated, microchipped and returned to their home area. This return to the colony would be an option only if the area is suitable for the community and a good place for the cats to live, which would never be on wild lands. (Although our Rescue has taken in many hundreds of feral cats, I personally have never encountered a colony of cats on State public wild lands.)

The colony cats would have a designated caregiver to provide food, water and shelter. The caregiver would be aware which cats belonged to the group and could alert rescue groups to any new cats coming in who would then be trapped, thereby removing any unaltered cats before they had time to breed. The colonies would be strictly managed, and with oversight could gradually be diminished as the cats pass away. This technique has worked successfully in many areas of the country and can work here. We just need to be allowed the option, and the resources, to make it happen.

Although cat colonies exist primarily, if not exclusively, in human populated areas, the State's regulation--to not release cats into the 'wild'--has stalled all efforts to try to help solve the homeless cat problem where it primarily exists, in cities and towns. Some cities and boroughs have used this to do nothing but kill cats and to refuse to allow others to work toward a humane resolution.



If the regulation was originally written to protect native lands and creatures, TNVR as it would operate in Alaska would be no threat. No TNVR advocate is talking about taking feral or any other kind of cats and releasing them to live on their own in some wild country apart from people. The purpose is to release the cats back into their friendly home territory when it is suitable, such as managed colonies in the trailer parks and subdivisions and industrial sites where they already have been living. Managed cat colonies can be a great benefit in areas where introduced rats and mice have taken up residence and multiplied.

Adding TNVR to the options that shelters and rescues have for managing homeless cat populations would make a huge difference in controlling feral cat numbers. It would also help save the lives of lost and abandoned cats now living on the streets, and take them out of the breeding population. This would be a huge step forward in decreasing the number of unwanted cats.

I hope that this Board will choose to be realistic and responsible. Give the shelters and the Rescue groups a chance to act in a humane way to control the homeless cat problem. People created the problem and now we need a chance to try to fix it. Please don't ignore it. Please don't pretend there is nothing that can be done. Because there is a method that has worked in many places and can work here. For the sake of the cats, our communities, and our native lands, please choose to give TNVR a chance by removing sterilized cats from the list of species that cannot be released into the wild. Please support Proposal 144.

Thanks for your time!



Submitted By
Karen Procter

Submitted On
2/17/2022 6:30:55 PM

Affiliation

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Dear Board Members,

I am writing in support of Proposal 144, and of trap-neuter-vaccinate-return programs in general. Proposal 144 will exempt sterilized cats from the list of species prohibited from being released into the wild, *i.e.* the "return" part of trap-neuter-vaccinate-return (TNVR). Rule changes that do not impede TNVR programs will be better for the cats, better for public health, and better for the wildlife we all want to protect.

I have long studied TNVR programs, and I believe their benefits far outweigh any adverse effects. Our community cats must be sterilized and vaccinated to control the size of the communities and to ensure that each individual cat lives as healthy a life as possible. I am sure you will find that support for community cat colonies is immense, particularly once citizens have educated themselves about TNVR.

I appreciate your consideration. Thank you for helping the cats of our Alaska community.

Karen M. Procter

Submitted By
Ian Reid
Submitted On
2/18/2022 9:42:46 PM
Affiliation



PC151
1 of 1

Hello,

I am writing in support of Proposal 199. There needs to be more separation between frequently used recreational trails in and near more populated areas of the state including but not limited to: Mat Su, Fairbanks, Anchorage, Turnagain Arm, Seward, Kenai, Soldotna, Juneau, Kodiak, etc.

Peoples pets have been accidentally caught, maimed and or killed in traps in numerous areas of the state for years. With so many people getting outside more as a result of the pandemic, it is more important than ever to create safer separation between trapping, traplines etc and where the general public recreates.

Thank you very much for your consideration of adopting Proposal 199.

Ian Reid / Anchorage



PC152
1 of 7

unapologetically **FOR ALASKAN RESIDENTS**

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

February 17, 2022

Comments to Alaska Board of Game

Statewide Meeting

March 4 – 12, 2022

Proposals we support: 103, 111, 119, 120, 135-137, 151, 168, 193, 239, 241, 243, 267

Proposals we oppose: 112, 140, 141, 146, 149, 173, 230

Definitions

Proposal 103 – 5AAC 92.990 Clarify whether hay and grain are considered as “hunting gear”

SUPPORT to define that hay and grain should *not* be considered as hunting gear

This proposal stems from a RHAK proposal regarding motorized access prohibitions in controlled use areas that deem hay and grain as “hunting gear” that are not allowed to be transported under those CUA restrictions.

A hunter was cited for using motorized access to transport hay and grain for his horses prior to hunting season under the current definitions. We do not believe that hay and grain should be considered “hunting gear” under any regulations.

Proposal 230 – 5 AAC 92.990(a)(30). Definitions.

Change 5 AAC 92.990 “full-curl horn” of a male (ram) Dall sheep from “at least eight years of age” to “at least **seven** years of age” as determined by horn growth annuli.

OPPOSE

We have concerns that too many sub-legal sheep are being harvested, and that this proposed change would affect sheep conservation and sustainability.

Falconry

Proposal 111 – 5 AAC 92.037. Permits for falconry.

Limit nonresident take of raptors to one bird every four years and limit unsuccessful permittees from applying the following year.

SUPPORT

Draw permits for certain coveted big game species have limits on how often one can apply after being drawn, and how often one can hunt after being successful. This proposal seeks to do the same for nonresident falconry capture permits, which are highly coveted and sought after, giving a fairer chance to all to draw a permit and successfully capture a falcon.

Proposal 112 – 5 AAC 92.037. Permits for falconry.

Increase nonresident opportunity for acquiring raptors.

OPPOSE

This proposal asks for too much, would have no quotas for nonresident capture of eyas birds from the nest. Nonresidents do not deserve the same opportunities as residents; if they wish to have those same opportunities, they are welcome to move to Alaska.

Proxy Hunting**Proposal 119 – 5 AAC 92.011(k). Taking of game by proxy.**

Include muskox on the list of species that can be taken under a proxy permit.

SUPPORT

Muskox are an important source of food for residents in NW Alaska, and when in Tier II and destruction of trophy value is required, there is no reason not to allow proxy hunting of those animals so those unable to hunt have a means to better acquire meat.

Unlawful Methods**Proposals 135-137 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Repeal the restriction on spotting sheep from aircraft during hunting season.****SUPPORT**

We have always opposed the board-generated Proposal 207 restricting the use of aircraft to spot sheep during the open sheep hunting season, and we support its repeal. This restriction came about as a board-generated proposal without any public requests for such a restriction, and was widely opposed by the public, various organizations, and numerous Advisory Committees. The Alaska Wildlife Troopers have said all along that it is unenforceable.

The restriction on spotting sheep from an aircraft is a danger to proper piloting of an aircraft under certain conditions and can lead to ethical hunters foregoing a sheep hunt when flying into an area and seeing sheep while looking for a place to land.

Alaska's same-day-airborne regulation already restricts someone spotting a sheep from the air and then hunting the same day they were airborne. This additional restriction serves no real purpose.

Permits for Bear Baiting

Proposal 140 – 5 AAC 92.044 (b)(4). Permit for hunting bear with the use of bait or scent lures.

Increase the number of bait station sites temporarily from 10 to 20 per guide use area.

OPPOSE

This proposal asks to double the number of bait stations a guide could have in each guide use area, and asks that this proposal if passed be temporary, but does not specify any specific length of time for it to be in regulation.

Some guides have adjacent guide use areas across rivers in which they set up to 10 bait stations on one side of the river and 10 bait stations on the other side. Resident hunters who are not guides are allowed up to 2 bait stations statewide, and we already have competition and conflict issues finding a place to set up a station and with bait stations being close together. Allowing guides to have 20 bait stations per guide use area would further exacerbate these issues.

Proposal 236 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.

Require ADF&G to notify bear bait station registrants of other bait stations within a one-mile radius of desired bait station location.

SUPPORT

We continue to have conflicts surrounding bear bait stations being in proximity which in part arise because hunters are unaware of where other bait stations are located when they register for a permit. The Department does not give out bait station locations to the public, nor does the Department (see proposal 237) notify registrants whether the location of their bait station is legal according to regulations in terms of being too close in proximity to another dwelling, publicly maintained road or trail.

Not providing information as to proximity of other bait stations when registering causes unnecessary conflicts and crowding. We understand the names of bait station registrants along with locations is not allowed to be made public, and this proposal isn't asking for that information to be made public. What this proposal seeks to address is simply informing hunters when they register and submit the location information of their station, to be informed whether or not is in within a ¼ mile, ½ mile, or a mile from another site. That information would help to decrease crowding of bait stations and conflicts among hunters.

Proposal 237 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.

Clarify that ADF&G will not issue permits to use bait or scent lures near prohibited areas already defined in regulation.

SUPPORT

Hunters who register for a bear bait station with the Department should not be held legally liable when the Department issues them a bait station permit for a bait station that falls within proximity boundaries to a dwelling, maintained road, trail, or public facility that make that bait station illegal.

The responsibility to ensure bait stations fall within legal boundaries as outlined in regulation should fall on the agency that issues the permit.

Hunting and Other Permits

Proposal 146 – 5 AAC 92.052. Discretionary permit hunt conditions and procedures.

Limit big game registration permits to one per species, per year.

OPPOSE

This proposal centers on goats yet would apply to all registration hunts for all species. We do not see how having multiple registration hunt permits for a single species during a calendar year negatively impacts the resource or hunt opportunities. In areas with quotas, once the quota is reached the hunt is shut down.

Some registration hunts for moose, for example, are for earlier seasons in southcentral, and some are for later seasons in the interior. There is nothing at all wrong, nor does it take away opportunity from others or threaten the resource, if a hunter picks up a registration permit for an August moose hunt, is not successful, then wants to pick up a permit for a later September moose registration hunt.

Proposal 149 – 5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts.

Create separate Dall sheep permit draw for second-degree-kindred hunters in areas that limit the number of nonresident hunters.

OPPOSE

Alaska's "must-be-guided" law, AS 16.05.407, does *not* differentiate between nonresident U.S. citizen hunters who are guided and those who hunt with a resident relative within second-degree-of-kindred (2DK). However, for many years now, the Board of Game has differentiated between those two groups of nonresident hunters in order to provide more opportunity to guides, at the expense of nonresidents wishing to hunt with a family member as their guide. On Kodiak Island, the Board has placed nonresident 2DK hunters in the resident pool of coveted brown bear tags. This is completely contrary to the intent of AS 16.05.407.

Resident Hunters of Alaska Proposal 241 seeks to do the opposite of this proposal, by requiring the board to treat all nonresident U.S. citizen hunters equally, as outlined in AS 16.05.407. Nonresident U.S. citizens who hunt with a licensed guide should not have any more, or less, opportunity to hunt than a nonresident who hunts with a 2DK Alaskan relative as their guide.

AS 16.05.407. Nonresident Hunting Big Game Animals Must Be Accompanied.

- (a)** *It is unlawful for a nonresident to hunt, pursue, or take brown bear, grizzly bear, mountain goat, or sheep in this state, unless personally accompanied by*
- (1) *a person who is licensed as*
- (A) *a registered guide-outfitter or a master guide-outfitter under AS 08.54 and who is providing big game hunting services to the nonresident under a contract with the nonresident; or*
- (B) *a class-A assistant guide or an assistant guide under AS 08.54 and who is employed by a registered guide-outfitter or a master guide-outfitter who has a contract to provide big game hunting services to the nonresident; or*
- (2) *a resident over 19 years of age who is*
- (A) *the spouse of the nonresident; or*
- (B) *related to the nonresident, within and including the second degree of kindred, by marriage or blood.*
-

Proposal 151 – 5 AAC 92.061. Special provisions for brown bear

drawing permit hunts. 5 AAC 92.069. Special provisions for moose drawing permit hunts.

Require all hunters to apply for permit hunts and pay the application fee during the application period.

SUPPORT

This is a Resident Hunters of Alaska (RHAK) proposal addressing how nonresident must-be-guided draw permits for brown bear and moose on federal USFWS Refuge lands are chosen and allocated.

The Board has created a loophole whereby nonresident must-be-guided draw permits on Refuge lands don't have to be applied for or go through the same "lottery" system that resident hunters go through with low odds of drawing a permit, nor do nonresident must-be-guided hunters have to pay a draw-hunt application fee or have their names in the public record as residents do.

These must-be-guided draw permits on USFWS lands are actually allocated to the individual guides with exclusive guide concessions on those federal lands, to do with them as the guide wishes. Some guides choose not to utilize the permits allocated to his or her concession area. Many guides make deals with clients prior to the draw hunt application period, have signed guide-client agreements, and then the client just shows up in Alaska and picks up an over-the-counter tag from the Department.

As we state in our proposal, what this loophole does is allow nonresident must-be-guided hunters 100% opportunity to participate in a draw hunt. There are many examples of this out there, of nonresident hunters posting on social media or online hunting forums of, for example, going on a coveted Kodiak brown bear hunt 5 times. A resident can apply for a

Kodiak brown bear tag for decades and never draw a permit, but nonresidents with enough money to hire a guide have a 100% opportunity to hunt. There are raffles conducted by other sportsman's organizations offering a guided Kodiak brown bear hunt to the winner, showing conclusively what is going on, that nonresidents don't really have to go through any draw permit process at all to be guaranteed an opportunity to hunt.

It is not constitutional to require resident hunters to go through a draw permit "lottery" process in order to hunt on certain federal lands in Alaska, yet allow nonresident guided hunters to skip that same draw permit lottery process, skip paying an application fee, and skip having their name in the public record.

Proposal 239 – 5 AAC 92.050. Required permit hunt conditions and procedures.

Require all resident registration permit hunts be available for application online

SUPPORT

This is a RHAK proposal that seeks to discontinue the ongoing deterrent used by the Department of requiring hunters to pick up certain registration permits ahead of the hunting season in outlying areas that are expensive to get to.

The Department is on record explaining why there is a requirement to pick up certain registration hunts in outlying villages: this deters non-local hunters from acquiring a permit and competing with locals for a limited resource.

If a wildlife resource is limited, and the Department has concerns of overharvest or going over quotas, it would seem a better approach would be for those hunts to be under a Tier hunt system whereby locals have a priority to hunt. All resident hunters are equal under the law in terms of registration hunts; all residents should have equal opportunity to acquire a registration permit online.

Proposal 241 – 5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts. 5 AAC 92.061. Special provisions for brown bear drawing permit hunts. 5 AAC 92.069. Special provisions for moose and caribou drawing permit hunts.

Remove allocations between guided and nonguided nonresident hunters.

SUPPORT

This is a RHAK proposal addressing past and current proposals, and Board of Game actions that separate out nonresident must-be-guided hunters and nonresidents hunting with an Alaskan relative within second-degree-of-kindred (2DK).

Alaska's "must-be-guided" law (AS 16.05.407) requires all nonresident U.S. citizens to either have a licensed guide, or a resident 2DK relative acting as their guide, to hunt brown bear, Dall sheep, and mountain goat. Nowhere does the statute make any differentiation between those nonresidents hunting with a guide or resident relative, yet the Board of Game has separated out those groups in some cases to give a preference to the guided nonresident hunter, and there are continuing efforts to discriminate against the nonresident hunter who hunts with a resident relative as their guide.

The board has also put the nonresident 2DK hunters in the resident pool of tags for the Kodiak Island brown bear draw hunt. All nonresidents are equal under AS 16.05.407 and the board should not interpret the statute differently.

Miscellaneous Topics and Game Management Unit Boundaries

Proposal 168- 5 AAC 92.XXX. New regulation.

Adopt a new regulation that specifies the Board of Game will not require guides for nonresidents hunting moose, caribou, or black bear.

SUPPORT

This is a RHAK proposal having to do with creation of new must-be-guided species hunts for nonresident U.S. citizens by the board, that falls outside what we believe is the board's authority. Alaska's must-be-guided law, AS 16.05.407, requires nonresident U.S. citizens to hire a licensed guide or hunt with a resident relative within second-degree-of-kindred when hunting brown bear, Dall sheep, and mountain goat.

If the legislature wanted to require nonresident U.S. citizens to hire a guide or hunt with a resident relative for other species, those species would be within the statute.

Agenda Change Requests for Consideration at Statewide Meeting

Proposal 267 - 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Limit or restrict all nonresident sheep hunting in Unit 19C

SUPPORT

This is a RHAK Agenda Change Request (ACR 4) that was accepted to be considered at the Statewide meeting as proposal 267, asking for limits or restrictions on nonresident sheep hunters in Game Management Unit 19C.

The 19C sheep population is in significant decline and the Department stated in comments on ACR 4 that it "*believes existing regulations are contributing to a decline in sheep populations in Unit 19C.*"

The 2020/2021 subsistence winter hunt (RS 380) was closed by emergency order and the 2021/2022 subsistence hunt has a restricted bag limit "*due to biological concerns.*"

To protect the sheep population and resident hunting opportunities, the unlimited nonresident sheep hunting opportunities that now account for 85 percent of the total sheep harvest in Unit 19C needs to be restricted or limited.

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

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



PC154
1 of 1

Submitted By

Francie Roberts

Submitted On

2/16/2022 2:15:00 PM

Affiliation

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Address

495 Mountain View Dr
Homer, Alaska 99603

I support the passage of Proposal 199. Traps should not be close to areas where adults and children and pets are recreating. There is enough space for traps to be set back from these areas. I also encourage this proposal to be expanded to the Kenai Peninsula.



Submitted By
Alissa Nadine Rogers
Submitted On
3/5/2021 11:13:21 PM
Affiliation

There is no scientific proof of how this process would improve or disprove the actual hunting regulations. If you want to move the weight difference with the actual distance of hunting. Then there has to be data showing significant impacts and proof.

Please provide proof of the distance of each weight and distance of ideal hunting (distance). Then the difference in the average between the two- also please bring proof of how this distance would provide an average of what you are looking for. From personal experience... it depends on where you hunt. Animals more comfortable to people (taking pictures/ sight seers).. If you are within so many miles out here in the real Alaska. Good luck getting that close and walking/ running as fast as they do on tundra. I've only known a few people in my family, who they call tundra walkers/runners. Good Luck running as fast as they do... out here in our western region. Historically, spears were main source of distance hunting, bow hunting was the same- but you had to be good at it at far distances (not as accurate as spear hunting at the same distance, even if you are trying to shoot from the same distance. Spear Throwing was always more sufficient.)

Anyway, we can always test this out. I'm always up for the great new updates on hunting. Maybe we can help your youth learn to adjust to regional hunting or learn new methods. The sky is the opportunity to learning, we have so many great resources to teaching young hunters. Instead of changing regulations, how about advancing and reaching out to hunters.

We all have our own version of youth hunting traits... Just because a version doesn't work, doesn't mean you have reached out to the locals who have hunted the lands far beyond and still remember the techniques of hunting with a bow.

I recommend reaching out to the traditional hunters of the area and finding out, the true bow hunting area. Find out why they have their traditions and why they want to have those regulations. For every regulation, there is history. Some good history and some bad. But, nothing that should be offending, as it all happened in the past and not directly to you.

Please contact me if you would like more assistance.

Thank you,

Alissa

On another note: Please do not use data on southern animals, as Alaskan animals and those that live more north have thicker skin and are more adapted to having more fat- plus more "umph"- given their current hunting acknowledgments.

Also, if you try to bring this up here in our hunting area... you would be better off shooting something smaller with that type of power...

Submitted By
Alissa Nadine Rogers
Submitted On
3/5/2021 11:34:55 PM
Affiliation

~The vast majority of air rifles available today come in either the .177 or .22 caliber, but several manufacturers have developed what are called "big bore" airguns in the .257, .30, .357, .45 & .50 caliber range. With their larger ammo and focused power, big bore airguns bring power and accuracy to hunting larger **PESTS** making them a popular choice for a lot of shooters.

Hyperlink: <https://www.airgundepot.com/big-bore-airguns.html>



Submitted By
Alissa Nadine Rogers

Submitted On
3/5/2021 10:30:50 PM

Affiliation

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~PROPOSAL 121

5 AAC 92.085. Unlawful methods of taking big game; exceptions.

Allow the use of dogs to hunt big game as follows:

The use of dogs is permitted to hunt, track, and retrieve large game.

What is the issue you would like the board to address and why? It's currently illegal to use hunting dogs for large game such as deer, bear, etc... It is a method used for thousands of years and completely ethical. It promotes safety, 100% ethical, and still fair chase.

Appologize for the grammar/spelling errors:

Thank you for your great idea and thank you for your proposal.

Great Ideas as they do this down states for the majority of it, but NO- Not for Alaska. There are so many things that can go wrong with this proposal and there is so many issues that can arise from this during rural hunting.

I can see people shooting other peoples dogs or accidentally hunting other people. All rural/ bush hunters already know to leave their dogs in the boat or in the cabin when hunting. At most, if you can't leave the dogs at home- they stay at home with a sitter. Dogs scare game away large game with their urine and feces.

Dog's are not used as hunting mechanisms in our area. They are used as working dogs. Yes, they can be trained to do so, but if you have everyone trying to do this.... It will become a disasterous realtionship between hunters and also this will reduce death in pets, if people decide to take them out to hunt moose where non-dog-users (will be shot without question).

Here is the truth, if I was out in my traditional hunting gounds. A random dog shows up harassing my Bull Moose that I was working 4-5 days pulling out to the meadow. I'd have no problem shooting that damn dog- as we have no season for hunting farrell dogs.

By; Alissa Nadine Rogers

Phone: 907-306-4345



Submitted By

Jillian Rogers Submitted On

2/16/2022 12:37:13 PM

Affiliation

Homer Animal Shelter

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PO BOX 15291

Fritz Creek, Alaska 99603

I'm writing in support of Proposal 144 and for Trap-Neuter Vaccinate- Return. I implore the Board of Game to support this important proposal and to exempt sterilized community cats from being listed as prohibited from being released into the wild. This program is recognized and used in almost all other states as it has proven time and time again to reduce the number of community cats in the long term. Euthanizing community or stray cats only adds the problem. More cats come into the colony to replace the ones gone. TNR, over the long term, reduces the numbers. As the director of the municipal shelter in Homer, this does not come up often, but it does come up. Being able to release these cats back to where they can live successfully and not reproduce, is the humane thing to do. It just makes sense. And it's about time that Alaska got on board.

From the desk of

Sam Rohrer
P.O. Box 1388
Kodiak, AK 99615



PC157
1 of 2

February 18, 2022

Kristy Tibbles
Executive Director, AK BOG
P.O. Box 115526
Juneau, AK 99811-5526

RE. 2022 BOG Statewide Meeting Comments

Chairman Burnett and BOG Members,

Thank you for serving our state and its wildlife resources and thank you for taking the time to read my comments on Statewide proposals.

Proposals 151 and 241 are specifically aimed at making changes to Unit 8 (Kodiak) regulations. These proposals are not appropriate for a statewide meeting, rather they should be submitted when Unit 8 is in cycle. I encourage the board to defeat these proposals for that reason. Additionally, the Kodiak Fish and Game Advisory Committee is unanimously opposed to these 2 proposals. Please take a close look at the AC comments.

Kodiak's Brown Bear Management Strategy is regarded as one of the most successful systems in wildlife conservation. This system is the result of careful work that the Kodiak community and ADF&G, in conjunction with the Board of Game has put together over the last 40 years. There are many important components to this system, and much time and thought has been given to how the whole system works together to benefit bears, hunters, the state of Alaska, and the Kodiak community.

If the BOG passes proposals 151 and 241 there will be seriously negative conservation, economic, and resident hunter opportunity consequences. I ask that the BOG be very careful in how it changes this enormously successful program.

Proposal – 151 OPPOSE

I ask that you oppose proposal 151. This proposal would prohibit the Department from making undersubscribed permits available over the counter. Reissuing of undersubscribed permits is not a "loophole" as the proponent of this proposal suggests, but rather, it is a process that is clearly authorized under both 5AAC 92.052.(23) and 5AAC 92.061.(4)(D).

There are many legitimate reasons why the department might choose to reissue undersubscribed permits. In the case of Unit 8, it serves to offer important consumer protections and helps to safeguard economic opportunities for small businesses.

Reissuing of undersubscribed permits allows nonresident hunters who for some reason must cancel their Kodiak Bear hunt an opportunity to cancel their hunt and it allows the hunting guide an opportunity to then rebook the hunt with a new client. If a client cancels their hunt, and the hunting guide is not able to rebook the hunt, then the client loses their deposit. This hurts both the client who lost their deposit, the guide who was not able to receive full payment for the hunt, but also other small businesses who benefit from nonresident hunters, such as local taxidermist, meat processors, bush plane operators, and hotels. It also causes ADF&G to lose out on valuable tag fees. However, because the department can reissue a permit, a hunting guide is able to rebook a new client and return the canceled hunters deposit. This is good for nonresident hunters, small businesses, and ADF&G.

Proposal 151 does nothing to benefit resident hunters, however it does hurt nonresident hunters, small businesses, and conservation funding. I ask that you unanimously reject this proposal.

**Proposal – 241 Oppose**

I ask that you oppose proposal 241. This proposal would remove any allocation differences between nonresidents and second degree of kindred (2DK) nonresident hunters. This proposal serves no conservation benefit and would harm resident hunters and small guide businesses.

Passage of this proposal would bring substantial harm to Unit 8 hunters and the Kodiak economy. It would also very likely result in the reduction of bear permits for both resident and nonresident hunters on Kodiak. Currently 2dk hunters harvest sows and small boars at a substantially higher rate than guided nonresident hunters. However, because the number of permits that are allocated to 2DK is small, this does not have a significant biological impact. However, if the limit on 2DK hunters was removed, Kodiak would see a large increase in 2DK participation, this would result in a substantial increase in sow harvest, and a subsequent reduction in available permits to all hunters.

Further, resident hunters can apply for Kodiak Bear permits using a party application with their 2DK relative. This is an important benefit for resident hunters. If proposal 241 passed, this opportunity for resident hunters would no longer be available.

The BOG has a long-standing policy for evaluating allocative proposals, that includes considering the last 10 years of harvest history. This proposal asks for an allocation that is not comparable to the harvest history and that would cause substantial biological harm and economic harm. For these reasons, I ask that you unanimously reject this proposal.

Proposal – 152/239 Oppose

I ask that you oppose proposal 152/239. This proposal seeks to tie the hands of the department and the BOG in the issuing of drawing permits. While generally all drawing permit hunts are available for online application, there is limited times when the department or the BOG chooses to offer there permits in a different manner.

In a state as large as Alaska, it is rare that one-size-fits-all solutions work. There are legitimate reasons why the Department and the BOG might choose to not offer drawing permits for application online. For this reason, I ask that you unanimously reject this proposal.

Proposal – 163/164 Support

I ask that you support proposals 163 and 164. These 2 proposals would require a hunter to validate their harvest ticket or permit upon wounding an animal.

Fair Chase ethics require that a hunter already abides by what this proposal would require. A version of this proposal has already been in regulation for Bear and Elk hunters in Unit 8 for many years. Some would argue that this proposal is unenforceable, but that misses the point of the proposal. It does not matter if the proposal is enforceable or not, what matters is that the State of Alaska and the BOG is clearly showing how an ethical hunter should conduct themselves. For this reason, I ask that you unanimously support these 2 proposals.

Thank you for taking the time to thoughtfully read my comments. I appreciate all that you do for Alaska!

Respectfully,

Sam Rohrer
Kodiak, AK



Submitted By

Justin Rondeau

Submitted On

2/17/2022 12:27:47 PM

Affiliation

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I am writing in support of Proposal 113 which allows non resident take of Eyas and Passage Gyrs, Peregrines, and Goshawks.

My wife Bethany was lucky enough to draw a non resident gyrfalcon permit 3 years ago and we had a magical time in Nome seeking and eventually finding a beautiful passage Gyrfalcon. We also spent thousands of dollars on housing and vehicle rentals, food and fuel for the trip and even came home with some nickknacks from shopping in downtown Nome.

I can't for the life of me figure out why anyone would want to limit non resident take when such a minuscule number of birds is affected.

Please help us maintain this integral part of our falconry culture.

Submitted By
Amy Russell

Submitted On
2/16/2022 12:53:50 PM

Affiliation



PC159
1 of 1

I support proposal 199. It has gotten to the point where I am scared to take my dog out anymore. The degree of laziness I have seen lately from trappers is shocking. A minimum of 50 yard setback from established trails seems actually too generous.

Thank you for your time,

Amy Russell

Submitted By
Revelle Russell

Submitted On
2/16/2022 1:00:36 PM

Affiliation



PC160
1 of 1

I support proposal 199 setting back traps at least 50 yards from trails. As it stands, trappers' rights are overriding my right to ski on a trail with my dog. Trappers are setting traps in residential areas, it is outrageous. I fail to see the detriment to trappers having to set their line up in a place that reduces risk to their neighbors.

Thank you,

Revelle Russell

Submitted By
Michelle Scaman
Submitted On
2/14/2022 11:44:13 AM
Affiliation

I support Proposal 144, trap-neuter-vaccinate-return (TNVR). It is important to our community.



PC161
1 of 1



My name is Kurt Schmidt, I am from Delta Junction Alaska, and have been a licensed falconer for over 30 years and a fulltime Alaskan resident for over 20 years.

I am currently a public school educator, and formerly was a biologist conducting raptor surveys for the Bureau of Land Management, US Fish and Wildlife Service, US Forest Service, National Park Service.

I fully Support Proposal 108 because it increases the opportunity for nonresident take in a sound manner and it exceeds recent nonresident interest of 13 applicants (High of 26 applicants and low of 13, average of 21 applicants per year.)

It offers 5 passage birds, 5 eyass peregrines, 5 eyass goshawks, tripling the current allowable take.

Eyass gyrfalcons should not be offered because of their multi generational use sensitive nest sites which are have been used repeatedly for millennia. Non-residents have recently been observed sharing nest site locations, advertising nest site locations all over the internet and increasing the risk and causing focused repeated take/disturbance to these sensitive nest sites. The collective non-resident lack of stewardship and concern for the long term welfare of these sensitive sites for both legal and illegal activities is a growing concern.

I fully support Proposal 109 and which requires the micro-chipping of gyr falcons being exported from the state on a non resident permit. The microchip is harmless as was observed by nonresidents bringing their birds to Alaska for falconry and self-electing to micro tag to avoid any mix-ups or confusion as to lawful ownership. The microchip offers a more permanent means of tagging a passage bird and will act as a deterrent to reduce the risk of these high value exported birds falling into unlawful commerce situations.

I fully support Proposal 110 pushing back the passage season take dates to September 15-November 15th to preclude the repeated interest of non-residents targeting certain nests and sharing nest site information both privately and internationally on social media that has caused undue attention and disturbance to certain nest sites. By pushing



back the take dates and allowing the chicks to fledge and disperse from their natal areas, will eliminate this undue nest site disturbance and reduce the widespread harmful sharing of sensitive nest site information.

I fully support Proposal 111 which limits a nonresident to being able to draw a once every four years to allow other folks to be able to participate in the resource. One person has drawn a permit three times and this unfortunate scenario limits the access of other applicants.

I do not support Proposal 112 which would put unreasonable levels of harvest on the reasonably accessible nest sites to Alaskan falconers and it would create a situation of undue hardship for Alaskans interested in taking a bird due to an exponential increase in take. This proposal shows the disregard nonresidents are willing to inflict upon the people that live here and the resource.

I AM VEHEMENTLY OPPOSED TO PROPOSAL 112.

I do not support Proposal 113. The proposal is unreasonable in number and will create an undue hardship on resident falconers by creating disturbance at the few easy access nest sites available. To show how lopsided their perspective is, one of the sources they cite here to support their perspective, will actually be testifying against their proposal.

Thank You,
Kurt Schmidt



Submitted By
Timothy Sell
Submitted On
1/30/2021 12:41:03 PM
Affiliation
Alaska falconers association

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108. I support this proposal. It allows falconers from the lower 48 access to the large coastal Peales peregrine falcons and the large Alaskan goshawks as eyasses. These are very sought after by non resident falconers and it doesn't have any negative effect on Alaskan falconers.

109. I support this proposal but would take it even futher to eliminate the chip requirement completely. It is redundant as these birds are already banded with an unremovable leg band that is quite capable of tracking their movements.

110. I support this proposal. When the non resident season was established it was intended to be a passage only take as it is worded. Young birds on their natal nesting sites are not passage birds, a passage bird is described as a bird free of its parents home territory and feeding itself. Several non resident falconers have gone on the opening date and harvested birds from their natal nesting areas, still being fed by parent falcons, these are clearly not passage birds and the date change assures that these practice cease.

111. I support this change

112. I do not support this proposal. With the approval of proposal #108 and the current passage take available to non resident falconers, non residents have access to gyrfalcons, Peales peregrines and northern goshawks. These are far and away the three species of interest to falconers from the lower 48 and nothing more is required and might impact the availability of rapotors to residents.

113. I do not support this proposal. With the approval of proposal #108 and the current passage take available to non resident falconers, non residents have access to gyrfalcons, Peales peregrines and northern goshawks. These are far and away the three species of interest to falconers from the lower 48 and nothing more is required and might impact the availability of rapotors to residents.

Submitted By
Bill Sherwonit

Submitted On
2/18/2022 4:06:45 PM

Affiliation
self



PC164
1 of 1

Members of the Alaska Board of Game,

I'm writing to express my whole-hearted support for Proposal 199, which would establish 50-yard trapping setbacks (or buffers) along certain trails in the Mat-Su Valley region. The setbacks would only affect popular recreational trails, often used by people accompanied by dogs. Though I live in Anchorage, I occasionally have hiked and skied in the Mat-Su area with my dog and thus have a vested interest in this proposed change. But whether or not I happen to recreate on the affected trails, I support this proposal as a common-sense and much-needed (and overdue) action, given the dangers to dogs and the consequent impacts on their human companions.

It's my understanding that at least seven dogs have been caught in traps this winter in Southcentral Alaska, and two have been killed by traps. This is unacceptable. There is widespread agreement among Southcentral residents, including many trappers from what I've been informed, that traps should be set away from popular multi-purpose recreational trails. We've all heard the horror stories of people whose dogs were trapped—and sometimes killed—when walking their canine companions in popular recreational areas that didn't have a substantial buffer (or any buffer at all).

Though the BOG sometimes shies away from public-safety issues, there is precedence for such trapping buffers, one notable example being Chugach State Park, where trapping setbacks are required where trapping is allowed. In the Mat-Su area, as in Chugach Park, enacting a 50-yard setback is really about the greater public good, with a minimum of hardship—if any—to those who do recreational trapping.

Whatever arguments opponents of this ordinance might put forward, I don't think anyone can seriously criticize the intention of this proposed ordinance; in the end, this is a public safety issue, with the safety of dogs at its heart. Of the many people I know who have dogs, most, if not all, consider their dogs to be companions and family members. I can vouch from my own life, that the death of a dog, whatever the circumstances, can be heartbreaking. For many of us it is, in fact, the loss of a family member. To have one caught in a trap would be an awful tragedy. This common-sense change will lessen the likelihood of that happening for people and dogs who walk or ski or bike along popular multi-purpose recreational trails in the Mat-Su region. How can that not be a good thing?

Thank you for considering my perspective,

Bill Sherwonit, Anchorage

Comments on Proposal 144 – Do not adopt

Ms. Basner's proposal makes a host of seriously inaccurate and misleading claims but one of the worst is her primary argument that because cats are capable of surviving in the wild in Alaska and because feral or stray cats can be captured in the wild for use as a pet, then cats should be removed from the list of domestic species that may not be released into the wild. Those two reasons (among others) are exactly why cats are on the list. Cats are not wildlife, cats are an invasive species that is highly destructive to wildlife due to predation, which affects species as large as snowshoe hares, and cat-related diseases, which infects lynx, moose, and even birds as large as eagles.

Cats kill an estimated 1.3 – 4 billion wild birds and 6.3 – 22.3 billion wild mammals in the U.S. annually. <http://www.nature.com/articles/ncomms2380> These small animals are the base of the food chain for many wild furbearers, raptors and owls.

I am a wildlife biologist with over 45 years of experience. I have reviewed and rebutted several of the most highly touted studies by TNR proponents and have written a detailed report on feral cats in Alaska with a special emphasis on Anchorage.

<https://www.trapneuterenclose.com/static/img/tnr-study-review.pdf>

https://abcbirds.org/wp-content/uploads/2020/03/Sinnott-2019_Citizen-science-or-pseudoscience_Response-to-Spehar-and-Wolf-2018.pdf

<https://www.muni.org/Departments/OCPD/Planning/SiteAssets/Pages/WNRCReso-MinutesArchive/WNRC%20ltr%20to%20Animal%20Control%20Board%20w%20Report-12-20-2019%20rev.pdf>

If you want to reduce or eliminate rats, do you provide feeding stations for them so you can attempt to catch the least trap wary individuals, neuter them and release them back into the wild? Of course not. By providing food, you will increase their productivity and survival, thereby increasing the population. Adopting a “no-kill” philosophy will never reduce the population. It will continue to increase because the rats who have not yet been trapped will continue to have fertile offspring and when the population increases you will want to put out more feeding stations. Cats are not rats, but they are both invasive, exotic species and the principles of population dynamics apply to both.

Contrary to what Ms. Basner writes, when communities implement TNR, cat numbers only decline initially, when people are excited about the new program and are willing to adopt cats. When most or all of the willing cat homes are full, adoptions fall off and cat numbers plateau or rise. People release adopted cats into the wild all of the time. There is not a single scientific study that has shown a significant decline in “community” cats over a time span of a decade or more. Most of the “studies” are anecdotal or they use population indices like “number of intakes” or “number euthanized” at shelters. The number of intakes and euthanized cats doesn’t decline because there are fewer cats, it declines because more people are adopting cats in the short term.

Cats – even sterilized cats – should never be released into the wild. The number of feral and stray cats must be reduced. I have submitted several proposals (106, 107, 166, 167) for the Board to consider that will help address this scourge to our wildlife populations.

Rick Sinnott
Certified Wildlife Biologist



PC166
1 of 1

Submitted By

David Skinner

Submitted On

2/17/2022 1:42:25 PM

Affiliation

South Central Director Idaho Falconers Association

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Thank you for allowing me to comment. I support proposal 113 in regards to out of state wild take of raptors for falconry. Take of wild raptors at these levels will never affect populations.

Submitted By
Susan Skvorc

Submitted On
2/16/2022 11:19:36 AM

Affiliation
VMBaH member



PC167
1 of 1

I am writing in support of Proposal 199 dealing with a 50 yd setback for the placement of traps near popular multi use trails in the Mat-Su Borough. I have lived in the borough for 32 years and have seen the great increase in population and number of people accessing trails in the area. The increased use has made it necessary to increase the buffer between trails where people and pets travel and areas of legal trapping. When I ski or bike with my dog he is always on a leash, but he is a dog and if he got loose he would run after rabbits and the like, and possibly be in danger of being caught in a trap that is near or on the trail. In deep snow, even human walkers could be at risk of accidentally getting a foot caught in a trap obscured by snow. Thank you for considering this proposal.



PC168
1 of 1

Submitted By

Terry Slaven

Submitted On

2/18/2022 2:22:03 PM

Affiliation

myself

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I support Proposal 199 which would provide a 50 yard trap set back on many MatSu trails. I am a frequent user of these trails and frequently bring my dog along. I use a leash on my dog but sometimes he gets away from me - never very far but I fear he could easily smell a nearby trap set up and get caught in it. I believe trappers need to get off the trails we all use and set their traps away from where dogs, children and hikers could accidentally get caught in one. This is a big borough and trails are narrow corridors winding through wild lands. I believe trappers have plenty of space in which to trap while leaving a 50 yard set back for the rest of us.

Submitted By
Lisa Slepetski



PC169
1 of 1

Submitted On
1/18/2022 4:18:24 PM
Affiliation

I **SUPPORT** the following proposals:

- **Proposal 107 - Add unconfined and unrestrained domestic cats to the definition of “deleterious exotic wildlife”;**
- **Proposal 145 - Classify F. catus as deleterious exotic wildlife and prohibit their release into the wild, feeding, and maintaining unconfined populations;**
- **Proposal 160 - Clarify the wanton waste regulation to specify that game animals taken by domestic pets must be reported and salvaged for human consumption; AND**
- **Proposal 166 - Amend the requirement for licenses and tags to include game legally taken with dogs and cats**

and as such, I **OPPOSE** the following proposal:

- **Proposal 144 - Exempt “sterilized community cats” from the list of species prohibited form being released into the wild.**

Feral and loose domestic cats cause a myriad of problems. The authors of Proposals 107, 145, 160 and 166 clearly illustrate the far reaching harm done when cats are left to roam outdoors uncontrolled, providing references to the scientific studies to back up the suggested actions by the Board of Game. Since cats can spread disease and/or kill Alaskan game, this is a relevant issue that should be addressed and I agree with the reasons and actions presented in the proposals. My husband and myself are extremely allergic to cats so we don't own any on purpose, so it is frustrating and harmful when loose neighborhood cats enter our sheds and spread dander, urine, and feces over our personal property that we subsequently touch and have an allergic reaction to. One cat did not want to leave my shed and threatened to scratch and bite. In the spring through fall, it isn't moose or native wildlife that destroy our gardens - it is neighborhood cats, digging up the vegetable starts that we carefully nurtured for weeks indoors before transplanting, not only destroying our plants and making a waste of our time and energy, but also depositing feces in the soil we are trying to grow edible plants in. We have watched them kill young hares on our property, as well as stalk my bird feeder in the winter and kill native birds. Cat owners that let their cats roam freely have no idea what their cat is doing; even worse, feral cats have no owner and as such, who would be accountable for their negative impact on others?

As stated in the proposals I support, allowing cats to roam free - feral or not - is not humane. From raptors to coyotes to lynx, to getting run over, getting pregnant, fighting with other cats, or getting diseased, the cruel ways in which loose cats can be hurt or killed is extensive. Cats are a large part of a coyote's diet in urban areas. It is a waste of money to trap neuter and release as feral cats draw in newcomer cats (feral or domestic) to their colony, meaning that 100 percent TNR is impossible - all while failing to provide true safety for the cats, while perpetuating problems for wildlife as well as humans.

Thank you for your time.



Submitted By
James R. Smith II
Submitted On
2/10/2022 6:50:01 AM
Affiliation

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OPPOSE Prop 137- I oppose prop 137. As a Resident of Alaska since 2004, since this prop went into place I have seen major differences while in the field. While in the field with boots on the ground the experience of a backpack sheep hunter has become much better. There's been a lot less airplane traffic buzzing around and people looking for sheep. Individuals say this isn't enforceable. I disagree. Since prop 207 went into place why has the amount of airplane traffic declined? This keeps the honest man honest. I've always said if you know for sure you're coming into land and you have to do a couple touch and goes and circle back and someone thinks you're flying for sheep than who cares do what's safe for you as a pilot. I get into a lot of super cubs and bush planes during sheep season and I have not once heard a pilot say I'm being rushed or this is a dangerous situation because they think that an individual is going to turn them in for flying for sheep.

If for whatever reason your sheep are bumped because of predators, hunters or animal behavior from when the pilots original scouting prior to Aug 10 or if you can't land into a spot because of weather or other hunters, then find a place to land and go hunting. I'm a firm believer in fair chase hunting. Throw your boots and backpack on and hike until you find rams.

The most important thing I've noticed since prop 207 went into place, sheep are a lot less nervous when a plane does fly above. I've noticed this in the Alaska Range, White Mountains and the Brooks Range. Prior to 207 many sheep would run as soon as they would hear or see a low-flying plane whether they had been buzzed or not. To me this is the most important reason not to pass prop 137.

Individuals need to hunt sheep like how sheep should be hunted. Boots on the ground and fair chase hunting. PERIOD!

SUPPORT prop 138. This makes total sense.

I OPPOSE Prop 151. This is an obvious attack on guides. On the Kodiak there is a system in place that has been created that's been working great. Guides do have to put in for the draw for their clients. There are times that clients can't make their hunt so they have to forfeit their tag. This leaves a hunt spot open based on their allocation numbers with the Kodiak National Wildlife Refuge. The guide then wants to rebook that spot, he/she has to reach out to the Dept. of Fish and Game and they have authorization to reissue that tag to a new client. This does not help resident hunters whatsoever. Plus if this is put in place a non-resident who has paid in full will not be able to get his/her money back or the outfitter is out the money because they can't rebook the tag.

I support prop 211.



PC171
1 of 1

Submitted By

Mindy Irene Smith

Submitted On

2/9/2022 11:39:18 AM

Affiliation

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I am in favor of the draw but would like to see the Board take action for this years drawing July 7,2022. That way it is fair and equal as stated in the proposal 265.

Submitted By
Bethany Smithers
Submitted On
2/17/2022 7:05:21 AM
Affiliation



PC172
1 of 1

I am in support of Proposal 199 to mandate setbacks on traps on or near multi-use spaces and trails. There is no reason whatsoever why lethal traps should be placed where domestic pets or children can easily be maimed or killed. These incidents are entirely preventable, and I believe it is incumbent upon us to protect and support safe outdoor family-friendly recreation. As multi-use recreation areas become more popular, the benefits of setbacks to the greater good far outweigh the minor inconvenience to trappers of walking a few extra steps. By definition, "multi-use" means that the rights and protections of all users must be taken into account. When pets are dying, and parents can't take their children on certain trails out of fear, those protections are egregiously violated. I strongly advocate for setbacks on multi-use trails to help keep them safe and enjoyable for all users.

Submitted By
Susan Sommer

Submitted On
2/17/2022 6:14:13 AM

Affiliation



PC173
1 of 1

I support the Alaska Wildlife Alliance's Proposal 199 requesting 50-yard trap setbacks from over 200 multi-use trails in the Mat-Su area, including trails in: Nancy Lakes, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Nelchina, Chickaloon, Government Peak, Knik Glacier, Willow, and more.

Ideally, I'd like to see trapping banned altogether in such populated areas. Alaska has plenty of room away from high-density population centers for people to trap. There's no good reason for trapping where people and pets roam on a regular basis.



Submitted By
Ted Spraker
Submitted On
2/17/2022 9:45:19 AM
Affiliation

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Dear Chairman Burnett and Board Members,

Thank you for the opportunity to submit comments addressing proposals before the Board during the statewide meeting. I realize Board members have an extremely busy schedule prior to meetings, but I hope you carefully consider the three proposals I authored (129, 154 and 155), and support them.

Proposal 129- require expanding bullets for big game, except wolf and wolverine.

Justification for this request originates from public testimony concerning wounding loss, primarily moose and caribou, when full metal jacket bullets (solids) were used. The comments generally focused on hunters using 223 or 5.56 caliber rounds with 55 grain full metal jacket bullets. The use of an expanding bullet is the standard in most states for hunting big game, where deer and elk are the primary species hunted, not moose or brown/grizzly bear. This request is comparable to the requirement to use steel shot for hunting waterfowl rather than lead, to reduce loss of birds.

Proposals 135-139- rescind the restriction on spotting sheep using aircraft.

I am opposed to these proposals along with the 86 percent of Alaskan sheep hunters who do not own a super cub. I am especially concerned, during a time of major declines in sheep counts to allow hunters with aircraft to be more efficient at finding and killing rams. I hunted sheep before and after this regulation was adopted, the difference in being harassed by aircraft and a quiet hunt, is like night and day. 207 works. This regulation has been in place now long enough to prove it does make your sheep hunt far more enjoyable, and fair to hunters that cannot fly every evening to spot rams. The current regulation has not prevented anyone from hunting sheep, the harvest data proves this, as many claimed it would.

Proposal 154- issue an additional permit when a party application is drawn for the last permit.

According to comments from the department, drawing a party application for the last permit available does not happen often, but it does. As difficult as permits are to win, I request the protocol be revised to add an additional permit rather than awarding the tag to the next single applicant. The Board may want to limit this to draw hunts with more than 10 permits.

Proposal 155- establish a limited entry draw hunt for "any bull" in all selective harvest moose hunt areas in the state.

The selective harvest strategy was first implemented in Unit 9 (3 brow tine rule) and the upper Susitna in 13B (spike only) in the early 1980s, then increased in area and application with the spike/fork or 50 inches or 3 brow tine rules, in Units 7 and 15, in 1987. Now, there are about 20 Units or portions of Units managed using this selective harvest strategy. Although this management process has been successful in increasing bull to cow ratio and allowing for longer hunting seasons, it is not always easy for inexperienced hunters to determine if a bull moose is legal. Issuing a few permits in each area, will give hunters an opportunity to apply in their local area and potentially increase the odds to draw a tag because more hunt areas are available. Additionally, this will increase money generated by draw hunts during a time when department funds are declining. The three areas where any bull permits for moose were issued generated \$103,665 for fall 2021.

Proposal 199- restrict trapping alone trails.

I am opposed to this request for several reasons.

First, this would be very difficult for enforcement and the trapping community to know where legal trapping could take place, I doubt that all these proposed trails can be identified on a map. Second, this request will not guarantee that free ranging dogs will not be caught in a trap. Alaska Trapper's Association has worked with other trail users and continues to do so to demonstrate a willingness to share trails and to caution trappers about setting certain traps close to trails. Pet owners need to be responsible for keeping their pets under control,

when using trails during the winter trapping season.



Proposal 241- remove the must be guided for non-residents in certain permit hunts.

I am opposed to this request.

There are only a few hunts where this requirement is applied, and it's well justified. The Board worked with the department to identify hunts where this approach was warranted. An allocation of a portion of the permits to guides is a benefit to local Alaskan guides but it doesn't come at a high cost to resident hunters simply because they may draw the permit, but after realizing the cost to make the hunt, they cancel, and the permit is wasted. This proposal has been submitted previously, primarily to destroy a few Alaskan guides.

Proposal 267- Limit or restrict non-resident sheep hunting in 19C.

I am opposed to this request because it will result in less opportunities for residents in other sheep areas and there will not be any benefit to the sheep population.

Unit 19C, is an area that has been heavily hunted by guided non-resident hunters for years but there remains plenty of opportunity for residents to hunt in this area, this is reflected by the harvest data. If guides are limited or restricted, they will simply move to another area, that's already crowded, and reduce hunting opportunities for residents there. Additionally, if this request is granted, resident sheep hunters, realizing guides are limited, will rush to this area like an "Oklahoma Land Rush" and the harvest and crowding will most likely increase.

Since this area is hunted under the full-curl regulation, it would be best to leave the hunt as is. As resident and non-resident hunters realize 19C is no longer a prime hunting area they will seek out new areas, and the over all high number of hunters will decrease. As an example, the Kenai Mountain's sheep population has declined sharply but the season has not changed because of the full-curl regulation.

The organization that submitted this proposal adamantly opposed a guide concession program to reduce guide numbers and keep guides from moving to a new area.

Submitted By
Adam St. Saviour
Submitted On
2/18/2022 11:26:38 PM
Affiliation
Mat Su resident



PC175
1 of 1

My family and I are in support of Proposal 199 and 228. I am a sportsman, and I am very tired of unethical trappers making a bad name for all of us. Every year I come across traps set on or near high use multi-user trails. Every year many pets are harmed or killed, including our own in the recent past. Individuals setting these are not following the trapper's code of ethics, and some are intentionally trying to do harm and cause conflict.

The 50-yard setback, on listed multi-use trails, outlined in Proposal 199, is a very reasonable approach to creating a safe and enjoyable outdoor experience for everyone. The vast majority of users on most of these trails are not trappers and should not have to fear every outing. Meanwhile, those that do want to trap off these trails are not unduly burdened. It is a very short distance to ride or walk and enables an authentic outdoor experience for the trapper. This is a win for all reasonable parties.

We support proposal 228 so that the law could be enforced, and because this will not put an undue burden on trappers that already following the code of ethics.

Submitted By
Mark Stevens

Submitted On
2/18/2022 3:42:40 PM

Affiliation



PC176
1 of 1

I hunted Alaska for the first time a couple years ago and am already planning a couple more trips in the next few years.

Please don't allow the use of rangefinding sights on archer hunts (123 & 124), or the use of crossbows (101 & 125). I quit going to Arizona each January because of having hunts ruined by people taking long shots with their crossbow and either missing or wounding game. One guy took a 90 yard shot at a bucking moving towards me, when I was within 40 yards at a buck. The following season, another hunter took a long shot at a buck quartering towards him (not a safe shot). I offered to help him track it, but he gave up after only a couple hours. He also hiked with the cocked crossbow slung on his back (unsafe!). It's too easy for people to pick up a crossbow and hunt as if it's just a slow rifle, in the process taking shots every responsible Bowhunter should know to be unethical.

Also, please don't allow the use of planes to scout during any sheep season--how is that even fair!?! Sheep live in an environment where they are ridiculously easy to spot from far distances--planes shouldn't be allowed.

Without restrictions on technology allowed while hunting, hunter success rate will continue to increase and either populations will start to decline and/or there will have to be reductions in season lengths or tags given(\$\$\$). Please restrict technology to allow more hunters more time in the field.

Thanks,
Mark Stevens

Submitted By
Brian Stoltz

Submitted On
2/17/2022 1:39:04 PM

Affiliation



PC177
1 of 1

I strongly oppose proposals 137 and 139. They roll back the rule of no spotting sheep from the air. I know pilots would not be able to closely circle sheep if hunters are pursuing them either way, however, prior to these rules going into effect I have had a sheep stalk ruined on a full curl ram by a super cub "spotting" the sheep by closely flying back and forth. Being in subdued colors I highly doubt the pilots saw us there. I do not carry a signal device or flares and do not feel like the onus should be in the hunter to ensure there is nobody pursuing sheep while pilots spot animals from the air.

This could be especially problematic if sheep populations decline as pressure will be concentrated on fewer animals.

Thanks for your consideration,
Brian Stoltz

Submitted By
Christine M Tait
Submitted On
2/15/2022 7:16:32 PM
Affiliation
AlpenRose Soap



PC178
1 of 1

I am in favor of Prop 199, Amended.

I recreate with my dogs on many public lands for pleasure and for K9 Search and Rescue training. When we have to worry about our dogs getting caught in a trap, and possibly killed, our choices for not only training, but for searching for lost and missing people, becomes very limited.

Please regulate the areas that are used both by dog owners and trappers. There are more dog owners than trappers, and human populations are only increasing. This conflict will continue to escalate if preventative measures are not taken soon. Please support Prop 199, and help prevent any further unnecessary dog deaths.

Thank you,
Christine

LAW OFFICE OF KNEELAND TAYLOR, P.C.

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February 17, 2022

Alaska Department of Fish and Game
Board Support
by email to: dfg.bog.comments@alaska.gov

To the Board of Game, and Board Support:

I am in this letter providing my comments to the proposals to be considered at your spring meeting which commences on March 4, 2022. I am providing with my comments one attachment, which is a print-out of material appearing on the website of the Great Land Trust. If there are any technical difficulties, please do not hesitate to contact me. My comments to a few of the proposals are as follows:

Proposal 199 Amended. I support it. This amended proposal would provide for 50 yard buffers for a short list of specific trails in the MatSu Borough. Within the buffers, some trapping would be permitted, but only with limited methods and means.

Having said that I support Proposal 199 Amended, I must make clear that I am deeply disappointed with the process used to prepare the amended proposal, and with the limited result. That process involved a meeting held on February 14 at the ADF&G Field Office in Palmer the purpose of which was to negotiate a compromise between proponents of Proposal 199, and “stakeholders”. I thought that meant representatives of organized trapping associations.

To begin, I want to sincerely thank Board Member Lynn Keogh for trying to accomplish something positive.

But the fact is that the process didn't work. Let me point to one specific trail as an example; namely the "Swan Lake Trail". The Swan Lake Trail is a relatively short trail in the Palmer Hay Flats State Game Refuge, which originates in the recently completed Ranch Subdivision in Wasilla. It and the Swan Lakes Upland

Loop Trail are immediately adjacent to several single-family homes and the trailhead is approximately 200 yards from the Machetanz Elementary School. The trail is mostly at ground level but includes some elevated boardwalk sections through wet areas and to an overlook on Swan Lake. **The trail is heavily used by the hundreds of residents in the nearby subdivisions and by school groups who regularly utilize the trail as an outdoor classroom.** In addition, the trail and surrounding area is used in winter by walkers, ice skaters, skiers, and others. It is located on nearly 1000 acres of lands owned by the Great Land Trust within the Palmer Hay Flats State Game Refuge.

I am providing copies of materials taken from the Great Land Trust's website, which include a map and pictures. Please take a look. Please take a look also at the comment by Barbara Jones. She is taught at the Machetanz Elementary School and used the trail on numerous occasions as an outdoor class room.

I agreed to participate in a stakeholder group with Board Member Keogh the purpose of which was to negotiate a compromise. But three trappers not associated with any trapping organization attended, and were granted what amounted to veto power. One of the two unaffiliated trappers who lives in Cooper Landing said he didn't know anything about the Swan Lake trail, and therefore vetoed its inclusion on the compromise list, while the other, a MatSu trapper, said he wanted to trap fox along the trail.

The Alaska Wildlife Alliance submitted a petition with more than a hundred signatures, and the general public submitted more than a hundred comments supporting buffers for this trail, and many others. And yet the Swan Lake Trail was vetoed by two individuals; one who openly said his veto was because he didn't know anything about the trail.

Board Member Keogh tried hard, but he was mistaken to give veto power to unaffiliated trappers, one of whom only wanted to make trouble. We all make mistakes, and I don't blame Mr. Keogh.

I blame the Department. The Department abdicates its responsibilities by asserting that closures to protect the public are "allocation" issues. Trapping with 330 Connibears on trails located next to elementary schools and used as an outdoor classroom is a public safety issue. It is absurd to not provide the Swan Lake trail with a buffer. Proposals should be evaluated on the merits. Career employees of the Department know this is true, and know that setting large traps along trails such as the Swan Lake trail should be banned. It is public safety which is at stake. Not allocation.

Proposal No. 199 Amended, if adopted, will allow some traps within 50 yards of trails, but will allow unrestricted trapping on the remainder of the Great Land Trust's in-holding. We, the proponents of buffers gave up a lot in reaching compromise on February 14. If compromise is not possible, then people like me will do our best to persuade the Trust to close the entire in-holding to all furbearer trapping. Why compromise if the door is slammed shut in our faces at the request of a single trapper who says he doesn't know anything about the trail?

Here is what I believe should happen going forward:

1. Proposal 199 Amended should be modified to include the Swan Lake Trail, and the amended proposal should be approved at the Spring 2022 meeting, by the BOG.
2. The BOG should request the Department to prepare a comprehensive list of heavily used multi purpose trails, trail heads, roads, public use cabins, and campgrounds in Units 14A, and 14B where there should be buffers. Guidance should be given to the Department as to what the BOG is looking for. The Department has the career employees, resources, and expertise to do a good job in preparing a list, and marshaling the reasons for inclusion of each trail, trailhead, etc.
3. The Department's list should be put forward for consideration by the BOG at a later date, after notice and opportunity for comment by the public, including all interested parties.
4. The BOG at this meeting (March 2022) should close all furbearer trapping within the city limits of Palmer and Wasilla. Reasonable exceptions for law enforcement to deal with nuisance animals should be allowed.

It was repeatedly stated by two of the unaffiliated trappers at the February 14, meeting that they worried that compromise would only encourage what they referred to as "creep". In other words, people like me would ask for, and get, more in the future. I understand that the Alaska Frontier Trappers Association categorically rejects any closures for the same reason: i.e. fear of "creep". They are wrong. The consequence of enacting reasonable restrictions reducing the setting of traps in the wrong places will end the public outcry for a stop.

What follows in this letter are my comments on a few of the other proposals before the Board.

Proposal 134. Oppose. This proposal would authorize the use of motion detecting cameras and sensory devices that can send messages through wireless communications. This proposal is limited to devices set near traps, while another proposal would authorize these devices anywhere. Generally speaking, the use of devices that can spot game and instantly transmit the information to someone far away is bad idea, because these devices make it too easy to hunt, and contribute to the game-farming of Alaska,

But the use of these devices near traps could be beneficial in a well-regulated program aimed at reducing suffering of animals caught in traps. As a society we mete out prison time and large fines for owners of domestic animals who allow their animals to die slowly, by starvation, and exposure. The major religions of the world support the humane treatment of animals. Killing an animal by starvation, and exposure over a long period of time is not humane. Ethical trappers agree, and return to their traps frequently. But not all trappers in Alaska are ethical.

Motion detecting devices, with wireless communication to the trapper could be linked with regulations mandating immediate return to a trap after receiving notice that an animal has been trapped. If the regulatory scheme were to so-provide, and were the scheme to be enforceable with things like the registration and monitoring of these devices, then I would support it. Since it is highly unlikely that the Board will enact a genuine regulatory scheme requiring trappers to quickly to dispatch trapped animal, I oppose the proposal.

Incidentally, the justification provided by the proponent about securing traps from marauding recreational users is not a sufficient basis to adopt the proposal. Disturbing or stealing a trap is a criminal offense already, and there is no evidence of widespread violation of the criminal statutes. When traps are disturbed it is usually when someone's dog gets caught, and the owner releases his pet.

Proposal 121. Oppose. This proposal would allow the use of hunting dogs in hunting, tracking and taking big game. While the proposer asserts the use of dogs in taking big game is fair chase, it is not.

Proposal 129. Oppose. This proposal by former BOG chair Ted Spraker would REQUIRE the use of expanding soft point bullets for big game hunting, excluding wolf and wolverine. While this proposal, if adopted, might reduce the loss of

animals through wounding of game, it would also increase the risk of death to humans through all-to-frequent hunting accidents.

Proposals 135, 136, and 137 Oppose. These identical proposals would authorize the use of aircraft to spot Dall Sheep during the open season. Once spotting is authorized, it would be impossible to enforce prohibitions on herding Dall sheep to more accessible elevations.

Proposal 234. Oppose. This proposal would authorize the use of stationary sensory or motion detecting devices (cameras) that can send messages through wireless communication. As stated above, the authorization of the use of these devices is, generally speaking, a bad idea.

Proposal 235. Oppose. This proposal would authorize the use of artificial light to hunt small game. The use of artificial light in hunting small game will serve as an invitation to people who want to hunt in the dark. Hunting in the dark poses a threat to the safety of ordinary citizens out for a walk, hike, or ski after hours. Hunters need to be respectful of the rights of other Alaskans who want to enjoy the outdoors, after hours.

Very truly yours,



Kneeland Taylor

MENU

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SWAN "QUGGESH" LAKE BOARDWALK & TRAIL

A new trail in the Palmer Hay Flats State Game Refuge is now open to the public!



In 2014, Great Land Trust raised \$1.5 million to purchase nearly 1,000 acres of private land – making the largest private inholding within the Palmer Hay Flats State Game Refuge open to the public. Next GLT raised money to build wetland boardwalks out into the Refuge from two different trailheads, providing stunning and never before seen views and access to fishing and wildlife watching spots.

The nearby Wasilla Creek Boardwalk & Trail opened in 2016, while we waited on opening the Swan Lake Trail until the adjacent housing development was completed. This spring, the access to Swan Lake was finalized, GCI and Fish & Game staff built a connector trail out to the road, and the Swan Lake Boardwalk & Trail are now open to the public!

If you've enjoyed the Wasilla Creek Boardwalk & Trail, you'll love visiting Swan Lake. A trail to the south takes you down a boardwalk and out to the viewing platform at Swan Lake where you'll get views of the Palmer Hay Flats and the Chugach Mountains in the distance. A trail to the north takes you on a 1-mile upland loop through a beautiful birch forest, with more views from the bluff out into the Refuge. The area is also the location of a former Dena'ina village site and holds cultural significance. The area is called *Quggesh*, which means swan.



GETTING THERE: From Anchorage, take the Glenn Highway north towards Wasilla. Take the Trunk Road exit and turn left onto Trunk Rd. Go through the traffic circle and take the exit onto South Trunk Road. Follow South Trunk Road as it becomes E. Nelson Road. Follow E. Nelson Road past the Wasilla Creek Trail parking lot until you see Machetanz Elementary School on your right. Just past Machetanz Elementary, take a left onto S. Barn Gable Loop (you will have already passed the other end of this loop), and the trailhead is just down the hill on your right. Look for the trailhead sign. Park along the right side of the roadway. NOTE: This section of S. Barn Gable Loop is a new road and is not yet visible on Google Maps.

Swan "Quggesh" Lake Trails

Palmer Hay Flats State Game Refuge



PC179
8 of 8



USGS Digital Quadrangle Map. All rights reserved. Source: USGS Digital Elevation Model (DEMs) Version 2, NOAA, USGS, Alaska DOG, and the USGS Elevation

This project was made possible through funding from the Alaska Conservation Foundation, the Alaska Waterfowl Association, ConocoPhillips, The Conservation Fund, ERM Group Foundation, Gateway Community Council, JL Properties, Mat-Su Trails & Parks Foundation, M.J. Murdock Charitable Trust, National Fish & Wildlife Foundation, NOAA, Rasmuson Foundation, Wildlife & Sport Fish Restoration Program, and many generous individual donations.

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Submitted By
Lorraine Temple
Submitted On
2/18/2022 7:46:17 PM

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Cooper Landing Community Safe Trails

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I am in complete agreement Proposal 199 of *at least* a 50 yard set back on the listed trails, recreation areas, pullouts and roads. The dogs caught in traps recently, and what has happened historically, are strong indicators that these conflicts need to be addressed. These dogs are more like important family members ;that grow up with kids in the household; these events are heartbreaking and unnecessary. The days of useful trapping for clothing and food are long gone; the lifestyle today of Alaskans is certainly more recreational than the other. Tourism is booming and winter activities that utilize the trails consist of skiiers, snowshoers, snowmachiners, hikers, fat tire bikers, dog mushers and most of these groups have their dogs running free along side them. This is a natural, healthy, expected excercise for the family and groups. When I was dog mushing in the Homer area, I always let a few dogs run along side for more training. I shudder to think today of doing that and can only think that my loose huskies stayed safe because back in the 80's, perhaps trappers were more ethical of where to place their traps. There seems to be a variety of "hobby trappers" that are spoiling it for the rest of the folks that are more sensitive to the issue. With this bad reputation that is growing exponentially regarding trappers, it seems to me that completely eliminating trapping in the state of Alaska could be the next move by the masses. I'm sure the current respectful trappers don't want that. In Cooper Landing, a survey was put out with 90% of the returned questionaires supporting a 400 yard set back, and some said they wanted as much as a mile. The multi use areas should simply *not* allow trapping and on the other hand, areas whould be posted with signs indicating active traps to alert recreational users. There is enough land and back country to accomodate all users safely. The time for change is immediate and necessary. Things have changed in our great state and we need to change with the times.



PC181
1 of 1

Submitted By

Chris Thomas

Submitted On

2/18/2022 4:58:04 PM

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I fully support 199. Christmas eve 12/24/21, I had a dog caught in a snare on the Moose Range Trails. Dog was no more than 10 yards off the ski trail. The potential for serious user conflicts is far too high. Please vote in favor of 199.



Submitted By
Henry D Tiffany IV
Submitted On
2/17/2022 11:57:17 AM

Affiliation
Self

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Address
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Ester, Alaska 99725

Dear Board of Game Members,

As a lifelong Alaskan resident, professional Master Big Game Guide & Outfitter and former chairman of the State of Alaska Big Game Commercial Services Board, I would like to comment on a few of the many proposals before you, specifically proposals 135 through 137 that seek to repeal 207, a law which makes it illegal to spot and locate Dall sheep during the Dall sheep hunting season of August 10th to September 20th. I would like to reiterate my continued, longtime support of this law, which was originally Board of Game generated proposal 207, and if often referenced as such. This law has had a very beneficial, positive effect on all ethical sport hunters and the experiences of all hunters and user groups enjoying our wild places and natural resources.

The argument has, and will, be made that this law is unenforceable, and I would suggest that is not entirely the case. In our current day and age of technology almost everyone is carrying with them a "smart phone" and more and more I am seeing hunters (resident, non-resident and guides alike) carrying these phones into the field on a daily basis. As such, everyone is carrying a video camera with them as well, since most all of these advanced phones can, and do, easily take video footage. As such, it does not take much effort to capture in video, or in photo, format flying behavior that is not ethical and/or is contrary to the language and intent of this law. That footage, and an accompanying complaint, can then be turned into the proper authorities to be investigated. While this law (207) might not prevent all such behavior I do believe it does help to curb the misuse of aircraft and since its inception my hunting experiences, and those of my clients, have been much better than before this became a law.

Instead of trying to repeal, or somehow weaken, this law I encourage you to strongly consider enhancing, and making 207 truly enforceable, and more closely adherent to the ethical, fair-chase ethos, which should encompass all sport hunting in Alaska. This law should in fact be expanded to fully include all big game species in Alaska instead of trying to reduce its effectiveness and I would fully support making it illegal to spot and locate any big game species from aircraft. That does not mean pilots and/or passengers should fly with their eyes closed and of course some big game species would be incidentally spotted while flying to and from remote locations but the intent behind this law is noble and makes it illegal to actively fly around looking for, spotting and locating Dall sheep and our hunting future could only be improved if it were expanded to include all big game species and by doing so it would make it much more enforceable.

At a minimum, I am in full support of proposal 138, which broadens 207 to include all open sheep seasons, including youth seasons. The youth is the future of hunting and we should be making every effort to instill in our youth proper, ethical and sportsmanlike behavior, which does NOT include spotting game from the air to then pursue it.

I do not see abiding by this law, or an expansion of this law, as a hardship or undue burden by any means because the majority of resident hunters, and a reasonable percentage of guides, have been successfully hunting sheep ethically and under the fair-chase clause for many decades so it can be done, as is proven every year by those hunters that harvest rams WITHOUT first having to spot them from the air. It would be a real travesty were you, the Board of Game, to even consider rescinding this 207 law, much less actually doing so.

I thank you, board members, for your continued service to our state, its people and its resources and appreciate the time, effort and diligence you bring to your efforts and decisions.

Respectfully,

Henry D. Tiffany IV



Submitted By
Henry D Tiffany IV
Submitted On
2/18/2022 6:33:30 AM
Affiliation
Self

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Ester, Alaska 99725

Dear Board of Game Members,

RE: Reconsideration of Proposal 206, Opposition to Proposals 151, 168, 241 and 267 and Support of Proposals 149, 159, 163 and 164

As a lifelong Alaskan and Master Guide with over 30 years of in-the-field experience hunting on the southern Alaska Peninsula, specifically in GMU 9D and 9E, I strongly urge you to please reconsider your adoption of Proposal 206, which extends the Brown Bear Spring Seasons in 9D and 9E until May 31st. I do not believe this is in the best interests of conservation or the resources.

Traditionally, at least since the 1980's, the Resident and Non-Resident Brown Seasons on the southern Peninsula were 15-to-16-day seasons and I believe that served conservation, the hunters, and the resources well and produced a high quality, sustainable harvest. Several years ago, due to pressure from some user groups, both the fall and spring seasons were lengthened and then most recently, just a few years ago, you reduced the season back to what it has traditionally been based upon conservation concerns. I was, and remain, in full support of that decision and I am strongly opposed to lengthening the season for any user group. You just reduced the season and now you are prepared to lengthen it again? That makes no sense to me and does not seem to be based upon sound, prudent resource management, data, or conservation.

Please, I implore you to reconsider the recent change to 206 and do not add any additional length to the season in units 9D and 9E and revert it back to the long standing, traditional October 7th to 21st and May 10th to 25th season dates.

I would also like to voice my strong **opposition** to Proposals 267, 151, 168 and 241 and my **support** of Proposals 149, 159, 163 and 164.

I thank you, board members, for your continued service to our state, its people and its resources and appreciate the time, effort, and diligence you bring to your efforts and decisions.

Respectfully,

Henry D. Tiffany IV

Master Guide #144

P.O. Box 329

Ester, Alaska 99725



Submitted By

Kathleen Tigan

Submitted On

2/7/2022 8:05:06 AM

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Alaska has approximately 30 licensed falconers, EACH of which can legally, take 2 wild Raptors of any species, at any time of each calendar year.

Alaska Falconers propose, in part, that the entirety of the roughly 4,500 licensed Falconers in the lower 48 be granted a total of ONLY 5 wild take permits EVERY FOUR YEARS – AND that ONLY non-residents be required to microchip. Additionally, ONLY non-resident trapping dates be September 15 through November 15, which is past a historic trapping time when weather conditions greatly reduce success, accessibility, and safety.

In comparison, Texas, being 2.5 times smaller than Alaska, with approximately 400 licensed, resident Falconers and each is granted 2 wild takes per year in addition to also allowing non-residents one wild raptor within that same year. Texas also makes an exception for Peregrines, a species as highly valued by Falconers as the Gyrfalcon by allowing 35 takes from September 20 through October 20, with a 60/40 split (resident /non-resident), in the three Federally approved Texas flyways.

With regards to Alaska, an argument can also be made that per capita, it is easier and safer to draw, trap and fly a Golden Eagle than it is to trap a Gyrfalcon.

The regulations proposed by the Alaska Falconers Association and Alaska Department of Fish and Game single out and seek to disparage Falconers in the lower 48 by overly complicating the process, greatly increasing our expenses and significantly reduce the number of take permits.

We respectfully request your consideration in supporting California Hawking Clubs submission of proposal #113 as a more reasonable solution.



Submitted By
Henry Titus

Submitted On
1/10/2022 12:04:49 PM

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White Mountain, Alaska 99784-0054

Proposal 120

Proxy Hunt Authorization for "any" antlered bull.

Hunting traditional foods for elders, now known as proxy hunting, has been our tradition and our culture. Continuing our tradition and our culture is being impacted by restrictions to proxy hunting in the winter moose hunt in unit 22.

We do not expect our elderly that have once provided for us as children to hunt big game, such as moose. They are elderly and most with restrictions themselves, such as lifting and even riding a snowmobile for periods of time.

I feel it is time to lift this restriction to proxy hunting during the winter moose hunt. To take proxy hunting away from us, is taking a part of who we are as Inupit and a part of our tradition and culture. This is a fact for many indigenous cultures throughout the world. I strongly advise restrictions to proxy hunting to be lifted so we may continue on with our tradition and culture thru "proxy hunting."

Quyana/Chin'an gu nin yu/Basi'! Thank You!

Henry J Titus Sr.



Submitted By

JoAnna Tomuro

Submitted On

2/15/2022 1:51:45 PM

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Anchorage, Alaska 99519

I would like to amend my statement from yesterday 2/14 (copied below), by adding I wish to support Proposal 144. I was mistaken to state it to be stricken. I am in support of TNVR. Thank you, JoAnna Tomuro 2/15/2022

Statement submitted 2/14/2022: I would like to move to strike down Proposal 144 as it exempts sterilized cats from being released into the community. I support TNVR (trap-neuter-vaccinate-return) as the city has ignored the over-population of cats and dogs in our community with lack of education and lack of truly free or low cost spay neuter resources for the general public. TNVR works to curb the population of unwanted animals in our community, it has been proven in many communities outside Alaska. To be clear, I only support the releasing of sterilized cats back to the community where there is a cat caretaker - a caretaker who feeds and waters, provides shelter and monitors the cats for injury or illness.

Submitted By

JoAnna Tomuro

Submitted On

2/14/2022 2:24:53 PM

Affiliation

Independent Rescuer

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PO Box 190664

Anchorage, Alaska 99519

I would like to move to strike down Proposal 144 as it exempts sterilized cats from being released into the community. I support TNVR (trap-neuter-vaccinate-return) as the city has ignored the over-population of cats and dogs in our community with lack of education and lack of truly free or low cost spay neuter resources for the general public. TNVR works to curb the population of unwanted animals in our community, it has been proven in many communities outside Alaska. To be clear, I only support the releasing of sterilized cats back to the community where there is a cat caretaker - a caretaker who feeds and waters, provides shelter and monitors the cats for injury or illness.



Submitted By
Ed Toribio
Submitted On
2/18/2022 9:26:41 PM
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APHA - Alaska guide

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Proposal 135: I support this proposal 135 and agree with the the wording in Proposal # 139 "aircraft may no be used to make multiple consecutive approaches near aany sheep or group of sheep,.." as a better alternative.

Proposal 136: I support this proposal and feel that the the wording in Proposal 139 " aircraft may not be used to make multiple consecutive approaches neat any sheep or group of sheep...during the open sheep season..." is a better solution to the issue.

Proposal 137: I support this proposal and feel that the wording in Proposal 139; "aircraft may not be used to make multiple consecutive aproaches near any sheep or group of sheep...during an open sheep season..." is a better solution to this issue.

Proposal 138: I OPPOSE this proposal.

Proposal 139: I SUPPORT this proposal.

Submitted By
Angela Torres
Submitted On
2/14/2022 6:04:34 PM
Affiliation



PC187
1 of 1

Please, support Proposal 144 and exempt sterilized community cats from the list of species prohibited from being released into the wild. TNVR programs are good for cats and good for communities. Thank you.



Submitted By

Bill mohrwinkel

Submitted On

2/18/2022 4:34:27 PM

Affiliation

Valley Mountain Bikers and Hikers

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Valley Mountain Bikers and Hikers supports proposal 199 to create 50 yard set backs on trails in the Matanuska Susitna Borough. VMBAH is a nonprofit organization that builds and maintains trails throughout the Mat-Su Borough. The Mat-Su borough is and has been for many years, the fastest growing area in Alaska. Because there are many more people in the Valley, there are many more people out using trails. Trapping is not an activity that is compatible with other users, especially those with their pet dogs. Trapping should be done well away from high use areas. While most trappers are ethical, many are not, hence the need for regulations.

Many trappers answer to this problem is to simply put your dog on a leash. While there is a leash law on Mat-Su borough lands, many trails do not require leashes. And even with leash laws, many people run their dog off-leash. This is common knowledge. While there are many areas where dogs should be leashed and even certain dogs that should be always leashed on public trails, trappers should acknowledge this and not trap where they could catch a loose dog in a trap. People are always amazed that trapping is legal just about anywhere. They assume there are laws that keep trapping away from trails and parks. Unfortunately, many dogs pay with their life because of this misconception. While this regulation will not prevent an unethical trapper from trapping less than 50 yards on a trail, at least there would be some legal recourse to remove the dangerous trap.

Although there are a handful of popular trails included in this proposal, Valley Mountain Bikers and Hikers does not think enough trails were included.

While trapping has historically been an import part of Alaska's history, unethical, weekend hobby trappers, using our trails and road system as a "trapline" has become a problem. Trapping is an activity that should be done well away from high-use areas and as our population increases in the Mat-Su Valley, it's time for regulations to protect other users, not just trappers.

There have been several dogs caught in traps on popular trails this winter.

The Board of Game can no longer turn a blind eye to this problem. It's only going to get worse. Please pass Proposal 199 and create 50 yard setbacks on trails in the Mat-Su.

Submitted By
Mike Vaughn
Submitted On
2/17/2022 10:20:26 PM
Affiliation
Waterfowl hunter



PC189
1 of 1

Members of the Board of Game,

I am submitting this comment in **SUPPORT** of **Proposal 231** which requests a re-evaluation of the definition of edible meat for cranes, geese, and swans. I would like to thank the proposer for bringing this issue forward and for the Board's consideration of this and the other proposals before you.

Admittedly, I have not hunted tundra swans, nor have I been involved in preparing swans for consumption but it stands to reason they carry a lot more useable "secondary" meat and the large game bird meat salvage requirements seem that they are likely appropriate. I do however think we have gotten a little sideways in this regulation when it comes to required retention of the back section of waterfowl and with the broad assignment of additional salvage requirements to vastly different groups of birds that fall into the generic goose category. A 2.9 lb average weight brant or 4.2 lb average cackling goose is in an entirely different league than a full size Canada goose, or a tundra swan, which may grow to 23 lb.

I certainly want to be a responsible and respectful user of the game I harvest but some of the salvage requirements, particularly when considered for these smaller geese, seem more like "feel good" motions rather than regulations of substance. I can get behind and support the recovery of secondary meat sources in the thighs and upper section of the wings where there is edible meat to be utilized, but I am in agreement with the proposer that the back section of a goose does not meet that standard.

Thank you-

Mike Vaughn



Submitted By

Linda von Bose

Submitted On

2/14/2022 2:33:10 PM

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Southcentral Alaska has an overwhelming number of unaltered cats living outside. **THE ONLY WAY WE ARE GOING TO REDUCE THE AMOUNT IS BY TRAP/NEUTER/VACCINATE AND RETURN. There is no other effective way to do it. I STRONGLY SUPPORT Proposal 144, TNVR and the exemption of sterilized cats from the list of species prohibited from being released to the wild.** In reality, those cats deemed not adoptable would be released back to the location/home they are already inhabiting and where there is a caretaker and shelter for them....not simply dumped 'out in the wild'. I've been doing rescue for nearly 18years and have done extensive trapping as well as colony control and in some cases, elimination. TNVR along with aggressive Spay/Neuter programs are critical management tools we must have!



Submitted By
Kyle L Wait
Submitted On
12/7/2021 11:16:04 PM
Affiliation

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Proposal 123, Electronic Rangefinders mounted to bows

These bow mounted rangefinders are very efficient! And that is why we should not allow them to be used. Archery hunting is based on limitations. The more we erode the limitations the more efficient we become. The more efficient we become the more game we harvest, forcing the board to limit opportunity. The changes allowed in archery in recent years have been reasonable and responsible without aiding archers too much. Bow mounted rangefinders might very well cross that line, the line that keeps us limited and respected. Alaska will not suffer any loss of bowhunting participation by continuing to ban electronic equipment being mounted to bows.

Proposal 137, Observing sheep from an aircraft during an open season.

I was frustrated and disappointed when the BOG took it upon themselves to propose and push regulation against public opinion. This was over reach and just plain wrong. Members can talk of intent or reason all day long but the fact remains, our BOG acted more like our current government than an appointed body charged with upholding public process.

Was this really ever an issue? Well my first 15 years in Alaska I didn't have a plane and I sheep hunted almost every year. Never once did I have an aircraft impact my hunt. I think we can all agree this tool can get misused / abused to the detriment of others. Those that abuse the tool should have been dealt with accordingly under existing laws forbidding the harassment of wildlife. But a law that makes an honest sportsman illegal because he spotted a sheep while flying through a valley is absurd. Am I supposed to fly blindfolded? Viewing a sheep from a quarter mile away is not unsportsmanlike nor will it impact anyone's hunt. Violators could have been dealt with under existing laws without creating new, impossible, overreaching regulation that was generated and passed in house! I hope we have learned our lesson about "working groups"!

Repeal Prop 206 by carrying this Proposal 137. Put some teeth in existing regulation regarding wildlife harassment and deal with unsportsmanlike conduct accordingly.

Kyle Wait, Palmer Alaska.

Submitted By
Jeanne Walker
Submitted On
2/18/2022 9:51:36 AM
Affiliation



PC192
1 of 1

I am dismayed that there are no trail setbacks on trap lines in Alaska. Please adopt the current proposal (199) to ensure safer trails for all users.



Submitted By
Barbara Warfield
Submitted On
2/9/2022 2:24:50 PM
Affiliation

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Regarding Proposal #265

My name is Barbara Warfield and my community of residence is Boise, Idaho.

I am writing in **Support** of proposal # 265 changing RM855 to DM 855.

I find the process for applying for a non-resident moose tag in Unit 22E very complicated and the process unfair.

It requires being super adept on the computer and keyboard since those wishing to compete for the available tags must do so at the same **exact moment** on July 7th at 0900 when the ADF&G opens it to receive and award registration permits to the first electronic applications they receive.

This method is unfair because: **1)** puts older individuals who may have slower fingers or not skilled at the computer at an unfair disadvantage; **2)** speed of transmission of mobile technology is not the same for everyone from different parts of the country; **3)** many older hunters do not have access to a reliable computer or internet at their residence. **4)** there will be those super skilled at technology who may use multiple computers, and if possible set for a scheduled automatic transmission of the form or automatic recurring transmission of the form.

For the above reasons, I feel that the current method of obtaining a non-resident moose tag in Unit 22E are a barrier for many and perhaps discriminatory.

Because of this, **I urge you to approve Proposal #265 and take action for this regulatory year and changing it to a draw system on July 7, 2022 so this unfairness can be rectified for the year 2022 by a "draw system as described in Proposal #265.**

Thank you for your consideration.



Submitted By

Andrew Weaver

Submitted On

2/18/2022 3:41:02 PM

Affiliation

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Address

9370 E. Santa Fe Circle
Palmer, Alaska 99645

I write to oppose Statewide Regulation Proposal #267, which seeks to restrict nonresident sheep hunting in Game Unit 19C so that only resident sheep hunting is allowed. Proposal #267 should be rejected for the following reasons.

(1) Proposal #267 is bad for Alaska's businesses, jobs, and economy.

I've operated as Registered Guide in Unit 19C for years. Our outfitting business financially supports numerous guides, assistants, and other trades and businesses involved in the hunting and outfitting industries. Our outfitting business relies on nonresident sheep hunting in Unit 19C. If approved, Proposal #267 will not only shut-down our business, and hurt all the businesses, trades, jobs, and livelihoods that depend on our business, it will also shut down all other outfitters currently providing hunts in Unit 19C

Even worse, the damaging effects of Proposal #267 will spread throughout Alaska to all those who financially depend on or benefit from nonresident hunters.

Nonresident hunters are one of the biggest revenues for the state. Non resident hunters visiting Alaska financially support vast sectors of Alaska's economy, including industries in tourism, travel, lodging, food and beverage, shopping, hunting, and guiding. From these vast sectors of Alaska's economy, a wide-range of Alaska businesses and jobs financially depend on or benefit from nonresident hunters, including aircraft transportation, motor vehicle rentals, gas stations, hotels, motels, bed and breakfasts, grocery stores, convenience stores, liquor stores, restaurants, bars, sporting goods stores, equipment stores, clothing stores, hunting guides, outfitters, and taxidermists. Since Proposal #267 seeks to restrict nonresident hunters, it will hurt Alaska's businesses, cut jobs, and damage the economy.

(2) Proposal #267 is bad for responsible sheep management in Unit 19C.

Proposal #267 will reduce the number of outfitters operating nonresident sheep hunting in Unit 19C. As business owners and employees who depend on the opportunity to guide sheep hunts, we take very seriously what happens in our units. We love Alaska and make business practices to protect and preserve the sheep population.

The State of Alaska has successfully managed sheep using the full curl or 8 year old method for years throughout the state. Outfitters have built their business models around this method and offered outfitting services accordingly.

Proposal #267 has nothing to do with increasing sheep numbers and has everything to do with wrongful entitlements by a small group of Alaskans. Sheep meeting the full curl or 8 year old test are the target of all hunters. If there is no full curl or 8 year old rams then no sheep will be taken during the season. The population of sheep will increase until a sustainable population of full curl or 8 year old rams exist.

It is important to remember, it was not nonresident hunters that caused the sheep decline but harsh winters. The outfitters operating in Unit 19C provide responsible sheep management because their businesses depend on it.



The individuals in support of Proposal #267 should consider their impact on sheep populations. Where will this end? How many sheep need to be on their wall? Nonresidents are required to wait 4 years between successful hunts, why is the concerned party not suggesting residents do the same to support sheep populations. As far as funding goes, here is another area the supporting parties of Proposal #267 fail to provide money where their mouth is. Increase the price of sheep tags to reflect every other state that offers opportunities to hunt Wild Sheep. This should go for both Residents and Nonresidents. The additional revenue generated from residents would greatly assist in management and preservation of a resource they consider their own. Everyone should pay to play when it comes to utilizing a resource.

(3) Proposal #267 is bad for all sheep management state wide.

Proposal #267 if approved will accomplish one thing and one thing only. Displacement of Outfitters and Nonresidents. The demand on this resource will not go away, and the need for Outfitters to provide for their families will not stop. If Proposal #267 passes you will see sheep populations in other areas of the state feel the impact. Both Outfitters and Nonresidents will move to areas where they can operate and hunt sheep thus compounding the problem. Proposal #267 is not the answer to a low sheep population it is simply the catalyst to more areas in Alaska dealing with a similar problem if a bad winter should hit.

Best Regards,

Andrew Weaver

Guide #1283



Alaska Board of Game

Lot 5

Proposals to: Statewide Regulations

Comments to Proposals.

Submitted by: Brian West

1000 Oceanview Dr.

Anch Ak 99515

Proposal 101. OPPOSE. Inability of an individual to draw a bow should not be the basis for adding a crossbow to the archery definition. At shorter ranges a crossbow, at least a modern crossbow, is effectively a rifle.

Proposal 102. OPPOSE. I see no reason why Alaska should be like every other state. Additionally, shotguns and muzzleloaders are not primitive weapons. Modern muzzleloaders are highly accurate and have long range capabilities. A shotgun is able to fire successive 200 rounds as fast or faster than a bolt action rifle. It is also the most effective weapon for hunting fowl. It is not a primitive weapon.

Proposal 103

Hunting gear should include everything used for the hunt to include feed for animals used for transport, especially as horses/mules are used in many non-motorized areas.



Board of Game, Comments to Proposed
Statewide Regulations

2 of 5

Proposal 115. SUPPORT

Proposal 119. SUPPORT

Proposal 121. OPPOSE.

Proposal 123. OPPOSE. People want a special hunt to limit competition, in this case primitive weapons. However, this proposer wishes to make his primitive weapon as modern as possible. At some point the weapon is no longer primitive.

Proposal 124. OPPOSE.

Proposal 125 OPPOSE. Modern cross bows are not truly primitive weapons and should not be allowed in such hunts.

Proposal 126. OPPOSE. With modern muzzle loaders it is hard to justify them as primitive weapons. These special hunts were set up to provide opportunity outside the general hunt with weapons that provided for limited success. Muzzleloaders are effectively a single shot rifle, ways should not be provided to make them more effective and in doing so compete with hunters in the general season. Nothing prevents a person from using these



Board of Game Comments to Proposals

3 of 5

Proposal 126 CONTINUED
modified weapons in the general hunt.

Proposal 127. OPPOSE. I have to wonder how effective an air rifle would be on a bear.

Proposal 128. SUPPORT

Proposal 129. SUPPORT

Proposal 146. OPPOSE. Acquiring multiple permit permits does not limit the opportunity for other hunters as the number of registration permits is not limited.

Proposal 147. SUPPORT

Proposal 148. SUPPORT

Proposal 149. OPPOSE. State law allows a non-resident hunter to hunt with a relative instead of a guide. If a non-resident should draw a tag for sheep he is allowed to bypass the guide and hunt with a relative, that is their right. The Board of Game has no authority to infringe upon that right.



Board of Game, Comments to Proposals
Statewide Regulations

4 of 5

Proposal 151. SUPPORT. Add that permits are also available at Fish & Game offices in Anchorage, Fairbanks etc.

These requirements are blatantly biased. They are used because a drawing permit cannot insure that the vast majority of permits go to local residents.

Proposal 153. OPPOSE. The most equitable form of permit distribution is through a random drawing. Everyone has an equal chance. The bigger question is why are non-residents being given permits?

Proposal 154. SUPPORT

Proposal 155. SUPPORT

Proposal 156. OPPOSE. Handicapped individuals should be treated just like everyone else. Their handicap is unfortunate, but, that does not mean they should be granted special privileges.

Proposal 168. SUPPORT. The Board has overstepped its authority on this issue.



Board of Game, Comments to Proposals
Statewide Regulations

5 of 5

Proposal 169. OPPOSE. You cannot require a person to adhere to some one else's religious beliefs. If hunting a particular animal is banned for a religious belief, all hunting will be banned to abide by other religious beliefs.



Submitted By
Vern Cleveland
Submitted On
2/3/2022 3:56:26 PM
Affiliation
Western Arctic Caribou Herd Working Group

February 3, 2022

ATTN: Board of Game Comments

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

(Submitted via online portal)

SUBJECT: Board of Game Proposal 245

To the Alaska Board of Game:

At its December 15, 2021 meeting, the Western Arctic Caribou Herd Working Group voted to submit a comment to the Alaska Board of Game regarding the following regulatory proposal.

PROPOSAL 245 – 5 AAC 92.220. Salvage of game meat, furs, and hides.

Proposal 245 would eliminate the current requirement in 5 AAC 92.220(d)(3) that rib meat for moose, caribou and bison must remain naturally attached to the bone until the meat has been transported from the field or is processed for human consumption.

Comment: The WACH Working Group voted unanimously to **not support Proposal 245**.

On behalf of the Western Arctic Caribou Herd Working Group, I thank you for this opportunity to comment.

Regards,

Vern Cleveland, Sr., Chair

Western Arctic Caribou Herd Working Group



Submitted By
Jack Reakoff
Submitted On
1/18/2022 4:53:57 PM
Affiliation
Western Interior Alaska Subsistence Regional Advisory Council

Phone
907-474-2270
Email
karen_deatherage@fws.gov
Address
Office of Subsistence Management, USFWS
1011 E. Tudor Road, MS 121
Anchorage, Alaska 99503

In Reply Refer to:
RAC.WI.22002.KD

Stosh (Stanley) Hoffman, Chair
ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Hoffman:

I am writing to you on behalf of the Western Interior Alaska Subsistence Regional Advisory Council (Council) to provide comments on proposals coming before the Alaska Board of Game (BOG) Statewide Regulations meeting scheduled for March 4-11, 2022 in Fairbanks.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Western Interior Alaska. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting, October 14-15, 2021, via teleconference due to the COVID-19 pandemic. Among the items discussed were BOG proposals that would affect subsistence users and resources in the Western Interior Alaska Region. The Council discussed and voted to submit the following comments to the BOG for consideration as it deliberates these proposals:

Proposal 172: 5 AAC 92.530. Clarify the legal use of highway vehicles, snow machines and off-road vehicles in the Dalton Highway Corridor Management Area (DHCMA) for hunting and trapping. Clarify the use of firearms, and transport of furbearers and trapping bait when trapping in the DHCMA.

Council recommendation: The Council voted unanimously to SUPPORT this proposal WITH MODIFICATION.

Council comments:

The Council wishes to reiterate its comments submitted for the 2019/2020 Board of Game Proposal 64. The sole purpose of the described area in Alaska Statutes was to protect big game populations. The Council supports the premise of the proposal to clarify use parameters of the DHCMA, and believes the BOG is the best management body to address enforcement and other issues brought forth by law officers and the public. The Council voted to amend Proposal 172 by replacing language with the following, which were also discussed and submitted by the Koyukuk River Fish and Game Advisory Committee:

1) Clarification to allow snowmachine use in the DHCMA for both access to traplines and the transport of legally defined big game bait. Licensed trapping is a very important management tool to harvest furbearers under trapping regulations. Travel to and from homes within or outside of the DHCMA by licensed trappers should not be impeded. Firearms to take free-ranging furbearers has always been allowed in the DHCMA under a trapping license, and should continue. Restricting trappers' ability to take predators would be detrimental to big game populations, and could cause the reduction of opportunity for subsistence and other users.

2) Clarification to allow residents north of the Yukon River to travel to their homes from the Dalton Highway. The residents of Wiseman, Coldfoot, Stevens Village, Anaktuvuk Pass, Allakaket, Alatna, Evensville, Bettles, and Nuiqsut should be permitted to travel from the Dalton Highway to their homes with legally taken big game. Access by residents using licensed highway vehicles should be allowed on

year round or winter roads to these villages in order to transport game, game parts, hunters or hunting gear, as defined in regulation. Specifically, residents should have access to the oil field roads to Nuiqsut, the winter roads to Stevens Village, Anaktuvuk Pass, Bettles, Evansville, Allakaket, and Alatna, and the year round road to property and businesses in Wiseman.

3) Clarification to allow licensed highway vehicles to transport hunters, game, game parts, and gear within 1 mile of the Dalton Highway. The current $\frac{1}{4}$ -mile restriction does not allow subsistence and other hunters to access boat-launching sites into the Koyukuk and Sag River drainages that have side road access outside of the quarter mile limit. Some hunters are currently accessing legal boat launch sites up to 18 river miles from logical accesses.

The Council does not support additional clarifying language within the original proposal; namely, the five bullet points on pages 207 and 208 of the BOG Proposal book. There is insufficient information provided as to what that clarifying language would be, and the impacts of any such language to subsistence uses within the DHMCA.

Finally, the Council wishes to convey that its support for any clarifying language via Proposal 172 is based upon Alaska Statute protection of big game primarily, but also other fish and wildlife resources. The Council's concern is for Federally qualified subsistence users who reside in or near the DHCMA whose homes and subsistence harvest is critical to their lifeway, as well as non-Federally qualified users who are protected under ANILCA Title VIII sec. 815. Further, any actions or clarifying language proposed by the BOG under this proposal should not be interpreted as taking away the rights afforded to subsistence users under the Alaska Native Claims Settlement Act and/or the Alaska National Interest Lands Conservation Act.

Proposal 173: 5 AAC 92.530(7). Repeal the Dalton Highway Corridor Management Area. Council recommendation:

The Council voted unanimously to OPPOSE this proposal.

Council comments: The Council wishes to reiterate its comments submitted for the 2019/2020 Board of Game Proposal 63. The Council strongly believes that the Alaska Board of Game's Dalton Highway Corridor Management Area (DHCMA) regulation is the most effective way to ensure enforcement of game management. Hunters and others rely on ADF&G regulations versus broad state statute as a much more reliable way to understand activities permitted in the DHCMA. Law enforcement can also enforce the BOG regulations for illegal activities. The BOG is tasked with game management within the statutorily delineated GMUs comprising the DHCMA.

The Council thanks the BOG for considering these comments, which reflect the importance of conserving healthy wildlife populations and providing for the continuation of subsistence uses in the Western Interior Alaska region. We look forward to continuing discussions with the Alaska Department of Fish and Game and BOG on subsistence matters affecting the region. If you have questions about this letter, please contact me through Karen Deatherage, Subsistence Council Coordinator, with the Office of Subsistence Management, at (907) 474-2270 or karen_deatherage@fws.gov.

Sincerely,

Jack Reakoff,
Chair

cc:

Federal Subsistence Board
Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Western Interior Alaska Subsistence Regional Advisory Council
Interagency Staff Committee
Administrative Record



Submitted By

Rachel L White

Submitted On

2/18/2022 7:54:07 AM

Affiliation

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8177077582

Email

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Address

13817 Malaspina Street

Eagle River, Alaska 99577

I am in support of Proposal 144. This proposal will exempt sterilized cats from the list of species prohibited from being released into the wild — i.e., the “return” part of trap-neuter-vaccinate-return (TNVR). Rule changes that do not impede TNVR programs will be better for the cats, better for public health, and better for the wildlife we all want to protect. Feral and stray cats already live outdoors and some are never going to be able to be adopted into homes and families because they are not socialized. Instead of leaving these cats to reproduce outside and create more unsocialized cats in the area, and instead of euthanizing all the cats that are not adoptable, TNVR would allow these cats to live out their remaining years without reproducing. Please support this proposal to exempt sterilized cats from being returned to locations where they already live.



Dear Board of Game members,

Thank you for your service!

My name is Kurt Whitehead, Master Guide #211. My wife Trina Nation is an assistant guide as well and we both own and operate a small hunting and fishing lodge on Prince of Wales Island near Klawock, AK. We offer fully guided saltwater fishing trips and fully guided hunts in GMU 2. We are both, year round, full time, snow shoveling, real Alaskan residents. I serve as Secretary for the East PoW AC, Klawock AC and Craig AC. Below are my personal comments for the statewide BoG proposals.

Proposal 101-Oppose

Proposal 102-Oppose

Proposal 106-Support

Proposal 107-Support with the change of wording to Feral Cats

Proposal 230-Oppose due to conservation concerns. Passage of this prop will undoubtedly result in a higher harvest with is not what we need at this time due to low sheep numbers statewide.

Proposal 117-Support. Whatever we can do to help make AST job's easier is a good thing.

Proposal 118-Support. This will make for a better and safer hunter.

Proposal 121-Oppose. I am opposed to allowing dogs to hunt big game in AK other than for tracking wounded game.

Proposal 122-Oppose. This prop only makes sense for deer. It will result in higher wounding losses if passed.

Proposal 123-Support. This will result in lower wounding losses.

Proposal 124-Support. This will result in lower wounding losses.

Proposal 125-Oppose. This makes sense if the hunter is handicapped but leave the archery only hunts to bow and arrow hunters only.

Proposal 126-Uncertain on this because muzzle loaders can accurately be shot out to 250yds so I've got concerns with this one.

Proposal 129-Support. This will result in lower wounding losses.

Proposal 130-Support. Whatever we can do to keep CWD from coming to AK.

Proposal 131-Support as long as we don't have to redo the harvest requirements.

Proposal 132-Support as long as we don't have to redo the harvest requirements.

Proposal 133-Oppose. This will result in high wounding losses. Have you ever tried to shot a beaver with a rifle much less an arrow AND recover it? Good luck.

Proposal 135, 136, 137, 138, 139 The main goal with all these props should be to lower the harvest of our sheep due to the statewide conservation concerns.

Proposal 232-Support. Lowering wounding loss is always good.



Proposal 141-Oppose. If passed, this will create chaos and be an enforcement nightmare in SE AK. It might work up north but not in SE AK.

Proposal 144-Oppose. Releasing feral, bird killing, disease spreading cats back into the wild is a BAD idea.

Proposal 145-Support. Releasing feral, bird killing, disease spreading cats back into the wild is a BAD idea.

Proposal 147-Oppose. If passed, this would bring back market hunting to AK.

Proposal 149-Support. This is a good proposal.

Proposal 151-Oppose. RHAK is again formulating comments specifically to hurt guides. Who and what benefits from this prop if passed? The sooner we get a guide concession for state lands, the better off all alaskans will be and hopefully RHAK will finally stop with their anti-guide rhetoric.

Proposal 154-Support.

Proposal 155-Support. This is a great proposal benefiting all alaskans.

Proposal 156-Support.

Proposal 157-Support.

Proposal 239-Oppose.

Proposal 241-Oppose. Is there a conservation benefit to this proposal? No. Does this add value to our game resource? No.

Proposal 243-Support.

Proposal 159-Support.

Proposal 245-Oppose. I've salvaged many racks of moose ribs. The meat lasts much longer on the bone.

Proposal 163-Support.

Proposal 164-Support.

Proposal 247-Oppose.

Thank you!

Kurt Whitehead



Submitted By
Danielle Williams
Submitted On
2/17/2022 8:55:56 PM
Affiliation
Alaska resident

Phone
907-748-2347

Email
dsmithz_70@yahoo.com

Address
2029 Blueberry Street
Anchorage, Alaska 99503

Alaska Board of Game Members:

My name is Danielle Williams. I am an almost 30-year Anchorage resident who has spent a lot of time recreating on trails in the Mat-Su area with my dogs. I'm writing to support Proposal 199 which requests 50-yard trap setbacks on more than 200 multi-use trails in the Mat-Su area. I understand this distance is considered a "reasonable compromise" between user groups in other areas of Alaska.

Trail-users with dogs are a large stakeholder group for Mat-Su area trails, which is why it's difficult to understand how it is legal for traps to be set on or near multi-use trails, campgrounds, roads and pullouts. The Mat-Su Valley (and Southcentral Alaska generally) is growing rapidly. There are many more people (including tourists) and dogs using these trails, campgrounds, roads and pullouts and the consequences are too great to not set traps back at least 50 yards.

Sadly, I have two different friends whose beloved dogs were caught in traps in the past couple of months on multi-use trails in Southcentral Alaska. One incident occurred on a popular Mat-Su area trail—gratefully my friend had a tool to release the trap. And though I recognize it's outside the scope of this proposal, it's worth mentioning that my other friend's dog died in a conibear trap near a trailhead on the Kenai Peninsula. It has been a heart-wrenching loss. I share this to demonstrate the impact of these traps near trails.

Please approve Proposal 199 and 50-yard trap setbacks on more than 200 multi-use trails in the Mat-Su area. I believe this is a more humane, safe and reasonable rule than what is currently in place for trapping in the Mat-Su area.

Thank you for your consideration.
Danielle Williams

Submitted By
freddie williams

Submitted On
2/17/2022 10:24:24 AM

Affiliation



PC201
1 of 1

Please support Proposal 144 and for TNVR programs. Board of Game support Proposal 144 and exempt sterilized community cats from the list of species prohibited from being released into the wild. TNVR programs are good for cats and good for communities.

Submitted By

Stephen Williams

Submitted On

2/17/2022 9:40:52 PM

Affiliation



PC202
1 of 1

Hello. My name is Stephen Williams. I support Proposal 199 which requests 50-yard trap setbacks on more than 200 multi-use trails in the Mat-Su area.

I am 29 year Alaska resident who spends a lot of time in the outdoors, including recreating on trails in the Mat-Su area with my dog. I understand and recognize there are mulitple users of public spaces that must be considered. I believe the the 50 yard distance is considered a “reasonable compromise” between user groups in other areas of Alaska.

Like myself, trail users with dogs are a large stakeholder group for Mat-Su area trails, which is why it's difficult to understand how it is legal for traps to be set on or near multi-use trails, vehicle pullouts and campgrounds. As a rapidly growing area of the state, the pressures from many different user types and pepole in general necessitate this 50 yard setback, without it the consequences to people and their pets are too great. For example, I recently had one friend who's dog was caught in a snare (around its neck) on the Moose Range Trails, near Murphy Road. The trpline was less than 2 ski pole lengths from the popular cross-country ski trail. Increase setbacks are critically needed.

Again, I support Proposal 199 and 50-yard trap setbacks for multi-use trails in the Mat-Su area. This is a reasonable rule for all users of the trails and will help to prevent accidental harm or deaths to pets.

Thanks in advance for your consideration.



Submitted By

Dave Winney

Submitted On

2/17/2022 12:05:28 AM

Affiliation

Phone

907-255-4736

Email

winney@cvinternet.net

Address

P.O. Box 1063

Valdez, Alaska 99686

Proposal 116

I support

Before the crossbow certification class was required hunters were able to hunt during the rifle season.

Now that a crossbow certification is required, if you don't live in Anchorage or Fairbanks is a hardship.

A archery instructor isn't qualified. A two to three day trip is needed to finish the course.

Proposal 121.

Opposiiion.

I wouldn't like to see the use of dogs to be allowed to hunt big game. What is stopping them from going on private property.

Proposal 127.

Support.

SCI record book has a airgun category, easy on the ears, modern day rifle and handgun ammunition is expensive and hard to find.

Proposal 130.

Opposition.

I would like to see synthetic urine used but not real urine.

They make biodegradable, non-toxic, artificial urine that will not be harmful to Alaska's wildlife.

Proposal 232.

Opposition.

I don't like the thought of the dogs going on private property.

They could get in traps and snares.

Proposal 239.

Opposition.

If this is passed It will eliminate some hunts. It works based on effort and not luck. Lots of villages have their own ordinances. I hunter who goes to stand in line is better educated on what the locals want to see from the hunt. Dicitionary permit authority is really important. It is the only way to have sustained hunt opportunities. If 239 is passed, how will it work for the online permits?



PC204
1 of 1

Submitted By

Ron Yuen

Submitted On

2/15/2022 7:32:02 AM

Affiliation

Phone

808-227-4166

Email

ronyuen@hawaii.rr.com

Address

95-982 Wikao St.
APT L301
Mililani, Hawaii 96789-5060

I am a local cat TNR participant in Mililani, Hawaii and I want you to know that I am in support for Proposal 144 and for TNVR programs. Please support Proposal 144 and please exempt sterilized community cats from the list of species prohibited from being released into the wild. TNVR programs are good for cats and good for all communities no matter where you live. Aloha!



Submitted By
Alissa Zank

Submitted On
2/18/2022 4:17:00 PM

Affiliation

Phone
9075218202

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Address
PO BOX 644
WILLOW, Alaska 99688

I do not support Proposal 199 proposing trapping setbacks from trails. Trappers should not be forced off of trails many of which are in existence because of trappers because those that recreate can't be responsible pet owners and don't keep their pets leashed or under control. I have dogs myself and I trap. I don't allow my dogs to go on public trails unleashed for many reasons including possible traps, other people, other wildlife, etc. Who decides what constitutes a "popular" trail? This overreach that is unwarranted. I do not support proposal 199. Thank you



Submitted By
Stefan Zijlstra

Submitted On
2/16/2022 4:05:56 PM

Affiliation

Phone
9076777473

Email
zijlstra@yahoo.com

Address
13910 Venus Way
Anchorage, Alaska 99515

I would like to comment on proposal 199, regarding a proposed 50-yard trap setbacks from popular multi-use trails in the MatSu region. I am STRONGLY in favor of this proposal. There is absolute zero need or logical reason for traps being set close to trails that are seeing heavy traffic by other user groups. These traps constitute a significant danger to dogs and/or humans and should be set back at least 50 yards, if not more, or made entirely illegal in areas that see a large number of walkers, bikers, or skiers in the winter. Therefore, I urge you to pass proposal 199. I would also ask you to consider this trapping setback of 50 yards from popular trails statewide, not only in the MatSu region.

Thanks!

Stefan Zijlstra

Submitted By

Alyssa Pravongviengkham

Submitted On

2/17/2022 11:23:17 AM

Affiliation



PC208
1 of 1

I have a degree in biology and have been practicing falconry since 2005. It is my understanding the non-resident falconry take laws are being considered for amendment. There are many applicants each year and few winners. I would like to recommend that there be more available winning participants chosen each year. I would also like to recommend that winners must wait one calendar year to apply again unless there are more 'tags' available than lottery participants at which time the opportunity would open to any non-resident. The resources (bird of prey populations) would not be impacted negatively. Alaska provides brutal winter conditions for young animals. Allowing June eyass through to early November passage take for lottery winners would make sense. These changes would align with most states non-resident take regulations.

Submitted By
James Ambrosini
Submitted On
12/16/2021 1:10:14 PM
Affiliation



PC209
1 of 1

Why has unit 15c hunting season been managed to close off access's by motor vehicle at the end of the moose season restricting access to hunting areas. This has been in effect since I first move to Alaska in 1982. Could some one explain to me the reason for this regulation? Moose numbers are up in 15c so it can't be because of that. The regulation pretty much closes access during the best part of the moose season. I think this regulation needs to be addressed or explain its purpose. It is my belief and many of my hunting associates that this needs to be changed or the closure days shortened so we can have access at the later part of the season. If not let us know the purpose of this regulation. Thank you for your consideration



Submitted By
Anita Argo

Submitted On
2/18/2022 3:09:00 PM

Affiliation
Concerned Citizen

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503568489

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anita_argo@hotmail.com

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320 Waite st
Sutherlin , Oregon 97479

I apologize in advance for submitting an additional form before I commented. Please void my first attempt. Not all cats are pets, many are cats that created a community of their own. They provide a natural form of pest control. The trap, sterilize and release program ensures reducing disease, their unchecked reproduction and general health. Those found to be cast away from homes are put up for adoption. Those born within a colony are not candidates for adoption but typically released in the location they were originally trapped. This is a humane system that helps everyone involved.



Subject: Non-resident Falconry Take

Board Members,

I can't tell you how strenuously I object to expanding the taking of any Alaska falcons by non-residents. One can quote relevant statistics 24/7, but those statistics pale in comparison to one other factor. As a long-time resident and participant, I've seen fish and game opportunities erode to the point of either being non-existent or unpleasant. The term, "Combat fishing," is no joke.

When I first fished the Deska, we were the only ones there. I took my dad and the oldest boy. We caught our limits of silvers. An Alaska dream that has turned into a nightmare. Try sheep hunting. I began taking my oldest son sheep hunting when he was nine and scored. That continued through my second son and daughter. Try it now. You won't because you can't.

You may think that this, "Minor," addition that our falconry board proposes won't really hurt Alaska falconry, and statistically, it may not. But if you approve this, you are opening a door that will never close and will just get pushed wider and wider open, until you've wrecked the one, last, remaining truly Alaska outdoor experience we have. Think how much of our land is federal! This issue won't be governed by you, and our F&G Department. It'll be governed by the Feds under the pressure of politicians who outnumber our own.

It baffles me that our falconry leadership is willing to sacrifice our sport and this valuable treasure to outsiders who have no investment in Alaska other than to take from it and us Alaskans.

Respectfully,

Burt Bomhoff
Master Falconer



Submitted By
Roni Carmon
Submitted On
5/22/2021 4:58:28 PM
Affiliation
Nra

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51985arness rd
Kenai Ak
99611, Alaska 99611

I believe the hunting guides being licensed is a really good thing. But I believe the animals they shoot .

The price is too low. The moose, they need to take it all home,with them.

The indian don't want the meat.

The hunter must take it home.

a 20,000 bear about right

a moose 15000.09

the resources of Alaska are then for free.

the salmon guides fish , are absolutely free to them.

Guides need to buy permits to fish.

Charter boats have taken 44 billion 310 million of revenue just off the Kenai peninsula alone.

They get there resources for free. Free fish ,300 days of fishing non stop.

The board of game, at least the guides are licensed,

Unlike the sports guides association,

The reap the fish , and leave alaaska with a pot of money



Submitted By
James Conner
Submitted On
8/22/2021 10:59:24 PM
Affiliation
None

Regarding increased muzzleloader opportunities.

Dear Board Members,

I think it would be great if more non drawing muzzleloader hunts were available for certified muzzleloader hunters. I believe this could be a win/win scenario for these reasons.

1. As a tool to keep game populations in check in areas where a high powered rifle may not be as safe as a muzzleloader with limited range, being used by a hunter that has completed the muzzleloader class and is likely more cognizant of shot placement and general safety considerations than less trained hunters.
2. This would extend hunting opportunities for Alaskans to enjoy their state and put meat on the table.
3. This could be a good economic boost to the businesses that sell the necessary equipment to participate in muzzleloader hunts.

Thank you for your service and considering my suggestion.

Sincerely,

James Conner

Submitted By
Rosielani M Enos

Submitted On
2/16/2022 11:44:10 AM

Affiliation



PC214
1 of 1

I am in support of the proposal for 50-yard trap setbacks from popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more. I believe this would cut down on multi-user conflicts in these high traffic areas, allowing all trail users to co-exist peaceably, in addition to increasing overall safety for trail users and their pets. Thank you.



Submitted By

Michael Guard

Submitted On

2/19/2021 2:42:10 PM

Affiliation

Phone

3017488124

Email

Mguard85@gmail.com

Address

538 cascade way
Frederick, Maryland 21703

Would like to see more non-resident tags offered! This would bring more revenue into the state as hunters come in and stay and hunt. Also stats show the resident tags are not filled at a high percentage. Offering more to our of state will still be able to maintain the harvest numbers and as stated above bring more money to all parties involved in traveling to Alaska.



Submitted By

James M Ingram MD

Submitted On

12/23/2021 11:01:23 AM

Affiliation

Phone

4025050842

Email

jmingram3@gmail.com

Address

2823

SW Bear Paw Trail

Palm City, Florida 34990

I believe the State of Alaska should allow non resident falconers to be regulated in the same manner as the resident falconers. All US falconers have the same and equal credentials and qualifications based on USFWS laws and regulations relating to the art of falconry. Therefore, all US falconers should have equal access to a **national resource**(raptors used in falconry) based on biologic information for sustainable take. There should be **no discrimination** related to where a qualified falconer lives. The take of raptors for falconry has been shown by USFWS studies to have no negative impact on the resource (raptor population) and will improve the survival of the raptor taken as well as the eyases that remain. A decision in this line would be good for the raptors, the falconers, and the state by eliminating unnecessary regulation and increasing state revenue.



Submitted By

Kamala Hughes

Submitted On

2/18/2022 12:49:22 PM

Affiliation

Phone

704 705 9805

Email

kamalahughes@yahoo.com

Address

1460 Medford Dr

Charlotte, North Carolina 28205

Please consider allowing TNVR cats to be able to uphold the 'R' and allow them to be released once they are vaccinated, spayed /neutered. This works well in most areas to reduce the population over time with creating and immediate termination of the animal's life.



Submitted By
Karl Gene Kerster

Submitted On
2/17/2022 12:02:07 PM

Affiliation
Visitor

Phone
9168320454

Email
karl@kerster.com

Address
9004 Canberra Drive
Sacramento, California 95826

Alaska, as a state, should be focused on allowing non-resident take of raptors for conservative political reasons. When states limit the use of state resources to only residents it is exactly the same as when communist Cuba does so. Don't be communists! Vote to allow tourist/non-resident take of the valuable and plentiful Alaskan gyrfalcons, peregrine falcons, goshawks and other wildlife.



From: [Knik](#)

Subject: Dall sheep management and the public's perception of BOG decisions

I support proposals 151, 230, 241, and 267 (relating to wild sheep) for the following reasons:

Alaska's wildlife is a public asset. The allocation of these assets should be in accordance with 1) sound science and 2) the Alaska state constitution. There is a growing public perception that the BOG is drifting away from their mission and instead caving in to pressure from profit motivated special interest groups that represent the guiding industry. This is effectively taking these resources away from the man of simple means and handing them over to the elite and the wealthy.



Submitted By
Joshua Livingston
Submitted On
2/14/2022 10:52:17 AM
Affiliation
AK Taxidermist

Phone
19074889307

Email
Joshua@akwataxidermy.com

Address
2944B Richardson Hwy
North Pole, Alaska 99705

Propose that the regulation requiring the taxidermist to wait 6 months before submitting required paperwork to sell be changed to 3 months. The current 6 months has little effect in effectively assisting the taxidermist/business in getting payed for monies/funds owed. It has never been effective in this manner. I have taken over this business from my Father/Charlie Livingston/Ak Wilderness Arts and Taxidermy, and he informed me this regulation is flawed and ineffective during his time from 1982 thru 2016, for 32years of business. Those who don't or won't pay, DO NOT pay without exception. We have spent up to 30 plus dollars, plus admin costs with accountants in attempts to collect. 3 months is much more manageable, even though it is mostly a lost cause and a financial loss regardless, as who wants someone elses Big Game/Small Game or Fish Trophy.

98% of these mounts remain in the showroom and are seldom sold, although some, a few and as many as possible, down payments are taken when possible. Promises of down payments, payed in the future days to come, are persued and attempts to collect are tried, usually without sucess.

Joshua Livingston, Taxidermist/Owner

Charlie Livingston, Former Owner/ Ak Wilderness Arts and Taxidermy



Submitted By

Wendy Louie

Submitted On

2/15/2022 3:47:30 PM

Affiliation

Phone

2064452919

Email

Shokokuphoenix@gmail.com

Address

4405 S 158th Street

Tukwila, Washington 98188

I believe that the number of Alaskan non-resident falconry permits should not be as restricted or as few as they currently are, and should be expanded as the actual biological numbers of the raptor resource allows, and in my opinion, unlimited non-resident take permits should be considered.

Here in my state (Washington state), we have unlimited take permits for non-residents (yes, including goshawks and gyrfalcons!), yet we have a significantly smaller landmass than does Alaska. We have seen absolutely no loss in raptor numbers during that time, if anything we have seen dramatic increases in several species.

Thank you for your consideration.

-Wendy Louie

Licensed Master Class Falconer

Tukwila, WA



Submitted By
Tom Meacham

Submitted On
2/18/2022 10:25:19 AM

Affiliation
self

Phone
907-346-1077

Email
tmeacham@gci.net

Address
9500 Prospect Drive
Anchorage, Alaska 99507

My wife and I support the adoption of Proposal 199. This proposal would resolve conflicts between trappers and other recreational users of identified public trails and recreational sites by establishing a "no-trap" buffer between these uses. Ethical trappers usually respect other outdoor users, but without an enforceable boundary, there will always be lapses. This proposal will enact minimal trapping ethics into law, and is long overdue. Please adopt Proposal No. 199. Thank you.



May 15, 2020

The North American Falconers Association (NAFA) is the largest membership falconry organization in the world, representing the falconry community of all three countries on this continent. Wild raptors are an important and integral part of the long traditions of the cultural heritage of falconry; and, therefore, falconers are among the most ardent raptor conservationists.

NAFA continues to strongly support science-based, biologically sustainable management of falconry and birds of prey and we have always encouraged the development of non-resident take provisions across the United States. NAFA was very pleased, therefore, when the Alaska Board of Game introduced a modest non-resident take for the first time in 2015.

Alaska has enormous raptor resources with species that are difficult to obtain in many other parts of the country. A trip to Alaska to obtain a falconry raptor represents the opportunity of a lifetime for many falconers in the lower 48. We applaud the Alaska Board of Game for considering an expansion to non-resident take opportunities for falconry.

Once again, we would like to offer any additional assistance that you are willing to call upon us for.

Respectfully,

Sheldon Nicolle
NAFAPresident@n-a-f-a.com
(214) 288-0760



Submitted By

Nicole

Submitted On

2/14/2022 10:42:05 AM

Affiliation



PC224
1 of 1

Please support for Proposal 144 and for TNVR programs. Ask the Board of Game to support Proposal 144 and to exempt sterilized community cats from the list of species prohibited from being released into the wild. Tell them TNVR programs are good for cats and good for communities. Include your experience with community cat programs if applicable.

Submitted By
Tammi Prigginsh
Submitted On
2/14/2022 5:57:42 AM
Affiliation



PC225
1 of 1

Please save God's creature's. God Bless ☺☺☺♥♥☺♥☺



Submitted By

Ryan Blumenberg

Submitted On

2/17/2022 4:17:55 PM

Affiliation

Phone

618-535-8913

Email

2016rblumenberg@gmail.com

Address

16472 Illinois River Road

Hardin, Illinois 62047

I oppose

Submitted By
Geth Simmons

Submitted On
1/6/2022 9:45:18 AM

Affiliation



PC227
1 of 1

I think this proposal would be a great opportunity to not only create additional revenue for Alaskan wildlife but would also give more hunters the opportunity to chase a species that they might otherwise never get to hunt. This would mean more recognition for the species and potentially more involvement from the traditional community for conservation efforts going forward. As hunters and conservationists there is no downside to involving more people who are passionate about the outdoors and allowing them to participate in the efforts of preserving a species.

Submitted By
Angelita L Torres
Submitted On
2/14/2022 6:01:33 PM
Affiliation



PC228
1 of 1

I agree with spaying and neutering cats, if the veterinarians weren't charging 3 to 400 dollars to get a cat fixed this wouldn't be so much of a problem.

Submitted By
Naomi M Weisman
Submitted On
2/14/2022 5:48:45 AM
Affiliation



PC229
1 of 1

Dear Members of the Board of Game:

I am writing to help support saving the lives of community cats by advocating for lifesaving programs I strongly urge you to consider changes to regulations that would benefit outdoor cats. Allowing TNVR [trap-neuter-vaccinate-return] programs in Alaska is a long-overdue solution to managing our outdoor stray cat population.

Current state rules and regulations severely hamper any lifesaving efforts focused on community cats. Alaska's Board of Game has been considering rule changes that could impact cats and the people who care for them. These changes have been pushed to early 2022.

Alaska's residents deserve TNVR (trap-neuter-vaccinate-return) programs, which are animal-friendly, cost-effective, and reduce the burden and bureaucracy placed on the state's animal shelters. The process is simple: Community cats are trapped, evaluated by veterinarians, vaccinated, spayed or neutered, ear-tipped, and returned to their outdoor homes, unable to have kittens.

The simple truth is that current methods of animal control relative to community cats are expensive, ineffective and often inhumane. Rule changes allowing TNVR programs would be better for the cats, for public health and for the wildlife we all want to protect.

Thank you for your consideration and for showing that you support safe, humane and positive solutions for cats living in your community.

Sincerely,

Naomi M Weisman.



Submitted By

Michael Will

Submitted On

2/14/2022 10:33:24 AM

Affiliation

Phone

8083446999

Email

Mauicat7@yahoo.com

Address

P.O. Box 571

Lahaina , Hawaii 96767

TNR is the only effective solution worldwide. Please don't make it worse with the strategy you may be discussing.

Submitted By
Kristen Falke

Submitted On
2/16/2022 1:24:57 PM

Affiliation



PC231
1 of 1

I do not support this action. It is my experience that people do not set traps on areas that the general public and their animals frequent. By way of the nature of the hunt, traps are Placed strategically to increase the chances of success, dictating that unless the human and his dog are running with the wolves, the two paths are seldom shared.

Man's accommodation for his PLEASURE should never come before satisfying another man's NEEDS for surviving. Take the dogs to a dog park, leave alone the OLDEST and most natural, least damaging and most ESSEfNTIAL act of human survival!!!
Most urgently, consider not confusing human rights for human supremacy.

Submitted By
Stephen Meyers
Submitted On
1/8/2022 6:32:21 PM
Affiliation



PC232
1 of 1

I am strongly opposed to the proposed requirement to set traps a designated distance away from select public trails. Existing leash laws and best trapping practices render this an unnecessary overreach. All recreational users -- including trappers -- have an equal right to enjoy the same public spaces. Common sense and good judgment on all sides is all that is required.



Submitted By
chris osowski

Submitted On
1/30/2022 3:00:28 PM

Affiliation

Phone
9072501235

Email
chrisosowski@msn.com

Address
3850 Truro Dr
Anchorage, AK 99507
anchorage, Alaska 99507

I dont trap, but I do use many trails in these areas recreationally and while I have never been aware of any people viewing their encounters with me or my family and our dogs as negative, I certainly have viewed more than my share of encounters with others as negative.

Generally speaking, I find at least half of dog owners using the trails to be inept at controlling their dogs, or completely ignorant of the laws to keep their animals under control, or worse yet (and most commonly) willfully and recklessly disregardfull of the laws pertaining to responsibly keeping their animals under control.

We keep our dog on a leash so she wont run off or bother others. When we meet others, we give way on the trail and teach her (and reinforce the training) to sit and be quiet and respectful of the others. I have literaly NEVER received the same kind of respect in my 50 plus years of living here.

I am not in the least surprised to hear that there are instances of peoples pets being caught or harmed or worse, considering it seems to be the norm to let your pets run wild, and pretend you have them under control, all the while when someone like myself encounters them we have ghem sniffing, growling, nearly threatening (I admit, I have NOT yet had to shoot one nor otersise fight one off) but what I am surprised about is the tolerance most people on the trails have for these overbearing, negligent, malefactors in our midst.

On top of this pushiness I've commonly encountered, I must admit that it thoroughly adds to the fullness of my experience to find myself stepping around their animals droppings on the trails, its especially special when the droppings are actually in the little plastic bags they so proudly display and then leave on the trailside (presumably to pick up on their way back?)

I guess its not so amazing that you dont hear of all these kind of encounters, because most people dont want to be bothered by conflict and spoil their experience (which is where Im coming from right up until i see these few representatives of this group of people insisting the rest of us not only put up with their casual disregard for the laws as they are applied to them, as well as insisting on new laws and restrictions on others who as near as I can tell only want to be allowed to utilize these public, multi use places as they are legally allowed to). Its kind of irritating to be honest.

I for one will be furious if you decide to add new restrictions on one user group without putting some teeth and accountability upon this other group (in this case the aggressor) for their clear and wanton preponderance for disregard of the laws as they apply to themselves

I'd like to see a survey done in all these areas asking:

- 1- how many animals did you see today
- 2- how many were properly leashed or otherwise controlled
- 3- how many signs of defacation did you encounter
- 4- did any of the animals encountered approach you
- 5- did any of the animals make you concerned for your safety, or the safety or your pet, or the safety of any other person
- 6- How many improperly set traps did you encounter

I have a strong belief that if I encountered any illegally set traps and reported them, that you would discipline the individual. I dont have that same strong belief that you would ticket or fine any pet owners for illegally loosing their dogs to ruin my experience on the trails. In fact, yesterday when I first read of this proposal, there was an individual openly bragging that if he fond any traps along trails he was using, that he "trips them to render them safe". I know full well that is against the law, yet the social media company has done nothing to police this cars of blatant lawbreaking, not have I heard of any followup from any officails in response to it being reported.

Submitted By
richard thomas

Submitted On
2/17/2022 11:02:02 AM

Affiliation



PC234
1 of 1

dogs are becomeing a increasingly large problem with the alaska wilderness. as someone who hikes often on multi use trails ive dealt with many agressive dogs / unrestrained dogs / and the dance anyone must do around the piles of dog poop left on the trails by their owners.

recently dog owners have been speaking out agaisnt trappers. while i understand the pain of losing a dog to a trap that dog if it had been within eyesight of the owner or on a leash would be alive today.

irresponsible dog owners are the biggest problem in this chain of events. even removing trapping completely would not change the other problems i have pointed out. trappers on the other hand are someone ive never seen on the trails, and i have never seen a trap from a trail.

i would hope that leash laws would be considered rather than farther restriction of the multi use trails to make one group feel "safer"

Submitted By
Adrienne voss
Submitted On
2/18/2022 5:05:58 PM
Affiliation



PC235
1 of 1

I support trap setbacks on mat-su trails! It seems reasonable, & common sense. It still allows for plenty of space for trappers to use, yet provides some safety for humans & pets.



Submitted By

Jamie Allison

Submitted On

2/15/2022 9:17:33 PM

Affiliation

Phone

9072321484

Email

aknursing@gmail.com

Address

PO Box 1473

Palmer, Alaska 99645

I am writing in full support of a 50 yard trap setback for all trails that are in a core population area. A few years ago, I almost stepped into a trap that had been placed on Reflection Lake in the Mat-Su, a popular year-round recreational area. I came across the corpse of a mature female moose that was rotting in a trap on the Matanuska River floodplain near where fat tire bikers and hikers regularly pass by. There is a deplorable lack of enforcement or accountability for trappers who practice unethically, do not reclaim their traps out of season, trap other wildlife incidentally, or place traps in blatantly hazardous locations. There has been shockingly little done on the part of the State of Alaska, Board of Game to reduce the risk of harm to certain types of trail users on multi-use trails as a result of traps. You cannot in good faith designate a trail as a 'multi-use trail' if one user is at risk of injury from using the trail as a direct result of activities permitted to another trail user. The effort of relying on a 'code of ethics' to guide trappers to a more consistent and safe use of traps has not been effective. I am grateful to the Alaska Wildlife Alliance for stepping up when the Board of Game would not to begin gathering data about incidental trap encounters with their Map The Trap initiative. Currently, I consider all lands where trapping is permitted off limits to me and my family during trapping season because the adventure is not worth the risk of harm. I cannot expect that trap placements will be a safe distance from trail users. How is that multi-use?

Submitted By
Alyssa Wu

Submitted On
2/18/2022 7:52:36 AM

Affiliation



PC237
1 of 1

I support the 50 yard trap setback in multi-use trail areas. These traps are truly a safety concern for those who can only recreate in more convenient and accessible areas.



Submitted By

Anne L Ver Hoef

Submitted On

2/18/2022 12:56:08 PM

Affiliation

Phone

9073454422

Email

annev@gci.net

Address

5820 Yukon Road

Anchorage, Alaska 99507-6663

I respectfully request that NO traps, snares or other means of capturing wild animals be allowed within a half (1/2) to a quarter (1/4) mile of a trailhead or public use trail. A sign indicating traps have been set should also be posted on the nearest point to a public use trail by the trapper. The trappers should be able to set a trap at least a quarter or a mile away from the main public use trails and trailheads.

Submitted By

Becci

Submitted On

2/17/2022 7:37:26 PM

Affiliation

Public

Yes please pass 50 yard setback from public use trails in natMat-Su Borough



PC239
1 of 1



Submitted By

Melissa Bell

Submitted On

1/16/2022 4:04:48 PM

Affiliation

Phone

9078303031

Email

Melissalhulme@yahoo.com

Address

2431 Nancy circle

Anchorage , Alaska 99516

Good Evening,

Traps do not belong anywhere near parks, schools, parking lots, or any public multi use trails and it is unacceptable that that is still allowed. A change here is long overdue to the policy. Even a 500 foot setback is not far enough. Thank you for considering the safety of our children, outdoor enthusiast and pets.

Submitted By
Beth Spence

Submitted On
2/18/2022 10:31:25 AM

Affiliation



PC241
1 of 1

I agree that traps should be moved farther off trails. I'm sad to that peoples dogs have been injured.

Submitted By
Bethan Carter

Submitted On
2/18/2022 4:02:03 PM

Affiliation



PC242
1 of 1

To whom it is concerned,

Please consider adopting the proposed 50-yard trap setbacks on popular multi-use trails including those in the following areas: Nancy Lakes, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and others. It is currently legal for traps to be set on or near multi-use trails, campgrounds, roads, and pullouts from as early as September through May.

Adopting this setback will increase the safety of humans and their pets. Already, at least seven dogs have been caught in traps, and two of them have been killed in Southcentral Alaska just this winter.

I recreate in the Mat-su area, and I want to feel safe doing so with my family--human or otherwise. Safe recreation brings money and greater health to the Mat-su area.

Thank you for your consideration.

Sincerely,

Bethan Carter



Submitted By

Traci Bradford

Submitted On

2/16/2022 1:00:34 PM

Affiliation

Phone

907-982-8320

Email

tracibradford67@gmail.com

Address

7261 S Hayfield Rd
Wasilla, Alaska 99623

I am in favor of the setback, especially for trails located in more populated areas and neighborhoods. Examples being Settlers Bay Coastal Park, Scout Ridge, and Govt Peak. I have personal experience with these trails and happily support them with donations and park passes. These trails are more heavily trafficked by families and individuals for winter hiking, biking, and skiing; and I don't think families are on the lookout for traps or even realize they can legally be literally right outside their own back yards. However, when I use trails in more rural areas, I realize I am taking a risk and try to be cautious. I am in favor of the 50 yard setback; I think that is a fair compromise for all to enjoy our wonderful multi-use trail system.

Submitted By
Bradley A Rud
Submitted On
2/17/2022 9:02:16 AM
Affiliation



PC244
1 of 1

A distinction needs to be made between leghold traps and snares placed on the ground and martin traps placed in trees. No dog is in any danger from martin traps, but a 50 yard setback can effectively put a trapper out of business. Also, I would recommend 25 yards, not 50. Even this will substantially decrease a trapper's ability to run a decent line.



Submitted By
Bryan Silva
Submitted On
2/18/2022 11:11:40 AM
Affiliation

Phone
9077440065
Email
brsilvaak@gmail.com
Address
4621 Piper St. #16
Anchorage, Alaska 99507

The outdoors are a multiuse resource and do not belong to whoever takes the most exclusive use. Trapping is offensive to many and is considered a form of "recreation" to some of its practitioners. It should not be allowed in areas where it will lead to conflict and a bad image for the state. If it is to be allowed, the beneficiaries should be burdened with making it fit in to other uses. This means that commonly used trails and areas of other recreational uses must be avoided.

Bullying by the trappers of the general public must not be allowed. By purposely placing traps where they threaten other users this is the result. This is like placing mines in those areas. The owners of dogs killed or injured by traps would agree that this is unreasonable. The owners of pets might avoid areas with traps just as they would avoid areas with explosive mines. The absence of recreational outdoor users does not justify trapping if they are absent out of fear.

Keep trapping to areas remote from recreational users.

Submitted By
Burt spence

Submitted On
2/18/2022 8:51:13 AM

Affiliation



PC246
1 of 1

I have no issues with trapping in general but would like to see increased set back parameters in place around well used public access points and trails. We run hunting dogs off leash in similar areas and I typically decrease my use of known trapping areas during the overlapping hunting/trapping season. This limits my access to possible hunting areas due to concern of safety for my hunting dogs.



Submitted By

Marti Buscaglia

Submitted On

1/17/2022 2:21:02 PM

Affiliation

Phone

907-268-9391

Email

marbusfri214@gmail.com

Address

22605 Deer Park Dr
Chugiak, Alaska 99567

Please vote to create trapping setbacks on trails. It will not highly inconvenience trappers and will make the Mat-Su area a safe place to recreate with our dogs. Ethical trappers already follow the guidelines, but we know from recent accidents with dogs that not all trappers are following them. Making it a requirement is sure to give inexperienced or new trappers the information they need to trap safely and responsibly. Thank you for your consideration.



Submitted By

Raymond Cammisa

Submitted On

2/16/2022 12:15:05 PM

Affiliation

Phone

9077267977

Email

Raybird68@hotmail.com

Address

17615 Lacey Dr
Eagle River, Alaska 99577

We are proposing 50-yard trap setbacks to increase public safety on popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more.

oposition to Trapping will grow to wanting and needing a complete ban on urban trapping. 50 yards or set backs are nothing and even the laziest of people can go 50 yards off the trails.

thank you



Submitted By

Carlene Van Tol

Submitted On

2/18/2022 11:19:34 AM

Affiliation

Phone

9077485270

Email

aktuffer@gmail.com

Address

P.O. Box 169

Palmer, Alaska 99645

I have lived in Alaska for twenty years and have seen tremendous growth in the Mat-Su borough during that time. I love the traditional ways of The Last Frontier, and I have two fur hats; however, I believe it is safest to keep traps set back away from trails for the safety of all who enjoy them. I support the proposal for the 50-yard setback on trails in Nancy Lakes Recreation Area, Big Lake, Palmer Hat Flats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacierview, Matanuska Susitna Valley Moose Range, Chickaloon, Government Peak, Willow, Nelchina, and more. I believe ethical trappers will find no objection to this proposal.

Submitted By
Carole Holley
Submitted On
2/17/2022 8:33:40 AM
Affiliation



PC250
1 of 1

Thank you for taking into consideration the safety of pets and other trail users. In order to protect pets, children, and inexperienced (or distracted) trail users, I would ask that you strongly consider including a provision that requires traps are setback a 1/4 mile from a trail along with a sign at the trail warning that "Trapping is 1/4 mile from trails." Thank you for your consideration.

Submitted By
Cassie Kinsland
Submitted On
2/17/2022 12:41:01 PM
Affiliation



PC251
1 of 1

I believe a 50 yard setback minimum is reasonable and should be implemented. Though, based on the average distance a typical person travels off the trail, I would prefer the setback to be at least one mile. A variety of community members use these trails and very frequently it is on these trails where people can, and do, go lost or missing. As a Search and Rescue K9 handler, my dog is trained to search for people and can cover a vast amount of acres in a short amount of time when searching off leash: this saves valuable time when your loved one is missing and/or injured and needs immediate help. However, we provide this community service, free of charge, at the dog's peril due to trapping. We endanger our K9 partner's life every single time we step onto these trails to render aid to our community. Please consider all community members, including your working K9s, when making this decision. A 50 yard setback for traps that kill is not too much to ask. Thank you.

Submitted By
Cecelia Quinn

Submitted On
2/17/2022 11:03:34 AM

Affiliation



PC252
1 of 1

I would like to encourage you to approve a greater setback for traps off of easements and hiking trails. Making it 50 yards would be a start, but frankly, dogs will get into trouble even with this, as their excellent noses will smell bait from a long way off. It seems like most trappers use snowmachines or dog sleds, and I would advocate for them being off trails entirely, in places where people and dogs don't get anywhere close to. This does not seem like a huge hardship for snowmachiners and mushers, as they often are off trail systems as a matter of course. If you've ever heard a dog screaming in a trap, you will never forget the horror. And while we're on the subject of trapping, I would also advocate for checking traps VERY frequently. We know a trapper who told us he checks them once a week, which is incredibly cruel if an animal of any kind has to sit in a trap for that long. Sometimes they chew their own leg off while waiting. My husband has to register and tag any personal use crab pots, while a trapper has no obligation to identify or mark trap sites, or be responsible for any legal issues for trap location. Thank you for your consideration on this issue. Within the last year we know of at least 4 dogs caught in traps within a few miles of our house on a quiet road, and 3 others several miles away.

Sincerely,

Cecelia Quinn



Submitted By

Chris Wilson

Submitted On

2/16/2022 8:16:34 PM

Affiliation

Phone

9072505622

Email

Wilaska907@gmail.com

Address

10914 John Henry
Palmer , Alaska 99645

Please ban trapping on multiuse trails. If not a full ban than I request that the board considers significant set backs of 500 feet or greater and that traps be marked with a visual signage that can be read from a distance of 200 feet or more



Submitted By

Colin McGovern

Submitted On

2/16/2022 9:10:02 PM

Affiliation

Phone

2073194205

Email

colinrmcgovern@gmail.com

Address

39377 Woodman Ln. N.
Homer, Alaska 99603

I am in full support of a setback for traps on all trails, not just multi use - I believe this to be a very reasonable ask of the state and one that would prevent a lot of injury/fatalities in the future to dogs and even children and adults! Please please please consider this... Thank you

Submitted By
Connor Mahon
Submitted On
2/18/2022 1:29:22 PM
Affiliation



PC255
1 of 1

As a lifelong Alaskan citizen I would like to voice my opinion that I do NOT approve of trapping on trails that are used by a multitude of other residents especially when the trails are used by people with children and dogs in tow. I understand the need for trapping by individuals that rely on it for food sustenance but when you live within an hours drive of Carrs or Fred Meyer I don't see how this could be used as an argument.

Submitted By
Terry Cummings
Submitted On
2/16/2022 1:15:20 PM
Affiliation



PC256
1 of 1

Regarding Trap Setback:

I encourage you to vote for the Trap Setbacks as too many dogs are being caught in traps and dying or becoming injured and suffering. These are family pets and are part of families. There is no reason for not supporting these setbacks.



Submitted By

Danelle Jefson

Submitted On

2/17/2022 8:47:53 AM

Affiliation

Phone

9072403976

Email

akdanelle@yahoo.com

Address

PO Box 1591

Palmer, Alaska 99645

Thank you for providing a format to comment.

I am an avid trail user in many locations in Southcentral Alaska. The trails are wonderful and a large part of my joy in living in such an amazing place. We have two dogs and regularly have them with us on trails. They are under voice command and off leash when far from a trailhead and it is permitted. The use of traps near trails scares me for the safety of our dogs. Each year, I watch the ADF&G video on how to free a dog from a Conibear trap and carry a flat leash for that purpose. I hope to never need to perform such a freeing. I do realize backcountry and trail access is valued to trappers, and many other trail users.

To limit traps to at least 1/4 mile from a trail corridor is a good compromise. Dogs will be much safer and not as drawn to bait further from the trails. 50 yards is simply too close.

Please pass ordinance to limit traps to at least 1/4 mile from any dogs, children or adults who use established trails.

Thank you. Sincerely, Danelle Jefson



Submitted By
Danny Rosenkranz
Submitted On
2/17/2022 7:31:29 AM
Affiliation

Phone
19072595582
Email
rosenkranzdanny@gmail.com
Address
POB 432
Copper Center, Alaska 99573

I strongly recommend adopting this proposal. Trapping is a privilege and should be managed to support the public's right of access within well established travel corridors, designated trails and ANCSA 17b easements.. Trapping is not an appropriate purpose within trails and easements currently utilized. Many trail corridors cross a complex pattern of land status. Trailhead signage should be posted to inform users regarding trapping restrictions. All dog owners should responsibility control their pets as required to by law and avoid impacting private property..

Submitted By
Debra Stogdill

Submitted On
2/17/2022 11:55:27 AM

Affiliation



PC259
1 of 1

Greetings, this comment is in regards to the issue of trap setting along established recreational trails. A great amount of the pleasure these trails provide is the freedom to include your whole family in the enjoyment of use. Small children and dogs do not always stay within the edges of the trail, and really shouldn't have to. Safety for these younger & less aware must be a priority. Trapping along public use trails just can't be & shouldn't be a concern for those who are blessed to use any of the trails open for public use. There can't even be a true call for it to happen, since animals in general avoid areas common to human use. The standard of a substantial buffer zone between trails and the ability to set traps absolutely needs to exist. We all appreciate & benefit from such a wise ruling. Thank you, Debra Stogdill



Submitted By

Diane

Submitted On

2/18/2022 12:56:22 PM

Affiliation

Phone

Taylor

Email

Taylor62.2016@gmail.com

Address

P. O. Box 457

Kasilof, Alaska 99610

I am writing in support of the proposed 50-yard trap setback in the Mat-Su Valley area. As the density in population continues to increase in the valley (an increase of over 20% in 2020!) it becomes imperative that Fish and Game understand and help balance the impact of traditional trapping activities along side leisure and recreational use of Alaska lands. Thank you for your consideration of this proposal.

Submitted By
Chris Diekman

Submitted On
2/16/2022 1:15:50 PM

Affiliation



PC261
1 of 1

There is a proposal for 50-yard trap setbacks to increase public safety on popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more. Currently, it is legal for traps to be set on or near multi-use trails, campgrounds, roads, and pullouts from as early as September through May.

This winter alone, at least seven dogs have been caught in traps, and two of them have been killed in Southcentral Alaska. Certainly these protections can be put in place to protect users, children, and their pets from harm along these multi-use trails.

Thank you for your time and consideration.



Submitted By

Dorothy Sturges

Submitted On

2/18/2022 3:22:19 PM

Affiliation

Phone

5206034507

Email

chili333@mac.com

Address

POB 282

Sonoita, Arizona 85637

Trapping is a cruel form of maiming and/or killing and must be stopped at once.



Submitted By

Dr. Shea Long

Submitted On

2/17/2022 12:00:43 PM

Affiliation

Phone

2088696432

Email

Shea.long8@gmail.com

Address

2430 tasha dr

Anchorage , Alaska 99502

I am writing to support creating a "safe zone" around trails by requiring traps to be placed 50 yards from the trails. This is a safety issue not only for pets but for children and adults as well. Please consider this important proposal from the community.



Submitted By

Drew Hosselton

Submitted On

2/18/2022 11:28:51 AM

Affiliation

Phone

907-982-1380

Email

andrew_hosselton@yahoo.com

Address

675 3rd St

Palmer , Alaska 99645

Laws surrounding trapping in the Mat-Su valley are out of date. The area and the amount of recreational users has outgrown the current regulations. Given the abundance of land and game in our state, I cannot see a valid reason as to why it is necessary to trap in such high traffic areas as Rabbit Slough, Mat Lakes, etc. The number of people using these areas for recreation far exceeds those who use it to trap, so why do the majority of users need to put the lives of pets and children at risk so a minority can trap game as a hobby? No one is asking to put an end to trapping, but the time has come to update regulations that are safer for the general population instead of a fading minority.



Submitted By

Emily Garrity

Submitted On

2/17/2022 9:59:56 AM

Affiliation

Phone

9072994717

Email

egarrity907@gmail.com

Address

39377 WOODMAN LN N

Homer, Alaska 99603

I am writing to express my full support of a 50 yard trap setback to increase public safety on multi-use trails. We are in Homer and in the last month, four dogs have been trapped close to the Watermelon Trail. Outdoor recreation is a major component of being healthy in Alaska in the winter. We need our public use trail systems to be safe for families and dogs to freely recreate.

Thank you for your consideration,

Emily Garrity



PC265
2 of 2

Submitted By
Eric Vilmer

Submitted On
2/16/2022 7:17:08 PM

Affiliation



PC266
1 of 1

Hi I am requesting 50-yard trap setbacks from multi-use trails in the MatSu region

Submitted By
Esther Adler
Submitted On
2/18/2022 8:16:59 PM
Affiliation



PC267
1 of 1

I'm an avid outdoorswoman and have my best furry friend with me wherever she's allowed to go. I recently learned of several trails I was hoping to go with her that have traps close to the multiuse trail. This is very concerning for someone that hikes and bikes all over Alaska. I'm hoping you mandate a 50 yard trap set back to protect dogs and their families from getting hurt and killed.

Submitted By
Fay Ondelacy
Submitted On
2/18/2022 6:31:29 PM
Affiliation

Phone
907-229-9248

Email
Fyondelacy@gmail.com

Address
3439 Briarcliff Drive
Anchorage, Alaska 99508

Dear Alaska Board of Game,

Please help reduce the trapping of our dear pets (dogs). The numerous traps set is far too much and can be reduced greatly without impediment on your part. Just asking to reduce.

Thank you,

Sincerely, Fay Ondelacy



PC268
1 of 1

Submitted By
Charles
Submitted On
2/16/2022 2:30:21 PM
Affiliation

Phone
Freedman
Email
tsunamichuck@yahoo.com
Address
4530 South Teton Circle
Wasilla, Alaska 99654

Please pass a 50 yard zone between traps and trails.





Submitted By
Guadalupe Marroquin

Submitted On
2/18/2022 2:07:57 PM

Affiliation
Anchorage Resident and trail user

Phone
206-743-1608

Email
lovethejourney.lupe@gmail.com

Address
6300 Bubbling Brook Circle
Anchorage, Alaska 99516

My recommendation is trapping be allowed, no closer than/a minimum of 1/4 mile from a trail, with a sign at the trail stating "Trapping 1/4 mile". Additional signage each half mile would also keep the public aware, and avoid needless and grievous harm and death to children and dogs.



Submitted By

Guinevere Hill

Submitted On

2/17/2022 5:09:15 PM

Affiliation

Phone

9073154610

Email

Guin.Hill@matsuk12.us

Address

2424 north willow dr
Wasilla, Alaska 99654

Alaskan laws should clearly state trappers must set their traps very far from trail systems. Children and dog safety should come first. Any true Alaskan trapper can make the extra effort to trap so everyone stays safe.



Submitted By

Hannah Kroon

Submitted On

2/17/2022 10:25:14 PM

Affiliation

Phone

907 830 7713

Email

hkroon90@gmail.com

Address

2970 E Tamarak Ave
Wasilla, Alaska 99654

I support the trapping setbacks to be at least 50 yards from multi-use trails. I live in the Matsu Valley and use many multi use trail systems here. The Matsu Valley population has grown tremendously since the trapping regulations were first established, and they no longer take into account the amount of traffic the trails see for recreational activities.

Submitted By
Heather Dean

Submitted On
2/18/2022 11:32:52 AM

Affiliation

Regulations around trapping distances from multi-use trails

ADFG,

As an avid trail user with children and a dog, I strongly support a greater, standard, trapping distance away from all of the trails. While I believe everyone has a right to use the trails, in cases such as trapping that use fresh meat as bait and could result in painful lose of life to trail users companions, a trapping distance of one quarter mile from the trail is not an unreasonable compromise. That's only one walk around a high school football field. This is a distance that will deminish the smell of fresh meat from the trail, and is a very easy distance for a trapper who uses trails to walk with his/her gear.

Thank you for your time.



PC273
1 of 1

Submitted By
Heather Guthrie
Submitted On
2/17/2022 5:49:11 PM
Affiliation



PC274
1 of 1

I am commenting to support the proposal of distancing traps from trails in the MatSu and surrounding areas. It is important to respect the rights of others to recreate and the usage of traps in close proximity to heavily trafficed trails and areas inhibits such peaceful co-recreation. It is not as simple as "keep your dog on a leash" or "keep your eyes on your children at all times" as anyone who has ever recreated with either the canine or the young knows that things happen. And they tend to happen quickly. I am a mother of a toddler and a senior, deaf dog who continually keep me on my toes in the backcountry. Mixing in any other variable (moose or bear or alarming sounds) means that one or both are susceptible to bolting. It is entirely possible to remain vigilant 100% of the time, but for those of us with more human tendencies, it is likely that at one time or another we have lost control of our less-trail-strict comrades. At these times, the rights of a trapper to trap infringe upon the right of a mother to recreate with her wanderlust companions. It is my opinion that traps should be placed at a minimum of 1/4 mile from each trail or trafficked area. At the very least I support the proposed extension to 50-yard trap setbacks. It is the least we can do to protect our vulnerable and our beloved.

Submitted By

Josh Hejl

Submitted On

1/9/2022 7:27:42 AM

Affiliation

I am writing to support the trapping setback for all trails.

I am tired of city/leisure trappers running amok on our public land.

Some basic common sense rules need to be applied because unfortunately they are unwilling to be responsible.

thank you.



PC275
1 of 1

Submitted By
Holly Norwood

Submitted On
2/16/2022 6:32:25 PM

Affiliation



PC276
1 of 1

Clifford and Holly Norwood have a cabin in the Crossman Ridge area of Homer. The dogs of our neighbors have been captured in traps placed too near to trails and roads. It is only a matter of time before children are caught.

We are not against trapping in principal.

What we do not support is having traps so close to passageways and roads. The simple solution is to disallow the setting of traps in proximity of any passageway that residents or hikers or anybody may explore. Those who trap claim an interest in the great outdoors. They just need to go farther to make this activity safe for all.

Submitted By
Hope McGratty

Submitted On
2/17/2022 6:12:32 AM

Affiliation

To Whom It May Concern:

I support 50-yard trap setbacks to increase public safety on popular multi-use trails. My husband and I utilize the trail system in South Central Alaska year around for hiking, running, skiing, and biking. Our 5 year old dog is always with us. In the last two months we have had two sets of friends have dogs caught in traps (Knik area and Kenai area). One dog was freed and one did not make it. This is terrifying. Safety for everyone can be improved while still allowing safe trapping. Please support a 50-yard trap setback.

Respectfully,

Hope McGratty



PC277
1 of 1



Submitted By

Kristine E Hutchin

Submitted On

1/21/2022 1:49:39 PM

Affiliation

Phone

9076967250

Email

khutchin@mtaonline.net

Address

10335 Stewart Dr

Eagle River, Alaska 99577

In my opinion, there should be a setback for traps on trails used by the public. That seems reasonable to me. Right now we are very fortunate that no children/toddlers have been caught in traps. Trappers will say the parents should be responsible to prevent children from being "trapped", but young children are SO fast that they are gone in a blink of an eye without parents even noticing, even while they are watching their children that the kids have gone off trail. So are parents supposed to leash their kids? I think not. The setback is not an unreasonable request of the trapping community. In addition with people using trails, do trappers really think the animals they want to trap are going to stay in areas of the trails? Only if the animal is rabid will they be near a trail. ADFG should be aware that any child or person who is "trapped" near a trail, the State of Alaska will most likely sued.



Submitted By

Jacob Gabriel Richards

Submitted On

2/16/2022 2:33:27 PM

Affiliation

Phone

5205374547

Email

jr6115007@gmail.com

Address

4900 East 5th Street Apt.1210

1210

Tuscon, Arizona 85711

Please think of public safety and keep traps away from roads and camp grounds buy at least 100 feet if not more. Or ban them during tourist travels and visiting hours so staff and public and hunters themselves won't be hurt. Thank you.



Submitted By

Jake Hansen

Submitted On

2/18/2022 11:32:33 PM

Affiliation

Phone

2089930456

Email

40Hansen@gmail.com

Address

PO Box 3165

Palmer, Alaska 99645

As a Palmer resident who regularly used the local trails with my dog, I support a 50 yard set back of traps. Public lands are to be used and shared by everyone, but if traps are set so closely to trails, it negatively affects non-trappers abilities to recreate freely. It is ethical and should be mandatory to keep users and their animals safe from traps by keeping them away from frequently shared trails.



Submitted By

Jane Baldwin

Submitted On

2/17/2022 4:57:11 PM

Affiliation

Phone

9077209394

Email

jane.baldwin@alaska.gov

Address

PO Box 670981

Chugiak, Alaska 99567

Over the past few years two of my dogs have been caught in baited traps, both set very near a frequently used trail. One trail was out of Knik, the other was on Ptarmagin Trail in Peter's Creek. Both times I was able to get my dog out without permanent injury, thankfully.

Once dog owners know there are baited traps on the trails, especially right next to the trail, that means that now that person can't really use the trail anymore. Honestly, is a dog owner going to keep their dog on a leash 2 miles up a steep trail? No. So in that case, 1 trapper is now able to use the trail, but 50 hikers are not able to. Trapping sacrifices the rights of the many for the few.

Thank you,

Jane D. Baldwin

(907) 720-9394



Submitted By

Janet Rhodes

Submitted On

2/18/2022 10:20:34 AM

Affiliation

Phone

7606995750

Email

janetrhodes1@msn.com

Address

31240 Calle Cirros
Temecula , California 92592

Please accept the proposed 50-yard trap setbacks to increase public safety on popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more. Currently, it is legal for traps to be set on or near multi-use trails, campgrounds, roads, and pullouts from as early as September through May.

This winter alone, at least seven dogs have been caught in traps, and two of them have been killed in Southcentral Alaska.

Thanks for your attention to this.



Submitted By

Jessica Shepherd

Submitted On

2/17/2022 10:44:18 AM

Affiliation

Phone

9072998811

Email

shepherdinthegarden@icloud.com

Address

PO Box 15332

Fritz Creek, Alaska 99603-6332

As a dog owner, I experienced the trauma of having a dog caught in a trapline near my home. After weeks of expensive vet visits and at-home care, she lost three toes and we retired her (at age three) from skijouring. I am not opposed to trapping per se, but a 50-yard setback doesn't seem like too much to ask for multi-use trails. Please support this change.

Thank you,

Jessica Shepherd



Submitted By

Jessica Thornton

Submitted On

2/18/2022 4:45:29 PM

Affiliation

Phone

9079525753

Email

jessicathorntondesigns@gmail.com

Address

675 3rd Street

Palmer, Alaska 99645

As a dog owner and frequent trail user, I fully support updates to trapping regulations. We need larger setbacks on popular trails to protect all users. Our current regulations are outdated and have not kept up with the increase in population and increase of users on our trails. Pet owners and parents should not have to fear for the safety of their children and animals while out enjoying our trails - it is not unreasonable to ask for setbacks to help prevent user conflicts from arising. Ethical trappers should be staying away from populated trails to begin with, so this shouldn't be a heavy burden when compared to the danger that traps pose to the rest of the public and our pets. Please approve these updates.

Submitted By
Jill K Valerius

Submitted On
2/16/2022 4:30:11 PM

Affiliation

I am in support of a 50 yard trap setback on trails in the Mat-Su.

Thank you,

Jill Valerius



PC285
1 of 1

Submitted By

Joanne Singleton

Submitted On

2/18/2022 3:27:34 PM

Affiliation



PC286
1 of 1

I love the opportunity to run, ski and hike with my dog. She is 17 months old and is on voice command and we use an e-collar in case we experience wildlife along the way. Our time outside is much more enjoyable because she can have some freedom bring off a physical leash. She never goes more than 6 to 10 feet off trail. I want to keep her close but now I'm terrified that even that is too far because an unidentified trap can be hidden by the side of the multi use trail. I also have a niece and a nephew and they too like to explore the woods. Given the size of Alaska and the fact so few people trap, I see no reason why limits can't be set to stop trapping near popular and well used areas. I feel very strongly that given there are way more dogs owners using these trails than there are trappers it is time for the trappers to compromise and move to less populated areas.



Submitted By

Sharon B Johnson

Submitted On

2/16/2022 11:35:10 AM

Affiliation

Phone

9073154376

Email

mans4@gci.net

Address

2760 N Barrys Resort Dr
Wasilla , Alaska 99654

Please set the trap setbacks to 50 yards. It is the right thing to do with the grieing number of people getting out of the trails. Thank you for your considetation.

Submitted By

Josh

Submitted On

2/16/2022 7:45:48 PM

Affiliation



PC288
1 of 1

Hi, my name is Josh and I'm a frequent user of the trails in the valley. I've personally had to help get a dog out of a trap that was located at an unexceptale distance to a public trail and it wasn't fun. These are the same trails I take my kids out on to explore nature and these traps scare the hell out of me. It would be nice if we could have a standardized set back distance so that we all can enjoy our public spaces safely. Thank you for your time.



Submitted By

Judith Steyer

Submitted On

2/17/2022 8:36:48 AM

Affiliation

Phone

5415146341

Email

Steyerbill@yahoo.com

Address

P.O. Box 15036

Homer, Alaska 99603

I support legislation to restrict the proximity of animal traps placement at least 50 yards from public use trails.

As a pet owner and previous sled dog owner I have had several nearly fatal experiences of dogs getting caught in animal traps while out recreating on public multiuse trails. This law could help prevent many future situations that would endanger animals.

Thank you for your consideration

Judith Steyer



Submitted By

Louise Kane

Submitted On

2/16/2022 1:13:04 PM

Affiliation

Phone

5082378326

Email

louise@kaneproductions.net

Address

920 Herringbrook Road

Eastham, Massachusetts 02642

My family has long held residence in Anchorage. One the things I dislike about Alaska is its horribly archaic attitude about trapping, snaring and killing predators. Not only do I support a setback but I would like to see this barbaric activity ended. How many of us would support this appalling activity if we saw just one animal languishing in a trap. Many civilised countries have banned trapping, its about time we did too.

Louise Kane, JD

Submitted By
Karen Shoemaker
Submitted On
2/17/2022 2:10:07 PM
Affiliation



PC291
1 of 1

Please keep trapping away from our trails which so many of use with our pets....i vote for the 50 yard boundry at a minimum!!!

Thank you

Karen Shoemaker and family



Submitted By

Kari

Submitted On

1/19/2022 5:17:36 PM

Affiliation

Phone

9076883272

Email

Krunnerkb@gmail.com

Address

24217 Platsek Dr
Chugiak, Alaska 99567

I would like to see more restrictions on trapping near popular trailheads and trails. People, families, kids and dogs should have safe means of exploring the backcountry and trails without unfair enticement of bait and traps near popular trailheads. There are thousands of Alaska acres of hunting property. Maintained trails and trailheads should remain safe of traps for people, kids and dogs who meander off-trail and in the vicinity of hiking trails. Baiting traps is both dangerous and an unfair advantage against curious kids and domesticated animals including dogs.

Submitted By
Karrin Parker
Submitted On
2/18/2022 12:00:24 PM

Affiliation

Phone
907-570-7688

Email
parkerkarrin@gmail.com

Address
PO 3667
Palmer, Alaska 99645

I am writing to support the proposal for :

50-yard trap setbacks to increase public safety on popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more. I am a dog owner and spend a lot of time out doors with my dogs on all of these trails. Alaska is a huge state and there are many areas that can be utilized for trapping that would be less of a threat to family pets and people , I believe that trapping should be done well away from heavily used areas where pets, and people can get injured or killed.



PC293
1 of 1



Submitted By

Kathryn Tryck

Submitted On

2/18/2022 1:45:42 PM

Affiliation

Phone

9072425169

Email

ktryck@gmail.com

Address

5125 Whispering Spruce Drive
Anchorage , Alaska 99516

I am in favor of the 50 yard set back for traps. It is the absolute minimum acceptable for safety. I think it should be more. My family has had property in the Matsu Valley for over 100 years. We spend many weeks there year round hiking, boating, swimming, skiing etc. For the safety of children (and adults) and pets not staying strictly on trails, just wandering the danger of traps is very real, especially in the winter cross country skiing! The areas under consideration are recreation areas heavily used year round.

YES!! Vote in favor of making the 50 yard set back for traps a reality! For the safety of all who recreate outside in the Valley!

Kathryn Tryck

Submitted By
Kelby Morisse

Submitted On
2/18/2022 12:52:30 PM

Affiliation

Hello,



PC295
1 of 1

I was skiing at Nancy Lake Cabin and was staying at a public use cabin. I was skiing with my dogs on the most popular trail leading off the lake in the southeastern corner of the lake. A snare was set less than 10 feet off the trail and approximately 50 yards from the lake itself. I'm an avid small game hunter and this trap placement was/is very unethical. I could reach the trap with my ski pole while I was still on the trail.



Submitted By

Ken Green

Submitted On

2/17/2022 10:28:16 PM

Affiliation

Phone

+19075951643

Email

kennkay@arctic.net

Address

Pobox 776

Cooper Landing, Alaska 99572

Support set back regulations for trappers in multi-use areas in Alaska. Thank you.

Submitted By
Kim Kittredge
Submitted On
1/8/2022 9:33:43 PM
Affiliation



PC297
1 of 1

I believe minimum setbacks and 'Active trapline' sinage are simple solutions to minimize conflicts along multiuse trails.

Submitted By
Kristin O'Connor
Submitted On
2/18/2022 11:06:38 AM
Affiliation



PC298
1 of 1

To Whom It May Concern,

I have been made aware of Proposal 199 Ammended. I support it, but would like to offer some insight into the useage of Swan Lake "Quggesh" Boardwald and Loop Trail located in Wasilla. This trail should be included in the proposal. The description of the trail from the Greatland Trust's website states "A trail to the north takes you on a 1-mile upland loop through a beautiful birch forest, with more views from the bluff out into the Refuge. The area is also the location of a former Dena'ina village site and holds cultural significance. The area is called *Quggesh*, which means swan." This trail is also located in a new subdivision and gets a lot of use from families in the neighborhood.

I am a teacher at Machetanz Elementary School. My class, and many others, use this trail on a weekly basis to extend our learning to the outdoors. Outdoor studies are an integral part of our school philosophy. We waited 7 years to get this trail built so that we could have access to a nature trail. The kids look forward to our weekly outings. They make observations, learn about the unique flora and fauna of our area, conduct nature studies, and enjoy just being in nature. There are borough supported archealogical digs going on just off the main trails as well, and many more that have been identified but not excavated.

Please put the Swan Lake "Quggesh" trail on the list as part of this proposal.

Thank you,

Kristin O'Connor

K/1 Teacher

Machetanz Elementary School

Submitted By
Kristine Hutchin
Submitted On
2/16/2022 4:28:27 PM
Affiliation



PC299
1 of 1

Traps near frequently used public trails have been responsible for trapping dogs in which some died and others maimed. Regulations are needed so traps are placed 50 yards from public trails. I don't know Why traps are set do close to public trails because just the fact of people using the trails will scare animals away from any trap so no animals will be trapped. The first time a toddler, child, or any person is caught in a trap near a public trail, it can be guaranteed that there will be a lawsuit against the State of Alaska.

Submitted By

Krysta

Submitted On

2/17/2022 9:36:43 AM

Affiliation



PC300
1 of 1

I am writing in support of the 50-yard setbacks to increase public safety on popular multi-use trails. When there are traps set on or near trails without warning, it makes it very difficult for people to keep themselves, their children and their pets safe. I wouldn't want a family member of mine stepping on something like that, and you shouldn't either. Thank you for your time.



Submitted By

Andrea K Lang

Submitted On

1/8/2022 6:55:32 PM

Affiliation

Andrea Lang

Phone

9072449290

Email

andrealang827@gmail.com

Address

1351 Early View Drive
Anchorage, Alaska 99504

Though I believe a 50 yard trail buffer for trapping is insufficient, I think it's important to stipulate a distance in order to keep pets and people safe. I am an avid hiker and skier, and although I am an Anchorage resident, I do recreate in the Matsu. I have dogs who run off leash in the backcountry and I fear for their safety regarding trapping along trails. Additionally, these traps are often baited and dogs will be lured to these traps.

Trails accomodate various user groups, however no particular group has the right to create an unsafe situation for others. Trapping so close to a trail used by children and pets create possibility for injury and death. Please consider the 50 yard set back.

Submitted By
Laura Eide

Submitted On
2/17/2022 7:23:57 PM

Affiliation



PC302
1 of 1

Please consider creating a trapping setback near popular trails. Traps set near trail heads and just off the trail are a danger to dogs and create anxiety amongst users of the trail. Moreover, every time a dog is caught in a trap, it contributes to significant anti-trapper sentiment. The more times that people hear about dogs being caught or killed in a trap, the greater likelihood that people will advocate for banning trapping altogether. In order for trappers and other trail users to go coexist peacefully, it is important for the interaction between them to be minimal. One common sense action that can be done to achieve this is to create distance between traps and other trail users by requiring a setback.

Submitted By
Laurie Hueffer

Submitted On
2/17/2022 7:37:49 AM

Affiliation



PC303
1 of 1

I am writing in support of common sense trapping safety measures to include clear marking, contact information and 50 yard setbacks from popular mulit-use trails in all areas of Alaska. Alaskans and tourists alike access these trails through-out the state and deserve safe access.

Luckily, 'only' dogs have been injured and killed thus far. While this is horrendous, what would be more so is the injury of any child or adult simply out recreating due to laziness and lack of accountability of the minor portion of trappers who don't follow basic safety guidelines and give all a bad name.

Trapping has a place in Alaska, however it should not be allowed without regulation to include clear marking, contact information and 50 yard setbacks on popular multi-use trails.

I also feel correct restraint of animals should be clearly marked and enforced on these multi-use trails.

This is not a one-sided issue. All users deserve safety, consideration and access to enjoyment of the outdoors. Regulation is simply necessary to ensure safe and enjoyable access functions for all.

Thank you for your time,

Laurie Hueffer

Submitted By
Liane Crosta

Submitted On
2/17/2022 1:01:54 PM

Affiliation



PC304
1 of 1

I absolutely disagree with traps being set next to trails made for families and pets. Pets are being caught, and this is inhumane!

Submitted By
Lindsay Branholm
Submitted On
2/17/2022 12:16:22 PM
Affiliation



PC305
1 of 1

I feel strongly about implementing this change. The Matsu borough has grown tremendously which means way more people out exploring our land and trails. We should be able to go out with our family pets and not have to worry about loosing them to such negligence.

Submitted By
Lindsay Cronin

Submitted On
2/18/2022 9:15:28 AM

Affiliation



PC306
1 of 1

I fully support the proposed 50-yard trap setbacks on popular multi-use trails. I'm honestly astounded such a rule doesn't exist and that trappers are simply "asked" to do the right thing. We don't "ask" people to obey the speed limit or leave the property of others alone; we legally enforce it through laws and regulations. I do not understand why trappers get a pass on being held accountable for their actions.

I cannot think of any other circumstances where someone is not only free from legal repercussions when essentially booby-trapping public land but in fact legally protected in doing so. Why do they have a right to make any public space unsafe for me and potentially deadly for my dogs?

Putting aside the leash debate, one of my dogs is training in search and rescue. She cannot be trained and leashed at the same time. Her skillset requires her to run freely and find people. How am I supposed to keep her safe, in training, and, most importantly, alive when baited traps could be anywhere and everywhere for months at a time?

There are enough dangers present when enjoying the beautiful natural settings of Alaska in winter. Angry moose, thin ice, avalanches. Humans haphazardly and randomly setting lethal killing machines wherever they please should not be one of them.

The time has come to recognize the right to safety of all the non-trappers who recreate on our trails and provide them legally enforceable protections against careless trappers.

Submitted By
Lindsay Hixon
Submitted On
2/18/2022 8:04:33 AM
Affiliation



PC307
1 of 1

Hello, this comment is in regards to the proposal for trapping regulations and the requirement to place traps at least 50 yards off popular multi-use trail systems. I am a responsible dog owner who loves her pets deeply. I also personally know one of the women who lost their dog to a trap this season and she is beyond devastated. That being said, trapping is a long lived part of Alaskan culture and people's livelihood and I cannot imagine we cannot come to an agreement to decrease dog/trapping interactions. My dogs go to advanced obedience classes regularly and are always on either leash or e-collar, but to say they are perfect and couldn't be baited is a fantasy. I've taken a trapping course to learn the signs that trapping is in the area/how to release pets and we have left areas where we saw snares less than 10 feet off the trail in a very popular area for off leash dogs. That is unacceptable and unethical by trappers. As someone who has done nearly everything I can to mitigate an issue with my own dogs I do feel it is reasonable to ask trappers to move 50 yards off major trails to trap - this is enough space for responsible pet owners to safely keep their pets under control and not feel anxious every time the pet goes into the brush to sniff and simply be a dog. Alaska is a massive state with numerous land for trapping and recreation both - why cannot we not try to accommodate each other? 50 yards is a small walk for most hunters and if you truly enjoy the sport it should not be a major issue.



Submitted By

Lisa A Wiley

Submitted On

2/18/2022 12:30:35 PM

Affiliation

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aklawwiley@gmail.com

Address

6836 DOUBLE TREE CT
Anchorage, Alaska 99507

I am writing in support of the 50-yard trap setbacks to increase public safety on popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more.

This winter alone, at least seven dogs have been caught in traps, and two of them have been killed in Southcentral Alaska.

I have had to remove two of my dogs from traps during my time in Alaska. Luckily, their injuries were relatively minor.

One of my friends owned the dog who was recently killed. Another of my friend's dog was killed in Cooper Landing from a trap 7 years ago. All dogs who were injured were under voice control and lured to the traps by food placed by the trappers.

Please, support 50 yard trap setbacks to protect our canine families.

Submitted By
Lucille Zercher

Submitted On
2/17/2022 7:45:18 AM

Affiliation
none



PC309
1 of 1

I support the proposal to extend the distance that a animal trap can be set from a multi use trail to at least 50 feet. I know this is just being proposed for the Mat-su Valley but I would also like it to be considered state-wide. I see that there were 7 dogs tramped and 2 killed this season in the valley but I assume there were more that just have not be reported. As the regulations stanfd it makes it so easy for people to set traps and impose their hunting practices on others that have a right to use the land for recreation and wholesome outings with their family and pets. This is a decent compromise and should be passed.

Submitted By
Maggi Rader

Submitted On
2/18/2022 4:01:17 PM

Affiliation



PC310
1 of 1

While I do no have a problem with trapping I do have a problem with trappers using multi use trails for their lines with no hint that a trapline is present. I am in strong suppot of at least a 50 foot setback or brushing your own line. Trails that are used by multiple people and animals seem like an extremely bad place to allow trapping.



Submitted By

Mahri Lowinger

Submitted On

2/18/2022 12:02:05 PM

Affiliation

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I support the proposal to set back traps farther from recreational trails where dogs are often on walks or camping and at risk for getting caught.



Submitted By

Mark E Norquist

Submitted On

2/17/2022 7:46:22 PM

Affiliation

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Due to the numerous domestic animals that have been caught in traps the past few years, it seems that adding setback for trapping from established trails/trailheads is sorely needed. If a trapper can't get himself a minimum of 50 yards away from a trail he has no business being in the outdoors. Being that a majority of Alaskans dislike the concept of trapping, this would be one small step you could make to give trapping a better reputation. Everyone wins.



Submitted By
Mark Moglich

Submitted On
2/17/2022 9:19:28 AM

Affiliation

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Gardnerville, Nevada 89410

Proposal I08:

Summary: Allow non residents "up to five permits for taking, transporting, or possessing an eyas Northern Goshawk for falconry statewide, and up to five permits for taking, transporting, or possessing an eyas Peale's Peregrine from units 1-4, for falconry by a nonresident"

- The AFA (Alaska Falconer's Association) has decided to offer us limited eyas take on one hand, but with very strict restrictions on both eyass and current passage take on the other that is laid out in Proposals 109,110,111.
- Only allowing units 1-4 in a small southern portion of the state, not exclusive to "Peale's Peregrines".
- Exclusion of Gyrfalcon take is based on unfounded claims and or proof by the AFA (Alaska Falconer's Association), which paints non-resident falconers in a negative and criminal light as referenced in their Proposal 110. The AFA maintains the reason for restriction of take to units 1-4, is due to the fact it is difficult for falconers to differentiate between Northern Goshawks, Peale's Peregrine, and Gyrfalcon eyries and eyasses. Experienced falconers can clearly tell the difference.
- We conclude that it is much more difficult to differentiate a Peal's peregrine and a Anatum Peregrine being both peregrines and much easier to see the difference between a Peregrine falcon and a gyrfalcon.
- This excuse to only allow take in units 1-4 is a very weak argument at best.
- Proposal 113 allows 5 Northern Goshawks 5 Peal's Peregrine and 5 Gyrfalcon's either a eyass or a passage raptor statewide as is offered for residents.
- **We do not support proposal 108** and ask that you consider Proposal 113

Proposal I09:

MICROCHIPPING. "All wild caught live gyrfalcons exported from the state by a nonresident must be microchipped and the microchip must be registered with an internationally recognized microchip registry such as (Petlink)"

- AFA claims that microchipping is "overburdensome", and should only be required for non-resident take.
- AFA shows great concern for protecting what they claim are "highly valuable" Gyrfalcons, yet only the ones taken by non-resident falconers.
- It is clearly stated that the entire lower 48 (Non Residents) can only export up to 5 Gyrfalcons annually, and being wild caught these birds cannot be sold/bartered. Said value of these birds is not monetary
- The AFA is using a poor excuse to exclude themselves from the microchip requirement, which is a regulation they brought onto themselves at the 20172018 Game Board meeting. If the microchip process is "overburdensome", as they say, it is a burden they wish only non-residents to endure.
- **We do not support 109** and ask that you continue to microchip all falcons required so they can be tracked inside and outside the state.

Proposal 110:

Summary: Delay of Non-Resident Passage Take Season to a potentially dangerous time frame.

Currently the non-resident passage take time frame is from August 15-October 31st. The AFA is requesting a DELAY of that time frame (billed falsely as an •extension') to the dates of September 15 - November 15.

In 2017/18, the proposed start date of September 5th, was denied due to deadly weather concerns and the dangers ii posed to non-residents.

The AFA claims this is to reduce the disturbance of nesting sites", and better align the time taking with the dispersal timing of Gyrfalcons from their "natal areas; but have no desire to change the current resident window, only non-residents.

It should be noted, currently an Alaskan resident can take up to 2 Gyrfalcons a season, within the current time frame.

They do not propose to restrict themselves out of these concerns.

Concerns for white Gyrfalcon harvesting is totally unfounded and backed with no facts since its only residents who are allowed to climb nest and hand pick a white gyrfalcon. Non residents do not climb or disturb nest.

Less than 5 white gyrfalcons have been taken for nonresident draw the first 5 years and most have been either Grey or Silver in color.

Concerns of disturbing the nest sites are overblown. In the last 5 years an average of 2 Gyrfalcons a year were taken by non-residents, and of the 10 total, only 3 were taken near the date of August 15th. No birds were taken direct from the nesting cliff. Non residents don't climb nest only RESIDENTS do!

Within the current timeframe starting August 15 the beginning of non resident take, falcons are fully fledged and hard pennis. There is no climbing of nests, or disturbing of nest sites by Non residents.

It should be noted Proposal 114, which is brought forward by the Alaskan Department of Fish and Game, mirrors AFA's Prop 110.

WE DO NOT Support 110 it's not safe to start the season later as was discussed at the Game Board meeting In 2017/2018.

The AFA, without any proof, using the argument that illegal falconry trade is a reason for further restricting non-resident take. They do not show the same concern for the current resident take, which paints falconers from the lower 48 as being more likely to commit criminal



activities than themselves.

The AFA promotes a false narrative, that there is a specific interest in "white Gyrfalcons".

Captive breeding within the United States, and abroad, has significantly reduced any need or existence of illegal trade. Gyrfalcons are readily available and bred within the US every year, where white F2 generation Gyrfalcon's are regularly advertised for \$4,000 or less. The AFA has chosen to portray a false concern of "illegal falcon trade" activities, in order to restrict the already very minimal non-resident take, yet shows no concerns to restrict themselves for the same reasons. The message is clear, which is that the AFA is telling their Board of Game that non-resident falconers are more likely to commit criminal activities than themselves.

WE DO NOT Support 110 it's not safe to start the season later as was discussed at the Game Board meeting in

201712018

Proposal 111

AFA proposes to Limit non resident take of raptors to one every four years. And to limit unsuccessful permittees from applying the following year. The "one in four" management system used in other areas

does NOT apply for a very limited and small number of non resident applicants. The drawing has always had less than 30 non residents apply for the 5 permits and in 2021 less than 20. Applying

once every 4 years would greatly reduce the number of applicants to almost zero after a few years.

We do NOT support Proposal 111

Proposal 114 (Alaska Game and FISH)

They propose to change season dates from August 15 start to September 15 start date

Proposal 114 is essentially the same as that offered by AFA's Proposal 114.

All my comments on proposal 110 apply to this proposal 114

As noted in my proposal 110 comments, the delay of take season makes it extremely hazardous

for a permittee which is why a similar proposal was turned down in 2017

DO NOT Support 114 it's not safe to start the season later as was discussed at the Game Board

- It should be noted Proposal 114, which is brought forward by the Alaskan Department of Fish and Game, mirrors AFA's Prop 110. in 2017/2018.

Proposal 113 (California Hawking Club)

- I ask that you pass Proposal 113 to allow the take of 5 Northern Goshawks, 5 Peale's Peregrines and 5 Gyrfacons. For non residents statewide. Please refer to our proposal with facts to back our proposal for non resident take.
- Please consider proposal 113 as a common ground compromise which includes the 5 eyass take of Goshawks and Peales as the AFA is in support in proposal 108.

• I SUPPORT PROPOSAL 113



Submitted By
Bernadette Martel
Submitted On
1/19/2022 8:44:21 AM
Affiliation
AK citizen

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PLEASE reconsider minimizing traps set off trail by at LEAST 50 yards. 100 is better. Also please consider extending the limitations of the Anchorage Bowl out to the most common trails used in Chugiak and Peters Creek by implementing these distances of 50-100 yards minimum. Also please consider enforcing/ requiring all traps be labelled and marked/signed to alert other users of its presence AT the site of the trap and NOT just at the TH. Baited traps will attract nearly ANY dog, well trained or not. Considering the large population changes to the State of Alaska, changes in demographics, new and increased users and recreationalists to backcountry trails/ areas, and increased competition to retain skilled and competent workers, why not adopt similar regulations of some of our sister Western Trapping States, such as WY, ID, MT, MI, MN, WA, CO and AZ? If our State is to continue to grow and improve economically, our regulations for such activities NEED to be updated to meet our NEWLY growing population within the State, or else risk losing out to most young, healthy, and educated potential citizens and workers that may choose to live elsewhere DUE to the concern and love for their families and pets at risk.

Submitted By
Marybeth S Holleman
Submitted On
2/19/2022 8:16:31 AM
Affiliation



PC315
1 of 1

I support trap setbacks from popular multi-use trails in the MatSu area. I know too many friends who've lost dogs to traps in the Valley. These are responsible pet owners who love their dogs. Trappers need to have respect for other trail users, and cede some trails to multipurpose.



Submitted By
Patrick P McCormick
Submitted On
2/1/2022 5:06:52 PM
Affiliation
Chugach view outfitters

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2700 w31st
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I support this regulation with revision. It is imperative to the continuation of trapping in Alaska that trapping happens in a way that does not impact other user groups, it is clear that there are many trappers in south central Alaska who are setting traps that essentially can only catch domestic dogs.

I think there are alternate solutions that do not entirely close trapping in areas such as the palmer hay flats and ensure that ethical trappers are allowed to continue.

I think that trapping should continue to be allowed in the areas mentioned however to end conflicts with other users, except

Conibear traps may not be set unless fully submerged or placed above the ground.

(7) One quarter mile of permanent dwellings, which are defined as buildings used primarily as permanent residences or businesses; but which definition does not include cabins with less than 800 square feet of livable space which are unoccupied a majority of the time.
(8) 50 yards of a developed hiking trail or groomed ski trail. Developed hiking trails are defined as trails for which public funds have been spent within the previous five years for construction and maintenance; and groomed ski trails are defined as trails which are routinely maintained and groomed to provide the public with recreational skiing venues. A list of developed hiking trails and groomed ski trails shall be maintained by the department.
(9) One quarter mile from the trailhead for any developed hiking trail or groomed ski trail.
(10) One quarter mile from any developed campground. Developed campgrounds are defined as campgrounds for which public funds have been spent in the previous five years for construction or maintenance; a list of which shall be maintained by the department.

By prohibiting ground set conibears there will be virtually no downside for trappers as the option to use non lethal traps still exist, trapping opportunity will not be eliminated in any way and the problem of incidentally killing domestic dogs will be eliminated. This would be a huge win win for both trappers and dog owners.

Submitted By
Megan E Swearingen
Submitted On
2/18/2022 11:43:59 AM
Affiliation



PC317
1 of 1

Hello Gentlepersons who may read my letter,

I personally find trapping the most inhumane and cruel practice that only seems to benefit humans, while animals found in traps must suffer an imminent painful and agonizing death. It is yet another example of humans exerting their power and control over animals. I feel traps should be banned completely. I am aware, however, that subsistence cultures rely on traps for survival, and I feel that is the only exception that should be made. Saying that I support that traps should be placed farther out from trails to protect people and pets only serves to protect domestic animals for people's benefit. Protecting only animals that people consider worthy is a disservice to animals that are wild, but still experience pain. This inhumane practice should be reduced and eliminated except for those who lack other resources. Far too many trappers are poaching their animals for hides at a high price. If animals in traps are caught, they should only be suffering in the name of providing nourishment and survival for a subsistent community. Please consider reducing and eliminating traps altogether except for subsistence cultures.

Respectfully,

Megan



Submitted By
Meghan Johnson
Submitted On
2/18/2022 2:49:11 PM
Affiliation
Hiker and Skiier

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To Whom It May Concern,

Since January of 2022 I know of three friends who have had an encounter with a trap and their family pet (dog). One pf these three resulted in a traumatic fatality with a conibear trap. I am not against trapping as this is part of Alaska's culture. However, I am a strong advocate for co-recreatin in this beautiful state. I have two dogs and one will never be off leash in public due to some special needs he has and the other one is smart, under voice command and like to let him run and be a dog. I always have leashes with me but some of the trap release kits are heavy and bulky and really add extra unwanted weight to what I carry for a hike. Trapping close to well used hiking trails puts house pets (dogs) at risk, not to mention the traumatic impact on the pet owners. Please implement a 150-200 feet set back rule and signage indicating when and where traps are set.

Thank you

Meghan Johnson

Dog owner, hiker, and skier

Submitted By
Melinda Myers

Submitted On
2/17/2022 6:36:42 PM

Affiliation



PC319
1 of 1

Dear Board of Game,

My name is Melinda Myers and I am writing in support of the proposed 50-yard trap setbacks to increase public safety on popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more. Currently, it is legal for traps to be set on or near multi-use trails, campgrounds, roads, and pullouts from as early as September through May. I continue to hear about dogs being caught in these traps. Just about a month ago an acquaintance's dog was killed in Southcentral, and hearing the trauma the family experienced was heart wrenching. Watching their dog die in front of them because of the dangerous trap and their inability to release and save their animal. No one should have to witness that and really, no animal should be trapped that way. There is no reason for them to be that close to highly used trails. What if a child or adult had wandered off the trail? We know that would provoke a change. Please increase the setback to protect both animals and people. I appreciate your time and consideration.

Sincerely,

Melinda Myers



Submitted By

Michelle scaman

Submitted On

2/18/2022 10:15:50 PM

Affiliation

I support the legislation proposing 50-yard trap setbacks to increase public safety on popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more. Currently, it is legal for traps to be set on or near multi-use trails, campgrounds, roads, and pullouts from as early as September through May.



Submitted By

Mindee Sayer

Submitted On

2/17/2022 2:38:20 PM

Affiliation

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Wasilla, Alaska 99654

I support and encourage the proposal requiring trapping in multi use areas to be no closer than 50 yards from trails. This proposal provides a make sense precaution to protect domestic pets and people sharing these areas. Requiring fatal traps to be placed further from trails will decrease accidental injuries/death, with minimal work or inconvenience to the trapper. This proposed solution seems to consider all users & safety concerns of a shared/multi use area, both providing enhanced safety and peace of mind for families and recreational users while still supporting trapping options for trappers. We live near the Palmer Hayflats and after recently learning a dog who was killed in the area As a result of a trap, I have been unwilling to use the area with my pets, as I am unwilling to risk such a tragedy. That said, under the current situation, it seems trappers have no risk, while families & pets, assume all the risk when using these areas. In order for multi use area to be accessible and safe for multiple uses, it seems such proposed measures would help ensure this area can be used, safely, by all and reduce the risk of accidental injury or death due to proximity to trails.

Submitted By
Mr. Ed Bennett

Submitted On
2/17/2022 8:10:21 AM

Affiliation

50ynds is a start. 1/4mile with a sign is more realistic for safety.



PC322
1 of 1



Submitted By
Nelson Wadman
Submitted On
2/18/2022 10:51:46 AM
Affiliation

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I am a bird and small game hunter and I do most of my hunting in the Mat-Su area because it is relatively close to my home and there is an abundance of small game. I would love to bring my dog with me as he is now old enough to start hunting with me. However, the stories I have heard from other hunters who hunt with dogs, as well as hikers who stick to the trails, about their dogs getting killed or permanently injured by traps make me not want to take my dog out hunting. I would much rather save my dog, and my money, and forgo the hunting season all together. I would feel much more comfortable if I had an idea of where traps might be placed in relation to the trails that I use to go hunting. I realize the risk of going off trail, and I accept that risk. But the fact that there is no formal regulation to keep traps a set distance off of trails is deeply concerning to me. I am by no means against trapping. I do not wish to ban trapping. I do believe that there needs to be a compromise so that trapping can continue to happen. As a hunter, I am subject to certain laws and regulations about where I can hunt in order to keep others safe. Trappers should have similar laws and regulations about where they are allowed to trap for the very same reason. I believe that a required distance off of public trails is a wonderful compromise. It is a compromise that would make me feel comfortable enough to take my dog hunting with me, because at least I would know where I could expect traps to be. Right now I have no idea where a trap might be, and that makes me scared for my dog, who I consider a friend and a member of my family. I know there is much debate about having trap set-backs, and so I would also accept a compromise to require that traps be marked so that trail users such as myself would know that a trap was nearby and that I should exercise caution. As I said before, my goal is not to ban trapping. My goal is to reach a compromise so that trapping can continue in a way that is safe for all who use and enjoy the outdoors.



Submitted By

Novalene Payne

Submitted On

2/17/2022 1:20:13 PM

Affiliation

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Anchorage , Alaska 99508

Hello,

As someone who has lived in Alaska since 2014 I have had the wonderful opportunity to take advantage of the wonderful park and trail systems that make our state so unique. I hope to continue to recreate with my husband and our future family but the fact that Alaska still allows trappers to have un restricted access to all land here is very unsettling. A phrase I hear pro trappers rebut with is "just leash your dog." While yes all pets should be leashed, hunting dogs are allowed off leash. Personally, I walk my dog on a long retractable leash, with Alaskas laws he could still wander into a trap, which is a something that is always on my mind. Being completely honest, this issue is about more than dogs. It's about my husband and I, should we have to fear every time we're recreating and decide to explore the area and/or go off trail about stepping into traps? Should I have to worry about my future children when they're too young to understand the dangers? For too long Alaskas laws have remained archaic.

Personally, I only believe trapping should be allow for the Indigenous Peoples of Alaska and those needing to subsistence hunt in remote areas. As we all know trapping is the least humane method of hunting but I understand in certain circumstances it should be allowed.

Please take time to think over losing a beloved pet or maybe your own foot when making a decision about regulations.

Thank you so much for your time.

Signed,

A Concerned Alaskan

Submitted By

Paige

Submitted On

2/17/2022 7:27:11 AM

Affiliation

I would like traps to be set further back for the safety of humans and their pets.



PC325
1 of 1

Submitted By

Patricia

Submitted On

2/17/2022 3:00:54 PM

Affiliation



PC326
1 of 1

Life long Alaskan, 4th generation and have owned many dogs who I'd take out and play on many of our trails. I do not agree with trapping and can't imagine loosing a pet in that way. Please remove the traps. Thank you for your time

Submitted By
Phyllis A Kopiasz
Submitted On
2/17/2022 7:04:10 AM
Affiliation



PC327
1 of 1

Please adopt new measures to protect citizens, children and pets. Too many have been killed, maimed and injured due to traps set too close to hiking trails. I know some of the worst incidents have involved legally-set traps where the trapper was either too lazy or indifferent to hike further into the woods, away from popular trails.

Please adopt new regulations to protect the majority of law-abiding citizens from the economic interests of wildlife killers.



Submitted By

Rebekah Morisse

Submitted On

2/18/2022 12:27:32 PM

Affiliation

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Anchorage, Alaska 99508

As a dog owner, lover of the Alaska outdoors, and as someone who comes from a hunting family, I support the ability of people to hunt and trap. I do think that having some setback requirements will allow for people to walk safely with their children and dogs and still allow people to trap. Watching the stories of people who have had their dogs in a trap or who have had their dog die is heartbreaking. I support the 50 yard setback to allow us all to use the trails safely. I have seen traps right next to trails where a child or dog could easily have been harmed, and I don't want anyone to experience that. Thank you for the opportunity to comment.

Submitted By

Rob Earl

Submitted On

2/18/2022 3:19:01 PM

Affiliation



PC329
1 of 1

Comment to Board of Game:

Trapping should be regulated and limited to certain areas. Obviously. It's dangerous, even if you do keep your dogs leashed. I'm offended that traps randomly strewn across the landscape restrict my freedom of the hills. Unregulated trapping is a danger to myself and my family. Trapping must be regulated. Frankly, I don't see that happening as long as the Board of Game is full of trappers and hunters. Eventually this will change (maybe sooner than you think!) and the Legislature will make the Board of Game more balanced. In the meantime, trapping supporters should see the writing on the wall work on some reasonable regulations. The fact that its legal to put traps anywhere (including directly on major trails) and that trappers aren't required to flag their traplines is RIDICULOUS. I mean, seriously? It's 2022 ladies and gentlemen. Get with the program. It's called "civilization". We live in one. Or we should be! Regulate trapping now, or maybe lose the privilege to trap altogether later on. Thank you for your work and Godspeed.



Submitted By

Roy J Wilson

Submitted On

2/16/2022 8:19:56 PM

Affiliation

Voter/tax payer

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Homer

Homer, Alaska 99603

First fallrun@sonic.net is a valid email the one you accepted is almost never used. It is obscene for any traps to be set closer than 1/4 mile of public use areas. The current regulations are another example of government welfare to special interest groups. Let the traders earn their money like the rest of us rather than sucking at the public tit.



Submitted By

RR Mier

Submitted On

2/18/2022 12:43:13 PM

Affiliation

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Proposing 50-yard trap setbacks to increase public safety on popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more. Currently, it is legal for traps to be set on or near multi-use trails, campgrounds, roads, and pullouts from as early as September through May.

Submitted By
Russell Johanson
Submitted On
2/16/2022 5:19:28 PM
Affiliation



PC332
1 of 1

I support a 50-yard setback for trapping on popular multi-use trails. This is a common-sense, reasoned, measured response to increased use and population growth.

Submitted By
Ryan Thompson

Submitted On
2/18/2022 1:45:41 PM

Affiliation
resident user



PC333
1 of 1

Please keep traps a minimum distance from recreational trails to keep pets and kids safe. Now the argument has been about dogs getting hurt or killed, but what will happen if it's a child!?



Submitted By

Sarah Hurkett

Submitted On

2/18/2022 11:25:29 AM

Affiliation

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eagle river, Alaska 99577

As a recreational trail user with children and dogs, I support trap setbacks to limit detrimental contact between traps and all other trail users.

Submitted By
Shannon O'Brien
Submitted On
2/16/2022 9:29:30 PM
Affiliation



PC335
1 of 1

I am writing to offer my support to the proposed 50-yard trap setbacks from popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more. I would also support a more lengthy setback for traps. It is important that trappers have their space to trap, but it is also important that our trails and trail boundaries are safe for residents and visitors.

Thank you for your consideration.

Submitted By
Sheri musgrave
Submitted On
2/18/2022 2:24:51 PM
Affiliation



PC336
1 of 1

I'm in favor of the setback of traps on multiuse trails. Please keep our children and dogs safe.



Submitted By
tammy vig

Submitted On
2/18/2022 10:19:26 AM

Affiliation

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16124 ROSENBURG CIR
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I am so against trapping being allowed near trails in Mat-Su. I personally know the person whose dog was killed by a trap and she is devasted. Please stop this madness.



Submitted By

Annette Tomco

Submitted On

2/16/2022 1:29:13 PM

Affiliation

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Palmer, Alaska 99645

Please consider this set back on public areas not only for the safety of our dogs but the safety of our children. We are not asking to end trapping but simply it made law that trappers follow their supposed "ethics codes" that is claimed they have but is not followed. Thank you.

Submitted By
Tyler Jones

Submitted On
2/18/2022 4:05:44 PM

Affiliation



PC339
1 of 1

I am writing to express my support for the 50 yard trap setback from multi-use trails. The fact that it is currently legal to set traps right next to trails where people recreate with their dogs and children is simply astonishing to me. By adopting the 50 yard setback, lives will be saved..



Submitted By

Wendy Howard

Submitted On

2/17/2022 4:02:48 PM

Affiliation

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Please set back off trails to protect our furry family members. Thank you!



Submitted By

April Woods

Submitted On

2/16/2022 1:03:22 PM

Affiliation

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I know of two people who had their dogs seriously hurt by a trap in the Mat-Su. I think it is very wrong to put the interests of low life trappers over the safety of everyone else. I don't think trappers should be allowed on public or private land, they should only be allowed to trap on their own land. You don't allow people to gold dig in public places, or drill for oil or water, so why allow sociopathic people kill innocent animals on public land, it is wrong, it is dangerous and the innocent lose as the evil win, it is just more bad government.

Submitted By
Yvette Galbraith
Submitted On
2/18/2022 3:01:03 PM
Affiliation



PC342
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It is time for 50 foot set backs for trapping on ALL trails. And especially in campgrounds, parks, multiuse trails and turn outs. Time for Alaska Board of Game to consider all user groups on Alaska lands. Also time for trappers to have ids on their traps to be accountable. This would help regulate the few who are screwing it up for the others.