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**ALASKA BOARD OF GAME**  
**Southcentral Region Meeting**  
Soldotna | March 17-22, 2023

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**The following comments did not include proposal numbers or community of residence: .....**  
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They are available for viewing on the meeting information webpage at:

<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=03-17-2023&meeting=kenai>



PC001

**Submitted by:** Denise Abel

**Organization Name:**

**Community of Residence:** Eagle River AK 99577

**Comment:**

I support trap set backs

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 147: Support

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Submitted By Greg Acord

Wasilla, Alaska

I support proposal 68

For the past 34 years I've guided hunters on the southwest end of Kodiak Island in the areas where the Kodiak Caribou live, KOD 10, KOD, 11, KOD 14. In the past couple of years there has been a dramatic increase in hunting pressure and harvest of the caribou herd in Kod14. I support proposal 68 to help manage harvest and a healthy caribou herd population.

Proposal 73

Submitted by Greg Acord

Wasilla, Alaska

I support proposal 73.

I've guided hunters on Kodiak Island for 30+ years and have witnessed the Deer population fluctuate due to harsh winter conditions in the past. There has been an obvious decline in the Deer population over the past 3 years, following 2 consecutive harsh winters. I believe reducing the bag limit on Deer will help the population rebound faster than if the limit remains at current level.

Proposal 77

Submitted by Greg Acord

Wasilla, Alaska

I support proposal 77 as amended.

I've guided bear hunters on Kodiak Island for 30+ years. During the 1994-2006 seasons when guides were only allowed to harvest male bears or lose a permit the following year, myself and I believe most Kodiak guides looked at and studied all available information on how to determine the sex of a Brown Bear. Determining the sex of most Brown Bears is not an exact science or easy to do. While in the field I observe bears almost every day that I can't determine if they are male or female.

I fully support proposal 77 but think it's only logical that all non-guided hunters and new assistant guides be required to view the "Take a closer look" video and any other relevant education the Kodiak Fish and Game department can provide before going in the field. Without some education/information it's not possible for even the most seasoned hunters to determine the sex of most Brown Bears observed in the field.

I believe that a small percent of hunters will harvest any bear observed on a Kodiak hunt because they believe that this may be a once in a life time hunt and would rather harvest a female than not harvest a bear. As an incentive for all hunters to harvest male bears, any hunter that harvests a female and eliminates a permit for the following year, his or her name should be posted in the next years Draw application. If a non-resident guided hunter harvests a female his name and the guides name should be posted.



## Proposal 78

Submitted By Greg Acord,

Wasilla, Alaska

I oppose Proposal 78

I have been an Alaskan resident since 1985 and have applied many years for a Kodiak Brown bear permit. I have also been directly involved in guiding Brown Bear hunters on Kodiak Island since 1988 and have witnessed many changes in the way the bear permits are issued. I believe the system currently in place is working well and is beneficial in supporting the successful Fish and Game Brown bear management plan and a healthy Brown Bear population.

The Brown bear population on Kodiak Island is one of the best managed wildlife populations in the world.

The Fish and Game Brown Bear management plan on Kodiak Island has been working exceptionally well for decades. Allowing a sustainable harvest while maintaining a thriving healthy population of an incredible resource, the Brown Bear. The formula that allows both resident and non-resident guided hunters to harvest Brown Bears is a delicate balance. That considers how many hunters can participate in the hunts, how many and what sex of bears can be harvested to maintain a thriving population.

One of the objectives in the F and G Brown Bear management plan is to have at least a 60% male bear harvest, this goal has consistently been maintained for decades using the current formula of 40% non-resident guided hunters and 60% Alaskan resident hunters.

On average 36% of bears harvested by resident hunters are female and 17% of bears harvested by non-resident guided hunters are female. On average 55% of resident tags issued are utilized, 45%, of the hunters do not pick up the permits. 90% of the non-resident guided tags are utilized, 10% of hunters do not pick up the permits. These statistics all contribute to the formula that makes the Brown Bear management plan so successful.

Please note: The statistics used above are from the Kodiak department of fish and game. They are currently putting together the past couple of years data so these



numbers may change slightly in the future, the F and G did not expect them to change much as these numbers have remained consistent for many years.

Considering the statistics above, it is logical to conclude that any scenario in the permitting process that allows more resident hunters and less non-resident guided hunters in the field will ultimately result in a higher harvest of female Brown bears. This will have a negative impact on the Brown Bear population and the F and G Brown Bear management plan. The goal of Proposal 78 is to increase resident bear permits and decrease non-resident guided permits. For this reason, I oppose proposal 78.

The authors of proposal 78 are concerned that non-resident guided hunters on the federal land of Kodiak National Wildlife Refuge do not pay the \$5 application fee or apply for a permit through the draw application process.

An Alaskan resident hunter must purchase a \$45 hunting license before applying for the draw and pay a \$5 application fee for each hunt applied for. They may apply 6 times for the same species for a max. \$75. If successful they must also purchase a \$25 Brown bear/Grizzly metal locking tag.

Total \$100 revenue to State of Alaska. \$280 using Pittman-Robertson fund.

A non-resident guided hunter is required to send the department of Fish and Game a Guide Client Agreement prior to hunting on Kodiak National Wildlife refuge. They must purchase a \$160 Non-resident hunting license to complete the Guide Client Agreement. They must also purchase a \$1000 Brown bear/Grizzly metal locking tag prior to hunting. When hunting on KNWR they must also pay a \$22.21 daily user fee to the U.S. Fish and Wildlife service.

Total \$1160 revenue to State of Alaska. \$4,640 using Pittman-Robertson fund.

Total \$22.21 for 1 use day and up to \$333.15 if they hunt all 15 days of the permit, revenue to U.S. Fish and Wildlife service.

Please note: The income generated thru License fees and Locking tag purchases to the State of Alaska can be matched with federal dollars at a ratio of 1:4 using Pittman-Robertson Funds. For example, if the state generates \$1160 from a non-resident guided Kodiak bear hunter, that \$1160 equates to \$4,640 income for the state of Alaska. An Alaska resident Kodiak bear hunter generates \$280 income for the state of Alaska using the Pittman-Robertson fund. I don't think the Draw application fees are eligible for matching funds but could be wrong. The bottom



line is, with the matching funds of the Pittman-Robertson funds, 1 non-resident guided Kodiak bear hunter generates more income for the state of Alaska than 16 Alaskan resident Kodiak bear hunters.

The authors of proposal 78 are also concerned that the draw hunt supplement results do not show the DB100 series Non-resident guided hunters' utilization of the available permits in the hunt areas within the Federal land of KNWR.

If the information from the Guide Client Agreement that all non-resident guided hunters on KNWR are required to complete is included in the Draw hunt results, this would remedy any confusion about the Draw results.





## Proposal 79

Submitted By Greg Acord,

Wasilla, Alaska

I oppose Proposal 79

I have been an Alaskan resident since 1985 and have applied many years for a Kodiak Brown bear permit. I have also been directly involved in guiding Brown Bear hunters on Kodiak Island since 1988 and have witnessed many changes in the way the bear permits are issued. I believe the system currently in place is working well and is beneficial in supporting the successful Fish and Game Brown bear management plan and a healthy Brown Bear population.

The Brown bear population on Kodiak Island is one of the best managed wildlife populations in the world.

The Fish and Game Brown Bear management plan on Kodiak Island has been working exceptionally well for decades. Allowing a sustainable harvest while maintaining a thriving healthy population of an incredible resource, the Brown Bear. The formula that allows both resident and non-resident guided hunters to harvest Brown Bears is a delicate balance. That considers how many hunters can participate in the hunts, how many and what sex of bears can be harvested to maintain a thriving population.

One of the objectives in the F and G Brown Bear management plan is to have at least a 60% male bear harvest, this goal has consistently been maintained for decades using the current formula of 40% non-resident guided hunters and 60% Alaskan resident hunters.

On average 36% of bears harvested by resident hunters are female and 17% of bears harvested by non-resident guided hunters are female. On average 55% of resident tags issued are utilized, 45% of the hunters do not pick up the permits. 90% of the non-resident guided tags are utilized, 10% of hunters do not pick up the permits. These statistics all contribute to the formula that makes the Brown Bear management plan so successful.

Please note: The statistics used above are from the Kodiak department of fish and game. They are currently putting together the past couple of years data so these



numbers may change slightly in the future, the F and G did not expect them to change much as these numbers have remained consistent for many years.

Considering the statistics above, it is logical to conclude that any scenario in the permitting process that allows more resident hunters and less non-resident guided hunters in the field will ultimately result in a higher harvest of female Brown bears. This will have a negative impact on the Brown Bear population and the F and G Brown Bear management plan. The goal of Proposal 79 is to increase resident bear permits and decrease non-resident guided permits. For this reason, I oppose proposal 79.



**Submitted by:** Justin Adolf

**Organization Name:**

**Community of Residence:** Kenai, Alaska

**Comment:** I support proposals 106 and 107, allowing moose hunting from motorized vehicles for the entirety of the moose hunting season. I would like it to be allowed for all hunters though. I happen to know for a fact that the horse only regulations were made by self serving board members who liked to hunt the rut without competition. There is plenty of land in unit 15C that is ONLY huntable from horses in the first place. Many people who live and work in Alaska and work in the oil industry work 2/2 or 3/3 weeks on and off, and could miss the entire season under the current rules. The current bull to cow ratio suggests that this would not be detrimental.

I do support proposal 118, allowing the taking of forked horn moose. From my experience, there are very few spikes but plenty of forks during hunting season. I would have been done hunting on opening day had I been able to shoot one of the several forks I saw.

I do not support opening up unit 15C to an early bowhunting season. Maybe bowhunting has its applications in urban areas, but I feel it is a special interest group trying to get priority. If you want to hunt with a bow that's fine and noble, but you shouldn't get your own special season. Actually, bowhunting after regular season while the moose are in rut would seem like a more favorable idea.

I do not support proposal 129. I do not believe in harvesting cow moose. The current cow to bull ratio doesn't support it either.

I do support proposal 132, considering that the wrong person looking at your moose rack can determine it's illegal when 9 out of 10 people would agree that it was legal.

I strongly support proposal 162, returning ptarmigan hunting to the traditional season. I do not know who changed the rules or why, but I have spent the majority of my life recreating in the Caribou Hills (starting in 1978, when I was 4) and I have never seen ptarmigan more abundant than they are today. After the forest fire in 2007, the habitat changed. Ptarmigan used to only breed up on the tundra before the fire, but now they breed all across the 80,000 acres that burned and grew back with willows. We used to never see them in the Caribou Hills area in summer, but now they are as common if not more common than Spruce Grouse on the trails in the summer and fall. I had a flock of about 30 wandering around the valley in front of my cabin last weekend! I suspect someone got offended by watching the Kilchers hunt them on tv and made the rule change to exclude hunting via snowmobiles. This does not serve the goal of allowing for ample opportunity to harvest wild game on state and federal lands, but furthers my suspicion that some people making the rules up are going by emotions instead of scientific facts, like ptarmigan abundance. Very few people who snowmachine in the Caribou Hills area of 15C even hunt ptarmigan. But those who do don't abuse it. Thank you for your time.

Justin Adolf

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 106: Support with Amendment Proposal 107: Support with Amendment Proposal 118: Support Proposal 119: Oppose Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose Proposal 125: Oppose Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Oppose Proposal 129: Oppose Proposal 130: Support Proposal 132: Support Proposal 133: Oppose Proposal 134: Support Proposal 135: Support Proposal 136: Support Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 162: Support Proposal 163: Support

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# Ahtna Intertribal Resource Commission

PO Box 613 – Glennallen, Alaska 99588

Phone: (907) 822-4466 Fax: (907) 822-4406

[www.ahtnatribal.org](http://www.ahtnatribal.org)

[connect@ahtnatribal.org](mailto:connect@ahtnatribal.org)



PC 004

March 3, 2023

Alaska Board of Game  
c/o Kristy Tibbles, Executive Director  
P.O. Box 115526 Juneau, AK 99811-5526

Submitted electronically via [adfg.alaska.gov](https://adfg.alaska.gov) and email to [kristy.tibbles@alaska.gov](mailto:kristy.tibbles@alaska.gov)

## **Re: Comments for the March 17-22, 2023 Southcentral Regional Meeting**

To the Members of the Alaska Board of Game:

The Ahtna Intertribal Resource Commission is comprised of eight State and Federally recognized tribes and two ANCSA corporations and represent approximately 5,000 tribal citizens. The Ahtna Traditional Use Territory includes the game management units 11, 13 and portions of 12 and 20. The residents and tribal citizens of the eight villages and our neighbors depend on moose and caribou to feed their families.

Below you will see our comments on proposals 173, 174, 175, 187, and 207 coming before the Board of Game at their March 17-22, 2023 meeting.

### **Proposal 173 – Reauthorizing antlerless moose season in 13A**

AITRC opposes proposal 173, which would reauthorize the antlerless hunt in 13A. Currently, the moose population is estimated at 146 animals above the midpoint of management objectives. However, because we do not know the standard error for this estimate, it is not clear that moose populations are *significantly* above the midpoint of management objectives, as directed by the BOG. There was no reported data on the twinning rates to indicate that the habitat cannot sustain the current population. Environmental factors, such as heavy snow, could quickly reduce the population to within or below management objectives within a single year.

Based on the seasons specified in this proposal, it is extremely likely that the targeting of cows will occur. From a conservation standpoint, one challenge with antlerless hunts is that some of the cows that are killed may be pregnant, effectively increasing the impact of these harvests on the following year's moose population. Cows harvested may also have calves with them, the killing of which would orphan the calves.

It appears that these cow hunts are being used as a tool to keep within the bull:cow ratio while maintaining current levels of bull harvest; if there is no indication that habitat is declining, there should be no actions taken. Although subsistence is supposed to have priority allocation, there are currently no subsistence hunts for antlerless moose in Unit 13.

**Proposal 174 – Establish an antlerless season in 13C**

AITRC is opposed to proposal 174, which would establish an antlerless season in Unit 13C. Although moose are currently above the midpoint of management objective in Unit 13C, they are still at approximately the proper bull-cow ratio. However, according to the ADF&G Area Biologist, the cow-calf ratio is low (15:100 rather than the objective of 30:100).

Because this would be an antlerless hunt drawing permit, it would only provide for non-subsistence uses. Rather than creating a new antlerless hunt in Unit 13C, the Board should instead increase its any-bull allocation to the Community Subsistence Hunt. This would help to ensure that subsistence needs are being met, while also addressing any concerns ADF&G may have about moose populations being above management objectives.

There was no reported data on the twinning rates to indicate that the habitat cannot sustain the current population. Environmental factors, such as heavy snow, could quickly reduce the population to within or below management objectives within a single year.

It appears that these cow hunts are being used as a tool to keep within the bull:cow ratio while maintaining current levels of bull harvest; if there is no indication that habitat is declining, there should be no actions taken.

**Proposal 175—Antlerless hunt in 13E**

AITRC opposes proposal 175, which would establish an antlerless hunt in Unit 13E. The bull-cow ratio is currently at management objectives. The harvest objective is below the management objective. However, because we do not know the standard error for this estimate, it is not clear that moose populations are *significantly* above management objectives. Environmental factors, such as heavy snow, could quickly reduce the population to within or below management objectives within a single year. Additionally, there is the potential for more train fatalities.

Looking at the most recent IM report for Unit 13, it states that twinning rates within 13E were high between 2018-2020 even with the population being above objective since 2014 leading us to believe that the population is not nutritionally stressed.

Although subsistence is supposed to have priority allocation, there are currently no subsistence hunts for antlerless moose in Unit 13.

Finally, we are concerned that these cow hunts may create a conservation concern that could result in restrictions on ceremonial moose harvest.

**Proposal 187 – reauthorize brown-bear tag fee exemption**

AITRC supports this proposal, as it would remove some of the barriers to participation in brown bear harvests. In addition, the tag fee exception would allow rural residents to defend life and property without dealing with compliance issues as it would be a legal harvest. Brown bear populations within units 11 and 13 are assumed to be healthy at this time and we are not aware of any conservation concerns that this proposal would negatively impact.

**Proposal 207 – Establish a Tier II hunt for Nelchina caribou in Unit 13**

In the Summer of 2021, the Nelchina Caribou Herd was estimated at 38,400. The state harvestable surplus was set at 1,250 and no winter hunt was authorized with a 2021 fall estimate of 35,500 animals. The Nelchina Caribou Herd was assessed prior to the 2022 hunting season at roughly 21,000 animals, a reduction of 14,500 animals. It was stated that due to severe winter conditions and a late spring thaw a higher-than-normal adult mortality and low calf recruitment occurred. In addition, it was stated that a small portion did not return from the wintering grounds.

Prior to the 2022 season, the herd was well below the low end of the population objective of 35,000-40,000. During the season there was a recorded harvest of 518 animals (84 draw harvest and 434 subsistence harvest) with no winter seasons open. In addition, the federal harvest is ongoing with a total of 121 animals with little to no harvest predicted for the rest of the federal season. After the 2022 fall season closed a population estimate was conducted via aerial surveys with an estimate of 17,433 animals, which is less than half of the lower end of the population objective. Nevertheless, over 3,800 tags were allocated for the 2023 season with an assumed harvestable surplus of at least 600 animals.

If the Board adopts regulations establishing a Tier II subsistence hunt for Nelchina caribou, the regulations should mirror the Tier I subsistence and Community Subsistence Harvest seasons: August 10 to September 20, and October 21 to March 31. The bag limit should be one caribou, and all the harvest requirements for Tier I subsistence hunting should apply to the Tier II hunt. The number of Tier II permits available should be based on (1) the estimated harvestable surplus of caribou in the year that a Tier II hunt is administered and (2) the predicted hunter success rates. ADF&G should apply the precautionary principle to ensure that there is no over-harvest, which would be especially harmful to the sustainability of the population while it is in a recovery phase.

Finally, AITRC also urges the Board to clarify that any member of an established community subsistence harvest group may hunt on behalf of any other group member who received a Tier II permit. Currently, the regulations provide that each group member who subscribes to the community harvest permit “must, if the community harvest hunt area is under a Tier II permit requirement for the species to be hunted, have received a Tier II permit for that area, species, and regulatory year.” 5 AAC 92.072(c)(2)(F). That requirement limits group members from hunting Tier II permits on behalf of other group members, contradicting the Board’s intent in adopting the community subsistence harvest program.

Respectfully,

Karen Linnell, Executive Director  
Ahtna Intertribal Resource Commission

Corporate Headquarters  
PO Box 649  
Glennallen, Alaska 99588  
Office: (907) 822-3476  
Fax: (907) 822-3495



110 W  
An  
Office: (907) 868-8250  
Fax: (907) 868-8285  
PC 005

*Our Culture unites us; Our Land Sustains us; Our People are Prosperous*

February 28, 2023

Alaska Board of Game  
c/o Kristy Tibbles, Executive Director  
P.O. Box 115526  
Juneau, AK 99811-5526

*Submitted electronically via [adfg.alaska.gov](http://adfg.alaska.gov) and  
email to [kristy.tibbles@alaska.gov](mailto:kristy.tibbles@alaska.gov)*

**Re: Comments for the March 17-22, 2023 Southcentral Regional Meeting**

To the Members of the Alaska Board of Game:

Ahtna, Incorporated ("Ahtna") is an Alaska Native Regional Corporation formed under the Alaska Native Claims Settlement Act. Ahtna's more than 2,000 Ahtna Athabascan shareholders include many residents and tribal members from eight villages in the southcentral and interior region of Alaska, centered on the Copper River Basin. These Native Village residents continue to live a customary and traditional hunting and fishing way of life. Ahtna has managed its land and resources, including moose and caribou populations in its traditional territory, since time before memory.

Ahtna submits the following comments on Proposals 173, 174, 175, 187, and 207 currently under consideration before the Board.

**Proposal 173**

**Reauthorize the antlerless moose seasons in Unit 13A.**

**COMMENTS:**

Ahtna opposes Proposal 173 to reauthorize the antlerless moose season in Unit 13A.

This drawing hunt for cows does not provide for subsistence opportunities. To reauthorize this hunt, the Board must at least make a finding that the harvestable portion of the population is sufficient to provide for subsistence uses and some other consumptive uses. AS 16.05.258. The Board has not made such a finding, and it should not.



The recent 2021-2022 and 2022-2023 high snow levels have weakened the population numbers.

Unit 13A currently has no surplus of moose; the population is currently within ADF&G's management objectives. This indicates that ADF&G does not need another tool in their management toolbox at this time.

If exceeding management objectives becomes an issue, ADF&G can submit a similar proposal at a future time. Reauthorizing this hunt will result in cows being harvested, which could likely destabilize the population.

The ADF&G management objectives for Unit 13A is 3,500–4,200, and the 2022 Moose Abundance for Unit 13A is 3,621; this is a 21% drop in population from 2021. There is another heavy snow winter this year and the population is at risk of dropping more due to heavy snow and already stressed animals going into the winter from last year's bad winter. It is not a good time to liberalize management practices.

#### **Proposal 174**

#### **Reauthorize the antlerless moose seasons in Unit 13C.**

#### **COMMENTS:**

Ahtna opposes Proposal 174, which would establish an antlerless season in Unit 13C. Although moose are currently above management objectives in Unit 13C, they are still at approximately the proper bull-cow ratio.

Because this would be an antlerless hunt drawing permit, it would only provide for non-subsistence uses. To authorize this hunt, the Board must at least make a finding that the harvestable portion of the population is sufficient to provide for subsistence uses and some other consumptive uses. AS 16.05.258. The Board has not made such a finding, and it should not.

There was no reported data on the twinning rates to indicate that the habitat cannot sustain the current population. Heavy snow as seen during the 2021-2022 and 2022-2023 winters could easily reduce the population to within or below management objectives before longer term population dynamics are known.

It appears that these cow hunts are being used as a tool to keep within the bull:cow ratio while maintaining current levels of bull harvest; if there is no indication that habitat is declining, there should be no actions taken.





The ADF&G management objectives for Unit 13C is 2,000–3,000, and the 2022 Moose Abundance for Unit 13C is 2,943. While this population is holding near the upper management objective in 2022, adjacent GMUs are experiencing severe population declines due to heavy snow that may affect Unit 13C this year.

**Proposal 175**

**Reauthorize the antlerless moose seasons in Unit 13E.**

**COMMENTS:**

Ahtna opposes Proposal 175, which would establish an antlerless hunt in Unit 13E. The bull-cow ratio is currently at management objectives. The harvest objective is below the management objective.

Although subsistence is supposed to have priority allocation, there are currently no subsistence hunts for antlerless moose in Unit 13.

Further, to reauthorize this hunt, the Board must at least make a finding that the harvestable portion of the population is sufficient to provide for subsistence uses and some other consumptive uses. AS 16.05.258. The Board has not made such a finding, and it should not.

Heavy snow conditions that we have experienced in 2021-2022 and 2022-2023 winters have had an impact on populations without known long term effects.

We are concerned that these cow-hunts may create a conservation concern that could result in restrictions on ceremonial moose harvest in the future.

The ADF&G management objectives for Unit 13E is 5,000–6,000, and the 2022 Moose Abundance for Unit 13E is 5,273. This is a 16% drop in population in one year due to heavy snow and very close to the minimum management objective. This year is another heavy snow year and the moose are stressed and not making it. It is not a good time to liberalize management practices.

**Proposal 187**

**Brown bear tag fee exemption.**

**COMMENTS:**

Ahtna supports Proposal 187. It will help with brown bear management in a way that benefits our area. The tag fee exemption improves the chance to take a brown bear opportunistically. This allows better management, reduces public safety concerns, reduces



property damage, and assists with increased survival of moose and caribou calves. The bear population and bear harvest are both improved by allowing increased opportunistic taking of problem bears that often prey on other bears.

**Proposal 207**

**Establish a Tier II hunt for Nelchina caribou in Unit 13.**

**COMMENTS:**

Ahtna opposes Proposal 207. Ahtna urges the Board to protect and sustain the Nelchina caribou population by ensuring that no hunting occurs until the herd fully recovers to within population objectives. Ahtna understands that foregoing subsistence hunting opportunities in the 2023-2024 season, at least, will be a hardship for Ahtna's shareholders, members of the Ahtna tribes, and others who depend on subsistence caribou. But there are overwhelming concerns regarding the sustainability of the Nelchina caribou herd.

Although subsistence hunting is vital to Ahtna's shareholders, the Nelchina caribou herd cannot sustain the current levels of hunting. The Board has set a management objective for the Nelchina herd of 35,000 to 40,000 caribou remaining after each fall hunting season. In previous years, the herd was at a stage of relative abundance. Between 2012 and 2016, the herd size ranged from 37,257 to over 50,000 caribou. This period of abundance continued through 2021, when the herd size was an estimated 38,400 caribou. During this time period, the intense hunting pressure and competition among hunters for Nelchina caribou continued to increase.

In 2022, the Nelchina herd collapsed. ADF&G's summer 2022 estimate was below 21,000 caribou. According to ADF&G's July 14, 2022 Advisory Announcement, the severe winter conditions and a late spring thaw resulted in higher than normal adult mortality and low recruitment of calves into the population. Changing climatic conditions also contributed to a late spring migration and a portion of the herd that did not return from wintering grounds. Although many of those environmental conditions are beyond ADF&G's control, ADF&G failed to implement any increased conservation measures to mitigate the changing conditions. The 2022-2023 winter is expected to continue and exacerbate those harsh conditions, resulting in an urgent need to reconsider the management approach for the herd.

The Board and ADF&G have a constitutional obligation to manage the Nelchina herd for sustained yield. The constitutional obligation requires the Board and ADF&G to adopt a precautionary approach to management decisions. When caribou herds enter



periods of precipitous decline, as the Nelchina herd is now, there should be little or no harvest to allow the herd to recover to a sustainable level.

***Ahtna supports a moratorium on all hunting until the Nelchina caribou herd recovers to within population objectives.***

If the Board adopts regulations establishing a Tier II subsistence hunt for Nelchina caribou, the regulations should provide open seasons that mirror the Tier I subsistence and Community Subsistence Harvest seasons: August 10 to September 20, and October 21 to March 31. The bag limit should be one caribou, and all of the harvest requirements for Tier I subsistence hunting should apply to the Tier II hunt. The number of Tier II permits available should be based on (1) the estimated harvestable surplus of caribou in the year that a Tier II hunt is administered and (2) the predicted hunter success rates. ADF&G should apply the precautionary principle to ensure that there is no over-harvest, which would be especially harmful to the sustainability of the population while it is in a recovery phase.

Finally, Ahtna also urges the Board to clarify that any member of an established community subsistence harvest group may hunt on behalf of any other group member who received a Tier II permit. Currently, the regulations provide that each group member who subscribes to the community harvest permit “must, if the community harvest hunt area is under a Tier II permit requirement for the species to be hunted, have received a Tier II permit for that area, species, and regulatory year.” 5 AAC 92.072(c)(2)(F). That requirement limits group members from hunting Tier II permits on behalf of other group members, contradicting the Board’s intent in adopting the community subsistence harvest program.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicholas Jackson".

Nicholas Jackson, Chair  
Ahtna Tene Nené Customary and Traditional Committee  
Ahtna, Incorporated



PC006

**Submitted by:** Zack Walters

**Organization Name:** Alaska Clearwater Sportfishing Inc.

**Community of Residence:** Cooper Landing, Ak

**Comment:**

Ethical standards of multi-use areas should include the safety of humans and there company. Trapping animals is an ancient method of harvesting wildlife and creates too much suffering of wildlife to be considered ethical means of harvest. Not to mention I have had many friends in the town of Cooper Landing have there dogs be caught in traps that are too close to the trails used by the local community.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147:  
Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152:  
Support Proposal 153: Support Proposal 154: Support

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PC007

**Submitted by:** alexander kime

**Organization Name:** Alaska Horsemen Trail Adventures

**Community of Residence:** cooper landing, alaska

**Comment:**

I support proposals #146 through #154 with possible amendments. It is time we look at these areas of concern just like we do with mangageing each stretch of the Kenai River as well as all the other rivers for fishing. I recomend stepping up the regulations to include concerned trapping areas and treat each one with common sense trapping regulations. Some traps may be ok, others not so. Set backs should be looked at for each concerned area and should make sound sense for all users. It's time to fatten up the trapping book as we have come to that point where we need more regulations.

I am a business owner in Cooper Landing as well as a trail user. I am also on the advisory game board committe in Cooper Landing; however my comments are my own.

Thank you for looking at this and hopfully solving the problem for all user groups.

Sincerely,

Alex Kime

Alaska Horsemen Guest Ranch

cell/text

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support with Amendment Proposal 146: Support  
with Amendment Proposal 147: Support with Amendment Proposal 148: Support with Amendment Proposal 149: Support  
with Amendment Proposal 150: Support with Amendment Proposal 151: Support with Amendment Proposal 152: Support  
with Amendment Proposal 153: Support with Amendment Proposal 154: Support with Amendment

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**Alaska Outdoor Council written comments on Board of Game proposals  
for SC Region March 2023 Meeting.**

Proposal 55. Do not adopt.

Keep moose harvest at or near the carrying capacity of the habitat in SC.

Proposal 56. Do not adopt.

There is no conservation concerns for black bear in GMU 6, 7, or 15.

Proposal 58. Adopt.

Education goat hunters as to the difference between bully and nanny Mt. Goats is in the best interest of the resource.

Proposal 61. Do not adopt

No conservation concern from current hunter harvest.

Proposal 68. Adopt

Increased monitoring of the harvest of introduced reindeer (now called caribou) population during declining numbers by registration permit is reasonable.

Proposal 69. Do not adopt.

Keep the genetic differences between Rocky Mountain elk transplanted on Kodiak Island and Roosevelt elk transplanted on Afognak Island would be advantageous for future relocations of both subspecies.

Proposal 70. Adopt

Anytime the Department feels data would support a less restrictive registration hunt over a drawing permit hunt AOC is supportive.

Proposal 73. Do not adopt.

AOC does not believe deer hunter harvest is the limiting factor in determining the conservation of introduced black tail deer in the remainder of GMU 8. Deer meat provides a food source for many Alaskans but you can only stockpile it in your freezer or after preserving, not on the hoof.

Proposal 74. Do not Adopt.

AOC does not support regulations deviating from current salvage requirements for game meat in 5AAC 92.220. Wanton waste of game meat is against the law, enforce them.

Proposal 78. Adopt.

This proposal could increase resident brown bear hunting opportunities for Alaskans without disrupting the current drawing regime, unless sow harvest suddenly increases.

Proposal 81. Do not Adopt.

This is an anti-trapping proposal that does not currently address a conservation or public safety issue.

Proposal 106. Adopt.

ATV use hunting moose in GMU15C should be allowed.



Proposal 108. Adopt.

Registration hunts for Dall sheep in GMU7 - 15 would give the Board a better idea of the amount of hunter participation and demand.

Proposal 109. Do not adopt.

Close Dall sheep hunting in GMU15. Full curl regulations prevent over harvest of Dall sheep.

Proposal 118. Do not adopt.

Including fork antlers back to legal moose harvest in GMU15 depends on current moose population and Bull/Cow estimates. ADF&G collects that data and have determined that the bull forked population of the moose herd still needs a reduction in harvest. We will see if protecting that segment of the bull moose population allows for spike/fork .... hunting regulations in the future.

Proposal 130. Adopt.

Renewing the IM Management Plan for GMU15 depends on current moose harvest numbers and populations estimates are. Current ADF&G moose population and harvest estimates doesn't show a clear trend that either moose populations or harvest objectives will be achieved without implementation of a continuing IM Management Plan.

AOC supports 5AAC 92.118 with ADF&G's recommended changes.

Proposal 131. Adopt

Reauthorize Antlerless moose hunts on Kalgin Island is essential sense it is a predator free zone.

Proposal 133. Do not adopt.

Taking of black bear from boats in GMU15C does not cause any conservatism concerns.

Proposal 136. Adopt.

Extending season for brown bear registration hunts in GMU7-15 could reduce brown bear conflicts with people and still not create any conservation concerns.

Proposal 143. Do not adopt.

Reducing distance between bait stations and structures is not in the State's best interest at this time do to current federal litigation regarding "who" makes the hunting regulations for Non-Federally Qualified Subsistence users on federal lands. Getting eaten by a grizzly bear who was food conditioned to eating donuts is a real fear for some who may feel safer if they knew no bears were eating human food around a structure, cabin.

Proposal 144. Adopt.

There is no reason why the Board could not more clearly define what is required of a structure to be classified as a permanent dwelling in GMU7 and 15. Nor what a developed recreational facility constitutes.

The Kenai Peninsula is easily accessible to 75% of Alaskan, that alone justifies greater clarity for both hunters at bait stations and the public. It's unreasonable that this proposal would need to go statewide, no other part of the state has the number of folks to have outdoor conflicts as does the Kenai Peninsula due to it's location and road accessibility to hundreds of thousands of users.

Proposal 145. Do not adopt.

This proposals is an unnecessary for conservation restrictions by an anti-trapping NGO whose goal for years has been to ban trapping. Passage of this proposal would be inconsistent with Article 8 of the Alaska State Constitution.



Proposal 146, 147, 148, 149, 150, 151, 152, 153, 154, and 155. Do not adopt.  
All these proposals are unnecessary restrictions on regulating trapping on the Kenai Peninsula.

Proposal 161. Adopt.

While the Board most likely does not have the authority to transplant game species, black tail deer, it would be worth showing public support to increase accessible game harvest for Alaskans.

Proposals 162 - 172. ?  
in Kachemak Bay area. GMU15(C)

Proposals 173 - 185. ?

Reauthorization of antlerless moose depends on the most recent populations figures for moose populations. AOC expects a lot of that data will be presented before the board deliberates on these proposals and will monitor moose population estimates as it is made available.

Proposal 200. Do not adopt.

Special moose season for Alaskan's 65 years or older, close to the rut (September 26-30), are unnecessary for achieving moose harvest objectives in SouthCentral Region.

Proposal 204. Do not adopt.

Full curl harvests restrictions on Dall sheep assures that the species is being managed on a sustainable basis, closures to any Dall sheep hunting in GMU19C are unnecessary.

As far as gaining public support, having the Alaska Board of Game submit their own proposals doesn't help. Even if the state attorneys have no problem with the board submitting their own proposals it's bad public relations.

Proposal 206. Adopt.

Keeping the current IM plan active in GMU21(E) allows the department to be able to implement a plan should the moose population decline.

Proposal 207. Adopt.

Establishing a Tier II hunt in regulation for the Nelchina Caribou herd is required by statute whenever the harvestable surplus of caribou falls below, the amount necessary for subsistence.

Proposal 200. Do not adopt.

AOC does not support bull moose hunts during the high potential time of coming into the rut.



# ALASKA

## PROFESSIONAL HUNTERS ASSOCIATION, INC.



PC 009

P.O. Box 240971 ~ Anchorage, AK 99524

Phone: (907) 929-0619

Email: [office@alaskaprohunter.org](mailto:office@alaskaprohunter.org) ~ [www.alaskaprohunter.org](http://www.alaskaprohunter.org)

March 3rd, 2023

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the March meeting in Soldotna. 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"><li>• 91.8 Million total economic output (2019)</li></ul>	<ul style="list-style-type: none"><li>• 57.4 Million <b>new</b> dollars to Alaska (2019)</li></ul>
<ul style="list-style-type: none"><li>• 59% of guide industry spending occurs in <b><u>rural</u></b> areas (2019)</li></ul>	<ul style="list-style-type: none"><li>• 1,380 people directly employed, total employment with multipliers; 1,890 (2019)</li></ul>
<ul style="list-style-type: none"><li>• 85% Active Guides are AK Residents (2019)</li></ul>	<ul style="list-style-type: none"><li>• Visiting hunters (guided &amp; non-guided) purchase 14% of total Alaska hunting licenses (2019)</li></ul>



<ul style="list-style-type: none"><li>• Guided nonresidents represented only 3% of current licenses but 30% of License/tag revenue</li></ul>	<ul style="list-style-type: none"><li>• Visiting hunters (guided &amp; non-guided) contribute 76% of total revenue to the ADFG wildlife conservation fund (2019)</li></ul>
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## **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 Region II 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 20 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 63- OPPOSE**

APHA opposes changing the Unit 6 brown bear season based on the stated conservation concerns by the department.

**Proposal 65- OPPOSE**

APHA opposes proposal 65 based on the stated conservation concerns expressed by the department.

**Proposal 75- OPPOSE**

The APHA opposes prop. 75 because changing the bag limit in unit 8 to count wounded against the one every four-year bag limit on a unit basis will complicate bag limits greatly when hunters hunt in units without the same restriction. If this proposal is considered it should be considered as a statewide proposal. The APHA opposes supports ethical hunting and minimizing wound loss but opposes this proposal due to the complexities it will cause for hunters who hunt in Unit 8 but may then choose to hunt in another unit in the state.

**Proposal 77- SUPPORT**

The APHA supports this proposal because this restriction is incorporated in the Kodiak brown bear management plan. We urge the board to carefully review the harvest and hunter effort data to ensure data supports implementing of this portion of the management plan. If the data requires it restrictions on bear allocation should be put in place as recommended in the agreed upon management plan.

**Proposal 78- OPPOSE**

The APHA strongly opposes Prop. 78 because it will remove an important consumer protection for guided hunters who must cancel their hunt for family or health reasons. The effect of Prop. 78 will be to do away with the "alternate list" that was created to allow guides who have a state required contract with a client to seek a replacement IF an unforeseen event occurs and the hunter can no longer accept the tag or participate in the hunt. Guided hunts are reserved with a significant deposit with full funds due in a set timeframe before the beginning of the hunt. While rare, there are situations where a client must cancel their hunts. During our teleconference leading up to filing these comments guides shared personal stories of hunters who canceled due to terminal cancer, cancer treatments, deaths in the family or sudden terrible health conditions. The alternate list that is used currently allows a guide to refund the money from a hunt to a client if one of these tragic events occurs.

Passage of Prop. 78 will cause undo and unnecessary harm to hunters who intended to hunt on Kodiak but for reasons beyond their control can no longer do so. This proposal is unnecessary and harmful to hunters who through no fault of their own cannot participate in the hunt they booked. This proposal will cause guides to either forgo committed hunts or keep deposits, as they may legally do, without the option of filling the hunt and issuing a refund to their client or their surviving family.



Proposal 78 is punitive and unnecessarily harmful to hunters. Proposal 78 does not achieve a desired conservation outcome and will result in significant cost to the public.

### **Proposal 79- OPPOSE**

The APHA opposes Prop. 79 because it will result in the transfer of allocation from one pool of hunters to another based on prior year participation. If this proposal is passed it will treat similarly positioned hunters and allocations differently. For instance, un-used resident tags or opportunities will not be transferred to nonresident allocations as the proposal is written. If the board seriously considers the proposal and mirrored treatment of unused resident tags and resulting increase in nonresident opportunities should be considered.

Transfer of guided nonresident opportunity to resident opportunities will result in different harvest rates of sows and may cause an overall reduction of opportunity in a given drawing area or unit-wide. Prop. 79 should fail as conservation outcomes may be negative and the proposal reduces opportunity in a legally questionable manner.

### **Proposal 80- OPPOSE**

The APHA opposes Prop. 80 because it is unnecessary and counter to the brown bear management plan. Current allocations already are in-line with the proposed allocation in Prop. 80.

### **Proposal 82- SUPPORT**

The APHA supports Prop. 82 based on the comments provided by the department.

### **Proposal 130- SUPPORT**

The APHA supports Prop. 130 based on the departments stated conservation benefits.

### **Proposal 204- OPPOSE/AMMEND**

The APHA recognizes and is concerned about the significant declines in sheep populations across the Alaska Range. Our members report similar declines (50-80% of the population) as the department depending on the specific area. However, the APHA OPPOSES a blanket moratorium on sheep hunting in GMU 19C. Sheep hunter harvest has not driven the decline in the sheep population and our current understanding is that a reduction in full curl harvest will not result in a faster sheep population recovery.

The APHA SUPPORTS amending Prop. 204 to create a group that will generate a western Alaska range sheep management plan based on the following factors:



- Scientific opportunity to study different management strategies after sheep population decline (comparison between areas closed to hunting, fully open and limited harvest)
- Western Alaska Range (WAR) has large tracks of state land with unlimited guiding
- WAR has large tracks of federal and private land where guides are limited
- WAR has a positive customary and traditional finding for a subsistence sheep allocation and priority
- WAR traditionally has high rates of nonresident participation due to remoteness and difficulty of access
- Recent federal actions to close portions of the Brooks Range to sheep hunting
- Predation is significant driver or cause of sheep mortality in some portions of the WAR

Past efforts to develop a statewide sheep management plan have failed. However, management plans for moose, caribou, bison and brown bears have succeeded when confined to smaller geographic areas. The APHA supports developing a management plan that is designed to increase sheep population in the WAR or mitigate risks of severe weather events in the future. This plan should be scientifically supported, and conservation based relying on expertise from department staff. Participation from the major landowners in the WAR to include private and federal stakeholders have the opportunity to alleviate the risk of federal or private actions that unnecessarily reduce opportunity to hunt in the future.

#### **Proposal 206- SUPPORT**



February 21, 2023

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

ATTN: BOG COMMENTS

Dear Chairman and members of the Board:

On behalf of over 1200 members of the Alaska Trappers Association, we wish to share our opinions on several proposals you will be considering at your March Southcentral Region meeting in Soldotna.

**PROPOSAL #64**

The ATA does not take a firm position on this issue. It's complicated. We don't feel that the proposed change in trap size will, by itself, impact any bycatch issue. We defer to the judgement of the Board for any resolution.

**PROPOSAL #81**

This appears to be a workable solution to snare encounters by deer and bears. Breakaway mechanisms have been developed for accidental moose catches in wolf snares. We can support the proposal but it should not be mandated until an appropriate mechanism has been developed.

**PROPOSAL #104**

ATA is categorically opposed to this proposal. It completely ignores the extreme fluctuations in lynx populations and the profound ability of lynx to range over wide areas. The proposal is purely philosophical. Hunting and trapping have little impact on viewing.

**PROPOSAL #145**

ATA deems this proposal unnecessary, at least as far as trapping is concerned. First, these crossings are not going to be completed for a number of years. Second, while these crossings will allow mobility for larger animals, they will not be the magnet that the proposal seems to think they will. Animals may frequent them just like they would any other habitat. To the extent they do get used, they will be used year around. Trapping is not likely to have any significant impact on the resource. Given that project completion is years away, no regulation like this should be imposed until the Department can ascertain the extent that furbearers would use the crossings and if there is actually any significant concentration. It would also be good to know if this is an issue in other states and, if it is, how do they deal with it and is their regulation beneficial?

**PROPOSALS #146 – 153**

ATA opposes these types of restriction. They call for a one-sided fix to a two-sided situation and would unnecessarily eliminate harmless harvest opportunity. Other users (namely, dog owners) have responsibilities also and there are other, less restrictive, ways of avoiding conflict. A combination of education and cooperation can allow coincidental use of these areas by all users. There is a significant amount of trapping opportunity which poses no hazard to people or pets that would be eliminated by



these proposals. ATA's Code of Ethics constantly reminds trappers to not set traps that could pose a threat to pets. We also encourage people to be responsible with their pets.

ATA and the Alaska Wildlife Alliance have been at odds over this issue for the past decade. Leadership from the two organizations met last summer. We agreed to work together on several fronts to reduce or eliminate the problem. Initial steps have been taken this winter. We ask the Game Board to give us time to determine if these actions will prove successful.

#### PROPOSAL #154

The ATA opposes this proposal. Trapline signage can be useful but it should be up to the individual trapper. While signage can be useful on trails that regularly get other traffic, it can also be useful to trapline scoundrels and would serve no purpose in areas that don't get significant multiple use. It could encourage other uses on trails that serve no purpose other than that of a trapline.

#### PROPOSALS #155 and 156

ATA opposes these proposals unless the Department deems them appropriate. A more logical action, which would allow for some harvest, would be to shorten the beaver trapping season back to allow under ice trapping only.

#### PROPOSAL #157

If the Department agrees, ATA believes this would be an appropriate change.

#### Proposal #158

ATA agrees that this would be an appropriate change. Aligning the coyote season with that of most other terrestrial furbearers is logical from the sense of fur quality and bycatch. The same is probably true for the wolf trapping season in Units 7 and 15.

#### PROPOSAL #159

ATA opposes this proposal. Fur quality on September 1<sup>st</sup> is not good. Fur quality on August 10<sup>th</sup> would be abysmal. Also, the taking of females during August could be detrimental to the survival of the young of the year. Trapping, within the established season, should remain the primary means of harvest.

#### PROPOSAL #160

ATA opposes this proposal. We believe that beaver can be better managed by simply manipulating the harvest season. Seasons would certainly be easier to enforce. It doesn't seem logical to limit the take to just half of a breeding pair prior to breeding season. The other half of the pair would not be productive.

Thank you for allowing ATA to participate in the regulatory process.

Sincerely,

Randall Zarnke, president

## **Comments on 2023 Board of Game - Southcentral Region Proposals**

### Proposal 75

Alaska Wildlife Alliance **supports** this proposal, both as it applies for Unit 8 and/or all areas with a one bear every four regulatory year bag limit.

This proposal echoes a 2007 regulation proposed by the Kodiak Fish and Game Advisory Committee and supported by the Kodiak Unified Bear Subcommittee (KUBS) that requires a wounded bear count against a hunter's bag limit. The KUBS is a citizen's group organized to work with natural resource agencies on the Kodiak Archipelago to encourage respectful conservation of Kodiak bears through research, management, and education. The group was created in 2003 as a recommendation of the Kodiak Archipelago Bear Management and Conservation Plan and includes representatives from a wide array of stakeholder groups including conservation organizations, bear hunting and viewing guides, local residents, Native land managers, and air-taxi operators. That regulation was initially adopted to encourage ethical hunting, promote ethical shot selection, and reduce wounding loss. The current regulation continues to be supported by the Kodiak Advisory Committee and the Kodiak Unified Bear Subcommittee and has gained widespread acceptance on Kodiak. Expanding this ethical regulation to areas where bag limits are low for conservation, such as Unit 8, makes sense.

This proposal would likely decrease the number of wounded/dead bears because hunters would be more considerate of shot selection and shot placement. We also agree with ADF&G that hunters/guides may conduct a more thorough and proper search for a wounded bear and apply greater effort in their search. With regards to the concern that this regulation would discourage unscrupulous hunters/guides from reporting a wounded animal, we remind the Board that this regulation is already in place and widely accepted in Kodiak. Bad apples are going to be bad no matter what, but this regulation would reduce unnecessary waste and provide an avenue for accountability.

### Proposal 77

Alaska Wildlife Alliance **supports** this proposal. ADF&G reports that the estimated density of independent bears recorded in 2019 was less than half the estimated mean density of four previous surveys during 1987-2007 and was only 58% of the lowest accepted management target prescribed for southwestern Kodiak Island as identified in the Kodiak Brown Bear Management Plan. While agencies determine the extent that forage quality impacts the bear population, this alarming decline warrants immediate action to reduce brown bear, particularly female brown bear, mortality.

As outlined in the Kodiak Brown Bear Management Plan, and in the interest of managing this important resource for sustained yield, efforts must be made to reduce harvest in areas exhibiting a potential population decline. Because female harvest has direct impacts on recruitment and population sustainability, we support the AC's efforts to reduce female harvest through this proposal.

### Proposal 81

Alaska Wildlife Alliance **supports** this proposal. We share concerns with the proposal authors of the impacts of snares on non-target wildlife and dogs. This proposal would still allow for trapping, but may likely protect non-target wildlife from the most harmful bycatch. It is notable that the



## **Comments on 2023 Board of Game - Southcentral Region Proposals**

Department reports multiple calls of brown bears caught in foot snares initially set to capture foxes. Since 2016 the department has observed and/or handled 2 bears and 2 deer caught in foot snares and has dispatched 2 additional bears due to significant injuries inflicted by foot snares not equipped with breakaway mechanisms. The department also reports that they receive complaints of domestic animals caught in snares along the Kodiak Road System, particularly in popular, high traffic areas. We hope the Board considers these incidents along the Kodiak Road System and the widespread public plea to adopt additional regulations that provide a safety mechanism for non-target species caught in snares.

### Proposal 85

Alaska Wildlife Alliance **opposes** this proposal because there are not enough goats in the area to warrant a new hunt without conservation concerns.

### Proposal 103

Alaska Wildlife Alliance **opposes** this proposal. Habituating brown bears to bait in an area close to the State's largest municipality may increase bear-human conflict. While the bait station would be difficult to access, the author expressly requests this area to expand opportunities for hunters close to Anchorage. The hunt, like the bears this hunt pursues, would also be close to Anchorage and exposed to human food in Chugach State Park. This Park is Anchorage's recreational hotspot, and habituating brown bears to these foods may be a danger to Park visitors.

Further, this hunt would require multiple administrative changes, such as a special use permit to discharge weapons and new hunts for brown and black bears in the area. While there may not be a conservation concern for the bears in this area, concerns over bear-human conflict must be seriously considered.

### Proposal 104

Alaska Wildlife Alliance **supports** this proposal.

### Proposal 109

Alaska Wildlife Alliance **supports** this proposal. ADFG data shows that the population has declined 80% since 1968. Current management using full curl regulations has not prevented this decline. In the interest of sustained yield, we encourage the Board to take any necessary measures to reduce mortality and increase conservation measures, including limiting hunting until there are signs of recovery.

### Proposal 116

Alaska Wildlife Alliance **supports** this proposal, as conserving female goats in the hunt area will provide ongoing opportunity for harvest and clarifying the penalty language may reduce confusion.

## Comments on 2023 Board of Game - Southcentral Region Proposals

### Proposal 130

Alaska Wildlife Alliance **opposes** this proposal. The stated purpose of Proposal 130 is to continue the habitat enhancement and predator control plan first adopted in 2012, but with minor amendments.

This proposal, if adopted, would violate AS 16.05.255(e). The relevant applicable statutory language is as follows:

"The Board of Game shall adopt regulations to provide for intensive game management to restore the abundance or productivity of identified big game populations as necessary..."

The Department makes it clear in Proposal 130 that moose population and harvest goals are being currently met. In other words, there is no evidence of a need to "restore" the abundance of moose, and there is no evidence that it is "necessary" to authorize intensive game management in Unit 15C.

The Department's proposal authorizes extreme measures to take wolves. Those extreme measures include the following:

- A. hunting and trapping of wolves by the public using motorized vehicles [i.e. chasing wolves using snow machines]
- B. public aerial shooting permits issued by the Commissioner under AS 16.05.783
- C. aerial wolf removal by department personnel under AS 16.05.783.

AS 16.05.783 provides for authorization of these extreme measures as part of a predator control program in only two circumstances, described in AS 16.05.783 (a) as follows:

- (1) in regard to an identified big game prey population under AS 16.05.255(g) that objectives set by the board for the population have not been achieved and that predation is an important cause for the failure to achieve the objectives set by the board, and that a reduction of predation can reasonably be expected to aid in the achievement of the objectives; or
- (2) that a disease or parasite of a predator population (A) is threatening the normal biological condition of the predator population; or (B) if left untreated would spread to other populations.

The Department's explanation for its proposal is stated in relevant part as follows:

"The department would like to have the plan [adopted in 2012] reauthorized with predator control and habitat enhancement options. *While Unit 15 C moose population and harvest objectives are currently being met* the department sees a benefit to reauthorizing and updating the plan. Updates to the plan include adding habitat enhancement, which was not the focus in the initial IM plan development. The department's intent is to utilize habitat work to maintain moose populations within objectives."

## **Comments on 2023 Board of Game - Southcentral Region Proposals**

The statutes authorizing intensive game management and extreme measures for controlling wolves do not allow intensive game management, and the use of extreme measures in these circumstances. The mere fact that the Department "sees a benefit" in reauthorization is insufficient grounds for approving an intensive game management plan, with extreme measures for controlling predators. For this reason, the proposal should be rejected in its entirety. We believe this proposal is illegal, and that fact can easily be demonstrated to a court having jurisdiction.

Further, the population objective for 15C that the department seems to have been wrestling with is the low bull to cow ratio; in other words, too many cows. Consequently, 15C has had several years of antlerless hunts in an effort to reduce the proportion of cows in the population. This year, it's DM549, but there are two either-sex moose hunts in the regulations that can be activated if an inadequate number of cows are killed. There's only one predator that disproportionately kills bulls over females, and that's humans, not bears or wolves.

Instead of reauthorizing IM, we encourage more wildlife enforcement in the Caribou Hills, given its hunter density and potential for snowmachine harassment of post-rut bulls.

### Proposal 134

Alaska Wildlife Alliance **opposes** this proposal on the grounds that increasing season length and opportunity will likely increase the chances this hunt is managed by Emergency Order. Upholding the mortality cap for this bear population is extremely important. Given the 5 day reporting requirement and success rate of harvest over bait, we expect that if the season is expanded, the cap will be reached before the end of the season and Emergency Orders will have to become the default management system. This creates confusion for hunters and those tracking this population. We advocate against management seasons that are so long, they almost always require EO actions to maintain mortality caps.

### Proposals 135, 136, 137, 138, 139, 140

Alaska Wildlife Alliance **opposes** these proposals for the same reasons as Proposal 134, but even more so given the 30 day season extension requested in Proposal 140. We do agree that the discrepancy in seasons is not ideal, though for different reasons. Habituating brown bears to bait that is exposed over black bear bait stations is a concern to our membership.

### Proposal 143

Alaska Wildlife Alliance **opposes** this proposal. The existing one mile restriction has been in place for over forty years, and for good reason. One mile is the minimum distance to provide a safe buffer around a bait site to limit interactions between nonhunters and bears. Bears are habitually attracted to bait sites and will check these sites for food even after food is gone. Decreasing the bait distance to human-occupied areas will only increase human-bear conflict and DLPs, particularly around campgrounds, homes and schools.

### Proposal 144

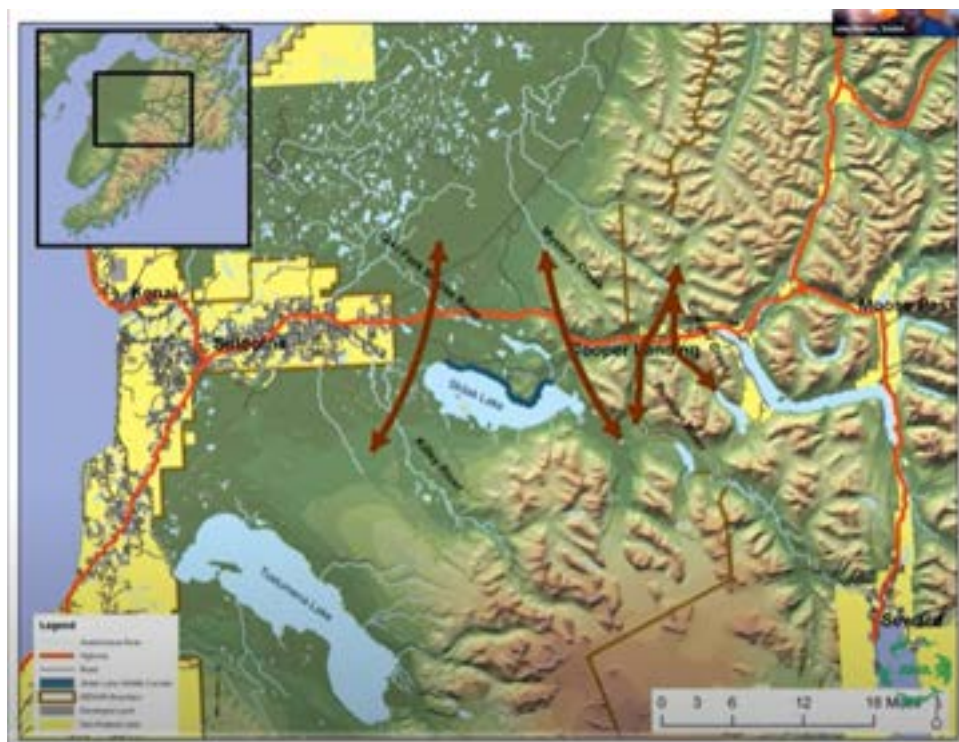
## Comments on 2023 Board of Game - Southcentral Region Proposals

Alaska Wildlife Alliance **opposes** this proposal on the grounds that many “developed recreational facilities” are not maintained by the State but experience extremely high recreational use. Kachemak Nordic Ski Club and the Tsalteshi Ski Trails are just two examples of recreational areas in this GMU that see hundreds of trail users (in all seasons) each day that are not state maintained. Reducing the bait station setbacks near these high-use areas would be extremely dangerous. We would also strongly oppose a Statewide proposal to align recreation facilities to this definition, as this discrepancy would only be multiplied by the dozens of recreational clubs and areas managed by non-state entities.

### Proposal 145

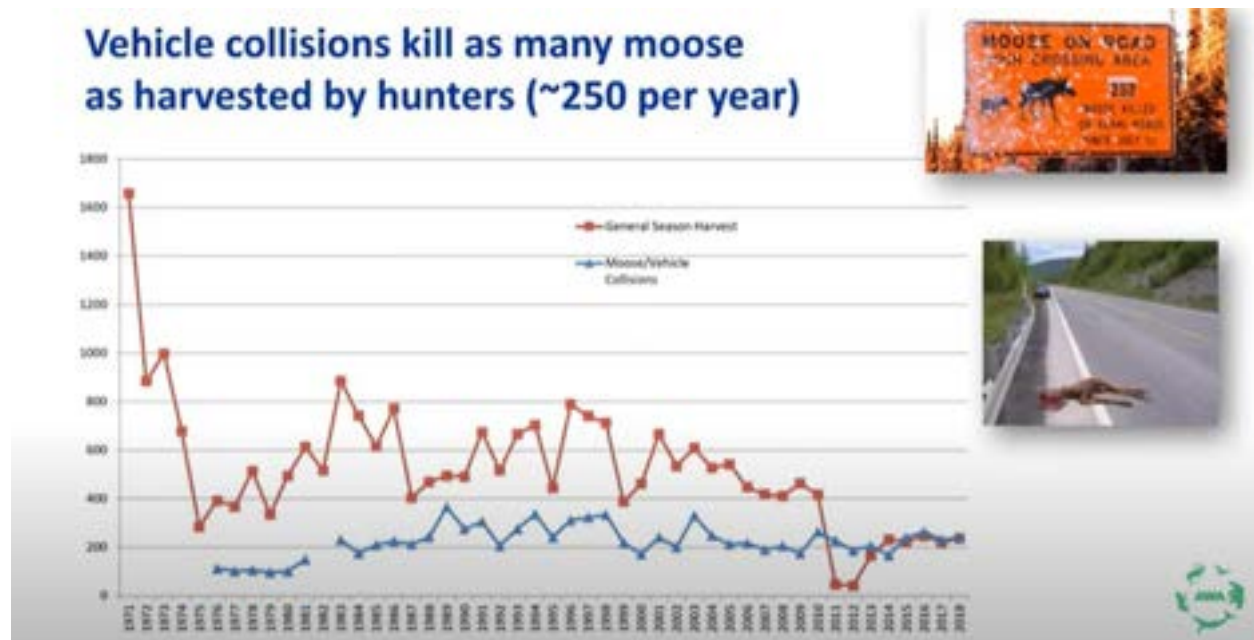
Alaska Wildlife Alliance **supports** this proposal. As ADF&G stated in their comments, once these crossings and their accompanying fences are built, they will “act as bottlenecks for wildlife moving across the highway corridor”. We also echo ADF&G’s statement that these areas could be highly effective and could impact non-target species.

More than \$10 million dollars are budgeted to develop these crossings. Only three landscape-scale corridors remain for north-south wildlife movement (20% of the area historically available), shown in the map below.



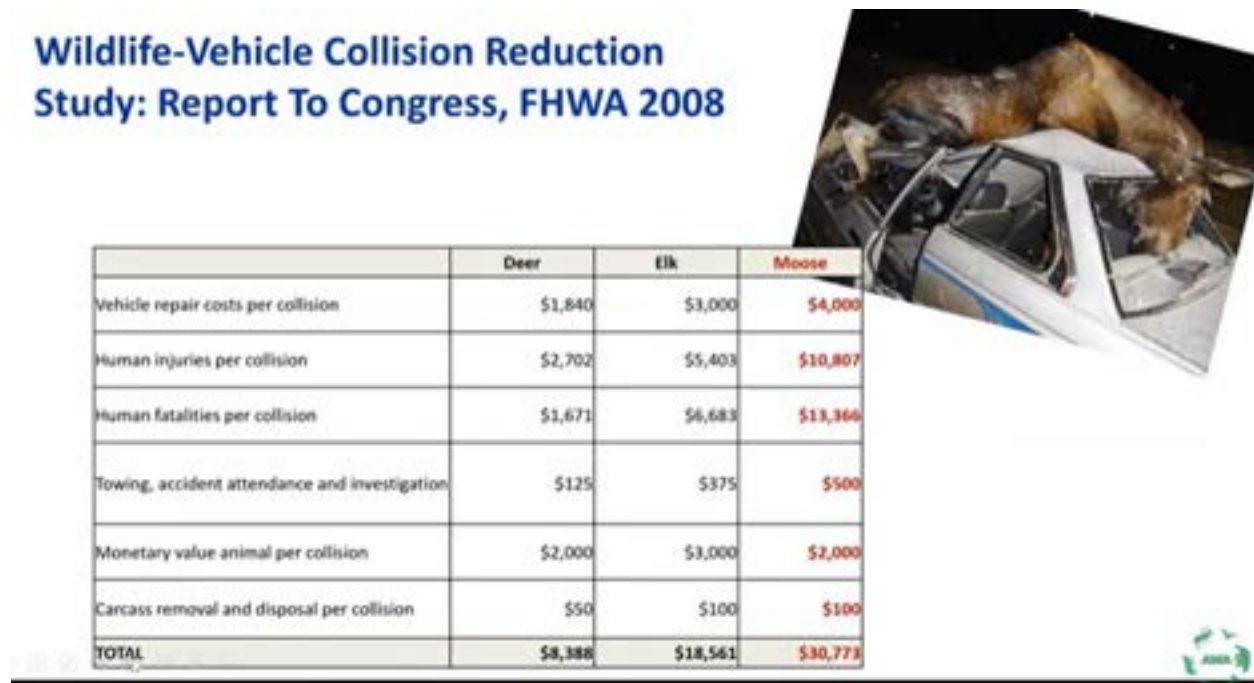
The Sterling Highway bisects these corridors, with ~1.2 million vehicles traveling per year, averaging 2.3 vehicles zooming down the road per minute (averaged over the year, of course summer travel is higher than winter).

Comments on 2023 Board of Game - Southcentral Region Proposals



There are about 10 years where humans killed the same number of moose in this area through vehicle collisions as we were during the general season hunt (~250 moose-vehicle collisions per year). Vehicle collisions are more detrimental to moose populations because 90% of moose killed by cars are cows and calves, as opposed to the general season hunt which is primarily bulls.

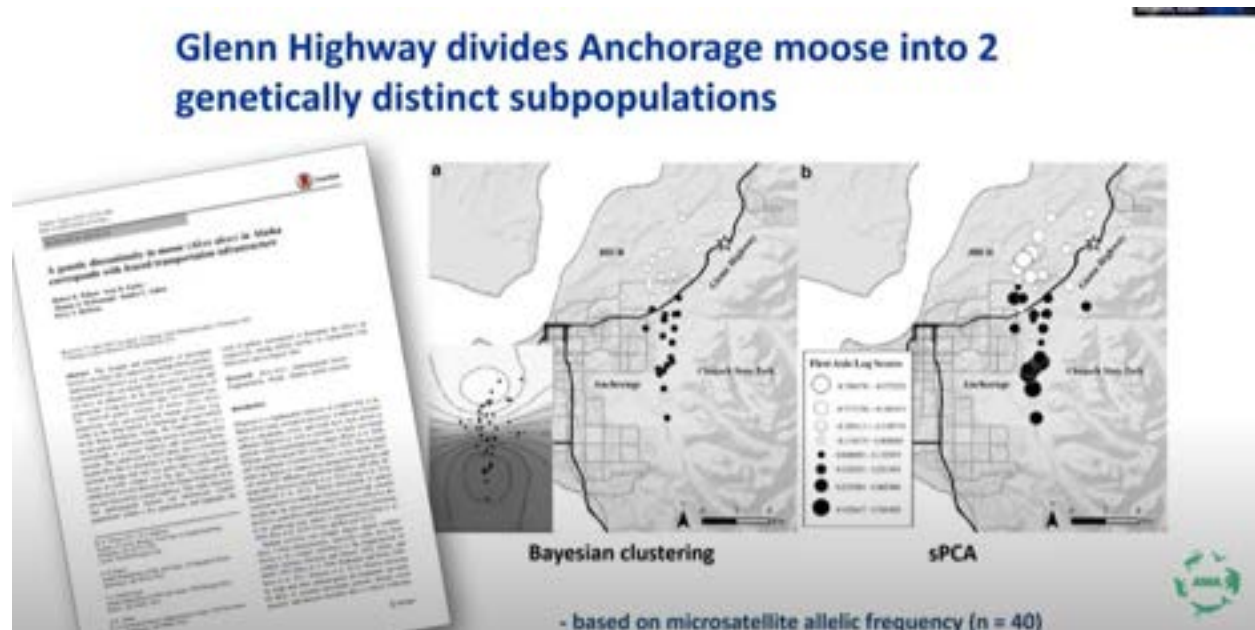
The costs of these collisions is high for human life, wildlife, and monetarily.





## Comments on 2023 Board of Game - Southcentral Region Proposals

Without crossings, moose populations can become isolated. A study by ADFG, UAF, and USGS reflects that the moose population on either side of the Glenn Highway are becoming distinct, because wildlife has such a hard time crossing the road.



The Cooper Landing Bypass wildlife crossings are circled above. Two of these crossings have already been completed:

## Comments on 2023 Board of Game - Southcentral Region Proposals



Wildlife crossings have also been established on the section of the Sterling Highway that transects the Kenai National Wildlife Refuge. The Refuge reports a 50% reduction in moose vehicle collisions since their development in 2019 (between MP 58-79). Some photos from those crossings are below:



## Comments on 2023 Board of Game - Southcentral Region Proposals



We want to protect all wildlife using these crossings, including moose who may be incidentally caught. In summary, these crossings will work to funnel wildlife across the road, but the more than \$10 million spent to develop these crossings will be null if there are no hunting and trapping setbacks protecting these corridors. Instead of becoming wildlife funnels, they will become wildlife sinks. We seek a common-sense approach to protecting these corridors.

### Proposal 146

Alaska Wildlife Alliance **supports** this proposal. The Citizen Advisory Board for Kachemak Bay State Park is composed of 12 community members who were appointed by the Director of Alaska State Parks for up to three-year terms. These Alaska State Parks Citizen Advisory Boards assist park staff with management and development issues, acting as an intermediary for public concerns and interests. The fact that this proposal was written and submitted by majority vote of this Board speaks to its popularity and reflection of Park values.

### Proposal 147

Alaska Wildlife Alliance **supports** this proposal, as it targets permanent, maintained, multi-use trails for setbacks to reduce user conflict. These winter trails are [mapped and marked](#) as permanent winter trails. The requested setbacks would not shut down trapping in these areas, but provide a corridor for non-trappers to enjoy the trails that are maintained for multiuse. This year multiple trap encounters have been reported, including three dogs that were caught within feet of the McNeil Elementary ski



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trails. These trails have a specific dog-user parking lot for folks skiing with their dogs and there are no tethered leash laws in place for these trails.

### Proposal 148

Alaska Wildlife Alliance **supports** the spirit of this proposal and encourages specificity on the trails the author seeks to protect for multi-use.

### Proposal 149

Alaska Wildlife Alliance **supports** this proposal. This proposal targets high-use campgrounds, which serve as entry points for multi-use winter trails (ex: Russian River campground provides access and parking to the Russian River trails). These campgrounds are marked and permanent. While we support the Department's encouragement of ethical trapping, these regulations would compliment that encouragement with true accountability. These setback proposals do not jeopardize the department's relationship with local trappers, and would not prevent the Department from issuing permits to address specific furbearer issues. Finally, it should be noted that Federally Qualified Subsistence users, who are the local trappers, would not be impacted by this regulation. This would only limit roadside, weekend trappers from non-qualified subsistence areas.

### Proposal 150

Alaska Wildlife Alliance **supports** this proposal. This proposal targets high-use pullouts frequented by locals and travelers on the Sterling Highway. While we support the Department's encouragement of ethical trapping, regulations would complement that encouragement with true accountability. These setback proposals do not jeopardize the department's relationship with local trappers, and would not prevent the Department from issuing permits to address specific furbearer issues. Finally, it should be noted that Federally Qualified Subsistence users, who are the local trappers, would not be impacted by this regulation. This would only limit roadside, weekend trappers from non-qualified subsistence areas.

### Proposal 151

Alaska Wildlife Alliance **supports** this proposal for the same reason we support the above trap setback proposals. Additionally, it should be noted that these backcountry ski areas are generally in the non-motorized sections of Turnagain Pass and see very limited trapping. Backcountry skiers are breaking the up-tracks to these destinations, and many do so with their dogs. Even the Manitoba Cabins have one cabin available for people with dogs due to the demand. In the case of an avalanche, Search and Rescue teams are deployed – many of which use dogs. These areas are also used to train Search and Rescue dog teams.

### Proposal 152

Alaska Wildlife Alliance **supports** this proposal. These trails are regularly groomed for skiing and frequented by locals and folks from Anchorage and the lower Peninsula.

**Comments on 2023 Board of Game - Southcentral Region Proposals**Proposal 153

Alaska Wildlife Alliance **supports** this proposal. These beaches are frequented by walkers and ice skaters. We know of one dog death that occurred on the Waikiki Beach a few years ago, and other non-lethal catches of dogs on these beaches since.

Proposal 154

Alaska Wildlife Alliance **supports** this proposal. We echo Alaska Wildlife Troopers' [2022 Board of Game comment](#) to proposal 228, which requested trap signage and labeling. Their comment was:

*“There are no other ways in Alaska to passively take fish/game with unmarked devices except by trapping. Crab/shrimp pots, burbot set lines, fish wheels, bear bait stations, gill nets, etc., all require markings. Trappers should be held to the same standard other resource users are. Trap/snare identification would greatly enhance AWTs ability to enforce illegal traps and incidental catches of moose, caribou, and dogs. Secondly, in the instance a trap is stolen or removed the trapper could report this to AWT much like when other resource users call to report shrimp/crab pots stolen or lost. One of the situations that is most common is when a dog is found dead in the trap and the trap is taken with the dog owner. Enforcement is unable to return the trap and there is a lost opportunity to educate and let the trapper know what happened-for the good and bad of it. AWT must also store traps with no leads with no way to return it or issue a citation if warranted. It has been rumored that trappers worry AWT would check their gear for such markings or somehow tamper with their gear. AWT would NOT routinely field check to look for ID number unless warranted. AWT spends an exorbitant amount of time trying to identify the owners of traps in both cases of violation or when stolen. Trapping does not have the same accountability as other resource users. The marking of traps/snares could be done with a unique anonymous number assigned to each trapper to prevent retribution from angry dog owners or anti-trappers if that was a concern. If the number were punched/inscribed onto the trap, it would also aid AWT in recovering stolen traps. Metal tags could also be issued from ADFG. The proposal to have an affixed or stamped means of identification would simply bring this method of take into alignment with ALL other resource users.”*

Proposal 155

Alaska Wildlife Alliance **supports** this proposal.

Proposal 156

Alaska Wildlife Alliance **supports** this proposal.

Peatlands on the southern Kenai Peninsula have been drying at the rate of 6-11% in surface area per decade since the 1950s due to a 62% decrease in annual available water on the western peninsula since 1969. These peatlands are integral to salmon-bearing watersheds. The peatlands also support other key species that the people of the region depend on (moose, beaver, birds, berries), and provide a number of other ecosystem services important to people's wellbeing, including flood control, aquifer recharge, cultural and recreation centers, and serving as natural wildfire breaks.

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Consequences of peatland drying on the southern Kenai Peninsula include increased fire risk because black spruce, a prominent encroaching tree species, is very fire prone. Additionally, a 15-year spruce bark beetle outbreak resulted in the culling of 4 million acres of trees in south-central Alaska which in some areas resulted in complete deforestation. New fledging grasslands are unprecedented and have resulted in a novel fire regime with human-caused grassland wildfires in spring, followed by the first lightning-caused grassland fires. As these 8,000 year old peatlands dry out, they become fuel bridges rather than natural firebreaks. Peatlands with a lower water table are less able to supply temperature-modulating groundwater or nutrients for salmon stream productivity.

None of these changing conditions bode well for cold-water fish –salmon and steelhead populations in particular. Most salmon species become vulnerable in waters with temperatures 68 degrees F and higher. Salmon-bearing waters on the southern Kenai Peninsula are repeatedly rising past this temperature threshold.

Since 2002, Cook Inletkeeper has been collecting continuous water temperature data below the confluence of the North and South Forks of the Anchor River. [Monitoring has revealed](#) that Anchor River temperatures consistently exceed Alaska's standards. Temperatures above 13°C (55 degrees F) exceed Alaska's standard for egg and fry incubation; temperatures above 15°C (59 degrees F) exceed Alaska's standard for migration routes. Water temperatures have even been recorded above 20°C (68 degrees F) which by State Standards "may not be exceeded." Cook Inletkeeper's research on water temperature in salmon streams suggests that "the Anchor River is highly sensitive to climate change impacts."

Beavers are a natural ally in combating these rising stream temperatures and drying peatlands, for the benefit of fish and people. But, beavers have been trapped out of the Anchor River system and, as ADFG states, have not recolonized the river system. Salmon and beavers co-evolved in these systems, and we believe this proposal is a prime opportunity to support beaver re-colonization, which will cool water temperatures and support declining salmon and steelhead.

Without beavers, streams have become eroded and incised, meaning they cut deep channels into the landscape. These channels disconnect the stream from its floodplain, disrupting the flow of water, nutrients, and, importantly for salmon, habitat. The areas around these streams shift from thriving, diverse wetlands with pools and floodplains surrounded by trees and shrubs—to dried peatlands made up of only a few species.

Researchers at Utah State University found that an increase in beaver dams resulted in a larger floodplain and a wider channel. As water built up behind the dams, it overflowed and spread past the banks, increasing the overall area and variability of suitable habitat for salmon. This created more places for salmon to hide from predators and to find food, more places for that food itself to find food and grow, and shorter distances for salmon to travel between those areas.

Researchers also documented that the effects beaver dams on water temperature are good for salmon. Ponds from these dams increased groundwater storage. During hot summer months, the cooler water from this storage mixed with surface water warmed by the sun during the day. While still

## Comments on 2023 Board of Game - Southcentral Region Proposals

high, this caused, if not a decrease in temperature (which was found to be up to 10 °C cooler in streams with beavers than in those without), at least no change in temperature. This could be huge for salmon who need refuge from hot water that is only getting hotter with the warming climate.

Cook Inlet salmon and steelhead in the Anchor are in trouble. We need to examine and explore every option available to save these important, iconic, and impressive species. Although here we only reference two published studies done so far on connections between beavers and these fish species, beaver-related restoration as a tool in salmon recovery is already being implemented in California, Oregon, and Washington.

This proposal will support beaver recolonization of an important fish system, as beaver dams generally improve habitat for rearing salmonids by storing water that can be used by juvenile salmon for overwintering ponds, particularly coho salmon; regulate water temperature; and assist in wetland formation and maintenance upstream of the structure. Nuisance beavers will not be affected by this proposal because the department can issue permits for the take of nuisance beavers as required.

### Proposal 157

Alaska Wildlife Alliance **supports** this proposal.

### Proposal 158

Alaska Wildlife Alliance **supports** this proposal and suggests an amendment that the Board match the wolf trapping season with the dates and restrictions listed in this proposal. We support the AC's consideration of user conflict in submitting this proposal, and believe that the proposal will be most effective, for non-trapping users and coyotes, if the wolf season is aligned.

### Proposal 159

Alaska Wildlife Alliance **opposes** this proposal. The author asserts that an extended season is needed because they believe wolverines are primarily found in the high country feeding on Dall sheep and mountain goats. This is not true. Although wolverines are capable of taking large ungulates as live prey (Magoun 1985), most ungulate presence in the wolverine diet is from scavenging—with some evidence of a seasonal reliance on local rodent abundance (Banci 1987, Magoun 1985, Gardner 1985) and marmots. Removing wolverines will not likely result in more Dall sheep.

The author also asserts that the Dall sheep in the Kenai Mountains are on a steady decline while predators continue to grow. This is also not true. Wolverine populations on parts of the Kenai Peninsula were estimated in 1995 and 2004. The most complete survey, conducted in 2004, estimated a population density of 3.0 wolverines per 1,000 square kilometers in the upper Turnagain Arm and Kenai Mountains (Golden et al. 2007b). A 1995 survey, using similar methodology but restricted to the northeast corner of the Kenai National Wildlife Refuge, estimated a density of 5.2 wolverines per 1,000 square kilometers (Golden 1996). They are primarily restricted to the rugged subalpine and alpine habitats in the mountainous eastern region of the Refuge and appear to be rare on the western lowlands of the Refuge.

## Comments on 2023 Board of Game - Southcentral Region Proposals

Wolverines on the Kenai Peninsula were previously considered a unique subspecies (*Gulo luscus katschemakensis*). A recent study of mitochondrial DNA suggests that despite a single unique haplotype in the Kenai population, the “occurrence of common and widespread haplotypes on the Kenai Peninsula is not consistent with subspecies status for this population” (Tomasik and Cook 2005). However, Tomasik and Cook (2005) also point out that the Kenai Peninsula population may harbor a disproportionate amount of the North American mitochondrial diversity and, as such, warrants special conservation.

The wolverine’s affinity for remote wilderness, rugged terrain, low densities, and large home-range sizes, coupled with its sensitivity to human disturbance, all contribute to the challenge of managing and conserving this solitary and secretive species (Ruggiero et al. 1994 cited in Tomasik and Cook 2005). Because wolverines have few natural predators, harvest by humans is believed to be the greatest factor influencing adult wolverine numbers (Hornocker and Hash 1981). Krebs et al. (2004) indicated that human-caused mortality was additive to natural mortality and that trapped populations of wolverine would decline in the absence of immigration from untrapped populations. However, as long as there was a source meta-population within a protected nearby refugium, harvested wolverine populations would likely persist. As with other low-density species, maintaining high annual survival of adult females is central to sustaining populations and harvest (Eberhardt 1990, Golden et al. 2007a).

We share the author’s concern about sheep populations, and encourage further research to understand the impacts of climate change and *Mycoplasma ovipneumoniae* on sheep. We believe these are the primary drivers of their population decline, not wolverine predation.

Proposal 160

Alaska Wildlife Alliance **supports** this proposal on the grounds that beavers are important, keystone species for salmon production and require additional protections in the Anchor River to support their recolonization (see comments on Proposal 156). This regulation would reduce the chances of over-trapping beavers and has been successfully applied in GMU 15B. Trapping will still be permissible, this proposal simply prevents multiple sets on a single lodge.

Proposal 162

Alaska Wildlife Alliance **opposes** this proposal. Increased harvest in February and March has the potential to negatively affect overall population levels because harvest during this time is removing birds that have survived into the next breeding season. Hunting during this time is highly effective and accessible, as snowmachines have ready access to virtually all of this area. Although there are no conservation concerns for this population now, we echo ADFG’s concern that an extended season with high bag limits would result in a conservation concern.

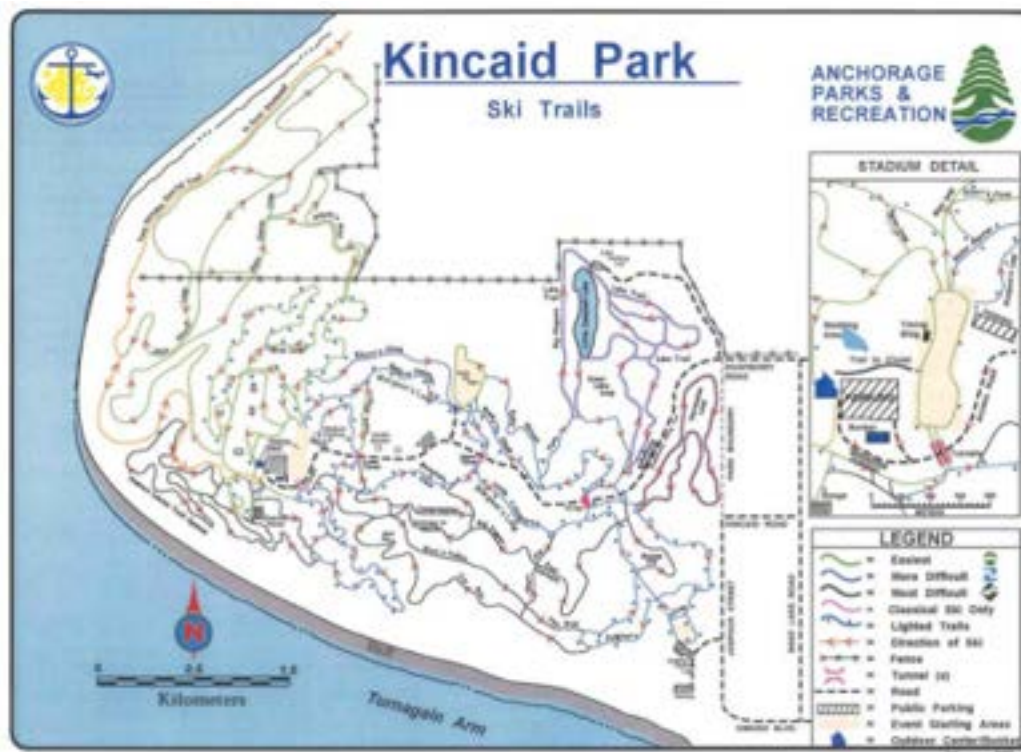
Proposal 200

## Comments on 2023 Board of Game - Southcentral Region Proposals

As written, Alaska Wildlife Alliance **opposes** this proposal. It would appear that this hunt would apply anywhere, including closed areas such as the Anchorage Management Area, and others where special controls apply, and is objectionable for that reason.

### Proposal 203

Alaska Wildlife Alliance **opposes** this proposal. We understand the author's intention to provide opportunity in an area that seems abundant for moose, but the recreational use of Kincaid Park, we believe, is too high to safely permit a hunt. Between the wide ski trails used by primarily walkers year-round (see below)



And mountain bike trails, also used year round (see below)

Comments on 2023 Board of Game - Southcentral Region Proposals



The park is highly used year-round. We're not sure how the department or Parks could divert recreational users from a hunt area during the hunt.





**The Alaskan Bowhunters Association**  
**Comments to the Alaska Board of Game**  
**Southcentral Region**  
**Soldotna, AK. March 17-21, 2023**  
**Submitted March 3, 2023**

To the Alaska Board of Game,

The Alaskan Bowhunters Association (ABA) is a membership 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". We thank the Board of Game for the opportunity to comment on proposals in advance of the upcoming meeting.

Bowhunters are not a special interest group but rather are individuals who greatly enjoy the added challenges of hunting with gear that is significantly less effective than modern firearms. The challenge in bowhunting is spending enough time with your quarry to get inside of its normal defensive perimeter for an ethical killing shot. Alaska has a rich bowhunting history. From Art Young in the 1920s, to Fred Bear and Glenn St. Charles in the 1950's, and many more until this present day. These pioneers of bowhunting did not choose their methods out of convenience, but out of a sense of challenge and adventure created by the limitations in their equipment. Today, bowhunting allows for the opportunity to challenge oneself, while at the same time having a limited impact on the resource. To many of us, bowhunting seems to be inherently a fairer way of hunting. For others, it may be a way to extend their season by hunting with a bow during the bow season and a rifle during the general season. Regardless of one's choice, archery seasons add hunting opportunity to all user groups who choose to take advantage of them. To be certain, bowhunters must be persistent and usually spend considerably more time in the field with lower chance of success.

Most states have recognized that the limitations of equipment of bowhunting result in greater opportunity for hunters to spend time in the field with lower impact on the game resources. As a result, nearly every state has established long archery seasons both before and after their general seasons.

The following comments reflect our stance on upcoming proposals for the Southeast meeting. We hope that the Board of Game seriously considers what our organization and membership have to say regarding these matters.

**Proposal 71 SUPPORT**

Proposal 71 asks for the establishment of a new drawing permit hunt for elk on southwest of Afognak island with up to 10 total permits being issued. The low success rates of archery equipment would guarantee very low harvest rate, but the added hunting opportunity would be greatly appreciated and utilized by bowhunters. The Alaska Department of Fish and Game (ADFG) Supports this proposal due to the added opportunity and does not believe it will have any impact on their management objectives. In the interest of more hunting opportunity with no negative impact, we ask the Board to adopt Proposal 71.

**Proposal 72 SUPPORT**

Proposal 72 is very similar to proposal 71 except that it is for Raspberry Island and would be up to 6 permits. For the same reasons as outlined for proposal 71, we ask that the Board adopt Proposal 72.



**Proposal 87 SUPPORT**

Proposal 87 is to create an early archery season for moose in Game Management Unit (GMU) 14C remainder similar to those already existing seasons in GMU's 14A and 14B which border this GMU to the North and GMU's 15A & 15B which are just across the inlet to the South. The existing early archery seasons have the same antler restrictions as the later general seasons and have a much lower success rate due to the limitations of archery equipment. ADFG supports this proposal because of the added opportunity and low impact. If the Board were to adopt this proposal, it would afford hunters in GMU 14C remainder the same opportunities as those in GMU's 14A, 14B, 15A, 15B & 16A.

**Proposal 91 SUPPORT**

Proposal 91 asks to add archery equipment as legal method of take to an already existing hunt. This hunt is drawing permit DL455 for black bear on JBER. Currently, this hunt is open only to shotgun while most other JBER hunts are open to the use of archery equipment. We ask that archery equipment be allowed in this hunt in addition to shotgun in order to allow those who draw to have more choices in the weapon they use. This proposal does not create any biological concerns and is supported by ADFG.

**Proposal 92 SUPPORT**

Proposal 92 is identical to proposal 91 except that it is for drawing permit hunt DL457. We ask that you adopt this proposal based on the same reasoning as for proposal 91.

**Proposal 99 SUPPORT**

Proposal 99 would create a new drawing permit hunt for brown bear for the same area as DL457. This area is already open for the take of black bear and it only makes sense to allow for bowhunters to target brown bears as well. ADFG supports this proposal and has no biological concerns.

**Proposal 100 SUPPORT**

This proposal is to establish an archery only drawing permit hunt for brown bear on JBER. There is definitely a brown bear presence on JBER and an archery hunt with a bag limit of one bear every 4 regulatory years would not have a significant impact. ADFG supports this proposal.

**Proposal 101 SUPPORT**

Proposal 101 is for extending the current brown bear season in GMU 14C remainder for certified bowhunters only. An extended archery hunt in this remote area would not have any impact on brown bear populations but would allow for additional hunting opportunity. ADFG supports this proposal and has no biological concerns.

**Proposal 110 SUPPORT**

This proposal is to create an archery only registration hunt for sheep in GMU 7 remainder. This would provide additional hunting opportunity and have no impact on sheep populations due to the limited effect of archery equipment and the full curl regulations in place. ADFG does not have any biological concerns for this proposal.

**Proposal 111 SUPPORT**

Proposal 111 is to create an archery only registration sheep season in GMU's 7 and 15 remainder. We ask that you support this proposal based on the same reasoning based on proposal 110. ADFG does not have any biological concerns for this proposal.

**Proposal 112 & 113 SUPPORT ( with possible amendment )**

Proposal 112 & 113 are for the establishing of a general archery only sheep season following the current season for the same areas as outlined in proposals 110 and 111. It is interesting that ADGF is neutral and has no biological concerns for proposals 110 and 111 but is opposed to 112 and 113 based on declining sheep populations. ADFG contradicts themselves by saying there is no biological concerns for proposals that cover the same areas and are for archery only. If there is a biological concern for hunting sheep in GMU 7 and 15, amending these proposals to change the last ten days of the current sheep season to archery only may be a better solution. This would allow for continued hunting opportunity while at the same time, lowering the impact on the population. However, we fail to see how any additional bowhunting under full curl regulations would have any negative effect on sheep populations based on ADFG's current management strategies.

**Proposal 119 SUPPORT**

This proposal would create an early archery moose hunt similar to those already in place in GMU's 15A and 15B. We ask that you adopt this proposal based on the same reasoning as proposal 87.

**Proposal 124 SUPPORT**

Proposal 124 would establish an early moose archery only season in GMU 15C remainder, similar to that in proposal 119. We ask that you adopt this proposal based on the same reasoning as can be found in proposal 87.

**Proposal 140 SUPPORT**

This proposal will extend brown bear season under RB300 but the extension would be for archery equipment only. We do not believe there will be a significant impact on brown bear populations based on the limited efficiency of archery equipment. It is important to note that there are several other proposals to extend this season without any weapons restrictions. We support extending this season regardless of weapons allowed as long as there are no biological concerns or loss in hunting opportunity. This proposal would be a good compromise if the board feels the other proposals to be too liberal.



**Proposal 82 OPPOSE**

This proposal would expand unrestricted weapon drawing permit hunts for sheep into an area that is currently archery only. This would have a negative effect on hunting opportunity. This area is for bowhunting only for a reason and should be kept that way.

The Alaskan Bowhunters Association thanks you for your consideration on these proposals.

Respectfully,

Mike Harris - Legislative Vice President, Alaskan Bowhunters Association



PC013

**Submitted by:** Chelsea Allen

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I support the proposal to move trapping equipment 100 yards away from ski, hiking and multipurpose trails to avoid/prevent injury/death to our dogs/animals.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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PC014

**Submitted by:** John Almanrode

**Organization Name:**

**Community of Residence:** Cooper Landing, Alaska

**Comment:**

I support Proposals 145 through 154 dealing with trapping set backs. As a resident of Cooper Landing I recreate all around the Kenai Peninsula. I do not want to be worried that I might get caught in a trap have a pet get caught in a trap as I am out enjoying the wilderness. It is no longer the 1800's or the 1900's and the population on the peninsula has obviously grown and the winter recreation opportunities have grown as well. These proposed set backs are so minimal that trappers should not feel that they are overly restrictive in any way. Please consider these proposals for the safety of all winter outdoor recreators and their pets. Thank you.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC015

**Submitted by:** Julie Almanrode

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

I support Proposals 145,149, 150, 151,152,153&154. With the growth of the community and winter activities, there needs to be some ethics established so that everyone, including trappers, can enjoy the great outdoors together.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC016

**Submitted by:** Mike Amos

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

I'm commenting in full support of Proposal #145; this proposal should be a "No-Brainer" by not allowing hunting and trapping 1/4 mile of wildlife crossings. The new bypass is going to be enough of a stressor on wildlife and then be forced to travel through a choke point on top of it.

I'm in full support of proposals #d 146, 147, 148 I have a residence in Homer also and I can't enjoy trails in Coopper Landing or Homer because of the fear of traps set too close to trails and the small number of active trappers on the Kenai Peninsula have a strangle hold on the rest of the population. What I don't get is that the Safe Trails Committee in Homer had the support of their AC and it sounds like someone got to them and they are no longer supporting them.

I'm in full support of proposals #149 - #154 being a homeowner in Cooper Landing we can't use our trails here either for fear of traps and a very small number of trappers are holding the rest of our townfolks "Hostage"! Whats really sad is that Coopper Landing Safe Trails can not get the support of our local AC which is not representative of the population of CL since the board is made up of consumptive users and no recreational people are on the board. Constant push back, bullying, belittling and whatever excuse they can come up with to not support these proposals. Now is the time to come together and come to a solution thats acceptable to both sides.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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Alaska Board of Game

March 2, 2023

PO Box 115526  
Juneau, AK 99811-5526

Re: BOG South-central Region Meeting

**Proposals 164-170:** proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin and Long-tailed Duck: **SUPPORT**

**Proposal 171:** Direct ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6,7 & 15 **SUPPORT.**

**Proposal 172:** Require mandatory harvest reporting for sea ducks in Kachemak Bay Unit 15C **SUPPORT**

Greetings,

I strongly support the above proposals to better manage a healthy population of the above waterfowl.

I also **STRONGLY SUPPORT PROPOSAL 146.**

Require a 100-yard setback of traps from the Diamond Creek Trail, Grewingk Glacier Lake Trail and the Grewingk Saddle Trail within Kachemak Bay State Park. These trails are heavily used by the public during trapping season, accompanied by their dogs.

- More than 8 pet dogs have been trapped recently on popular Homer trails. This is a real problem!
- With a growing population on the lower Kenai Peninsula, and particularly in Homer, an increase in non-consumptive users on multi-use trails, conflict in trapping areas is becoming more common in Unit 15C. If nothing is changed, more dogs will be trapped, causing unnecessary harm to State Park users and dogs, and huge public outcry.
- User conflicts are time consuming and energy draining for all involved. Already overtaxed and underfunded, ADF&G employees and State Park staff will be increasingly burdened.

Respectfully Submitted

*Robert Archibald*

Robert E. Archibald



**Submitted by:** Jacob Argueta

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

Literature indicates that allowing beaver to reinhabit their historical range, specifically here on the Kenai Peninsula, would have a myriad of benefits including aiding in water retention and regulation, increased habitat for other native species, and carbon sequestration. Limiting beaver takes could allow for beaver to expand into their historical range more effectively. Limiting beaver takes and allowing for range expansion could provide an economic, biologic, and societal boon that far out ways any current benefits associated with the standing regulations.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 160: Support

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**Submitted by:** Michael Armstrong

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

Comments on Proposals 146, 147, 149, 152 153.

I support these proposals to create trapping setbacks from trails in Kachemak Bay State Park and ski trails in the Homer area. I also support setbacks in the Cooper Landing Campground, the Cooper Landing Trails, and the Kenai Lake Beaches.

I have lived on Diamond Ridge since 1994, and have hiked and skied in the area. We have granted permission to the Kachemak Nordic Ski Club to use our property for its Marathon ski trail. When that trail is set, we frequently ski it with our well-trained dog.

Over the years, trappers have set traps within 10 yards of the Marathon trail. These traps have not been identified by signage, and several times our neighbors' dogs got caught in the traps. The Diamond Ridge area is becoming more settled, with active recreational use.

Much of the land is unmarked private land, but if irresponsible trapping continues, trappers can expect to see private land and access locked up,

These proposals allow trappers continued use while protecting dogs and people who go off trail. Responsible and ethical trappers know not to set traps near recreational trails. These proposals enforce ethical practices on novice or amateur trappers who might not yet be familiar with good trapping practices.

The proposals also have the benefit of protecting trapping as a subsistence and income livelihood so that the public does not damn all trappers and trapping for the actions of a few.

Thank you for considering this reasonable compromise between banning trapping outright and allowing unrestricted, dangerous use.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 152: Support Proposal 153: Support

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PC020

**Submitted by:** Kari Arno

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I am against the 100 yard set back.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Oppose Proposal 147: Oppose

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PC021

**Submitted by:** Mike Arno

**Organization Name:**

**Community of Residence:** Homer Alaska

**Comment:**

I am against the restrictions on trapping in exchange for the right to let dogs run loose on public trails with snow machine's and skiers. snow machines and loose dogs on the same trails are a very unsafe combination.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Oppose Proposal 147: Oppose

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PC022

**Submitted by:** Barbara Atkinson

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

Please note that I am in support of proposal #145, 149,150,151,152,153,154, 146,147,and 148.

Our dog was caught in a snare not far off a trail and the trapper didn't check his traps for 10 days. Amazed the dog survived.

Barbara Atkinson

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC023

**Submitted by:** Thomas Atkinson

**Organization Name:**

**Community of Residence:** Cooper Landing, Alaska

**Comment:**

I am in support of Trap Setback purposal # 145, 149, 150, 151, 152, 153, 154, 146,147, 148.

Trappers need to be mindful of Multi use areas.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC024

**Submitted by:** Brandy Avril

**Organization Name:**

**Community of Residence:** Anchorage Ak

**Comment:**

As a cabin owner in the south Caribou Hills, and a dog owner I HIGHLY OPPOSE BOTH Proposal 146 and 147. Our dog sometimes runs along the snow machine and 4 wheelers as we head out to our cabin almost weekly. We have had previous sightings of traps right next to the trail with scents which can attract the dogs. Thankfully, we were able to keep the dog away from the trap. It concerns me that they are allowed to trap right next to any trail. Really no reason for that. Most trappers have a snow machine and/or wheeler which allows them to get further out into the hills and non populated areas to set their traps and run their trap lines. A 100 ft setback is very do-able and really not an inconvenience to a trapper.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Oppose Proposal 147: Oppose

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PC025

**Submitted by:** James Majetich

**Organization Name:** Backcountry Hunters and Anglers

**Community of Residence:** Palmer, Alaska

**Comment:**

My name is James Majetich, the Chapter Coordinator for Backcountry Hunters and Anglers in Alaska, and I am writing to voice my wholehearted opposition to the proposed trap setback regulations that were received by the Board of Game.

In proposals 146, 148, 150, 151, 152, and 153 it is implied that the responsibility for safe use of public lands throughout several areas on the Kenai Peninsula rests solely on the shoulders of one specific user group.

In proposal 146, the author acknowledges the difficulties in funding signage requirements as well as the difficulties in enforcing leash laws and in using a leash while partaking in backcountry activities such as cross country skiing, so therefore any restrictions would likely not be adhered to. I believe that it is categorically wrong to levy new restrictions on one user group under the premise that another simply would not comply should the be given any regulation themselves.

Aside from being exceptionally discriminatory to one user group, these proposals would also greatly reduce trapping opportunities that pose little to no danger to domestic dogs such as submerged, elevated, under ice and enclosed traps.

A significantly better alternative would be for all user groups to follow the lead of the trappers and work to educate the public about being responsible and respectful multi-users of Alaska's trails as opposed to seeking to limit the opportunities of others.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Oppose Proposal 148: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose  
Proposal 153: Oppose

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PC026

**Submitted by:** Loretta Ballance

**Organization Name:**

**Community of Residence:** Fritz Creek/Homer, AK

**Comment:**

PROPOSAL 146 5 AAC 92.550, Proposal 146 and 147:

Oppose.

Animal ownership has requirements. Period.

Trapping has seniority, usefulness and purpose. Close the area to recreation without setting responsibilities/liabilities/laws for tourist/recreators. A set sprung by an unleashed dog should require compensation and an apology to the trapper, just like in domesticated areas where unleashed dogs are a legal liability whose wrong doing's require compensation, and perhaps other legal action. The trap lines need protected from disrespectful tourist recreators who should carry insurance to cover the losses they create for others.

Tourists want to steal a way of life from others, and to steal what others have created and made safer, and want to not pay for the damage they cause to the land and to others. Tourists are expensive predators to have around, they are careless predators that expect to be served up whatever they want, regardless of the drain on the environment, the existing maintenance systems, or the expense to society. It is sad that the tourist thinks they are not responsible for the harm they cause, and that they want to make others bend to their wants. Tourists want others to change, to forfeit, to lose so they can let their stupid dog have it's way with other people's constructs, creations, or lifestyle.

So, why not just let farmers graze their livestock on your lawn, or eat your landscaping, or root in your garden? That would be fair--if farmers thought like tourists, correct? Farmers don't do that on purpose, because farmers have been taught to be responsible and to know that they have to pay for their 'harms'.

Tourists should pay for their special access needs, and they should pay for special trails to be built away from those they would harm with their demands, and they should pay for the demands they place on the rest of the social structure.

It's about power over others, about control, about squeaky wheels, about stupid dogs causing problems for themselves and others in the wilds just like they do in the domesticated world.

Bind the power over the dog, control the dog.

P.S. Given the volatility of our society in these squishy days of delusions, unenforced law, and unstable perceptions, "inflammatory remarks or inappropriate language" might need to be clarified with more specific definitions. Thank you.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Oppose Proposal 147: Oppose

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**Submitted by:** Elijah Barbour

**Organization Name:**

**Community of Residence:** Soldotna

**Comment:**

Proposal 57

As an avid outdoorsman and dog handler I support proposal 57. A well trained versatile hunting dog can be used to recover not only waterfowl and upland birds, but wounded and dead furbearers as well.

Recovery of game should be first and foremost in all aspects of hunting and/or trapping, and the way to ensure recovery of said game is with a trained versatile hunting dog.

Why in any scenario would we want a fatally wounded animal to escape only to go to waste? As ethical sportsmen and women, we should be responsible for what we take and that responsibility should be aided with the effective tools to successfully implement active recovery of these wounded animals. Versatile hunting dogs are those tools.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 67: Support    Proposal 71: Support    Proposal 72: Support    Proposal 82: Oppose    Proposal 87: Support  
Proposal 91: Support    Proposal 92: Support    Proposal 93: Support    Proposal 99: Support    Proposal 100: Support    Proposal  
101: Support    Proposal 110: Support    Proposal 111: Support    Proposal 112: Support    Proposal 113: Support    Proposal  
119: Support    Proposal 120: Support    Proposal 121: Support    Proposal 122: Support    Proposal 123: Support    Proposal 124:  
Support    Proposal 125: Support    Proposal 126: Support

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# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 028

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.

**Please select the proposals that you are in support of (select all that apply).**

If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) for extra forms.

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☐ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. 300 yds
- ☐ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. 300 yds
- ☐ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain. 300 yds
- ☐ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. 300 yds
- ☐ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes. 300 yds
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## Other areas setback proposals:

- ☐ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail. 300 yds
- ☐ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails 300 yds
- ☐ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward. 300 yds

Comments:



PC 028

100 yards isn't enough. Please  
consider 300 yds.

Dogs can travel 100 yds in seconds

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Sean Barnett

Organization (if any):

Signature\*: Sean D. Barnett

Email\*: [REDACTED]

Street Address: [REDACTED]

City\*: Cooper Landing State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.



PC029

**Submitted by:** Daniel Basargin

**Organization Name:**

**Community of Residence:** Homer

**Comment:**

I agree with all of these proposals.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 118: Support Proposal 119: Support Proposal 120: Support Proposal 121: Support Proposal 122: Support  
Proposal 123: Support Proposal 124: Support Proposal 125: Support Proposal 126: Support Proposal 127: Support  
Proposal 128: Support Proposal 129: Support Proposal 161: Support

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PC030

**Submitted by:** Ross Beal

**Organization Name:**

**Community of Residence:** Fairbanks, Alaska

**Comment:**

PROPOSALS 145 THRU 154

I appose these proposals. Mention of precedent set by closing trapping and set-backs by any municipality are attempts to regulate trapping. The state constitution has given the authority to regulate Alaska's Fish and Game to the Alaska Board of Game only. I'm not aware that these municipalities have ever worked with the Alaska Board of Game in an attempt to resolve any foreseen or real problems with current trapping regulations.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Oppose Proposal 146: Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal  
150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose

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**Submitted by:** Cristine Beaudoin

**Organization Name:** na

**Community of Residence:** Homer, AK

**Comment:**

I absolutely support proposal#146 and #147. Trapping and recreational activities do not mix. Even 100 yd setback isn't far enough for the nose of most dogs. Public trails are not the place for trapping and currently very dangerous for those of us that use them, while recreating with our dogs. The question in my mind is why a trapper would even consider setting up a trap line near populated trails in the first place.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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I would like to address proposals 146-153 and my opposition to them as they seem to deal largely with setbacks from various trails, campgrounds, buildings and roads. I oppose proposals incorporating setbacks into trapping regulations. In my experience setbacks will have little to no effect in preventing accidental catches and will become an unnecessary burden on those that enjoy the recreation of trapping in Alaska.

Many of these proposals seem to support a disproportionate responsibility be placed on the trapper to avoid accidental catches of pets, but they dismiss the fact that the owner of the pets also carry a responsibility to watch and keep track of their pets. I completely understand the desire for pets to be safe and stay out of traps while allowing them freedom to be unhindered out in nature. I enjoy allowing my pets to accompany me without a leash much of the time. However, I also understand that by doing so I have a responsibility to take steps to safe guard my pet from harm. These proposals seem to desire this responsibility be transferred to another group, in doing so is limiting their freedoms, in my mind this is unfair and unjust.

Having owned a number of great dogs over the years it has been my experience that they love to follow trails. If they were not leashed or trained to listen, my dogs would follow a trail, whether foot, snowshoe or machine without hesitation. Should a setback be established and a trap placed at the legal distance, a pet, primarily a dog, I believe, will follow the trail established by the person that set the trap. This will then result once again in accidental catches and again the trapper will be blamed. But in reality, it is the owner that is at fault for failing to take steps, of which there are many, to safeguard the pet. As a trapper, I don't want to catch pets and take steps to avoid catching them. I don't trap directly on groomed trails used for skiing and snowshoeing, nor do I trap at trail heads. It takes time, effort and work to trap and I have no desire to waste that time by catching pets. However, I also would like to have the opportunity to recreate and enjoy trapping without undue burden being placed upon myself and family as we enjoy trapping here in Alaska.

#### Proposal 154

I would like to speak regarding my opposition to proposal 154 as well. While this proposal seems like a positive and logical approach, it is neither. In my experience having to notify the public of traps in an area will assist people in tampering with legal trap lines. It seems to also be another effort to put excessive pressure and burden on a group of recreational users to lessen responsibility on other groups.

As an example, just this season on a trail my son and I established far from normal recreation trails we went to check our traps only to find some people went down the length of the trail snowshoeing. This wasn't an issue until I found that as they went down the trail they used their trekking poles to trip each trap they found. I reset my traps and prepared for lynx season. In early Feb I once again went to check these traps only to find what appears to be a lynx was stolen out of the trap. At another location I had a wolf trap, chain and drag stolen as well. After these instances I don't feel labeling our traplines is a burden the trapping community should bear. I personally can't afford to set cameras throughout my lines yet in an effort to safeguard my legal right to trap.



In closing some of these proposals site the activities *"of winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals"*. These activities however do not require setbacks from trails to be safely enjoyed. The issues, once again, result from pet owners being irresponsible concerning their pets. Proposal 150-154 also incorporates some data regarding dog catches. It reads as follows; *"As of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press."* Southcentral Alaska is a large area, with what I guess to be a good number of dog owners that share many different trails with trappers. While I don't have exact numbers for dogs or trappers in the specified area, 7 caught and 2 passing away seems that it would be a pretty low percentage compared to the number of dogs and trappers using the trails. This would seem to suggest it is unnecessary to add additional burden to trappers by establishing wide sweeping setbacks.

In the same proposals the phrase, "To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area...." Is used several times. Once again none of these activities requires trail setbacks. However, it does make me wonder why trapping isn't among these. My kids and I love trapping and although my wife doesn't come along on the line she makes lunches and loves to see what our investment in finances, time and energy bring.

Thank you for your time

Tom Bobo



PC033

**Submitted by:** Jack Bradley

**Organization Name:**

**Community of Residence:** Moose Pass, Alaska

**Comment:**

I am commenting in support of proposals 145 through 154. The Kenai Peninsula is Alaska's Playground, which means it is imperative that it is kept safe for all - hikers, bikers, fishers, beach-goers, tourists, dogs, children, and everyone else. I have been a resident of the Kenai Peninsula for 5 years and in my relatively short time here I have heard too many stories of injuries and deaths dogs have sustained by improperly or illegally placed traps. There is no reason that I can understand that trappers in the largest state in our Union need to encroach further on the high-traffic, public use lands mentioned in these proposals. We are so lucky to live in a state with endless abundance and opportunities for recreation, hunting and trapping, but we must ensure these activities and the people who engage in them can do so harmoniously, without putting people and their pets in unnecessary danger. I very much fear that encroaching trapping regulations will lead to an avoidable increase in injury both to people and pets.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC034

**Submitted by:** Stephane Brault

**Organization Name:**

**Community of Residence:** Anchorage, Alaska

**Comment:**

Proposal 56: Prohibit taking of big game from boats in Units 6, 7, and 15 . Taking of big game from boats rarely, in my opinion put the hunter in an stable shooting scenario and result in increase of wounded and/or non retrieve animal.

Proposal 61: Lower the resident and nonresident general season bag limit for deer in Unit 6 . A lower bag limit will allow for an increase in hunting opportunity for a higher number of hunter.

Proposal 147: Establish trapping setbacks along certain snow machine and Nordic ski trails in Unit 15C. Setback will increase safety of trail user and will not be an unreasonable burden on the trapper.

Proposal 148: Require 100-yard trapping setbacks from known multi-use trails in Unit 7 Setback will increase safety of trail user and will not be an unreasonable burden on the trapper.

Proposal 149: Establish trapping setbacks along the perimeter of campgrounds in Unit 7 Setback will increase safety of trail user and will not be an unreasonable burden on the trapper.

Proposal 150: Establish trapping setbacks along certain roads and pullouts in Unit 7 . Setback will increase safety of trail user and will not be an unreasonable burden on the trapper.

Proposal 154: Require signs be posted at all active trapping access points in Unit 7 .

This proposal will increase awareness and safety with very little effort from trapper

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 56: Support with Amendment    Proposal 61: Support

Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support    Proposal 154: Support

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PC035

**Submitted by:** Melissa Brennan

**Organization Name:**

**Community of Residence:** Cooper Landing, AK

**Comment:**

Support trapping setback signage in Cooper Landing recreation areas, proposals 149-154

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC036

**Submitted by:** Amy Brodersen

**Organization Name:**

**Community of Residence:** Cooper Landing, Alaska

**Comment:**

As a full-time resident of Cooper Landing, and an avid back country enthusiast, I spend a majority of my time out enjoying the areas public lands. In order to increase public safety for ALL recreational user groups within Cooper Landing and the nearby Summit Lake Recreation Area, I am in support of trapping set-backs along multi-use trails and back country access points. My support for trapping setbacks in the Cooper Landing area is not to end trapping, but to reduce conflicts between a small minority of trappers and a large and increasing majority of other recreational user groups.

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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**Submitted by:** Alton Brown

**Organization Name:**

**Community of Residence:** Palmer, AK

**Comment:**

To whom it may concern,

I am writing on behalf of the proposal to close sheep hunting in 19C. While it's no secret that sheep numbers are hurting in the area and across the state, closing the season would have no beneficial impact on the herd. Sheep management is already struggling across the state due to a lack of funds. Closing the season for 5 years would directly take out around \$500,000, just from our outfit, that is being brought in by non-resident hunters. These dollars directly go into the local economy and management of the herd. One non-resident hunter brings in between \$40-50,000 per sheep hunt. That money goes into tags, outfitters, and Alaska's economy. I imagine a significant portion of that cost has taxes from the Pittman-Robertson act as well. It would be foolish to stop bringing in this essential funding for our sheep herds.

Instead of closing the season, what myself and other guides/outfitters would like to see is increasing the cost of resident sheep hunting. Residents are spending about \$1000 on the high end for a sheep hunt they get to do every year. Since the funding of sheep management is struggling so bad, adding tags that resident hunters would need to buy would increase the funding tremendously.

Another thing I would like seen done is adding a mandatory field day/quiz for anyone who buys a sheep tag. Including guides. The biggest harm we can do as hunters to the sheep herd is shooting sub-legal rams. A lot of the people going on these sheep hunts have never even seen a ram. Having a field day where they come in and learn about sheep biology and get to put their hands on legal vs sub-legal rams would have highly beneficial.

Thank you for taking the time to read my comment. I hope the Board uses reason and not emotions when voting on all these issues.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 204: Oppose

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PC038

**Submitted by:** Josiah Brown

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

Hello the majority of residents of Cooper Landing are in favor of setbacks of traps on popular multi use trails. A survey was conducted to prove this.

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC039

**Submitted by:** Jeffrey Bryden

**Organization Name:**

**Community of Residence:** moose pass, AK

**Comment:**

Support proposal 119. I would like to see a Unit 7 early season moose archery option that matches what the unit 15 A and B area is. I would like to hunt the unit 7/15 border area. The same moose live and use both of these areas.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 112: Support Proposal 113: Support

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**Submitted by:** Jon Burrows

**Organization Name:**

**Community of Residence:** Port Alsworth

**Comment:**

I oppose Proposition 204 as it is written which would seek to close all sheep hunting in unit 19C to residents and non-residents for 5 years.

My view comes from guiding and spending time in unit 19C for the past 10 years. While overall sheep numbers are declining in much of the unit, I see self regulation and cutting back of guides and residents (which is happening) coupled with the existing full-curl rule that will help regulate the harvest and also won't completely remove all user groups from the chance to hunt a legal ram.

The full curl regulation that was implemented in 1992 is the check-valve designed to protect young rams from harvest and give them the opportunity to live and breed (raise population) and also focuses the hunter's efforts on taking older, mature animals which are generally more likely to die in a harsh winter.

This rule is what allows hunting opportunity but does not guarantee that there will be a lot of harvestable, legal rams available. It says hunt and take the legal rams but if there aren't many legal rams- back off, hunt less, take fewer clients. That has been happening: the outfitter I work for has taken less than half the number of hunters this season as past seasons and I know firsthand other hunters are doing the same. The full-curl rule is what should dictate there are fewer harvestable rams, not putting a full 5 year closure to even have the chance to hunt.

It's obvious to anyone who has spent more than a few seasons in this area that overall sheep numbers have been in decline. The older ram class is depleted but we have also found dead heads from young rams and ewes indicating other factors in sheep die-off.

We can't protect Dall sheep from the severe winter weather that often kills them and I don't think that by this regulation alone we can play a significant role in bringing numbers back. It does play a small role but I don't think that offsets the cost of full closure and the hunting pressure that will shift elsewhere.

I don't have the full answer on the challenges of Dall sheep management during these lean and rough years but at this time I oppose the radical step of a full 5 year closure for all users in unit 19C.

Thank you,

Jon Burrows

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 204: Oppose

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PC041

**Submitted by:** Les Butters

**Organization Name:**

**Community of Residence:** Flagstaff, Arizona

**Comment:**

Limiting non-resident moose hunters to 20 in Unit 19C by draw is unreasonable. There are numerous other measures to consider to lessen moose harvest, hunting pressure and decrease predation. I have hunting 19C for 20+ years and have seen the extensive increase in wolf and bear populations. Allowing non-residents to harvest a Grizzly by applying a moose tag would lessen moose harvest and decrease Grizzly populations. Placing the non-resident draw with a higher permit number but limiting party size to (4) four will reduce moose harvest...

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Proposal 205: Oppose

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PC042

**Submitted by:** Janette Cadieux

**Organization Name:**

**Community of Residence:** Cooper Landing, AK

**Comment:**

Our community has voted to support Proposals 145, and 149-154 because they make sense for both trappers and other users of the lands surrounding our community. This sensible regulation similar to that in other states and other communities should be adopted. Proposal 145 should be amended to include all upsized culverts and trail underpasses within the same MP 45-60 project area.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support with Amendment Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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**Submitted by:** Diana Carbonell

**Organization Name:**

**Community of Residence:** Fritz Creek

**Comment:**

I write in support for proposals #145, #146, #147, #148, #149, #150, #151, #152, #153, and #154. I want to be able to use public trails without the fear of my pets being maimed or killed by traps. 100 yard set backs seem like a very reasonable compromise between the tiny number of people who trap and the overwhelming number of Alaskans who use trails for skiing and hiking

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

#### **Other areas setback proposals:**

- ☐ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 044

Most ethical trappers already follow these guidelines.  
I am a supporter of ethical trapping done in a  
responsible manner.

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Irving R. Carlisle

Organization (if any) \_\_\_\_\_

Signature\*: Irving R. Carlisle

Email\*: \_\_\_\_\_

Street Address: \_\_\_\_\_

City\*: Soldotna State\*: AK Zip code: 99669

\*Indicates it must be filled in to be accepted.



To: Alaska Board of Game

From: Kathleen Carlsen/Kodiak

Re: Proposal to Extend Bear Hunting Seasons

As a life-long Kodiak resident and the daughter of one of Alaska's first Master Guides, Bill Poland, I'd like to provide a bit of history:

We are told people are not taking care of their garbage.

When I was growing up in the 50's and 60's, every house had at least one garbage can, not a one was "bear proof", that blew away during big winds. Garbage would be scattered throughout, and usually the kids were tasked with retrieving the missing cans and lids. People were most likely a bit less environmentally conscious at that time. However, no bears.

We are told it's the dump.

I grew up on what is now Rezanof Drive, a block out of town from what is now Kodiak Middle School. About 100 yards from our home and across the street was a Clark's Lake, which the city, while my father was City Manager, turned into a "sanitary landfill" aka dump. However, no bears.

Older residents, including those who grew up in the 20's and 30's, they confirm that bears were unheard of in the Kodiak residential area. The closest bears got to town was the ranches many miles out the road towards Pasagshak. Even sitting a deer in town was rare. But bears, absolutely not an issue.



K. Carlsen, page 2

So, what's changed? The city has gotten bigger, yes. But the bears have gotten much bolder. It is unthinkable that 50 years ago, this number of bears would be allowed to endanger peoples lives and property. If the authorities did not dispatch the bears, the men of this town would. I don't know if there are more bears, but they certainly are in areas that they have not been for at least a hundred years.

I've always been able to walk and hike around Kodiak without any thought of bears. Pillar Mountain, Abercrombie, Spruce Cape, Near Island, the bike trail...the worry was about coming across a sketchy person, not bears. The past 10 years, however, all has changed. With so many bears running loose, my world has shrunk. Even the bike trail has been known to have bears! Even downtown! After a long cold winter, hiking has been a mainstay for women and children to get regular exercise. This situation is adversely affecting our health. It is wrong, it is dangerous, and it is untenable.

The bears already have 95% of the island to roam in, they need to be kept out of the Kodiak residential area including our Pillar, Abercrombie, Spruce Cape, and Near Island. Kodiak Bears and people cannot live in the same area. We've had a dog torn to shreds a few blocks from my home as well as a long time hiker of Pillar Mountain trails attacked by a bear. It's just a matter of time until a child is killed.

Therefore, I'm in favor of extending the bear hunting season on the road system.



PC046

**Submitted by:** Clint Carlson

**Organization Name:**

**Community of Residence:** Ninilchick AK

**Comment:**

I Clint Carlson SUPPORT Proposal #162 I am a full time resident here in the region 15C.

My wife and I are living remote in the Caribou Hills and the Ptarmigan are  
a great source of protein.

The extension of the season will allow us to hunt later in the winter. The early part of the season presents lots of marshy areas which makes it difficult to traverse.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 162: Support

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PC047

**Submitted by:** Heath Carroll

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

I support these proposals for trapping in the cooper landing area

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support  
Proposal 154: Support

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**Submitted by:** Kathryn Carssow

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

I am writing in support of nine proposals now before the Board of Game at its March 17, 2023, meeting: 145, 146, 147, 149, 150, 151, 152, 153 and 154. I am the former owner and operator of the Russian River Ferry in Cooper Landing. I am a 46-year Alaska resident, 38 of those years spent in Southcentral, including Anchorage and Homer. I have hiked and skied extensively throughout the Kenai Peninsula and drive the Sterling Highway regularly throughout the year.

I ask the BOG to give serious consideration to the ever-growing conflicts between consumptive and other winter outdoor recreation and to take action to reasonably protect the enjoyment of all users of our trails and in wild areas on the Kenai Peninsula. Trapping is an historic and appreciated use of our public lands. It only comes into negative light when others pursuing other forms of winter recreation unintentionally come upon traps. 100-yard setbacks on mapped trails on public lands minimizes conflicts that happen when people or their pet dogs are unintentionally injured in traps. By minimizing these conflicts, trapping will continue to be an appreciated and supported sport. This is why Homer area trappers and outdoor recreationalists have agreed to these reasonable provisions in the Homer and Cooper Landing areas. Winter trails and public lands can be enjoyed by all with setbacks from high use and mapped trails and beaches. Signs indicating where active trapping is taking place protects everyone.

Further, with the millions begin spent on wildlife crossings that protect motorists as well as multiple wildlife, it only makes sense to create hunting and trapping buffers that encourage, rather than kill, harm or discourage wildlife from using them.

Thank you in advance for taking action to put in place these reasonable and locally supported measures.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support  
Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC049

**Submitted by:** Samantha Castle

**Organization Name:**

**Community of Residence:** Anchorage, Alaska

**Comment:**

I support proposal #145 to provide a 1/4 mile buffer from hunting and trapping near wildlife crossing underpasses and overpass on the Sterling Highway. The purpose of the wildlife crossing areas should be to allow animals to cross the highway in a way that is safe for both the animal and for drivers using the Sterling Highway. Allowing hunting and trapping in and around the wildlife crossings would deter animals of all kinds from using the wildlife crossings as their path to move across the highway. This, in turn, would defeat the purpose of implementing these underpasses and overpass. By creating a 1/4 mile buffer zone near these wildlife crossings, I believe that animals will learn over time that they are a safe and convenient pathway in which to get across the highway, incentivizing them to continue using the designated wildlife crossings rather than running across the highway. If animals use the crossings, there will be less roadkill as well as fewer wildlife-vehicle accidents along Sterling Highway. I believe that the wildlife crossings will be infinitely more successful if a 1/4 mile buffer from hunting and trapping is created, benefiting animals and people in the area. Please implement this buffer to help wildlife crossings along the Sterling Highway become a success!

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Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 160: Support

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PC050

**Submitted by:** Carson Caudle

**Organization Name:**

**Community of Residence:** Marshall, Texas

**Comment:**

Proposal 204: Oppose

Dear Board of Game Members,

My name is Carson Caudle. I spent this past hunting season working for Alaska River Wild Adventures as a packer in unit 19C. Working for Guide [REDACTED], I learned a lot about the area and about the sheep in the area. Spencer and the rest of his guides are very knowledgeable of this unit and have great respect for the conservation of the game in the unit. While working, I saw many sheep daily. Even though our success rate was down, I saw many rams. Though mature 8-year-old rams were few, we saw a great number of potential rams for the next seasons to come. Speaking with the guides, I learned that harsh winters from past years are one of the main factors that lead to this shortage of mature rams. Though cycles of this nature happen periodically, shutting the unit down could potentially lead to an influx of hunters into other units, which in turn would hurt the populations in those units. [REDACTED] states that as well

in his comment. Spencer has also said that they will be cutting back on sheep hunters for the next season, which I believe is a great idea. From the rams I saw this past season, I know there will be mature rams next season. When it comes to ewes and lambs, I saw a great abundance of them. I just think this past season was the result of those harsh winters 7-8 years ago. I highly recommend you consider the comments of [REDACTED] and the rest of the guides from ARWA as we oppose the shutting down of unit 19C.

Thank you for your consideration,

Carson Caudle

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 204: Oppose Proposal 205: Oppose

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## Proposal 204: Oppose

Dear Board of Game Members,

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Thank you for your consideration,

Carson Caudle



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

February 18, 2022

Re: Comments to the Board of Game

Dear Chairman Burnett and Board of Game Members,

As you know, Kodiak's bear management system for the last 40+ years has been a huge success. It is a somewhat complex, intricate system developed over time that you must be careful changing. For this reason **I am opposed to proposals 78, 79 and 80.**

Proposal 79: require all hunters to apply for permit hunts and pay the application fee during the application period

- Only some of the draw permits on Kodiak are available due to the alternate list. Many areas have alternates drawn.
- Due to the nuances of the Federal Land Use Policy, the permits referred to as "not applied for" **are** utilized, but not drawn.
- The guided component of the Kodiak management system is key in the ability to have a consistent harvest and comprised of adult boars along with a low harvest of sows.
- This provision was put in place so that the non-resident bear tags would be filled to assist with management and the Kodiak system allows guides to fill hunts with "over-the-counter" tags,
- The current non-resident tag policy promotes easily managed biological sustainability and economic stimulus for Kodiak and the State.
- State constitution mandates that wildlife will be utilized for "maximum benefit for its people." The Kodiak Brown Bear is a "non-meat animal", thus it is not managed to maximize as a food source. Therefore, priority management is for economic and intrinsic value. "For the maximum benefit of the people" should thus involve a high percentage of nonresident guided hunters which clearly maximizes the economic value of the Kodiak bear.
- application fee lost (\$5) is infinitesimal in comparison to Non resident lic/tag fee (\$1160) matched three fold by PR funds (totaling \$4640/tag) plus a major loss of business to state and local economies , if these permits sit unused.
- Any management change can and will have a trickle effect with multiple and potentially lasting biological consequences.
- This is very important tool of the BOG and the Department
- Due to Federal selection system, areas having only one guide will have no alternates as guides can only sign contracts for the applicants to apply for the draw up to the number of permits available. If someone cancels, permit will sit idle.



- Proposer has problems with guides “taking permits off the table”. Guides are extremely knowledgeable of the areas they work. Probably more so than the ADF&G or USFWS. In fact, ADF&G and the USFWS have started a “citizen science” program asking guides to document sightings to assist them with management.
- Additionally, under Federal guidelines, guides are **required** to “assure a reasonable chance of success” and **must not** take the maximum number of permit holders allowed if needed to assure this.

Proposal 79: Transfer under-subscribed non-resident brown bear permits for unit 8 to the resident allocation

- All of the reasons listed above for proposal 78
- Would negate current system where ADF&G knows some permits will be unused and sets numbers accordingly
- It will start to negate historical harvest data and current management plan
- Increased biological concerns with resident higher rate of sow harvest

Proposal 80: Adjust the allocation of Unit 8 non-resident Brown Bear Permits to be not more than 35% in any hunt.

- Current system looks at Island wide %'s and not individual area
- Bear density different in different areas
- Other factors used: access to an area, areas around villages to reduce population, etc.
- Numbers have been in place since 1976 and it is working great

I am in favor of Proposal 81: Require all snares on Kodiak Road System to include breakaways

- The BOG has traditionally sided with the Alaska Trappers Association with not enacting any safety measures for wildlife and domestic animals, instead trying to use education. ATA has not provided any help as promised and it's time to be responsible and ethical and start to protect these animals.

Thank you for the opportunity to voice my concerns and I would like to thank you all for giving your time for the State of Alaska.

Sincerely,

*Paul A. Chervenak*

Paul A. Chervenak



PC052

**Submitted by:** Dorothy Childers

**Organization Name:**

**Community of Residence:** Indian, AK

**Comment:**

Proposal 98 - Brown bear hunt in Unit 14C, Rainbow Creek drainage

I urge the Board of Game to oppose proposal 98. I am a longtime resident of Rainbow Valley and I use the park year round for hiking, berry picking, and snow shoeing. Opening the narrow valley to a bear hunt would present a clear safety burden for people who use the area and for Rainbow Valley residents, including families with children. Having hunters navigating the private property boundary in the Rainbow Creek drainage would result in confusion and likely conflict. A hunt in this drainage would go against the Chugach State Park's management and purpose.

Proposal 103 - Establish a bear bait hunt for black and brown bears, Unit 14C McHugh Creek drainage

I urge the Board of Game to oppose proposal 103. It's hard to imagine a more dangerous proposition given the heavy recreational use of the McHugh Creek drainage. As a resident of Rainbow Valley, the prospect of bear baiting in the adjacent valley is very alarming. This is clearly not consistent with the management and purpose of this area of the park.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

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PC053

**Submitted by:** Bradley Christensen

**Organization Name:**

**Community of Residence:** Anchorage, AK

**Comment:**

see attached

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Proposal 64: Support with Amendment Proposal 81: Support with Amendment Proposal 104: Oppose  
Proposal 145: Oppose Proposal 146: Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal  
150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose Proposal 155:  
Oppose Proposal 156: Oppose Proposal 157: Support with Amendment Proposal 158: Support Proposal 159: Oppose  
Proposal 160: Oppose

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## South Central Region B.O.G Proposals 2023

### PROPOSAL 81

#### **Require all snares set on the Kodiak road system to include breakaway mechanisms.**

-I am hesitant to support this proposal as written. Break away devices (BAD's) are known to be finicky when it comes to measurable release poundage and it takes an above average snare builder to get consistent results with them. Should you find this proposal favorable, I would suggest foregoing any language about anchor strength or maximum release poundages due to enforceability issues. The below paper has excellent information regarding snares and break away devices.

[https://www.fishwildlife.org/application/files/5515/2002/6134/Modern\\_Snares\\_final.pdf](https://www.fishwildlife.org/application/files/5515/2002/6134/Modern_Snares_final.pdf)

### PROPOSAL 64

#### **Change the minimum jaw spread for trapping land otter in Unit 6 as follows: from 5 $\frac{7}{8}$ " to 5 $\frac{1}{8}$ "**

-I maintain a neutral stance on this proposal. I will note that should you allow the smaller foot hold traps to be used, it would be wise to create provisions for body grip traps. Here is the language I would propose using: "When trapping river otter in units where the mink and marten seasons are closed, you must use either a snare or a killer- style (body-grip) trap with an inside jaw spread of 6  $\frac{1}{2}$ " or greater, or a steel trap (foothold) with an inside jaw spread of 5  $\frac{1}{8}$ " or greater."

### PROPOSAL 104

#### **Close Chugach State Park and Glacier Creek drainage in Unit 14C to lynx hunting and trapping**

-I am opposed to this proposal. Much of this area resides inside of the Anchorage Closed Area already. Further this proposal ignores the naturally occurring extreme population cycles and ability to range over enormous distances that are inherent with lynx. With this in mind, it is a stretch to say that hunting and trapping play much, if any role in reducing viewing opportunities for these naturally elusive creatures in this area. By removing the ability to hunt and trap lynx in this area, you may inhibit the ability of the department to manage the social carrying capacity, especially during the peaks of the lynx cycle.

### PROPOSAL 145

#### **Close areas to hunting and trapping within 1/4 mile of parts of the Sterling Highway in Units 7 and 15.**

-I am opposed to this proposal. The structures mentioned in this proposal have yet to be built and the project is still several years out from completion. Since the structures do not currently exist, there is no issue. Further, there is no demonstrable data to support that trapping and hunting within a  $\frac{1}{4}$  mile of these five planned structures will have a detrimental effect on the local wildlife populations.

**PROPOSALS 146, 147, 148, 149, 150, 151, 152, 153****Establish trapping setbacks along trails, trailheads and pullouts in Units 7 and 15.**

-I wholeheartedly oppose all of the above proposals related to trapping setbacks. These continue to be a one sided “solution” to a two sided problem. Proposal 146’s author makes the point that *“Other considerations, including appropriate signage warning park users of traps during trapping seasons, would help avoid conflicts but is labor intensive and requires funding which is currently not available. Requiring park visitors to have their dogs on a leash during trapping season is another option. Skiing and snowshoeing with a dog on a leash is difficult and is not adhered to”*. In short, since other user groups would fail to follow regulations and other options are labor intensive, financially burdensome and *“regulation enforcement is difficult at best”*, trappers need to carry all of the burden and be excluded from the use of public land. These proposals would also greatly reduce trapping opportunities that pose little to no danger to domestic dogs such as submerged, elevated, under ice and enclosed traps. A better alternative would be for all user groups to follow the trappers’ lead and work to educate the public about being responsible and respectful multi-users of Alaska’s trails.

**PROPOSAL 154****Require signs be posted at all active trapping access points in Unit 7**

-I oppose this proposal. While “active trapline” signage along personal traplines is encouraged. “Active trapline” signs on multi-use trails could create conflict where there currently is none. For instance, if there are only marten and ermine sets set along a multi use trail, there is little to no danger to domestic dogs, but by signing the trail, users are now actively looking for sets. This could lead to tampering and theft as well as added undue stress to the non trapping public about a non issue. Advisory signage like the one’s the ATA has posted are a much better alternative. They remind all user groups, trappers and pet owners alike, to be respectful of one another and to be responsible in their trail use.

**PROPOSAL 155****Close Unit 15C to beaver trapping**

-I oppose this proposal unless biologically necessary. I would defer to the Department biologist to make an educated estimate of the beaver population and the impact regulated trapping harvest is having on said population. Moving the start of beaver season from Oct. 15 back to Nov. 10 would be a preferable alternative. By eliminating the early open water season the take would be reduced while still allowing a trapping season.

**PROPOSAL 156****Close beaver trapping in the Anchor River and Deep Creek Drainages in Unit 15C for six years**

-I oppose this proposal unless biologically necessary. I would defer to the Department biologist to make an educated estimate of the beaver population and the impact regulated trapping harvest is having on said population. Moving the start of beaver season from Oct. 15 back to Nov. 10 would be a preferable alternative. By eliminating the early open water season the take would be reduced while still allowing a trapping season.

**PROPOSAL 157****Shorten beaver trapping seasons in Unit 7 from Oct. 15 to Nov. 1**

-I support this proposal. I would amend it to push the season start date back to Nov. 10. Though there may not be a large decline in the overall beaver population in unit 7, there seems to be a localized decline in many of the most accessible areas of the unit. By essentially eliminating the early open water season, beaver populations should begin to rebound in these areas.

**PROPOSAL 158****Shorten the coyote trapping season in Unit 7 and 15 from Oct. 15 to Nov. 10**

-I support this proposal. By aligning the coyote season with the start of the rest of the general season, it will reduce some confusion by the non trapping public as to the start of "trapping season" and help reduce user conflict. This proposal will, to a small degree, help alleviate incidental take, though the lynx season in units 7 and 15 doesn't open until January 1 so this should not be used as the primary means of justification of this proposal's passage.

**PROPOSAL 159****Lengthen wolverine hunting season in unit 7 and 15 from Sept. 1 to Aug. 10**

-I oppose this proposal unless deemed biologically necessary by the department. I would defer to Department biologists on the impact wolverines are having on sheep and goat populations during this time. Trapping should remain the primary management tool for wolverines. The taking of wolverine in August may have an adverse effect on population recruitment due to kits still being dependent on their mothers at the time. Further, there is no prohibition on the taking of females or females with offspring in the hunting regulations regarding wolverine.

**PROPOSAL 160****Limit beaver trapping to one set per lodge in unit 7 and 15**

-I oppose this proposal unless the department deems it biologically necessary. Moving the start of beaver season from Oct. 15 back to Nov. 10 would be the preferable alternative. By eliminating the early open water season. The take would be reduced while still allowing a trapping season.



**Submitted by:** Sue Christiansen

**Organization Name:**

**Community of Residence:** Homer

**Comment:**

Please support proposals 145,146,and 147

Requiring minimal trapping setbacks in multi-use areas will provide you with overwhelming support. Who doesn't want their dog to be with them safely outside?

99.6% of Alaskans do not trap and travel on recreational trails with their pets. Please serve these individuals, as well as trappers as the Alaskan Constitution dictates. It only takes 2 minutes to walk 100 yards and a trapper could very easily access these traps if on a snow machine.

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We don't have data on populations or harvest of sea ducks in our local area. I have seen the numbers of sea ducks radically decline since the 1970s. Many of Alaska's sea ducks do not go down to the Lower 48 to nest, where Pacific Flyway surveys are conducted. Our birds go up to Alaska's northern boreal forests and deltas to lay their eggs, and they don't get counted.

According to a study published in Science Magazine, there has been a 30% decline in the number of birds since 1970. Unless you take some action there is no expectation that this trend will slow or reverse. As a decision maker, your choices will impact the ability of your grandchildren and great grandchildren to be able to appreciate these birds.

90% of Cook Inlet Sea Ducks overwinter in Kachemak Bay. Sea ducks have site fidelity. They return to the same place every year. Kachemak Bay is the easiest place in Alaska to hunt ducks. There is so much we don't know. Why not do our best to increase populations? Populations will not recover from consecutive years of over-harvest—high site-fidelity and low reproduction rate. Please support 164, 166, 169, 171. Thank you.

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According to Alaska Statute 16.20.510 and the Alaska Constitution 5AAC95.610 as Board Members your priority is to encourage rehabilitation of depleted wildlife populations. It is too early to open Ptarmigan hunting up! Please maintain our current ptarmigan season and bag limit north of K-Bay in 15C. Being an "old timer" I can testify to huge ptarmigan numbers compared to present numbers due to changes in hunting practices and easy access with snowmobiles. ADFG research has shown that any mortality on ptarmigan after mid-January is additive and could cause population declines. Bag limits have little effect as most hunters take an average of 3 birds/trip. So it is the number of hunters, timing of season, and access that really drives effects from hunting.

Ptarmigan on the Peninsula are finally starting to show some recovery. We are only starting to see them in some places where they once were. Just because they have been noticed again is not a good reason to go back to the regulations that made them essentially disappear. Most of the places we used to see them, the birds are still not there. Why not have Ptarmigan in good numbers for awhile? Please oppose 162 and 163!

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Please close beaver trapping in Unit 15C.

There are very few beaver around these days on the Kenai Peninsula. Please give beavers some time to replenish themselves down here...just a few years, get the population back up. Give trappers some beaver to catch.

This is an issue bigger than beaver trapping. Beavers are engineers in rewetting and recharging ground water, essential for our diminishing salmon. They also have a huge ability to restore drying peatlands, vital for carbon sequestration and climate change mitigation. We need them. If you close Diamond Creek and Anchor River areas with monitoring and a 6 year sunset clause, at least they will be able to repopulate in that area. and move around. Your job description defined by the Alaska Constitution (5AAC 95.610) and (AS 16.20.510) includes "encouraging rehabilitation of depleted wildlife populations". That would be beavers...here on the Kenai Peninsula. No one else has the power to increase their numbers. Please support 155 or at least 156.

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 155: Support with Amendment  
Proposal 156: Support Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 166: Support  
Proposal 169: Support Proposal 171: Support

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## **CHUGACH STATE PARK CITIZENS' ADVISORY BOARD**

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

February 28, 2023

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

### **Subject: 2022/2023 Board of Game Proposals**

I am writing on behalf of the Chugach State Park Citizen 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 Citizen 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 visits 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 2022/2023 Board of Game regulatory proposals that will affect the park's wildlife and users. Our recommendations and proposed amendments are included below. These proposals were discussed at length during our Wildlife subcommittee meeting on December 16th, 2022, and our regular board meeting held February 13<sup>th</sup>, 2023. Additional amendments to this letter were needed after the February 13th meeting, and a final vote was provided via email with 13 votes in favor, none opposed and 2 member unavailable for a vote. Findings are included below for the Board of Game to review and consider.

**PROPOSAL 89** REAUTHORIZE THE ANTLERLESS MOOSE SEASONS IN UNIT 14C  
AS PROPOSED BY THE ALASKA DEPARTMENT OF FISH AND GAME.



**Amendment(s) Discussed:** None

**Recommendation:** Support

**Findings:** This hunt has proven to be an effective tool at managing the moose population within Unit 14C for a number of 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 the desired population level within the subunit helps to avoid over-browsing of winter habitat, moose-vehicle collisions, moose-human conflicts, and the resulting die-offs from starvation.

**PROPOSAL 90** ESTABLISH A PRIMITIVE OR ANY WEAPONS HUNT FOR BLACK BEAR IN UNIT 14C, SOUTH FORK EAGLE RIVER: ALL DRAINAGES INTO SOUTH FORK EAGLE RIVER EXCLUDING AREA WITHIN ½ MILE OF DEVELOPED FACILITY.

**Amendment(s) Discussed:** None

**Recommendation:** Oppose.

**PROPOSAL 97** ESTABLISH A PRIMITIVE OR ANY WEAPONS HUNT FOR BROWN BEAR IN UNIT 14C, SOUTH FORK EAGLE RIVER: ALL DRAINAGES INTO SOUTH FORK EAGLE RIVER EXCLUDING AREA WITHIN ½ MILE OF DEVELOPED FACILITY.

**Amendment(s) Discussed:** None

**Recommendation:** Oppose.

**Findings:** One of the purposes for establishing Chugach State Park was to provide areas for the public display of local wildlife. Negative wildlife-human interactions are not common within the park, but public safety is a concern as visitors seek to view wildlife and use park resources for recreational pursuits. Most visitors seem to be aware of the potential threats that come with recreating alongside wildlife and encountering bears has not prevented most residents from using area parks and trails. Certain activities occurring within the park such as hunting have been the source of public contention over the years because of individual personal recreational perspectives. The Division of Parks and Outdoor Recreation manages public safety as well as the land and recreation resources. Accessible, year-round recreation areas like the South Fork of Eagle River and the interconnected trail system of the West fork of Eagle River drainage have been historically set aside from the use and discharge of weapons for this purpose, and we believe the intent of this should be upheld. Authorizing a hunt in this drainage would go against the Chugach State Park's management and purpose.

**PROPOSAL 98** ESTABLISH A BROWN BEAR HUNT WITHIN UNIT 14C, RAINBOW CREEK: ALL DRAINAGES INTO RAINBOW CREEK EXCLUDING AREA WITHIN ½ MILE OF DEVELOPED FACILITY.

**Amendment(s) Discussed:** None



**Recommendation:** Oppose.

**Findings:** One of the purposes for establishing Chugach State Park was to provide areas for the public display of local wildlife. Negative wildlife-human interactions are not common within the park, but public safety is a concern as visitors seek to view wildlife and use park resources for recreational pursuits. Most visitors seem to be aware of the potential threats that come with recreating alongside wildlife and encountering bears has not prevented most residents from using area parks and trails. Certain activities occurring within the park such as hunting have been the source of public contention over the years because of individual personal recreational perspectives. The Division of Parks and Outdoor Recreation manages public safety as well as the land and recreation resources. Accessible, year-round recreation areas like Rainbow Creek drainage have been historically set aside from the use and discharge of weapons for this purpose, and we believe this intent of this should be upheld. Authorizing a hunt in this drainage would go against the Chugach State Park's management and purpose.

In addition, the Board has considered concerns from the local Rainbow Valley residents who will be impacted by this proposal and are opposed to it. They cited numerous concerns including: hunters being unaware of property lines and therefore unable to stay outside of the required ¼ mile from a developed facility; hunters searching for boundary lines will lead to trespassing; rifle bullets traveling well beyond the ¼ mile boundary and pose a safety concern for families in the area; undue burden on residents to maintain safety and potential increased conflicts with hunters.

**PROPOSAL 103** ESTABLISH A BEAR BAIT HUNT FOR BLACK AND BROWN BEARS WITHIN UNIT 14C, MCHUGH CREEK DRAINAGE: STATION FOR BEAR BAITING MAY 1- JUNE 15; UP TO 6 CERTIFIED USERS BY REGISTRATION PERMIT.

**Amendment(s) Discussed:** None

**Recommendation:** Oppose.

**Findings:** This proposal is in direct conflict with 11 AAC 12.220(b), and 11 AAC 12.050(a). One of the purposes for establishing Chugach State Park was to provide areas for the public display of local wildlife. Negative wildlife-human interactions are not common within the park, but public safety is a concern as visitors seek to view wildlife and use park resources for recreational pursuits. Most visitors seem to be aware of the potential threats that come with recreating alongside wildlife and encountering bears has not prevented most residents from using area parks and trails. Certain activities occurring within the park such as hunting have been the source of public contention over the years because of individual personal recreational perspectives. The Division of Parks and Outdoor Recreation manages public safety as well as the land and recreation resources. McHugh Creek is one of the most highly developed trailheads along Turnagain Arm and being a mere 20-minute drive from Anchorage, it consequently receives heavy use year-round especially in the spring with its southern exposure. Areas like McHugh Creek drainage have been set aside from the use and discharge of weapons for this purpose.

It would be very challenging for hunters to meet the required 1 mile from a recreational facility and ¼ mile setbacks (5 AAC 92.044) from a developed trail within the steep, mountainous, non-motorized McHugh Creek drainage. Since McHugh drainage is so narrow, it is likely the bait





station will lure bears toward a developed trail rather than away. Park regulations prohibit leaving bait station equipment in the field for extended amounts of time unattended.

Additionally, the Chugach State Park Citizen Advisory Board reviewed a similar proposal during the 2018/2019 Board of Game cycle for Unit 14C. On February 13th, 2019 the Board submitted a public comment unanimously opposing a proposal to establish a baited bear hunt, citing concerns regarding increased bear/human interactions, encouraging frequent visitation due to feeding, habituation to non-natural food sources, and development of social trails by hunters who frequent certain sites. The Board acknowledges that bear bait hunts have merit when done responsibly, but does not believe the circumstances have changed since opposition in 2019. The Board does not believe this proposal is in the best interest of all park users and its peripheral residents.

The Chugach State Park Citizen Advisory Board would also like to express general support for proposals that seek to expand and/or create new hunting opportunities for various user types, given the proposed changes do not directly conflict with park management or regulations, create safety concerns, or have significantly negative impacts on wildlife populations (per Alaska Department of Fish and Game) or existing historical uses in the park.

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

Sincerely,

*Trond B Jensen*

Trond Jensen  
Chair

cc: Ben Corwin, Chugach State Park Superintendent

Dave Battle, ADF&G



**Submitted by:** Kevin Clark

**Organization Name:**

**Community of Residence:** Seward, AK

**Comment:**

I am a hunter/trapper from Seward, and I am writing to oppose proposals

#144,#146,#147,#148,#149,#150,#151,#152,#153,#154 on the grounds that they are an unnecessary infringement on hunter/trapper rights.

Over the past few years, we have seen these same proposals come up claiming that this will make trails more safe and will limit user conflict. And every time they come up the reasoning is always someone's dog got caught in a trap so therefore trappers need to be limited in where they can trap. That logic is flawed.

Here in Seward, there were two instances of dog catches in traps. Neither of which occurred on a state/federal maintained/established trail. One was an off leash dog that got caught in a wolverine set up snow river when a group of backcountry skiers decided to utilize a trappers trail to go up the frozen river bed. In that instance there were multiple off leash dogs that the owners did not have under control. In the the other instance there was a dog caught in a snare off the railroad tracks near Kenai Lake. Again it was an off leash dog accompanied be a walker on a trappers trails to their trap line.

The underlining issue in both these (and every other dog catch scenario) is the fact that irresponsible dog owners do not leash their animals, the animals go and hunt up trappers sets because of the lures that we use, the dog gets caught and the trappers get blamed.

These set backs, if passed, won't salve the issue that an off leash dog can still go hunt up a trap. From my perspective, all that this would do is open the door for further future setbacks, and ultimately an all out ban on trapping. Look at New Mexico or Colorado. Two states with a storied past rich with trapping culture, now reduced to laws and regulations that prevent you from even owning a trap. Do we want that here? Do we want to start the inevitable stripping of Alaskan's rights to continue in the culture of their forefathers? Most of these trails that the set backs are proposed on were kicked in by trappers. Are we really going to now kick them off their own trails?

The plain and simple facts are this. Since Alaska was founded as a state, dog owners, trappers, and hunters have coexisted without the need for drastic intervention in the form of restrictive regulations such as the set back proposals. All it takes is responsibility from all user groups. Trappers already have regulations that we are required to adhere to. Hunters do as well. From my perspective, the only user group that doesn't have regs that restrict their activities are the same ones calling for these set backs. How is this fair? That some users should be held to regulatory restrictions while others have none? And those with none can lobby to impose more restrictions on user groups that already have restrictions? Surely you can see the hypocrisy in this.

I implore you, the Board, to vote down all these measures. Keep Alaska's public land accessible and free of needless burden.

Thank You

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Oppose Proposal 146: Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose

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PC057

**Submitted by:** Jeff Collins

**Organization Name:**

**Community of Residence:** homer

**Comment:**

I have run into traps, some right on the trail, with no signage while skiing,when signage was present it was very general,traps in the area,stopped taking my dog to some areas long ago,setbacks are common sense measures,trappers should be in favor,good for the sport,catching dogs,Bad

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support



PC058

**Submitted by:** Bob Bourland

**Organization Name:** Compton Traditional Bowhunters

**Community of Residence:** Damascus, Oregon

**Comment:**

Compton Traditional Bowhunters, The National Traditional Bowhunting organization would like to support the following proposals. All of these proposals increase opportunities for our bowhunters in Alaska.

Proposals 67,71,72,87,91,92,93,99,100,101,110,111,112,113,119,120,121,122,123,124,125, and 126.

We oppose proposal 82 that would open an Archery area for Rifle sheep hunting.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 67: Support Proposal 71: Support Proposal 72: Support Proposal 82: Oppose Proposal 87: Support  
 Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 99: Support Proposal 100: Support Proposal  
 101: Support Proposal 110: Support Proposal 111: Support Proposal 112: Support Proposal 113: Support Proposal  
 119: Support Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support Proposal 124:  
 Support Proposal 125: Support Proposal 126: Support



**Submitted by:** Janette Cadieux, CLAPC Chair

**Organization Name:** Cooper Landing Advisory Planning Commision

**Community of Residence:** Cooper Landing, AK

**Comment:**

See attached

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support    Proposal 149: Support    Proposal 150: Support    Proposal 151: Support    Proposal 152: Support  
Proposal 153: Support    Proposal 154: Support

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Cooper Landing Advisory Planning Commission  
Janette Cadieux, Chair  
[REDACTED]  
Cooper Landing, AK 99572

December 19, 2022

Alaska Department of Fish and Game  
Board of Game  
Attn: Jerry Burnett, Chair  
[jerry.burnette@alaska.gov](mailto:jerry.burnette@alaska.gov)  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Mr. Burnett:

I am writing this letter to make you and the entire Alaska Board of Game (BOG) aware of a recent vote taken by our community land planning commission. We support Proposal 145 currently before the board.

Since the earliest planning of the Cooper Landing Bypass in the 1980s the Cooper Landing Advisory Planning Commission (CLAPC) within the Kenai Peninsula Borough Planning Department has been involved in that effort. As you likely know, that enterprise, currently in staged build phase, is now called the Sterling Highway MP 45-60 Project. If needed, you may acquaint yourself with the project details at: <http://sterlinghighway.net>. Throughout this endeavor, the continued north/south passage of wildlife has remained highly important to the values and economic vitality of our community. This may be evidenced by our involvement with the document "Delineation of Landscape Linkages" that may be accessed on the CLAPC website: [https://www.kpb.us/images/KPB/PLN/APC/Cooper\\_Landing/Cooper\\_Landing\\_connectivity\\_revised\\_compressed\\_2.pdf](https://www.kpb.us/images/KPB/PLN/APC/Cooper_Landing/Cooper_Landing_connectivity_revised_compressed_2.pdf)

Knowing that the new highway would create a barrier to free movement of wildlife, we have been supportive of the wildlife under and over passes being built into this new highway design and were pleased to see the inclusion of the state's first wildlife overpass. We have also been concerned that, without proper regulation, the very structures designed to help wildlife move past the barrier of the new highway would promote targeting by trapping or hunting within, or in close proximity to, these structures thus doing the opposite of the designed intent of these facilities. We have met with the State of Alaska Department of Transportation and Public Facilities (ADOT&PF) as well as United States Forest Service (USFS) and United States Fish and Wildlife Service (USFWS) in past CLAPC meetings to specifically discuss ecological impacts such as invasive species introduction, handling of tree cutting in the context of the spruce bark



beetle infestation, and the potential conflict with the taking of animals at highway wildlife passage structures. CLAPC has met once again to consider this last concern.

We encourage the Alaska Board of Game to take the common-sense action of Proposal 145 to protect wildlife in its use of the structures specifically built to provide safe wildlife passage. CLAPC also voted to encourage the BOG to extend the protections in Proposal 145 to other highway passage structures within the MP 45-60 Project including the three upsized culverts west of Juneau Creek Bridge, the road underpass in Kenai Area Plan, Unit 395, at the Juneau Creek Bridge both west and east side, the Slaughter Gulch underpass, and the Coyote Notch underpass. While these other structures were not built specifically for wildlife passage they will likely become additional points of wildlife passage and therefore should be included by amendment to Proposal 145.

Thank you for the opportunity to make BOG aware of our community's thoughts on this matter. The BOG is aware of the importance of wildlife to Alaskans and our community's economies. We feel certain you will see the sense in Proposal 145 and pass it. We encourage BOG to include the amendment CLAPC has put forth.

Respectfully,

Janette Cadieux  
Cooper Landing Advisory Planning Commission, Chair

Cc:  
Stosh Hoffman, Vice Chair, [stosh.hoffman@alaska.gov](mailto:stosh.hoffman@alaska.gov)  
Allen Barrette, Member, [allen.barrette@alaska.gov](mailto:allen.barrette@alaska.gov)  
Jake Fletcher, Member, [jacob.fletcher@alaska.gov](mailto:jacob.fletcher@alaska.gov)  
Lynn Keogh, Member, [lynn.keogh@alaska.gov](mailto:lynn.keogh@alaska.gov)  
James Cooney, Member, [james.cooney@alaska.gov](mailto:james.cooney@alaska.gov)  
Ruth Cusack, Member, [ruth.cusack@alaska.gov](mailto:ruth.cusack@alaska.gov)  
Kristy Tibbles, Executive Director, [kristy.tibbles@alaska.gov](mailto:kristy.tibbles@alaska.gov)



Cooper Landing Advisory Planning Commission  
Janette Cadieux, Chair

[REDACTED]  
Cooper Landing, AK 99572  
[REDACTED]

January 9, 2023

Alaska Department of Fish and Game  
Board of Game  
Attn: Jerry Burnett, Chair  
[jerry.burnette@alaska.gov](mailto:jerry.burnette@alaska.gov)  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Mr. Burnett:

I am writing this letter to make you and the entire Alaska Board of Game (BOG) aware of a recent vote taken by our community land planning commission. We support Proposals 149-154 inclusive, currently before the board.

It is our understanding that a survey of all Cooper Landing mailing addresses revealed that 83%-97% of respondents support set-backs on trails, at campgrounds, along beaches, and at pull-outs along with identifying signage of traps and trapping areas. Cooper Landing residents have multiple reasons for wanting these reasonable trapping regulations including safety for children and pets but also because trapping as it exists could threaten the nascent winter tourism in our community. There are plenty of things that can threaten the economic viability of our community but trapping should not be one of them. Trapping by .4% of Alaskans does not need to impact the other 99.6% of Alaskans so negatively. The two user groups can, with reasonable regulation of trapping, co-exist without rancor.

You have heard from our community recently regarding our support for BOG Proposal 145. We encourage the Alaska Board of Game to take the common-sense action of both Proposal 145 and Proposals 149-154 inclusive and make these a part of regulation. The BOG is aware of the importance of wildlife to Alaskans and our community's economies. We feel certain you will see the sense in Proposals 149-154 and pass them into regulation. Thank you for the opportunity to make BOG aware of our community's thoughts on this matter.

Respectfully,

Janette Cadieux  
Cooper Landing Advisory Planning Commission, Chair



**Submitted by:** Clay Coo

**Organization Name:** Cooper Landing Emergency Services

**Community of Residence:** Cooper Landing, AK

**Comment:**

I fully support all proposals pertaining specifically to Cooper Landing only.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support    Proposal 149: Support    Proposal 150: Support    Proposal 151: Support    Proposal 152: Support  
Proposal 153: Support    Proposal 154: Support

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**Submitted by:** Lorraine Temple

**Organization Name:** Cooper Landing Safe Trails

**Community of Residence:** Cooper Landing

**Comment:**

Dear Board of Game,

A bundle of 44 comments were submitted via USPS regarding the trap setbacks and active trapping signage in the Cooper Landing area. These comments were collected at Salmonfest in August 2022 prior to proposal numbers being assigned.

To clarify, the proposals referred to, and I'll give them to you in the order on the forms, are:

#154 - Signage

#152 - Trails

#149 - Campgrounds

#150 - Roads and Pullouts

#153 - Beaches

#151 - Summit Recreation Area

If I recall correctly, (and I'm doing this from memory) 41 were in favor of all the 100-yard setbacks, 2 were in favor of some of the proposals and 1 was totally opposed.

Please accept these as a batch under the Cooper Landing Safe Trails Committee submissions. They are all, with the exception of one, signed by the individual who filled it out.

Thank you for honoring these comments.

Regards,

Lorraine Temple

Cooper Landing Safe Trails Committee, chair

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After discussion with the Cooper Landing AC and more research, the Cooper Landing Safe Trails Committee recommends the following changes to proposals #149.. We feel this will make it more acceptable, more compromising and easier to understand. The original proposal language that we would like to remove has a strike-through, and the new language has been added in red.

Please consider these amendments to our proposal.

Respectfully submitted,

The Cooper Landing Safe Trails Committee

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Dear Board of Game,

After discussion with the Cooper Landing AC and more research, the Cooper Landing Safe Trails Committee recommends the following changes to proposals #150. We feel this will make it more acceptable, more compromising and

easier to understand. The original proposal language that we would like to remove has a strike-through, and the new language has been added in red.

Please consider these amendments to our proposal.

Respectfully submitted,

The Cooper Landing Safe Trails Committee

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Dear Board of Game,

After discussion with the Cooper Landing AC and more research, the Cooper Landing Safe Trails Committee recommends the following changes to proposals #151. We feel this will make it more acceptable, more compromising and easier to understand. The original proposal language that we would like to remove has a strike-through, and the new language has been added in red.

Please consider these amendments to our proposal.

Respectfully submitted,

The Cooper Landing Safe Trails Committee

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Dear Board of Game,

After discussion with the Cooper Landing AC and more research, the Cooper Landing Safe Trails Committee recommends the following changes to proposals #151. We feel this will make it more acceptable, more compromising and easier to understand. The original proposal language that we would like to remove has a strike-through, and the new language has been added in red.

Please consider these amendments to our proposal.

Respectfully submitted,

The Cooper Landing Safe Trails Committee

(see attached)

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Dear Board of Game,

After discussion with the Cooper Landing AC and more research, the Cooper Landing Safe Trails Committee recommends the following changes to proposals #152. We feel this will make it more acceptable, more compromising and easier to understand. The original proposal language that we would like to remove has a strike-through, and the new language has been added in red.

Please consider these amendments to our proposal.

Respectfully submitted,

The Cooper Landing Safe Trails Committee

\*see attachement\*

Note: We just submitted suggested amendments for proposals #149 & #150 but did not write the verbiage, "see attached". Each of those submissions contains an attachment that needs to be opened.

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Dear Board of Game,

After discussion with the Cooper Landing AC and more research, the Cooper Landing Safe Trails Committee recommends the following changes to proposals #153. We feel this will make it more acceptable, more compromising and easier to understand. The original proposal language that we would like to remove has a strike-through, and the new language has been added in red.

Please consider these amendments to our proposal.

Respectfully submitted,

The Cooper Landing Safe Trails Committee

\*see attached

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Please see the attached petition and signatures that were collected from Seward and from Anchorage residents who come down to the Kenai Peninsula to recreate. There were a total of 103 signatures of support collected over the course of 2 days.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

---

Petition from Seward in support of proposals #145, 146, 147, 148, 149, 150,151, 152, 153, 154

"See Attached"

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Dear Board of Game,

After discussion with the Cooper Landing AC and more research, the *Cooper Landing Safe Trails Committee* recommends the following changes to proposals #149.. We feel this will make it more acceptable, more compromising and easier to understand. The original proposal language that we would like to remove has a strike-through, and the new language has been added in red.

Please consider these amendments to our proposal.

Respectfully submitted,

*The Cooper Landing Safe Trails Committee*



## **PROPOSAL 149**

### **5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along the perimeter of campgrounds in Unit 7 as follows:

#### **1) SOLUTION:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish a 100-yard trapping setback along the perimeter of the campgrounds listed and described in the table provided, ~~2) We are requesting a 50 yard trapping setback for traps~~ with the exception of: traps with an inside spread of 5 inches or less which are set at least 4 feet above the ground or snow level, size 3 leg-hold marten traps in boxes, and size 110 and 120 conibear traps in boxes. ~~an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.~~ We are requesting these changes to protect the safety of people and their pets utilizing campgrounds in the Cooper Landing area.

#### **2) REGULATORY LANGUAGE:**

**ADD Regulatory Language for Unit 7: “Trap setback of 100-yards on all sides of the campgrounds listed, ~~Traps with an inside spread of 5 inches or less, which are at least 4 feet above the ground or snow level, and size 3 leg hold marten traps in boxes are allowed if more than 50yards from all sides of the campgrounds listed.”~~**

#### **Amended to:**

**...with the exception of: traps with an inside spread of 5 inches or less which are set at least 4 feet above the ground or snow level, size 3 leg-hold marten traps in boxes, and size 110 and 120 conibear traps in boxes.”**

- Quartz Creek Campground
- Crescent Creek Campground
- Russian River Campground
- Cooper Creek Campgrounds, North & South

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state-managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

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

#### **1) ISSUE:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish ~~4) a 100-yard trapping setback along the perimeter of the campgrounds listed and described in the table provided,~~ ~~2) We are requesting a 50 yard trapping setback for~~ with the exception of: traps with an inside spread of



5 inches or less that are set at least 4 feet above the ground or snow level, size 3 leg-hold marten traps in boxes, and size 110 and 120 conibear traps in boxes. We are requesting these changes to protect the safety of people and their pets' utilizing campgrounds in the Cooper Landing area.

Unit	Campground Name	Location	Winter Uses
7	Quartz Creek Campground	Mile 1 Quartz Creek Road, Cooper Landing	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, dog mushing, dog training,
7	Crescent Creek Campground	Mile 3 Quartz Creek Road, Cooper Landing	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, dog mushing, dog training,
7	Russian River Campground	Entrance is Mile 53 Sterling Highway, Cooper Landing	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, dog mushing, dog training,
7	Cooper Creek Campgrounds, North & South	Mile 50.7 Sterling Highway, Cooper Landing	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, dog mushing, dog training,

2) WHY:

Year-round outdoor recreation is an important and growing segment of the Cooper Landing area's economy. The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing's primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As the amount of winter recreation has increased over the past 20 years, so has the number of dangerous encounters between user groups and traps set in recreational areas. While many trappers



set their traps a responsible distance from campgrounds, trap placements close to campgrounds, present a very real danger, especially for young children and pets. As of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press. Since land managers and law enforcement do not track trap safety incidents all reports are collected and tabulated unofficially and are considered incomplete. While we respect the rights of trappers to set their traplines near campgrounds, we are seeking trapping regulation that will ensure the safety of all area user groups.

Our proposed 100-yard ~~and 50-yard~~ trapping setbacks ~~are~~ **is** not large enough to significantly limit a trappers' opportunity to trap near a campground. Proposing setbacks for campgrounds still leave most other areas unrestricted to trapping. Trappers who follow the Trapper's Code of Ethics' third tenant, to "promote trapping methods that will reduce the possibility of catching non-target animals," most likely already set traps back from campgrounds. The setbacks we are requesting will not unduly impact trappers and will greatly improve all user groups' safety. These proposed setbacks would also align with the Forest Service's Our Values Statement, which includes the intention of managing for "*Safety. In every way: physical, psychological, and social.*"

The 100-~~and 50-~~yard setbacks we have proposed would not present an undue burden on trappers. The average backpacking speed is 1 to 2 miles per hour. Assuming trappers are walking between one and two miles per hour, the setback distances requested would require only an additional two to three minutes of walking to place and check traps. Since many trappers use snow machines, the 100-yard setback could be crossed in less than 1 minute. **A local Cooper Landing trapper, as well as trappers from other nearby GMUs, have endorsed a 100- yard setback as reasonable and logical.**

Our proposed 100-yard ~~and 50-yard~~ setback distances will not impact the Board of Game's ability to manage wildlife along the listed campgrounds. Should trapping a particular species within the setback become biologically necessary, the board could use a temporary permit

system to address any problem that might arise. A similar proposal requesting a 100-yard setback from trails has been submitted and endorsed by the Homer AC. Having regulations that are similar, will make management, education, and enforcement easier in Units 7 and 15.

Establishing trap setbacks in the Cooper Landing area has strong community support. Cooper Landing property owners and residents were surveyed about trapping issues in their area in March, 2021. Returned surveys were tallied to show that 90% of the respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt setbacks were unnecessary.

Our proposal includes all public campgrounds accessed by a variety of users groups during the trapping season. The campgrounds that we have proposed for trapping setbacks are used for: cross country skiing, access to backcountry skiing, snowshoeing, hiking, fat tire biking, dog mushing, snow machining, travel by search and rescue dogs and personnel, hunting and trapping.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates 2,500 to 3,500 trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses.



**PROPOSED BY:** The Cooper Landing Safe Trails Committee

(HQ-F22-008)

\*\*\*\*\*





Dear Board of Game,

After discussion with the Cooper Landing AC and more research, the *Cooper Landing Safe Trails Committee* recommends the following changes to proposals #150. We feel this will make it more acceptable, more compromising and easier to understand. The original proposal language that we would like to remove has a strike-through, and the new language has been added in red.

Please consider these amendments to our proposal.

Respectfully submitted,

*The Cooper Landing Safe Trails Committee*



## **PROPOSAL150**

### **5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along certain roads and pullouts in Unit 7 as follows:

#### **1) SOLUTION:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish 1) a 100-yard trapping setback along both sides of roads and all sides of the pullouts listed and described in the table provided, 2) ~~We are requesting a 50 yard trapping setback for traps~~ with the exception of: traps with an inside spread of 5 inches or less that are set at least 4 feet above the ground or snow level, size 3 leg-hold marten traps set in boxes, and size 110 and 120 conibear traps in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular roads and pullouts in the Cooper Landing area.

#### **2) REGULATORY LANGUAGE:**

**ADD Regulatory Language for Unit 7: “Trap setback of 100-yards on both sides of roads and all sides of pullouts listed, ~~Traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, and size 3 leghold marten traps in boxes are allowed if more than 50 yards from the road or pullout.”~~**

#### **Amended to:**

**...with the exception of: traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, size 3 leg-hold marten traps in boxes, and size 110 and 120 conibear traps in boxes.”**

- Quartz Creek Road - Quartz Creek Road from its intersection with the Sterling Highway to the powerline crossing at approximately mile 2.5.
- Quartz Creek Road - From powerline crossing to Crescent Creek Trailhead at mile 3.5 (used in winter for skiing)
- East Quartz Creek and Williams Road - Entire East Quartz Creek Road from its intersection with Quartz Creek Road and Williams Road
- Old Sterling Highway (unmaintained portion of Quartz Creek Road) - Old Sterling Highway from the Crescent Creek Trailhead to Tern Lake Rest and Picnic area
- Snug Harbor Road - The first 2.8 miles of Snug Harbor Road from its intersection with the Sterling Highway to the entrance of the Chugach Electric Power Station
- Bean Creek Road - The entire distance from the Sterling Hwy to end.

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach



State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state- managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

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

#### 1) ISSUE:

We are requesting the Board of Game amend 5 AAC 92.550 to establish ~~4~~ a 100-yard trapping setback along both sides of roads and all sides of the pullouts listed and described in the table provided. ~~2) We are requesting a 50 yard trapping setback for~~ with the exception of: traps with an inside spread of 5 inches or less that are set at least 4 feet above the ground or snow level, size 3 leg-hold marten traps set in boxes, and size 110 and 120 conibear traps in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular roads and pullouts in the Cooper Landing area.

Unit	Road or Pullout Name:	Description	Winter Uses
7	Quartz Creek Road	Quartz Creek Road from its intersection with the Sterling Highway to the powerline crossing at approximately mile 2.5.	Walking, hiking, fat tire biking
7	Quartz Creek Road	From powerline crossing to Crescent Creek Trailhead at mile 3.5	Cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, and access to backcountry skiing
7	East Quartz Creek and Williams Road	Entire East Quartz Creek Road from its intersection with Quartz Creek Road and Williams Road	Walking, hiking, fat tire biking,
7	Old Sterling Highway (unmaintained portion of Quartz Creek Road)	Old Sterling Highway from the Crescent Creek Trailhead to Tern Lake Rest and Picnic area	Cross-country skiing, access to backcountry skiing, snowshoeing, hiking, skijoring, snowmachine use



7	Snug Harbor Road	The first 2.8 miles of Snug Harbor Road from its intersection with the Sterling Highway to the entrance of the Chugach Electric Power Station	Walking, hiking, fat tire biking
7	Bean Creek Road	The entire distance. This road is mostly surrounded by private property, but unless posted, traps can be set.	Walking, hiking, fat tire biking
7	Russian Gap Road	The entire distance. This road is mostly surrounded by private property, but unless posted, traps can be set.	Walking, hiking fat-tire biking
	All vehicle pullouts along the Sterling Highway	Pullouts along the Sterling Highway from its junction with the Seward Highway to the entrance to the Russian River Ferry and Boat Launch	People use these pullouts to let their animals and children take bathroom breaks,
			stretch their legs, take in the views and gear up for backcountry activities

## 2) WHY:

Year-round outdoor recreation is an important and growing segment of the Cooper Landing area's economy. The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing's primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As the amount of winter recreation has increased over the past 20 years, so has the number of dangerous encounters between user groups and traps set in recreational areas. While many trappers set their traps a responsible distance from roads and pullouts, trap placements close

to roadways, or in pullouts, present a very real danger, especially for young children and pets. As of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press. Since land managers and law enforcement do not track trap safety incidents all reports are collected and tabulated unofficially and are



considered incomplete. While we respect the rights of trappers to set their traplines near roads and pullouts, we are seeking trapping regulation that will ensure the safety of all area user groups.

Our proposed 100-~~and 50~~-yard trapping setbacks ~~are~~ is not large enough to significantly limit a trappers' opportunity to trap near a road or pullout. Proposing setbacks for only the most popular and heavily used roads and pullouts leaves all other areas unrestricted. Trappers who follow the Trapper's Code of Ethics' third tenant, to "promote trapping methods that will reduce the possibility of catching non-target animals," most likely already set traps back from heavily used roads and pullouts. The setbacks we are requesting will not unduly impact trappers and will greatly improve all user groups' safety. These proposed setbacks would also align with the Forest Service's Our Values Statement, which includes the intention of managing for "*Safety. In every way: physical, psychological, and social.*"

The 100- ~~and 50~~-yard setbacks we have proposed would not present an undue burden on trappers. The average backpacking speed is 1 to 2 miles per hour. Assuming trappers are walking between one and two miles per hour, the setback distances requested would require only an additional two to three minutes of walking to place and check traps. Since many trappers use snow machines, the 100-yard setback could be crossed in less than one minute. **A local Cooper Landing trapper, as well as trappers from other nearby Units, have endorsed a 100- yard setback as reasonable and logical.**

Our proposed 100-yard ~~and 50-yard~~ setback distances will not impact the Board of Game's ability to manage wildlife along the listed roads and pullouts. Should trapping a particular species within the setback become biologically necessary, the board could use a temporary permit system to address any problem that might arise. A similar proposal requesting a 100- yard setback from trails has been submitted and endorsed by the Homer Advisory Committee. Having regulations that are similar, will make management, education, and enforcement easier in Units 7 and 15.

Establishing trap setbacks in the Cooper Landing area has strong community support. Cooper Landing property owners and residents were surveyed about trapping issues in their area in March 2021. Returned surveys were tallied to show that 90% of the respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt setbacks were unnecessary.

Our proposal includes only the most popular roads and pullouts accessed by a variety of users groups during the trapping season. The popular roadways and pullouts that we have proposed for trapping setbacks are used for: cross-country skiing, access to backcountry skiing, snowshoeing, hiking, fat tire biking, dog mushing, snow machining, travel by search and rescue dogs and personnel, hunting and trapping.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates 2,500 to 3,500 trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses.

**PROPOSED BY:** The Cooper Landing Safe Trails Committee

(HQ-F22-009)

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Dear Board of Game,

After discussion with the Cooper Landing AC and more research, the *Cooper Landing Safe Trails Committee* recommends the following changes to proposals #151. We feel this will make it more acceptable, more compromising and easier to understand. The original proposal language that we would like to remove has a strike-through, and the new language has been added in red.

Please consider these amendments to our proposal.

Respectfully submitted,

*The Cooper Landing Safe Trails Committee*



## **PROPOSAL 151**

### **5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along highway pullouts, backcountry access points, and winter trails in Unit 7 as follows:

#### **1) SOLUTION:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails described in the table provided. We are requesting these changes to reduce conflicts with trappers and increase safety among the rising number of backcountry user groups to Unit 7.

#### **2) REGULATORY LANGUAGE:**

**ADD Regulatory Language for Unit 7: “Trap setback of 100-yards along the perimeter of highway pullouts accessing backcountry areas along the Seward Highway, and on both sides of the winter trails listed within the Summit Lake Recreational Area, ~~However, traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, and size 3 leghold marten traps in boxes are allowed if more than 50 yards from the trail or pullout.~~”**

#### **Amended to:**

**...with the exception of: traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, size 3 leg-hold marten traps in boxes, and size 110 and 120 conibear traps in boxes.”**

- Japan Woods - The west side of the Seward Highway from the southern-most tip of Summit Lake (MP 44.5) north to Colorado Creek (MP 46.5).
- Tenderfoot Campground – Ski Area - MP 46 of the Seward Highway.
- Park N Poke - The west side of the Seward Highway from the southern-most tip of Lower Summit Lake (MP 47) to the gravel pit at (MP 49).
- Manitoba Mountain - MP 48 of the Seward Highway, pullout on the east side of the highway for the Alaska Mountain Huts (non-profit organization), following the established .7-mile trail to the Manitoba Cabin, and up the Polly Mine Trail (1 mile) to where it meets with the Manitoba Mountain Trail and continuing up to tree line at the summit of Little Manitoba Mountain.

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state- managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

**What is the issue you would like the board to address and why?****1) ISSUE:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails described in the table provided. We are requesting these changes to reduce conflicts with trappers and increase safety among the rising number of backcountry user groups to Unit 7

Unit	Trail Name	Description	Winter Uses
7	Japan woods	The west side of the Seward Highway from the southern-most tip of Summit Lake ( <b>MP 44.5</b> ) north to Colorado Creek ( <b>MP 46.5</b> ).	Backcountry skiing, snowshoeing, bird hunting, hiking
7	Tenderfoot Campground – Ski Area	<b>MP 46</b> of the Seward Highway.	Backcountry skiing, cross-country skiing, snowshoeing, bird hunting, hiking, snow machine use
7	Park N Poke	The west side of the Seward Highway from the southern-most tip of Lower Summit Lake ( <b>MP 47</b> ) to the gravel pit at ( <b>MP 49</b> ).	Backcountry Skiing, snowshoeing, bird hunting, hiking
7	Manitoba Mountain	<b>MP 48</b> of the Seward Highway, pullout on the east side of the highway for the Alaska Mountain Huts (non-profit organization), following the established .7-mile trail to the Manitoba Cabin, and up the Polly Mine Trail (1 mile) to where it meets with the Manitoba Mountain Trail and continuing to tree line at the summit of Little Manitoba Mountain. <a href="https://www.alaskahuts.org/manitobahiking-guide/">https://www.alaskahuts.org/manitobahiking-guide/</a>	Backcountry and cross-country skiing, snowshoeing, bird hunting, hiking, backpacking for camping and cabin use

*Note: Maps for the following proposal are available at:*

[https://www.cnfaic.org/wpcontent/uploads/2013/10/Summit\\_Lake\\_Area.jpg](https://www.cnfaic.org/wpcontent/uploads/2013/10/Summit_Lake_Area.jpg)

**2) WHY:**





Trapping setbacks would establish safe zones for user groups accessing backcountry areas for: cross-country skiing, backcountry skiing, snowboarding, snowshoeing, ice fishing, bird hunting, cabin rentals and more.

Trapping setbacks would reduce some of the dangers to safety personnel called to respond to an area requiring the use of search and rescue dogs to find injured, lost, or buried victims.

The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing's primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings.

To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates **2,500 to 3,500** trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses. It would also align with the Forest Service's Our Values Statement, which includes the intention of managing for "*Safety. In every way: physical, psychological, and social*".

A survey conducted in Cooper Landing by the Cooper Landing Safe Trails Committee, in March 2021, found that 90% of respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt that setbacks were unnecessary. **A local Cooper Landing trapper, as well as trappers from other nearby GMU's, have endorsed a 100-yard setback as reasonable and logical.**

A similar proposal requesting a 100-yard setback from trails has been submitted and endorsed by the Homer Advisory Committee. Having regulations that are consistent within the region will make management, education, and enforcement easier in Units 7 and 15.

**PROPOSED BY:** The Cooper Landing Safe Trails Committee

(HQ-F22-011)

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Dear Board of Game,

After discussion with the Cooper Landing AC and more research, the *Cooper Landing Safe Trails Committee* recommends the following changes to proposals #152. We feel this will make it more acceptable, more compromising and easier to understand. The original proposal language that we would like to remove has a strike-through, and the new language has been added in red.

Please consider these amendments to our proposal.

Respectfully submitted,

*The Cooper Landing Safe Trails Committee*



## **PROPOSAL 152**

### **5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along trails and trailheads in Unit 7 as follows:

#### **1) SOLUTION:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish 4) a 100-yard trapping setback along both sides of the trails and all sides of the trailheads listed and described in the table provided. 2) ~~We are requesting a 50 yard trapping setback for traps~~ with the exception of: traps with an inside spread of 5 inches or less that are set at least 4 feet above the ground or snow level, size 3 leg-hold marten traps set in boxes, and size 110 and 120 conibear traps in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular multi-use trails in the Cooper Landing area.

#### **2) REGULATORY LANGUAGE:**

**ADD Regulatory Language for Unit 7:** “Trap setback of 100-yards on both sides of the trails and trailheads listed, ~~Traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, and size 3 leghold marten traps in boxes are allowed if more than 50 yards from the trail.~~”

#### **Amended to:**

**...with the exception of: traps with an inside spread of 5 inches or less which are at least 4 feet above the ground or snow level, size 3 leg-hold marten traps in boxes, and size 110 and 120 conibear traps in boxes.”**

- Crescent Creek Trail
- Lower Russian Lake Trail
- Bean Creek Trail
- Russian Gap Trail/Historic Quartz Creek Trail
- Resurrection Trail, South End
- West Juneau Bench Trail
- Devil’s Pass Ski Loops
- Stetson Trail parking area and first 400 yards

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state- managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

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

#### **1) ISSUE:**



We are requesting the Board of Game amend 5 AAC 92.550 to establish 4) a 100-yard trapping setback along both sides of the trails and all sides of the trailheads listed and described in the table provided. ~~2) We are requesting a 50 yard trapping setback for~~ with the exception of: traps with an inside spread of 5 inches or less that are set at least 4 feet above the ground or snow level, size 3 leghold marten traps set in boxes, and size 110 and 120 conibear traps in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular multi-use trails in the Cooper Landing area.

Unit	Trail Name	Description	Winter Uses
7	Crescent Creek Trail  USGS Map Seward B7, C7 and C8  USFS, Chugach National Forest Map for Crescent Creek Trail	Begins at Crescent Creek Trailhead parking area at mile 3.5 of Quartz Creek Road and ascends 6.5 miles to the Crescent Lake Cabin at the west end of the lake.	Backcountry skiing, snowshoeing, hiking, backpacking, fat tire biking, and access to public use cabins
7	Lower Russian Lake Trail  USGS Map Seward B8, Kenai B1  USFS, Chugach National Forest Map for Russian Lakes Trail	Lower Russian Lake Trail from the trailhead parking located in the Russian River Campground about 1.0 miles from the campground entrance to both the Barber Cabin on the shore of Lower Russian Lake and to the Russian River Falls Overlook.	Backcountry and cross-country skiing, skijoring, snowshoeing, hiking, fat tire biking, backpacking and access to public use cabins
7	Bean Creek Trail	Bean Creek Trail starting at its trailhead at mile 0.5 of the west end of Slaughter Ridge Road to its intersection of the main Resurrection Pass Trail above Juneau Falls.	Backcountry and cross-country skiing, snowshoeing, hiking, fat tire biking, snow machining, dog mushing, backpacking, and access to public use cabins



7	Russian Gap Trail/Historic Quartz Creek Trail	This trail is referred to as the Quartz Creek Trail on the 2004 plat approved by the Kenai Peninsula Borough for the Russian Gap Subdivision. This trail ascends behind the west side of KPB parcel 11912507 and continues through parcel 11912513, connecting with the Russian Gap Trail and heading north easterly along a bench below Russian Gap.	Backcountry and cross-country skiing, snowshoeing, hiking, snowmachine use
7	Resurrection Trail, South End  USGS Maps Seward B8, C8 and D8	From the southern Resurrection Trail trailhead on the Sterling Highway continuing to the Swan Lake public use cabin	Backcountry and cross-country skiing, snowshoeing, hiking, fat tire biking, backpacking and access to public use cabins
7	West Juneau Bench Trail  USGS Maps Seward B8, C8 and D8	From the Sterling Highway pullout at mile 53.25 just west of the southern Resurrection Trail trailhead continuing to its intersection with the Resurrection Trail.	Back country and cross-country skiing, snowshoeing, hiking, snow machining, fat tire biking, backpacking for camping and cabin use
7	Devil's Pass Ski Loops USGS Map Seward C7 and C8 USFS, Chugach National Forest Map for Devil's Pass Trail	These trails begin at the far end of the parking area for Devil's Pass Trail head at mile 39.5 of the Seward Highway. They loop along the cleared area to the northeast of the parking lot between Quartz Creek and the Seward Highway.	Backcountry ski access, cross country skiing, snowshoeing, fat-tire biking, skijoring



7	Stetson Creek Parking area and Trail	Stetson Trail parking area at milepost 50.7 of Sterling Highway. Setback of 100 yards around clearing beyond gate under the power line and first 400 yards up the trail.	Cooper Landing EMT training, search and rescue dog training, hiking and snowshoeing
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## 2) WHY:

Year-round outdoor recreation is an important and growing segment of the Cooper Landing area's economy. The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing's primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As the number of winter trail users has increased immensely over the past 20 years, so have the number of dangerous encounters between user groups and traps set in recreational areas. While many trappers set their traps a responsible distance from multi-use trails, trap placements close to (or in) trails and trailheads present a very real danger to all users, especially young children and pets. As of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press. Since land managers and law enforcement do not track trap safety incidents all reports are collected and tabulated unofficially and are considered incomplete. While we respect the rights of trappers to use these multi-use trails, we are seeking trapping regulation that will ensure the safety of all trail users.

Our proposed 100- ~~and 50~~-yard trapping setbacks ~~are~~ is not large enough to significantly limit a trappers' opportunity along multi-use trails. Proposing setbacks for only the most popular

and heavily used multi-use trails leaves all other areas unrestricted. Trappers who follow the Trapper's Code of Ethics' third tenant, to "promote trapping methods that will reduce the possibility of catching non-target animals," most likely already set traps back from heavily used trails. The setbacks we are requesting will not unduly impact trappers and will greatly improve trail user safety. These proposed setbacks would also align with the Forest Service's Our Values Statement, which includes the intention of managing for "*Safety. In every way: physical, psychological, and social.*"

The 100- ~~and 50~~-yard setbacks we have proposed would not present an undue burden on trappers. The average backpacking speed is 1 to 2 miles per hour. Assuming trappers are walking between one and two miles per hour, the setback distances requested would require only an



additional two to three minutes of walking to place and check traps. Since many trappers use snow machines, the 100-yard setback could be crossed in less than one minute. **A local Cooper Landing trapper, as well as trappers from other nearby GMUs, have endorsed a 100- yard setback as reasonable and logical.**

Our proposed 100-yard ~~and 50-yard~~ setback distances will not impact the Board of Game's ability to manage wildlife along the listed trails. Should trapping a particular species within the setback become biologically necessary, the board could use a temporary permit system to address any problem that might arise. A similar proposal requesting a 100-yard setback from trails has been submitted and endorsed by the Homer AC. Having regulations that are similar, will make management, education, and enforcement easier in Units 7 and 15.

Establishing trap setbacks in the Cooper Landing area has strong community support. Cooper Landing property owners and residents were surveyed about trapping issues in their area in March, 2021. Returned surveys were tallied to show that 90% of the respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt setbacks were unnecessary. 86-89% responded in favor of setbacks along the trails and trailheads listed above, while 10-12% did not feel they were necessary.

Our proposal includes only the most popular multi-use trails used by a variety of users during the trapping season. Popular trail uses in our area include: cross-country skiing, access to backcountry skiing, snowshoeing, hiking, fat tire biking, dog mushing, snow machining, travel by search and rescue dogs and personnel, hunting and trapping. The Stetson Trail parking area and first 400 yards has been utilized for search and rescue dog training which is critical to the active avalanche areas close by.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates **2,500 to 3,500** trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses

**PROPOSED BY:** The Cooper Landing Safe Trails Committee

(HQ-F22-012)

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Dear Board of Game,

After discussion with the Cooper Landing AC and more research, the *Cooper Landing Safe Trails Committee* recommends the following changes to proposals #153. We feel this will make it more acceptable, more compromising and easier to understand. The original proposal language that we would like to remove has a strike-through, and the new language has been added in red.

Please consider these amendments to our proposal.

Respectfully submitted,

*The Cooper Landing Safe Trails Committee*





## **PROPOSAL 153**

### **5 AAC 92.550. Areas closed to trapping.**

Establish trapping setbacks along Kenai Lake beaches in Unit 7 as follows:

#### **1) SOLUTION:**

We are requesting the Board of Game amend 5 ACC 92.550 to establish 4) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake as described in the table provided. 2) ~~We are requesting a 50-yard trapping setback for traps~~ with the exception of: traps with an inside spread of 5 inches or less that are set at least 4 feet above the ground or snow level, size 3 leg-hold marten traps set in boxes, and size 110 and 120 conibear traps in boxes. We are requesting these changes to protect the safety of people and their pets utilizing the most popular multi-use beaches in the Cooper Landing area.

#### **2) REGULATORY LANGUAGE:**

**ADD Regulatory Language for Unit 7:** “Trap setback of 100-yards from mean high-water mark of Kenai Lake on the north side from the Kenai River Bridge to 1 mile past the end of Williams Road and on the south side from the Kenai River Bridge to ¼ mile past the powerline crossing (powerline is at mile 2.8 Snug Harbor Road), also, Kenai Lake Beach (Locally known as Waikiki Beach) ¼ mile north to ¼ mile south of the lake access road at mile 5.8 Snug Harbor Road, ~~Traps with an inside spread of 5 inches or less, which are at least 5 feet above the ground or snow level are allowed if more than 50 yards from the beach.”~~

#### **Amended to:**

**...with the exception of: traps with an inside spread of 5 inches or less which are at least 5 feet above the ground or snow level, size 3 leg-hold marten traps in boxes, and size 110 and 120 conibear traps in boxes.”**

- Kenai Lake Beaches
- Kenai Lake Beach (Waikiki Beach)

The precedent for establishing trapping buffers for public safety along multi-use trails in the State of Alaska has already been set, most notably in the Municipality of Anchorage, parts of Chugach State Park, the City/Borough of Juneau, and along six trails and surrounding all school yards in the Matanuska-Susitna Borough. While these municipalities and boroughs have approved trapping regulations on lands they manage, they have not issued regulations for state- managed trails in deference to the regulatory powers of the Board of Game. We are asking the Board of Game to rectify this situation in our area.

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

#### **1) ISSUE:**

We are requesting the Board of Game amend 5 AAC 92.550 to establish 4) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake as described in the table provided. 2) ~~We are requesting a 50-yard trapping setback for traps~~ with the exception of: an inside spread of 5 inches or less that are set at least 4 feet above the ground or



snow level, size 3 leg-hold marten traps set in boxes, and size 110 and 120 conibear traps in boxes.

We are requesting these changes to protect the safety of people and their pets utilizing the most popular multi-use beaches in the Cooper Landing area.

Unit	Beach Area	Description	Winter Uses
7	Kenai Lake Beaches	Kenai Lake Beaches: on the North side from the Kenai River Bridge to 1 mile past the end of Williams Road and on the south side from the Kenai River Bridge to ¼ mile past the powerline crossing (powerline is at mile 2.8 Snug Harbor Road). <i>Area from the mean high-water mark to 100yds back.</i>	Cross-country skiing, snowshoeing, hiking, fat tire biking, skijoring, snow machining
7	Kenai Lake Beach	Kenai Lake Beach (Locally known as Waikiki Beach) ¼ mile north to ¼ mile south of the lake access road at mile 5.8 Snug Harbor Road. <i>Area from the mean high-water mark to 100yds back.</i>	Cross-country skiing, snowshoeing, hiking, fat tire biking, skijoring, snow machining

## 2) WHY:

Year-round outdoor recreation is an important and growing segment of the Cooper Landing area's economy. The community of Cooper Landing is located on the Sterling highway at the headwaters of the Kenai River. Easily accessible by road, Cooper Landing is located only 100 hundred miles south of Anchorage, the largest city in the state. Cooper landing's primary economy is based on summer recreation and tourism to the area, however, as winter recreation in the area increases, Cooper Landing businesses could take advantage of this opportunity and extend their seasonal offerings. To encourage the increasing number of family-friendly, active, outdoor recreational pursuits (e.g., winter biking, cross-country skiing, backcountry skiing, snowshoeing, trail running, ice fishing, bird hunting, and backcountry cabin rentals) in the area, it would be beneficial for business owners to be able to accurately market Cooper Landing as a fun, safe, and uniquely beautiful area, for visitors to enjoy with their family and pets.

As the amount of winter recreation has increased over the past 20 years, so has the number of dangerous encounters between user groups and traps set in recreational areas. While many trappers set their traps a responsible distance from popular beaches, trap placements close to (or on) multiuse beaches present a very real danger to all users, especially young children and pets. As of late February 2022, seven dogs have been caught in traps throughout Southcentral Alaska, and two dogs were killed, as reported via the Alaska Press. Since land managers and law enforcement do



not track trap safety incidents all reports are collected and tabulated unofficially and are consequently incomplete. While we respect the rights of trappers to set their traplines near beaches, we are seeking trapping regulation that will ensure the safety of all area user groups.

Our proposed 100—~~and 50~~-yard trapping setbacks ~~are~~ **is** not large enough to significantly limit a trappers' opportunity to trap near beaches. Proposing setbacks for only the most popular and heavily used beaches leaves all other areas unrestricted. Trappers who follow the Trapper's Code of Ethics' third tenant, to "promote trapping methods that will reduce the possibility of catching non-target animals," most likely already set traps back from heavily used beaches. The setbacks we are requesting will not unduly impact trappers and will greatly improve all user groups' safety. These proposed setbacks would also align with the Forest Service's Our Values Statement, which includes the intention of managing for "*Safety. In every way: physical, psychological, and social.*"

The 100- ~~and 50~~-yard setbacks we have proposed would not present an undue burden on trappers. The average backpacking speed is 1 to 2 miles per hour. Assuming trappers are walking between one and two miles per hour, the setback distances requested would require only an additional two to three minutes of walking to place and check traps. Since many trappers use snow machines, the 100-yard setback could be crossed in less than 1 minute. **A local Cooper Landing trapper, as well as trappers from other nearby Units, have endorsed a 100- yard setback as reasonable and logical.**

Our proposed 100-yard ~~and 50-yard~~ setback distances will not impact the Board of Game's ability to manage wildlife along the listed beaches. Should trapping a particular species within the setback become biologically necessary, the board could use a temporary permit system to address any problem that might arise. A similar proposal requesting a 100-yard setback from trails has been submitted and endorsed by the Homer AC. Having regulations that are similar, will make management, education, and enforcement easier in Units 7 and 15.

Establishing trap setbacks in the Cooper Landing area has strong community support. Cooper Landing property owners and residents were surveyed about trapping issues in their area in March, 2021. Returned surveys were tallied to show that 90% of the respondents felt setbacks for traps in the Cooper Landing area were necessary, and 10% felt setbacks were unnecessary.

Our proposal includes only the most popular beaches used by a variety of user groups during the trapping season. Popular beach uses in our area include: cross-country skiing, snowshoeing, hiking, fat tire biking, dog mushing, snow machining, travel by search and rescue dogs and personnel, hunting and trapping.

As of the 2019 census, there are 731,545 residents of the state of Alaska, and based on sealing records, license sales and the annual "Trapper Questionnaire," the Alaska Department of Fish and Game estimates 2,500 to 3,500 trappers in the state. By adopting this trapping regulation in Unit 7, the Board of Game would better represent the majority of its constituents and the current areas recreational uses.

**PROPOSED BY:** The Cooper Landing Safe Trails Committee

(HQ-F22-007)

\*\*\*\*\*



# BOG: Southcentral Region Meeting

Submitted by: Anonymous user

Submitted time: Feb 23, 2023, 8:19:08 PM

First Name

**Lorraine**

Last Name

**Temple**

Organization Name (if applicable)

**Cooper Landing Safe Trails**

Community of Residence

**Cooper Landing**

Email Address

**[cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com)**

Write Your Comment Here:

**PC 061**

**Dear Board of Game,**

**A bundle of 44 comments were submitted via USPS regarding the trap setbacks and active trapping signage in the Cooper Landing area. These comments were collected at Salmonfest in August 2022 prior to proposal numbers being assigned.**

**To clarify, the proposals referred to, and I'll give them to you in the order on the forms, are:**

**#154 - Signage**

**#152 - Trails**

**#149 - Campgrounds**

**#150 - Roads and Pullouts**

**#153 - Beaches**

**#151 - Summit Recreation Area**

**If I recall correctly, (and I'm doing this from memory) 41 were in favor of all the 100-yard setbacks, 2 were in favor of some of the proposals and 1 was totally opposed.**

**Please accept these as a batch under the Cooper Landing Safe Trails Committee submissions. They are all, with the exception of one, signed by the individual who filled it out.**

**Thank you for honoring these comments.**

**Regards,**

**Lorraine Temple**

**Cooper Landing Safe Trails Committee, chair**





## Cooper Landing, Homer & Seward Trap Setback Proposals Petition



PC 061

I support the following proposals submitted to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (Cooper Landing Area) and Game Unit 15 (Homer). I believe these proposals suggesting 100-yard setbacks are reasonable to maintain safe recreation for all public land users and their pets.

**# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass

**#149 Campgrounds in Cooper Landing:** Establish a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds.

**# 150 Roads and pullouts around Cooper Landing:** Establish a 100-yard trapping setback along both sides of roads and all sides of the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and pullouts from mile markers 37(Tern Lake) - 54.9(Russian River Ferry).

**#151 Summit Lake Recreation Area:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.

**#152 Trails in Cooper Landing Area:** Establish a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and first 400 yards of the trail.

**#153 Kenai Lake Beaches:** Establish a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake

**# 154 Signage for Cooper Landing Area:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

### **Homer & Seward setback proposals:**

**#146 Trails in Kachemak Bay State Park:** Establish 100-yard trapping setback from the Diamond Creek Trail, Grewingk Glacier Lake Trail and the Grewingk Saddle Trail.

**#147 Ski Trails in Homer:** Establish 100-yard setback from the mapped Snowmad Trails south of Caribou Lake and the Kachemak Nordic Ski Club Trails

**# 148 Seward Trails:** Establish a 100-yard trapping setback from trails in Seward.

# I SUPPORT 100-YD TRAP SETBACKS AND SIGNAG



PC 061

## Supporters

Name print

Signature

Address

1. MIKE AMOS Mike Amos
2. JANICE HAAS Janice Haas
3. MICHELLE HENDERSON Michelle Henderson
4. Jim Solison Jim Solison
5. Michelle Keagle Michelle Keagle
6. (Libby) Elizabeth Ferrara Elizabeth Ferrara
7. Jill Hemstock Jill Hemstock
8. Elizabeth Sutphin Elizabeth Sutphin
9. Brianna Hutchison Brianna Hutchison P.O.

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25. \_\_\_\_\_





# Cooper Landing, Homer & Seward Trap Setback Proposals Petition



PC 061

I support the following proposals submitted to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (Cooper Landing Area) and Game Unit 15 (Homer). I believe these proposals suggesting 100-yard setbacks are reasonable to maintain safe recreation for all public land users and their pets.

**# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass

**#149 Campgrounds in Cooper Landing:** Establish a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds.

**# 150 Roads and pullouts around Cooper Landing:** Establish a 100-yard trapping setback along both sides of roads and all sides of the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and pullouts from mile markers 37(Tern Lake) - 54.9(Russian River Ferry).

**#151 Summit Lake Recreation Area:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.

**#152 Trails in Cooper Landing Area:** Establish a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and first 400 yards of the trail.

**#153 Kenai Lake Beaches:** Establish a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake

**# 154 Signage for Cooper Landing Area:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## **Homer & Seward setback proposals:**

**#146 Trails in Kachemak Bay State Park:** Establish 100-yard trapping setback from the Diamond Creek Trail, Grewingk Glacier Lake Trail and the Grewingk Saddle Trail.

**#147 Ski Trails in Homer:** Establish 100-yard setback from the mapped Snowmad Trails south of Caribou Lake and the Kachemak Nordic Ski Club Trails

**# 148 Seward Trails:** Establish a 100-yard trapping setback from trails in Seward.



# I SUPPORT 100 YARD SETBACKS & TRAPPING SIGNAGE



PC 061

## Supporters

	<u>Name print</u>	<u>Signature</u>	<u>Address</u>
1.	Ashley Coons	Ashley Coons	
2.	NOVIE PHIBBY		
3.	ANTONIO ORNETO	Antonio Orneto	
4.	Jesse Skidmore	Jesse Skidmore	
5.	Aimee Leatherman	Aimee Leatherman	
6.	Hannah Leatherman	Hannah Leatherman	
7.	Julie Allison	Julie Allison	
8.	Andy Billings	Andy Billings	
9.	ROSS MATER	Ross Mater	
10.	Paul Collins	Paul Collins	
11.	Rene Montgomery	Rene Montgomery	
12.	Charles Joseph	Charles Joseph	
13.	Laura Glasgow	Laura Glasgow	P.
14.	Lisa Maurice	Lisa Maurice	32
15.	Dawn Krause	Dawn Krause	
16.	Mallory Rangel	Mallory Rangel	
17.	Melinda Peters	Melinda Peters	
18.	Alyssa Legros	Alyssa Legros	
19.	Katalia Kalugin	Katalia Kalugin	
20.	Judah	Judah Brueckner	F
21.	Heather Shank	Heather Shank	PO
22.	John Higgins	John Higgins	
23.	Laura Perri	Laura Perri	B
24.	Merce Rodolf	Merce Rodolf	B
25.	Melissa Henderson	Melissa Henderson	



## Supporters

Name print

Signature

Address

- |     | Name print           | Signature            | Address |
|-----|----------------------|----------------------|---------|
| 1.  | Kathy Kloster        | Kathy Kloster        |         |
| 2.  | Marshall Miller      | Marshall Miller      |         |
| 3.  | Kelsey Weiford       | Kelsey Weiford       |         |
| 4.  | Cheryl Seese         | Cheryl Seese         |         |
| 5.  | Amy Hnat             | Amy Hnat             |         |
| 6.  | Katy Turner          | Katy Turner          |         |
| 7.  | Tris Seeno-Turner    | Tris Seeno-Turner    |         |
| 8.  | River Seeno-Turner   | River Seeno-Turner   |         |
| 9.  | Cheryl Verschueren   | Cheryl Verschueren   |         |
| 10. | Susan Stamm          | Susan Stamm          |         |
| 11. | Maddie Haas          | Maddie Haas          |         |
| 12. | James Corant         | James Corant         |         |
| 13. | MARGARET DEBBOUT     | MARGARET DEBBOUT     |         |
| 14. | Kelli Palaka         | Kelli Palaka         |         |
| 15. | Marvin Tapsheld      | Marvin Tapsheld      |         |
| 16. | Carilla Warner       | Carilla Warner       |         |
| 17. | Fred Moore           | Fred Moore           |         |
| 18. | Oliver Smith         | Oliver Smith         |         |
| 19. | Tonya Foote          | Tonya Foote          |         |
| 20. | Lavinia C. Dickinson | Lavinia C. Dickinson |         |
| 21. | Dana Van Slyke       | Dana Van Slyke       |         |
| 22. | Virginia Corliss     | Virginia Corliss     |         |
| 23. | Ram Humphrey         | Ram Humphrey         |         |
| 24. | Ron Phelan           | Ron Phelan           |         |
| 25. | ARIZ STIVERS         | ARIZ STIVERS         |         |



# I SUPPORT 100 YARD SETBACKS & TRAPPING SIGNAGE



PC 061

## Supporters

	Name print	Signature
1.	Abby Hearth	Abby Hearth
2.	Kareli Peltola	Kareli Peltola
3.	Georgia Houde	Georgia Houde
4.	Hannah Racette	Hannah Racette
5.	Rylee Haddox	Rylee Haddox
6.	Allie Hrabchak	Allie Hrabchak
7.	Dana Drummond	Dana Drummond
8.	Angus Batchelder	Angus Batchelder
9.	Rebecca Marks	Rebecca Marks
10.	Alyssa Walker	Alyssa Walker
11.	Susan Boersma	Susan Boersma
12.	Danielle Edwards	Danielle Edwards
13.	Frank Miller	Frank Miller
14.	Kara McMahon	Kara McMahon
15.	BRETT ZIMMERMAN	Brett Zimmerman
16.	Christian Howlett	Christian Howlett
17.	Christian Cunningham	Christian Cunningham
18.	Naomi Michelsfeld	Naomi Michelsfeld
19.	Jonathan Humpal	Jonathan Humpal
20.	Terry Slaven	Terry Slaven
21.	Jamie Brown	Jamie Brown
22.		
23.		
24.		
25.		



# I SUPPORT 100 YARD SETBACKS & TRAPPING SIGNAGE



PC 061

## Supporters

	Name print	Signature	Address
1.	Alex Loan		99518
2.	Clint Helander		99508
3.	CHRISTOPHER HANSMAYER		99507
4.	Seiji Takagi		99509
5.	Shawn Overstreet		99516
6.	ALDEN WORACHEK		99507
7.	Rick Rota		99507
8.	ISAAC SWANSON		99508
9.	Taken Cox		99518
10.	Nagmi Norem		Anchorage, AK
11.	CHRISTOPHER SAGAN		Anchorage, AK
12.	Timely Cox		
13.	Andy Duenow		
14.	CHRIS CALVERT		
15.	ANTONIO MENDOZA		
16.	Malcolm Loring		
17.	Derek Maier		
18.	Sarah Webster		
19.	Reed Lekander		
20.	Nicoleann Morris		
21.	Amenda Andros		
22.			
23.			
24.			
25.			

I SUPPORT 100 YARD SETBACKS & TRAPPING SIGNAGE  
Supporters



PC 061

Name print

Signature

Address

1. Andra Wardlaw Andra Wardlaw
2. Johet Van Driessche Johet Van Driessche
3. Colton Anthowiak Colton Anthowiak
4. Sarah Hunt Sarah Hunt
5. Victoria Monaco Victoria Monaco
6. Angel Monaco Angel Monaco
7. Gayle Forrest Gayle Forrest
8. Valerie Boulden Valerie Boulden
9. Rawlins D Apperson Rawlins D Apperson
10. Deborah Kellers Deborah Kellers P.O.

11. \_\_\_\_\_
12. \_\_\_\_\_
13. \_\_\_\_\_
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**Submitted by:** Megan Corazza

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

Hello, my name is Megan Corazza and I was born and raised and still reside in Homer, Alaska. These comments are in support of proposals 146 and 147.

I was raised on a trapline across Cook Inlet and have been a trapper myself in my adult years. I support trapping. However, last spring I was out on the Watermelon Trail in Homer, a trail I grew up using on snowmachine, horseback, ATVs and skiing. That day, my dog got caught in a lynx trap less than 15 feet off the side of this well used trail. I learned that another group just ahead of us had their dog get caught in another trap 15 feet off the trail also, just an hour earlier.

I was very shocked to realize that people were actively trapping so close to such a well used public trail. In the days following I received much feedback from other trappers in Homer that they were also astounded that someone would be trapping so close to the trail. At least four other trappers chimed in that they didn't feel like the Watermelon Trail traps were ethical.

I was able to contact the trapper - turns out he was a friend of mine from commercial fishing, and he worked together with a safe trails group in Homer to propose a compromise for an allowable distance to trap off of SNOMAD-maintained trails and KNSC trails. This was approved by the Homer Advisory Fish and Game committee last spring.

I hope that a regulation can go in place to protect dogs while owners are recreating on these public trails. I understand and respect that the trails a trapper creates to run his or her trapline need to not be included in this regulation.

I am all for ethical trapping 100 yards off of the public trails as defined by Proposals 146 and 147.

Thank you,

Megan Corazza



Homer, Ak 99603



*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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**Submitted by:** Ed Corneio

**Organization Name:**

**Community of Residence:** Fairbanks, AK

**Comment:**

I support AWA's Proposal #145 to secure hunting and trapping setbacks from new wildlife crossings on the Sterling Highway Cooper Landing bypass. Thank you.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Support Proposal 56: Support Proposal 57: Oppose Proposal 58: Support Proposal 59: Support  
Proposal 60: Support Proposal 61: Support Proposal 62: Oppose Proposal 63: Oppose Proposal 66: Support  
Proposal 67: Support Proposal 68: Support Proposal 69: Support Proposal 71: Support Proposal 72: Support  
Proposal 73: Support Proposal 74: Support Proposal 75: Support Proposal 76: Oppose Proposal 77: Support  
Proposal 78: Support Proposal 79: Oppose Proposal 81: Support Proposal 82: Oppose Proposal 83: Oppose  
Proposal 86: Oppose Proposal 89: Oppose Proposal 90: Oppose Proposal 97: Oppose Proposal 98: Oppose  
Proposal 101: Oppose Proposal 103: Oppose Proposal 104: Support Proposal 105: Support Proposal 107: Oppose  
Proposal 109: Support Proposal 114: Support Proposal 116: Support Proposal 117: Support Proposal 128: Oppose  
Proposal 132: Oppose Proposal 133: Support Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose  
Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 140: Oppose Proposal 141: Oppose  
Proposal 143: Support Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support  
Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support  
Proposal 154: Support Proposal 155: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support  
Proposal 159: Oppose Proposal 160: Support Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support  
Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support Proposal 169: Support  
Proposal 170: Support Proposal 171: Support Proposal 172: Support Proposal 187: Oppose Proposal 188: Oppose

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PC064

**Submitted by:** Kenneth Corrigan

**Organization Name:**

**Community of Residence:** Frenchtown, NJ

**Comment:**

Although I'm a non resident, I frequently spend a lot of time and money bowhunting Alaska.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 67: Support Proposal 71: Support Proposal 72: Support Proposal 82: Oppose Proposal 87: Support  
Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 99: Support Proposal 100: Support  
Proposal 101: Support Proposal 110: Support Proposal 111: Support Proposal 112: Support Proposal 113: Support  
Proposal 119: Support Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support  
Proposal 124: Support Proposal 125: Support Proposal 126: Support



PC065

**Submitted by:** Benjamin Cox

**Organization Name:**

**Community of Residence:** Sterling, AK

**Comment:**

I propose reinstating the original ptarmigan closure of March 31 in the whole of Unit 15. I have a cabin in the low lands of Caribou Hills near mile 17. I have seen more ptarmigan in the last 2 years, both lowland and in higher elevations, than any year before. Being a Disabled Veteran, I respect the current regulations but am unclear why it changed in the first place. I hunt from the main trails and venture off trail to retrieve the meat that I've shot. Ptarmigan hunting is a valuable resource that is needed and appreciated throughout all the communities of this state. I may not be physically able to partake in all of the hunting in this State, but a sustainable resource like that has a big impact on cultural and local subsistence. Though the game limits changed, the population of ptarmigan has increased drastically. I do enjoy hunting ptarmigan, but ultimately I enjoy seeing nature and all it has to show. I work on the Slope and see all facets of wildlife. I marvel at the experiences and views that now many get to see. My plea is that you reinstate the normal ptarmigan hunting season to March 31st.

Sincerely,

Sergeant Benjamin Cox

Operation Iraqi Freedom 2005-2006, 2008-2009

Stationed at Fort Wainwright, AK 2002-2010

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 162: Support





**Submitted by:** Sandra Cronland

**Organization Name:**

**Community of Residence:** Homer

**Comment:**

I support the following proposal(s) that have been submitted to the Alaska Board of Game to reduce conflicts with trappers & non trappers and increase safety for the increasing numbers of multi-use trail users in Game Unit 15(c) Homer AK area. I believe the 100 yard set back proposals are reasonable setbacks for safer recreation for all trail users and their pets.

.Proposal #146

100yd. Trapping Setbacks from 3 popular winter trails in Kachemak Bay State Park .

Proposal #147

100yd. Trapping Setbacks from mapped KNSC ski & mapped multi-use Snomads trails in Homer area.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

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**Submitted by:** Terry Cummings

**Organization Name:**

**Community of Residence:** Anchorage, Alaska

**Comment:**

see attached

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support  
Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 156: Support  
Proposal 157: Support Proposal 158: Support Proposal 159: Support with Amendment Proposal 160: Support

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**Submitted by:** Theresa Dale

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

Proposal 146-147

I'd like to see passing these proposals as a way to compromise the desire of ski enthusiasts and trappers. It's a big beautiful place we coexist in and I think these proposals address not stopping the activities (skiing or trapping) but simply making it safer for our pets.

So many people enjoy the commonalities of love for our dogs. Let's prevent things that can potentially cause great harm and trauma for all involved.

I'm not a ski person, nor a trapper/ hunter person. I am however an avid dog person. Let's help our furry friends in a safe and responsible manner and just give them some additional space.

Thank you in advance for your good guidance and common sense approach to this issue.

Kindly

Terrilynn Dale

Homer, Alaska

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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### Proposal 145: Support

This proposal is key to allowing animals safe travel between landscapes. Without a 1/4 mile protection these under/over passes become SINKs (death traps) instead of safe passageways. This is a common-sense approach and should have been negotiated between the State and Department of Transportation as part of the original design and implementation of these structures. Unfortunately, it is now a decision the Board of Game is being asked to decide upon. Hopefully the BOG can realize the importance of keeping hunters and trappers a reasonable distance from these structures to allow them the opportunity to provide the benefits they were intended to provide. Other states have implemented similar regulations around these types of structures as it makes clear sense not to create a death trap for wildlife. Animals must funnel through these structures and thus they create the unfortunate scenario to funnel animals to hunters and trappers if they remain unprotected by some reasonable buffer around them. Please take the step to ensure wildlife has the fair and reasonable opportunity to pass safely from one landscape to another.

Carol Damberg, Anchorage, AK

### Proposal 149, 150, 151, 152, 153, 154: Support all

The Cooper Landing Safe Trail proposals are well thought out proposals. These have been discussed and are supported by many, especially locals and those who frequent the area to enjoy a diverse array of recreational activities. The Safe Trail committee has worked extensively and tirelessly to survey and speak with the diverse audiences that their proposals would effect. They have also worked in the past with the Board of Game to understand their concerns about trapping setbacks. The results are the following proposals that limit trap setbacks to the most highly used regions in the name of safety for pets and people.

Trappers are supporting these proposals because they know they are reasonable, they do not want to be responsible for injury to dogs or people, and they recognize that by doing nothing they are potentially reducing the public's support for trappers.

The Board of Game needs to start regulating trapping along trails – times have changed! These are not major closures and are in fact very well-reasoned proposals. If the Board of Game continues to deny away these types of proposals that seek balanced regulations for diverse user groups they diminish their credibility. The BOG members are appointed based upon their **interest in public affairs, good judgment, knowledge, and ability in the field** of action of the board, and with a view **to providing diversity of interest and points of view** in the membership. Please consider the diversity of interests represented by these proposals. Do not ignore the viewpoints of other recreationists that share trails with trappers. Please seek balanced regulations that ensure safety and allow varied interests to co-exist with known boundaries and expectations.



Carol Damberg Anchorage, AK

### Proposal 159 – OPPOSE

The comment response by the ADFG asserts that increasing the hunting season will have no impact on wolverines and thus they support the proposal. Unfortunately, the ADFG does not refute the fact this proposal is submitted as predator management proposal that assumes that wolverines are major predators of Dall sheep and goats and responsible for their decline. The proposal also indicated “if you can shoot bears and wolves in August – why not wolverines”? Perhaps a look at the difference in biology between these species would be helpful. This is unfortunate that ADFG does not refute the flawed logic behind why this person submitted the proposal and why wolverine management should perhaps be different than bear and wolf management. The ADFG comment also does not acknowledge that the most recent population estimate was in 2004!. This is a species that can be very vulnerable to overharvest. This species exists in very low densities throughout its range but especially on the Kenai. Why extend the hunting season when

- 1) the wolverine population status is unknown
- 2) The new harvest dates could interfere with kit survival and mating periods and
- 3) the proposal is based on flawed assumptions that this species is a major predator of Dall sheep/goat and thus responsible for their population changes. You might ask the department what are the major factors causing sheep and goats to decline?

Please consider the following biological facts:

- Kits are born from January to April. Adult size is reached by early to mid-winter. Kits become independent from their mother in the fall (September....) at approximately 5 or 6 months of age but mostly remain within their natal home range until they become at least 1-year-old. Hence this regulation could impact the survival of first year kits if they are not independent by August 10 and the mother is killed.
- The breeding season extends from May through August (ADFG Website).(Hence this proposal would interrupt this important period of the wolverines life cycle – mating season)
- The author asserts that an extended season is needed because they believe wolverines are primarily found in the high country feeding on Dall sheep and mountain goats. **This is not true. Although wolverines are capable of taking large ungulates as live prey (Magoun 1985), most ungulate presence in the wolverine diet is from scavenging—** with some evidence of a seasonal reliance on local rodent abundance (Banci 1987, Magoun 1985, Gardner 1985) and marmots. Removing wolverines will not likely result in more Dall sheep and goats.



- The author also asserts that the Dall sheep in the Kenai Mountains are on a steady decline while predators continue to grow. **This is also not true.** Wolverine populations on parts of the Kenai Peninsula were estimated in 1995 and 2004. The most complete survey, conducted in 2004, estimated a population density of 3.0 wolverines per 1,000 square kilometers in the upper Turnagain Arm and Kenai Mountains (Golden et al. 2007b). A 1995 survey, using similar methodology but restricted to the northeast corner of the Refuge, estimated a density of 5.2 wolverines per 1,000 square kilometers (Golden 1996).
- Wolverine (*Gulo gulo luscus*) are uncommon on the Kenai Refuge. They are primarily restricted to the rugged subalpine and alpine habitats in the mountainous eastern region of the Refuge and appear to be rare on the western lowlands of the Refuge.
- The wolverine's affinity for remote wilderness, rugged terrain, low densities, and large home-range sizes, coupled with its sensitivity to human disturbance, all contribute to the challenge of managing and conserving this solitary and secretive species (Ruggiero et al. 1994 cited in Tomasik and Cook 2005).
- Because wolverines have few natural predators, harvest by humans is believed to be the greatest factor influencing adult wolverine numbers (Hornocker and Hash 1981). Krebs et al. (2004) indicated that human-caused mortality was additive to natural mortality and that trapped populations of wolverine would decline in the absence of immigration from untrapped populations. However, as long as there was a source meta-population within a protected nearby refugium, harvested wolverine populations would likely persist. As with other low-density species, maintaining high annual survival of adult females is central to sustaining populations and harvest (Eberhardt 1990, Golden et al. 2007a).

Carol Damberg, Anchorage, AK

### Proposals 146, 147, 156, 157, 158 160 Support

Carol Damberg, Anchorage, AK.



PC070

**Submitted by:** Jon Dawson

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

My wife and I have a residence in Cooper Landing and care deeply about land use in the community. We make regular use of trails in the area, and frequently venture off the trails into surrounding woods. I am writing to express support for the proposals for trap setbacks from heavily used recreation areas and, most importantly, the proposal to require signage for active trapping--Proposal 154. We have a dog and three grandchildren, and are especially worried about the risks that traps pose to pets and children. Signage would allow us to take appropriate precautions when enjoying this beautiful locale.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC071

**Submitted by:** Toran Degen

**Organization Name:**

**Community of Residence:** (Rainbow Valley) Indian, AK

**Comment:**

Opposed to prop 98 due to increased danger to valley residents (including children) and hikers in the area. The added risk of hunters in our valley is too dangerous to be allowed. Concerns include, trespassing, safety risk of weapons being fired near/around/at residents /hikers.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 98: Oppose

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**Submitted by:** Fred Dickerson

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

I support proposal #146 & #147. We frequently take our dog on local ski trails. Would be nice to not have it potentially getting trapped when leaving the trail.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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THE STATE  
of **ALASKA**  
GOVERNOR MIKE DUNLEAVY

## Department of Natural Resources

DIVISION OF PARKS AND OUTDOOR RECREATION

18620 Seward Hwy  
Anchorage, AK 99516  
Main: (907) 345-5014  
Fax: (907) 345-6982



PC 073

December 16, 2022

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

**Subject: 2022/2023 Board of Game Proposals.**

In 1970 the legislature restricted the state-owned land and water described in Alaska Statutes (AS 41.21.120-41.21.125) to use as Chugach State Park. In doing so, this land was closed to multiple-purpose use and designated as a special-purpose site under Article 8, section 7 of the Constitution of the State of Alaska. Because these lands are not available for multiple-purpose use, leasing and subsurface development are precluded. Five primary purposes were outlined for Chugach State Park in statute:

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

Chugach State Park is located in Southcentral Alaska mostly within the Municipality of Anchorage. The park contains approximately 495,000 acres of land and comprises nearly half of the Alaska Game Management Unit (GMU) 14C. Although vast portions of the Southcentral Alaska region are sparsely populated, almost half of the State's population resides in or near Anchorage. Anchorage represents the most highly developed urban area in Alaska.

Management responsibility for the park, described in AS 41.21.122, is assigned to the Department of Natural Resources for control, development, and maintenance. The statute states that the Department of Fish and Game shall cooperate with the Department of Natural Resources for the park purposes described above (AS 41.21.121) relevant to the duties of the Department of Fish and Game.

With over 1.3 million visitors annually, Chugach State Park has carefully reviewed the 2022/2023 regulatory proposals that will affect the park's wildlife and users.

### **PROPOSAL 90**

#### **5 AAC 85.015. Hunting seasons and bag limits for black bear.**

#### **5 AAC 92.530. Management Areas.**

This proposal seeks to establish a primitive weapon or any weapons hunt for black bear in the West Fork of Eagle River Drainage in Unit 14C as follows:

Hunt Area: Unit 14C, South Fork Eagle River: all drainages into South Fork Eagle River, excluding that area within ½ mile of a developed facility.



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**Amendment:** None

**Recommendation:** Oppose

**Findings: 11 AAC 12.190. Firearms and other weapons.** (a) A person may not discharge a weapon within a state park except as provided by this section, AS 41.21, 11 AAC 20, or 11 AAC 21.

(d) Notwithstanding (c) of this section, a person may discharge a weapon in a state park for the purpose of lawful hunting or trapping, except that a person may not discharge a weapon in a state park as follows:

(1) within one-quarter mile of a developed facility or as otherwise provided by this section, AS 41.21, 11 AAC 20, or 11 AAC 21;

(4) in Chugach State Park within the following drainages:

(B) Eagle River and all tributary drainages downstream from the confluence of Icicle Creek and Eagle River located in Section 24, T13N, R1E, Seward Meridian.

One of the purposes for establishing Chugach State Park was to provide areas for the public display of local wildlife. Negative wildlife-human interactions are not common within the park, but public safety is a concern as visitors seek to view wildlife and use park resources for recreational pursuits. Most visitors seem to be aware of the potential threats that come with recreating alongside wildlife and encountering bears has not prevented most residents from using area parks and trails.

Certain activities occurring within the park such as hunting have been the source of public contention over the years because of individual personal recreational perspectives. The Division of Parks and Outdoor Recreation manages public safety as well as the land and recreation resources. Accessible, year-round recreation areas like the South Fork of Eagle River and the interconnected trail system of the West fork of Eagle River drainage have been set aside from the use and discharge of weapons for this purpose.

Authorizing a hunt in this drainage would go against 11 AAC 12.190(4)(F) and the Chugach State Park's management and purpose.

### **PROPOSAL 97**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

**5 AAC 92.530. Management Areas.**

This proposal seeks to establish a primitive weapon or any weapons hunt for brown bear in the West Fork of Eagle River Drainage in Unit 14C as follows:

Hunt Area: Unit 14C, South Fork Eagle River: all drainages into South Fork Eagle River, excluding that area within ½ mile of a developed facility.

**Amendment:** None

**Recommendation:** Oppose

**Findings: 11 AAC 12.190. Firearms and other weapons.** (a) A person may not discharge a weapon within a state park except as provided by this section, AS 41.21, 11 AAC 20, or 11 AAC 21.

(d) Notwithstanding (c) of this section, a person may discharge a weapon in a state park for the purpose of lawful hunting or trapping, except that a person may not discharge a weapon in a state park as follows:



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(1) within one-quarter mile of a developed facility or as otherwise provided by this section, AS 41.21, 11 AAC 20, or 11 AAC 21;

(4) in Chugach State Park within the following drainages:

(B) Eagle River and all tributary drainages downstream from the confluence of Icicle Creek and Eagle River located in Section 24, T13N, R1E, Seward Meridian.

One of the purposes for establishing Chugach State Park was to provide areas for the public display of local wildlife. Negative wildlife-human interactions are not common within the park, but public safety is a concern as visitors seek to view wildlife and use park resources for recreational pursuits. Most visitors seem to be aware of the potential threats that come with recreating alongside wildlife and encountering bears has not prevented most residents from using area parks and trails.

Certain activities occurring within the park such as hunting have been the source of public contention over the years because of individual personal recreational perspectives. The Division of Parks and Outdoor Recreation manages public safety as well as the land and recreation resources. Accessible, year-round recreation areas like the South Fork of Eagle River and the interconnected trail system of the West fork of Eagle River drainage have been set aside from the use and discharge of weapons for this purpose.

Authorizing a hunt in this drainage would go against 11 AAC 12.190(4)(F) and the Chugach State Park's management and purpose.

### **PROPOSAL 98**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear.**

**5 AAC 92.530. Management Areas.**

This proposal seeks to open a hunt for brown bear within the Rainbow Creek drainage in Unit 14C as follows:

Hunt Area: Unit 14C, Rainbow Creek: all drainages flowing into Rainbow Creek, excluding that area within ½ mile of the Seward Highway or within ½ mile of a developed facility.

**Amendment:** None

**Recommendation:** Oppose

**Findings: 11 AAC 12.190. Firearms and other weapons.** (a) A person may not discharge a weapon within a state park except as provided by this section, AS 41.21, 11 AAC 20, or 11 AAC 21.

(d) Notwithstanding (c) of this section, a person may discharge a weapon in a state park for the purpose of lawful hunting or trapping, except that a person may not discharge a weapon in a state park as follows:

(1) within one-quarter mile of a developed facility or as otherwise provided by this section, AS 41.21, 11 AAC 20, or 11 AAC 21;

(4) in Chugach State Park within the following drainages:

(F) Rainbow Creek.

One of the purposes for establishing Chugach State Park was to provide areas for the public display of local wildlife. Negative wildlife-human interactions are not common within the park, but public



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safety is a concern as visitors seek to view wildlife and use park resources for recreational pursuits. Most visitors seem to be aware of the potential threats that come with recreating alongside wildlife and encountering bears has not prevented most residents from using area parks and trails.

Certain activities occurring within the park such as hunting have been the source of public contention over the years because of individual personal recreational perspectives. The Division of Parks and Outdoor Recreation manages public safety as well as the land and recreation resources. Accessible, year-round recreation areas like Rainbow Creek drainage have been set aside from the use and discharge of weapons for this purpose.

Authorizing a hunt in this drainage would go against 11 AAC 12.190(4)(F) and the Chugach State Park's management and purpose.

### **PROPOSAL 103**

**5 AAC 85.015. Hunting seasons and bag limits for black bear.**

**5 AAC 85.020. Hunting season and bag limits for brown bear.**

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

**5 AAC 92.530. Management Areas**

Establish a bear bait hunt in Unit 14C, the McHugh Creek drainage for black and brown bears as follows:

(1) Station for bear baiting for brown and black bears in Unit 14C McHugh Creek drainage area starting May 1 through June 15. Up to six certified users of the bait station shall operate the bait station by registration permit.

**Amendment:** None

**Recommendation:** Oppose

**Findings: 11 AAC 12.190. Firearms and other weapons.** (a) A person may not discharge a weapon within a state park except as provided by this section, AS 41.21, 11 AAC 20, or 11 AAC 21.

(d) Notwithstanding (c) of this section, a person may discharge a weapon in a state park for the purpose of lawful hunting or trapping, except that a person may not discharge a weapon in a state park as follows:

(1) within one-quarter mile of a developed facility or as otherwise provided by this section, AS 41.21, 11 AAC 20, or 11 AAC 21;

(4) in Chugach State Park within the following drainages:

(E) McHugh Creek.

**11 AAC 12.220. Unattended equipment.** (b) A person may not leave equipment in an undeveloped area of a state park for more than 72 hours unless the person is primarily engaged in recreation activities on a daily basis in the state park in which the equipment is located or on public land adjacent to the state park.

**11 AAC 12.050 Refuse and waste.** (a) No person may bring waste or refuse from a household into a state park.

One of the purposes for establishing Chugach State Park was to provide areas for the public display of local wildlife. Negative wildlife-human interactions are not common within the park, but public



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safety is a concern as visitors seek to view wildlife and use park resources for recreational pursuits. Most visitors seem to be aware of the potential threats that come with recreating alongside wildlife and encountering bears has not prevented most residents from using area parks and trails.

Certain activities occurring within the park such as hunting have been the source of public contention over the years because of individual personal recreational perspectives. The Division of Parks and Outdoor Recreation manages public safety as well as the land and recreation resources. McHugh Creek is one of the most highly developed trailheads along Turnagain Arm and being a mere 20-minute drive from Anchorage, it consequently receives heavy use year-round especially in the spring with its southern exposure. Areas like McHugh Creek drainage have been set aside from the use and discharge of weapons for this purpose.

Additionally, it would be very challenging for hunters to meet the required 1 mile from a recreational facility and ¼ mile setbacks from a developed trail within the steep, mountainous, non-motorized McHugh Creek drainage. Since McHugh drainage is so narrow, it is likely the bait station will lure bears toward a developed trail rather than away. Park regulations prohibit leaving bait station equipment in the field for extended amounts of time unattended.

Authorizing a hunt in this drainage would go against 11 AAC 12.190(4)(E), 11 AAC 12.220 (b), 11 AAC 12.050, and the Chugach State Park's management and purpose.

2022/2023 Board of Game Proposals 90, 97, 98, and 103 are in direct conflict with park regulations and management. The locations of these proposals occur in the most heavily recreated areas of the park; areas that have been set aside from the use and discharge of weapons.

I greatly appreciate the opportunity to review and submit comments on the above proposals. Please let me know if you have any questions regarding these recommendations. Thank you for your consideration

Sincerely,

Ben Corwin  
Park Superintendent  
Chugach Region



**Submitted by:** Doug Dorner

**Organization Name:**

**Community of Residence:** Kodiak AK

**Comment:**

Proposal 73 – I’m supporting this as amended by the Kodiak AC (reduce deer bag limit for nonresidents from 3 to 1)

Proposal 74 – I’m supporting this as amended by the Kodiak AC (deer must remain bone-in, the AC amended it just to make the language a little clearer based on input from AWT)

Proposal 81 – I’m supporting this. The Kodiak AC supported it unanimously. This would require snares set on the Kodiak Road System to have breakaway mechanisms.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 73: Support with Amendment Proposal 74: Support with Amendment Proposal 81: Support

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PC075

**Submitted by:** Melissa Dowell

**Organization Name:**

**Community of Residence:** Kenai, AK

**Comment:**

Proposal 145 - Support

We are investing in the wildlife of this state by creating these wildlife crossings and it is imperative that we not turn these crossings into a trap for these same animals we are attempting to protect. As one of the largest and least inhabited states in the country, there are plenty of places to hunt and trap.

Proposal 146 - Support

Proposal 147 - Support

Proposal 148 - Support

Proposal 149 - Support

Proposal 150 - Support

Proposal 151 - Support

Proposal 152 - Support

Proposal 153 - Support

One of my greatest joys of living in Alaska is the amazing trails available to explore however I am consistently worried that I or my dogs may be injured while walking them because of the allowance of traps so close to the trails. As one of the largest and least inhabited states in the country, there are plenty of places to hunt and trap without allowing them to be set right alongside recreation trails. Alaska is an incredibly attractive destination for outdoor recreation which supports many community economies but if we get the reputation for people or domestic animals being injured due to traps that are placed right by trails, you can bet that tourism will decrease.

Proposal 154 - Support

One of my greatest joys of living in Alaska is the amazing trails available to explore however I am consistently worried that I or my dogs may be injured while walking them because of the allowance of traps in the same areas. Signage would decrease that worry because it would be clear where areas of concern are present.

Proposal 156 - Support

Proposal 157 - Support

Proposal 160 - Support

Based on review by experts there are population concerns that would be addressed or, at least mitigated by these efforts. Retaining healthy populations of all species in Alaska is in everyone's best interest, humans and animals. If we do not address population concerns proactively, we risk loss of animals which takes more investment and management to correct.

#### Proposal 158

Making regulations easy to understand for all is the best way to promote adherence and awareness. Aligning timing whenever possible is a logical way to accomplish that goal.

#### Proposal 159 - Opposed

The assertions made are inaccurate. Extending the season is unlikely to result in greater Dall sheep abundance since they are not a primary portion of a wolverine's diet. On the adfg site it states that while ungulates can be killed by wolverines, this is a rare occurrence. Wolverines are not increasing in density over the peninsula. Again, on the adfg site it states, "Wolverines are found at low densities across Alaska. Results from a cooperative study with Chugach National Forest indicated a wolverine density of 4.5 to 5.0 wolverines per 1,000 square kilometers in Kenai Mountains and Turnagain Arm area, which is typical for other areas of South-central Alaska." This 4.5-5 count is, at best, stable and current guidelines should not be changed.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 159: Oppose Proposal 160: Support



PC076

**Submitted by:** Ron Downing

**Organization Name:**

**Community of Residence:** Homer, AK

#### **Comment:**

Just today I heard about this matter of trapping near trails, campgrounds etc. I can't imagine walking carefree on one of our beautiful trails with my son or my dog only to wander off the trail to take a leak and find a trap. If I have heard correctly about this it seems like madness. I would say even 100 yard setbacks are too close. Please reconsider!

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC077

**Submitted by:** Justin Dubay**Organization Name:****Community of Residence:** Wasilla, ALASKA**Comment:**

I am a guide/outfitter in Alaska who has hunted in 19C for 25 years. I will leave this short. The numbers of ewes and lambs is down quite a bit due to environmental and predation issues. Most of it being environmental. I oppose the closing of 19C to sheep hunting because limiting the harvest of mature rams will have no impact on the overall population. The problem lies in ewes and lambs not surviving the winter. I spend countless days in sheep country year round and have witnessed this first hand. This is a cycle like any other animal goes through. Closing the season to mature rams will only allow these rams to die on the mountain. I also believe the number of residents who harvest is down due to overall numbers being down. The decline in numbers is a state wide problem not limited to 19C. Please reconsider shutting this unit down at all let alone five years. thanks

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 204: Oppose



PC078

**Submitted by:** Ben Dubbe**Organization Name:****Community of Residence:** Homer, AK**Comment:**

In support of Proposal 161 with amendments.

I am fully in support of this proposal and the reasons behind it. I would like it to be amended to include not just the south side of Kachemak Bay, but also the adjacent outer coast and islands. If deer were to be introduced to the south side of Kachemak Bay there is no barrier preventing deer from traveling to the outer coast and because of that it would effectively be in the reintroduction area. It has been my observation that short passages like the one to the Elizabeth Islands are not a barrier to Sitka deer. Additionally, it may be found that the habitat is better on the outer coast and a reintroduction would be better started there.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 105: Support with Amendment Proposal 106: Support with Amendment Proposal 107: Oppose Proposal 108: Support Proposal 110: Support with Amendment Proposal 112: Support Proposal 113: Support Proposal 114: Support Proposal 115: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support Proposal 124: Support Proposal 125: Support Proposal 126: Support Proposal 129: Support Proposal 133: Oppose Proposal 134: Support

Proposal 135: Support Proposal 136: Support with Amendment Proposal 137: Support with Amendment Proposal 138: Support with Amendment Proposal 139: Support Proposal 140: Oppose Proposal 145: Oppose Proposal 146: Support with Amendment Proposal 147: Support with Amendment Proposal 148: Support with Amendment Proposal 149: Support with Amendment Proposal 150: Support with Amendment Proposal 151: Support with Amendment Proposal 152: Support with Amendment Proposal 153: Support with Amendment Proposal 154: Support Proposal 155: Oppose Proposal 156: Oppose Proposal 157: Oppose Proposal 158: Support Proposal 159: Support Proposal 160: Support Proposal 161: Support Proposal 171: Support Proposal 172: Support

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# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 079

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 079

Aate recreational use trumps trapping.

(feel free to add extra pages of comments)

Printed Name (First and last)\*: RALPH DIERRE

Organization (if any) \_\_\_\_\_

Signature\*: R. Dierre

Email\*: \_\_\_\_\_

Street Address: \_\_\_\_\_

City\*: Anchorage State\*: AK Zip code: 99515

\*Indicates it must be filled in to be accepted.



PC080

**Submitted by:** William Durrant

**Organization Name:**

**Community of Residence:** Hope

**Comment:**

Proposals 145-155. Trapping is incompatible with skiers, hikers and dogs. Too dangerous. Give some set back to ensure safety of children pets. Big state plenty of opportunities to trap away from people.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Support

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PC081

**Submitted by:** Caleb Eckert

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

In order to keep populations robust and healthy, more conservative limits on hunting help guarantee that harvest can continue. Not only do these support a balanced, thriving, healthy ecosystem, but they also encourage hunting in the long-term by easing pressure on sea duck populations as a whole. Retaining or increasing conservative measures for harvest limits for waterfowl is a sensible action that balances concerns about overharvest and desires from hunters. This is why I vocalize support for Proposals 164, 166, and 169—all of which lower bag limits yet still allow for hunting to continue.

In addition, I oppose Proposals 162 and 163 for precisely the same reasons as above: it is not clear that there is a need from area hunters for increased harvest limits, and there is no reason to put further pressure on waterfowl and ptarmigan populations without robust data to back up the liberalization/removal of hunting regulations. Reductions of hunting pressure and more conservative management helps guarantee the continuance of hunting in the long-term.

Additionally, I strongly support Proposal 171, due to its potential to provide more accurate and holistic data on sea duck populations to better guide effective management actions. There are few reasons for less data to be gathered on any species that is hunted or otherwise more heavily pressured by human activity.

I support Proposals 156 and 160. Beavers create critical habitats for a wide array of species across the board, and are vital co-managers of the wider ecosystem. Reductions in trapping pressure on this keystone species mean a healthier ecosystem for all users—including hunters and trappers—that can remain resilient to disruptions and crises of all kinds and more self-sustaining in the short and long term.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 156: Support    Proposal 160: Support    Proposal 162: Oppose    Proposal 163: Oppose    Proposal 164: Support  
Proposal 166: Support    Proposal 171: Support

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I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area. Please select the proposals that you are in support of (select all that apply).*

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

#### **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☐ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☐ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 082

I Think The distance should be  
greater - I've XC Skied in AK For  
20 yrs. , its great Fun To Take my  
dog AND go . I don't Like Trapping  
AT ALL .

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Charles Roger ELKINS Jr

Organization (if any) \_\_\_\_\_

Signature\*: Charles Roger Elkins Jr

Email\*: \_\_\_\_\_

Street Address: \_\_\_\_\_

City\*: Cooper Landing State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.





**Submitted by:** Angelica Evans

**Organization Name:**

**Community of Residence:** Anchorage, Alaska

**Comment:**

In regards to proposal 145, I support a trapping and hunting buffer surrounding the wildlife crossing in coopers landing.

While the proposed 1/4 mile buffer is a start, I would support a much more substantial buffer area of at least 1 mile surrounding the crossing.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147:  
Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152:  
Support Proposal 153: Support Proposal 154: Support Proposal 155: Support Proposal 156: Support Proposal 157:  
Support Proposal 158: Support Proposal 160: Support

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# Cooper Landing, Homer & Seward Trap Setback Proposals, Comments & Ballot



I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee and other agencies to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (Cooper Landing area) and Game Unit 15 (Homer) I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing, Homer, and Seward area. **Select the proposals that you are in support of (select all that apply).***

*If there is more than one person in your household, please have each person submit their comments separately. Make copies of this form if needed or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) to request more.*

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- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100-yard trapping setback from the Diamond Creek Trail, Grewingk Glacier Lake Trail and the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100-yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100-yard trapping setback from trails in Seward.

Comments:



PC 084

As a landowner and dog owner here on the Kenai Peninsula, I enjoy the outdoors walking my dog and want it to be a stress free experience. Even though we live out East End Road, we stop along the highway going to Anchorage & Seward. All of the proposals for trap setbacks are potentially where I like to walk my dog. I am totally in favor of the 100yd setbacks to protect my pets, also to keep trappers equipment safe.

(Feel free to add extra pages of comments!)

Printed Name (First and last)\*

Katherine Farrington

Organization (if any)

Signature\*

Katherine Farrington

date

2/27/23

Email\*

Street Address:

City\*

Homer

State\*

AK

Zip code:

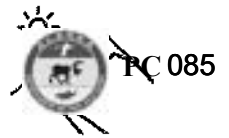
99603-9725

\*Indicates it must be filled in to be accepted.

Send to: ADF&G Boards of Support Section  
PO Box 115526  
Juneau, AK 99811

Comments via mail must be received (not postmarked) by the due date of March 3<sup>rd</sup>!  
Remember to have each household member submit separate comments individually.

# Cooper Landing, Homer & Seward Trap Setback Proposals, Comments & Ballot



I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee and other agencies to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (Cooper Landing area) and Game Unit 15 (Homer) I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

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## Other areas setback proposals:

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- ☒ **# 148 Seward Trails:** Establish a 100-yard trapping setback from trails in Seward.

Comments:



PC 085

Anyone that is too lazy to walk 100 yds off an established trail to set a trap should not be trapping. I am in favor of the 100 yd setback on all of the proposals.

(Feel free to add extra pages of comments!)

Printed Name (First and last)\*: Patrick Fallington

Organization (if any) \_\_\_\_\_

Signature\*:  date 2/27/23

Email\*: 

Street Address: 

City\*: Homer State\*: AK Zip code: 99603

\*Indicates it must be filled in to be accepted.

Send to: ADF&G Boards of Support Section  
PO Box 115526  
Juneau, AK 99811

Comments via mail must be received (not postmarked) by the due date of March 3<sup>rd</sup>  
Remember to have each household member submit separate comments individually.



**Submitted by:** Nina Faust

**Organization Name:**

**Community of Residence:** Homer

**Comment:**

See attached.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 155: Support Proposal 156: Support with Amendment Proposal 160: Support

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As a long time Alaskan, I use trails in public areas. I am very concerned about the lack of buffers or zones along our public trails to keep public recreation separate from the trapping of animals. Multi-use areas are great, but some activities, like trapping, do not belong in close proximity to multi-use trails. I support new regulations to create setbacks. Specifically, I support Proposals 145 through 154 that will create setbacks along specific trails in Cooper Landing and Homer and Seward, as well as require signs where there is active trapping.

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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P.O. Box 2994

Homer AK 99603

December 15, 2022

Members of the Alaska Board of Game

Anchorage AK 99603

RE: Proposals 164-172 Regarding Sea duck Bag Limits and Reporting in Kachemak Bay, Unit 15C

Dear BOG Members:

I fully support all the proposals listed above that would reduce the bag limits for Goldeneyes, Buffleheads, Harlequins, and Long-tailed ducks in Kachemak Bay and make the reporting requirements for take of these ducks more stringent.

The sea ducks in Kachemak Bay have been hit hard over the years with guided hunts in many of the fiords. These populations are very slow to recover so the decline due to the intense hunting is very evident.

Since Kachemak Bay Critical Habitat Area's purpose is "to protect and preserve habitat areas especially crucial to the perpetuation of fish and wildlife, and to restrict all other uses not compatible with that primary purpose" (Alaska Statute 16.20.500), it is clear the Board of Game needs to change the regulations to conserve these populations.

With populations so low, we need to be very conservative in setting the take of these long-lived but slowly reproducing populations. Please pass these proposals so the local Kachemak Bay sea duck flocks can recover.

Respectfully,

Nina Faust

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support  
Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support

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P.O. Box 2994

Homer AK 99603

October 20, 2022

Members of the Alaska Board of Game

Anchorage AK 99603

RE: Proposals 165-172 Regarding Sea duck Bag Limits and Reporting in Kachemak Bay, Unit 15C

Dear BOG Members:

I fully support all the proposals listed above that would reduce the bag limits for Goldeneyes, Buffleheads, Harlequins, and Long-tailed ducks in Kachemak Bay and make the reporting requirements for take of these ducks more stringent.

The sea ducks in Kachemak Bay have been hit hard over the years with guided hunts in many of the fiords. These populations are very slow to recover so the decline due to the intense hunting is very evident.

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With populations so low, we need to be very conservative in setting the take of these long-lived but slowly reproducing populations. Please pass these proposals so the local Kachemak Bay sea duck flocks can recover.

Respectfully,

Nina Faust

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Proposal 165: Support Proposal 166: Support  
Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support  
Proposal 172: Support

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P.O. Box 2994

Homer AK 99603

January 27, 2023

RE: Proposal 162 Board of Game Southcentral Region Meeting, March 17-21, 2022

I have lived in the Skyline Drive area of Homer since 1986 and have skied and hiked all of the area extensively. In particular, I have skied almost all of the drainages from Lookout Mountain and all other drainages east of there down into the Beaver Flats and Fritz Creek drainage over the time period from 1986 until now. Ptarmigan used to be seen frequently on top and around Lookout Mountain and occasionally in some few areas closer to Skyline Drive. As more hunters with snow machines frequented the area, the numbers went way down to the point where no ptarmigan have been seen for years.

Last winter in spring of 2022, I finally saw a couple of ptarmigan again in the Skyline/Ohlson Mt Road area. I did not see any in the drainages or on the hillsides above. The population is not by any means recovered even to its sparse abundance of the 1980s compared to the historic dense flocks reported by homesteaders in the 1940s. The closure has successfully begun restoration of this depleted population but it has a long way to go to fully recover.

Please do not open the spring season for Ptarmigan hunting. In reality, splitting the season and allowing a fall hunt with the spring nesting season closure is good sense management for abundance. With the efficiency of snowmachines and the speed with which hunters can kill ptarmigan in willow patches it would make sense to maintain this closure permanently to allow the population to stay at a higher natural level. Photographers, hikers, skiers, and tourists along the Skyline Drive and Ohlson Mountain Road will be able to enjoy seeing our state bird from their cars. The split season makes it easy to manage this species for all Alaskans so it can become a bird that might easily be seen from the road which will attract birdwatchers to our community. Right now, spotting a ptarmigan from any commonly driven road is a rarity. It is important to remember that Alaska wildlife is to be managed for all Alaskans. This closure is starting to make a difference but it is a long way from allowing ptarmigan to once again become abundant.

I urge a no vote on this proposal.

Sincerely,

Nina Faust

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 162: Oppose

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P.O. Box 2994

Homer AK 99603

October 20, 2022

RE: Proposal 162 Board of Game Southcentral Region Meeting, March 17-21, 2022

I have lived in the Skyline Drive area of Homer since 1986 and have skied and hiked all of the area extensively. In particular, I have skied almost all of the drainages from Lookout Mountain and all other drainages east of there down into the Beaver Flats and Fritz Creek drainage over the time period from 1986 until now. Ptarmigan used to be seen frequently on top and around Lookout Mountain and occasionally in some few areas closer to Skyline Drive. As more hunters with snow machines frequented the area, the numbers went way down to the point where no ptarmigan have been seen for years.



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I urge a no vote on this proposal.

Sincerely,

Nina Faust

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Proposal 162: Support

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If I already commented on Proposal 162, I would prefer this version be used.

P.O. Box 2994

Homer AK 99603

January 27, 2023

RE: Proposal 162 Board of Game Southcentral Region Meeting, March 17-21, 2022

I have lived in the Skyline Drive area of Homer since 1986 and have skied and hiked all of the area extensively. In particular, I have skied almost all of the drainages from Lookout Mountain and all other drainages east of there down into the Beaver Flats and Fritz Creek drainage over the time period from 1986 until now. Ptarmigan used to be seen frequently on top and around Lookout Mountain and occasionally in some few areas closer to Skyline Drive. As more hunters with snow machines frequented the area, the numbers went way down to the point where no ptarmigan have been seen for years.

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Please do not open the spring season for Ptarmigan hunting. In reality, splitting the season and allowing a fall hunt with the spring nesting season closure is good sense management for abundance. With the efficiency of snowmachines and the speed with which hunters can kill ptarmigan in willow patches it would make sense to maintain this closure permanently to allow the population to stay at a higher natural level. Photographers, hikers, skiers, and tourists along the Skyline Drive and Ohlson Mountain Road will be able to enjoy seeing our state bird from their cars. The split season makes it easy to manage this species for all Alaskans so it can become a bird that might easily be seen from the road which will attract birdwatchers to our community. Right now, spotting a ptarmigan from any commonly driven road is a rarity. It is important to remember that Alaska wildlife is to be managed for all Alaskans. This closure is starting to make a difference but it is a long way from allowing ptarmigan to once again become abundant.

I urge a no vote on this proposal.

Sincerely,

Nina Faust

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Proposal 162: Oppose

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[REDACTED]  
Homer AK 99603  
[REDACTED]

February 10, 2023

Members of the Alaska Board of Game  
Anchorage AK 99603

Dear Board Members:

RE: Proposal 155: **5 AAC 92.550 Areas closed to trapping.**

Beavers are important wetlands and stream engineers. Many of the drainages on the Kenai Peninsula have low populations of beaver, especially in the Anchor River and Fritz Creek Drainages that I am familiar with. I would like to see this proposal passed.

RE: Proposal 156: **5 AAC 84.270. Furbearer trapping.**

I support Proposal 156 but I would recommend it be amended. I would like to see the Fritz Creek Drainage added to the closure, and I would like to see the closure on the Anchor River and Fritz Creek drainages be for a 10-year period, with a review at the end of the closure to see if there are enough beaver to warrant reopening the season.

From my personal experience in exploring and hiking drainages flowing into the Beaver Flats and Fritz Creek, all the old beaver dams in the upper drainages coming down from the Skyline Drive and Ohlson Mountain Road area no longer have beaver. There used to be a thriving colony in the drainage that comes out of the wetlands area off the first big downhill on Ohlson Mountain Road. Further downstream, numerous active beaver dams hosted several animals. I know that snowmachiners accessed this lower colony and set traps. Eventually there were no more beavers.

Much research has been done throughout the country on the effects to watersheds when beavers are removed entirely from drainages. This research is providing methods for restoration efforts to help with drought, loss of fishery and animal habitat, erosion control, and many more benefits that come from restoring beaver. The book, *Eager: The Surprising, Secret Life of Beavers and Why they Matter* by Ben Goldfarb details the drastic transformation of land throughout America due to the intensive hunting, trapping, and eradication of beavers. It also discusses some of the new methods for dealing with problem beavers and methods for restoration of beaver in areas where they have been extirpated.

In Homer, Inspiration Ridge Preserve, owned by the Center for Alaskan Coastal Studies (CACS), is potentially a site for a beaver restoration project when historically there were beavers maintaining a dam and ponds in the wetlands near Ohlson Mountain Road. If pursued and



successful, restoration of beaver in this location would create wetlands for nesting waterfowl, the native dolly varden fish in this creek, and would store water from runoff, preventing erosion downstream and helping to recharge ground water. Educational opportunities about wetlands ecology and the role of beavers would be a side benefit.

However, if CACS invests in this project, it is important that the beaver are protected from trapping for a long enough period to establish a healthy thriving colony whose family members would eventually migrate downstream to repopulate other old dam sites. Whether that time-period is 6 years or 10 years may be debatable, but I feel we should provide a sufficiently long time period for the closure to allow full success of a project like this and for the repopulation of both the Anchor River and Fritz Creek Drainages. Restoring beaver throughout the drainage, especially of the Anchor River drainage, would benefit the popular salmon and steelhead fisheries.

So, I fully support an amended Proposal 156, as I have stated.

RE: Proposal 160: allows take of one beaver per lodge

I support this Proposal as it would end multiple sets on a single lodge and allow only one beaver to be removed. Makes sense to limit the take and allow the family to continue maintaining their lodge and reproducing. That will help protect the population of beavers in the drainage. Marking makes it easy for other trappers to see the lodge is not available for further trapping.

Thank you for the opportunity to comment.

Respectfully submitted,

Nina Faust



PC087

**Submitted by:** Vivian Finlay

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

I am in complete support of Proposals 146 and 147 requiring 100 yard setbacks for setting traps near established walking trails, and ski trails. We have vast areas of "wilderness" and dogs are often off leash when they are with their owners. Dogs can accidentally be caught in traps which are too close to the trails. Trappers and other trail users have agreed with the 100 yard setbacks previously. Please support their wishes. Thank you.

Vivian Finlay

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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PC088

**Submitted by:** Kate Finn

**Organization Name:**

**Community of Residence:** Homer

**Comment:**

I live inside Homer City limits and am very concerned for the welfare of my own animals and those of others!

I feel very strongly about the passage of Proposal#146 regarding the Saddle/Glacier trails and Proposal #147 regarding the snowmobile and Nordic Ski Club trails!!

MAKE OUR TRAILS SAFE for ALL USERS

Thank you,

Gratefully,

Kate Finn

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**March 3, 2023**

**To: Alaska Board of Game, Southcentral Region Meeting Spring 2023**

Members of the Board of Game,

My name is Cody Fithian. I live in Wasilla, Alaska. I am a guide, but I also actively hunt with my family and can see both sides of the resident/non-resident conflict that can exist within our hunting community. My following comments are directed at **Proposals 204 and 205**, both affecting unit 19C. I guide in that unit, and also spend time each year hunting on my own and with my family. My experience in the unit is not limited to hunting, as I spend a considerable amount of time there throughout the year.

**Proposal 204: Opposed.**

I do not support Proposal 204. Making such a broad change to a resource in Alaska without any scientific support or research into the root issues is wrong and sets a bad precedent for other harvests and bag limits in the state for both resident and non-resident hunters.

Having been active in unit 19C since 1994, and seeing firsthand populations of both sheep, moose and caribou rise and fall due to either extreme winters or over population of wolves/ bears and subsequent predation, I do not see how shutting down the harvesting of sheep for five years will help the issues we are currently experiencing. I believe that sheep population statewide need to be studied and a broader approach taken to managing and dealing with low sheep numbers. It is also my opinion that increased predator control in unit 19 will have a greater impact on our sheep populations than eliminating human harvests. The last two years especially we have personally witnessed a large rise in wolf populations and signs of predation, and have observed an increase in late winter avalanches due to heavy snowfall and subsequent deaths within the sheep winter ranges. Eliminating human harvests of sheep for five years is not the right answer to the problem.

**Proposal 205: Opposed.**

I also do not support Proposal 205. The issue as I understand it is an unfair hunting opportunity for resident hunters due to over hunting and crowding by non-resident hunters. In my opinion, any time there is easy (relatively speaking) access to an area there will be overcrowding and conflicts. In unit 19C, the majority of the issues I have heard of are in the Farewell area where it is possible to land large aircraft and easily transport in ATV's and gear. In the last 19 years, as a pilot I have made numerous stops at Farewell to refuel, wait on weather, or occasionally pick up or drop off gear or supplies. While there are a number of guides utilizing the Farewell airfield, the overwhelming majority of people and camps I have seen around Farewell and its vicinity are resident hunters. Changing the non-resident season to a draw only hunt will not fix the problem, which I believe is specific to that "corner" of 19C and not reflective of the entire geographic area that unit 19C encompasses. A person only has to visit the Farewell area after the 1st of October when most people have left to realize there are plenty of moose.

Submitted respectfully,

Cody Fithian



**Submitted by:** Adrienne Fleek

**Organization Name:**

**Community of Residence:** Cooper Landing, AK

**Comment:**

I use the trails around Cooper Landing twice a day and have my dogs with me. I'd greatly appreciate setbacks and signage for trapping so I can avoid incidents that impact my family. I also submitted hand written notes on this topic. Thank you for your condo and support for local residents.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support  
Proposal 153: Support Proposal 154: Support

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**Submitted by:** Adrienne Fleek

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

Form Letter/See Attached

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# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 090

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

***Please select the proposals that you are in support of (select all that apply).***

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## **Other areas setback proposals:**

- ☐ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☐ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☐ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.





I strongly support trap setbacks in Cooper Landing. I walk, mush, ski, and run with my dogs 1-2 times a day on the trails in and around Cooper Landing with my 2 dogs and would feel so much more secure knowing there are no game traps close to the area my family recreates in.

I am a lifelong Indigenous Alaskan and want to make sure these <sup>safe</sup> opportunities co-exist with trapping activities- which I also support in designated areas away from the primary places where residents recreate. Gunal'cheesh for including my comments (feel free to add extra pages of comments) + hearing this issue.

Printed Name (First and last)\*: Adrienne Fleck

Organization (if any):

Signature\*: 

Email\*: 

Street Address\*: 

City\*: Cooper Landing State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.



PC091

**Submitted by:** Courtney Fleek

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

My name is Courtney Fleek and I've had a home in Cooper Landing for over 10 years. I've used the many trails in the area in both winter and summer. It's the main reason I chose this town.

I support proposals #149-154 that create 100 yard setbacks and signage at areas the public accesses trails and beaches to recreate in this narrow valley. Many of these access points are at campgrounds and along the highway or at pullouts.

I've used these trails and beaches with children and pets and always have traps in the back of my mind. 100 yard setbacks for traps would really increase safety for the public. So would signage when traps are in the area.

The 1/4 mile buffer to the wildlife crossings to be built with the new highway in proposal 145 would be good to make the crossings as effective as possible.

Thank you

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC092

**Submitted by:** Mike Flora

**Organization Name:**

**Community of Residence:** Homer, Ak

**Comment:**

I support proposal 147. My feelings are that trappers should recognise that the public does enjoy recreating with dogs in the backcountry, free of worry about their dogs being injured. It is not asking much of trappers to maintain a trapline a reasonable distance from public trails. Please consider that when harvesting a public resource, all crabbers, cod fishermen, longliners, salmon netters, trollers, follow extensive requirements governing when , how, where, to set gear..trappers should not be an exception .

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Proposal 147: Support

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PC093

**Submitted by:** Lauren Flynn

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

Hello, I am writing in support of proposals 146 and 147 to create 100 yard trap setbacks off of some common winter trails in my area. I learned a lot when my dog was caught in a foot trap last winter during a ski. Though it was a surprising and scary situation, we got her out uninjured, and I had a really great and educational talk with the trapper. Now I am more in tune with trapping seasons and if i am nervous that an area might have traps, I keep my dog on a leash. Since the event, I have learned how 100 yard setbacks can benefit both trappers and dog owners, and how user groups have been coming together across the state to propose setbacks. I think it is a fair compromise. I hope the State is as inspired by this community driven compromise as I am and will support proposals 146, 147 and others like it.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC094

**Submitted by:** Rick Foster

**Organization Name:**

**Community of Residence:** Homer and Little Tutka Bay, Alaska

**Comment:**

Thank you for your service and for considering my comments

I am a Homer home owner and resident, but spending most time with extended family in our Little Tutka Bay cabin Retired state Habitat Biologist with PHD, Resource Ecology. My comments are result of my observations, knowledge, science-based findings

Proposals 164-170: proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin & Long-tailed Duck: I SUPPORT

Proposal 171: Direct ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6,7 & 15: SUPPORT.

Proposal 172: Require mandatory harvest reporting for sea ducks in Kachemak Bay Unit 15C: SUPPORT

Proposal 163: proposal to roll back existing protections for Sea Ducks in Kachemak Bay: OPPOSE.

Thank you for your consideration.

Rick Foster Thank you for your service and for considering my comments

I am a Homer home owner and resident, but spending most time with extended family in our Little Tutka Bay cabin  
Retired state Habitat Biologist with PHD, Resource Ecology. My comments are result of my observations, knowledge, science-based findings

Proposals 164-170: proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin & Long-tailed Duck: I SUPPORT

Proposal 171: Direct ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6,7 & 15: SUPPORT.

Proposal 172: Require mandatory harvest reporting for sea ducks in Kachemak Bay Unit 15C: SUPPORT

Proposal 163: proposal to roll back existing protections for Sea Ducks in Kachemak Bay: OPPOSE.

Thank you for your consideration.

Rick Foster

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

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PC095

**Submitted by:** Jacob Fraley

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

Hello, my name is Jacob Fraley

I am opposing board proposals 146 and 147, trappers are facing more and more regulations every year and with the increase of user groups of trails that have their dogs accompanying them the unleashed pets are getting into trail sets. Instead of making the trappers change when they are already following the entire book of regulations. Why not impose leash laws on the people that are not controlling the animals that are accompanying them? Furbearers use trails and sets that are not on the trail will not produce. Please do not support these proposals. Thank you

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Oppose Proposal 147: Oppose

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PC096

**Submitted by:** Allison Galbraith

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

As a very frequent, all-season user of the areas specified in proposal numbers 146, 147, 148, 149, 150, 151, 152, 153, and 154, I wish to voice my support for the trapping setbacks in these areas and the posting of signage to indicate active trapping. Please consider keeping these high use and multi use areas safe for everyone.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support  
Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area. Please select the proposals that you are in support of (select all that apply).*

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **#145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

#### **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **#148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:

CH



PC 097

~ all are good proposals but most  
Trappers ~~can't~~ read or pay attention to regs.  
won't

~ have had 2 dogs in traps within these  
corridors

~ Use these areas alot!

Peninsula needs these changes.

(feel free to add extra pages of comments)

Printed Name (First and last)\*: GARY GALBRAITH

Organization (if any) -

Signature\*: Gary Galbraith

Email\*: [REDACTED]

Street Address: [REDACTED]

City\*: COOPER LAUDINE State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.

# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 098

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## Other areas setback proposals:

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.





I am <sup>an</sup> Active member of our community and it is continuously frustrating to me not to have a place to go that we can walk our dog without being caught in a trap. Times have changed and there are more outdoor recreationalists who contribute to our economy, visit our area and their needs, interest and safety are being ignored. I am not fond of trapping, however I respect individuals rights for activities as long as it doesn't impact all user groups. In our community, it does that now. Vast majority in Cooper Landing took the time <sup>2-3</sup> several years ago in support of setbacks in high use areas. The support is there and in discussion with other trappers - those who trap ethically - they do not see a problem with setbacks as they already avoid those areas. It's those who don't we need the setbacks for, and the new wildlife crossings that are coming with the bypass that also should have this regulation in place.

Printed Name (First and last)\*:

Yvette Galbraith

Organization (if any)

Cooper Landing Community Club Board, CLES active EMS Provider, CLAPC Committee Member

Signature\*:

Yvette R. Galbraith

Email\*

Street Address

City\*:

Cooper Landing

State\*:

AK

Zip code:

99572

\*Indicates it must be filled in to be accepted.



PC099

**Submitted by:** Emily Garrity

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

I oppose proposal #162 to lengthen the ptarmigan hunting season past January 1st.

We are just starting to see the return of ptarmigan to our area and feel it necessary to allow numbers to build back up before any further hunting is allowed.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC100

**Submitted by:** Rob Gemmen

**Organization Name:**

**Community of Residence:** Anchor Point, Alaska

**Comment:**

I believe proposal 146 and proposal 147 are not in the best interests of public use. Dog owners concerned with the safety of their pet should keep them on a leash and learn to release them from any trap that they could legally encounter. The burden of protection for the pet someone chooses to bring into a legal trapping environment should not fall on the trapper but on the pet owner.

Help keep our time honored tradition alive and well!

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Oppose Proposal 147: Oppose Proposal 150: Oppose

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**Submitted by:** Ann Ghicadus

**Organization Name:**

**Community of Residence:** Seward Alaska

**Comment:**

I support proposals 145 through 154. The intention is to make popular trails and campgrounds and other well used areas safer for families with dogs and kids. Seems like a no brainer to me. Its past time to reduce the terror of watching a family member die a horrible death.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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**Submitted by:** Lucas Giesey

**Organization Name:**

**Community of Residence:** Juneau, AK

**Comment:**

Strongly oppose Proposal 83. Sheep units in the state are closing because there are “too few sheep”, so why would you open one up to more rifle hunting.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 66: Support Proposal 71: Support Proposal 72: Support Proposal 83: Oppose Proposal 84: Support  
Proposal 85: Support Proposal 87: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support  
Proposal 94: Support Proposal 95: Support Proposal 96: Support Proposal 97: Support Proposal 99: Support  
Proposal 100: Support Proposal 101: Support Proposal 110: Support Proposal 111: Support Proposal 112: Support  
Proposal 113: Support Proposal 114: Support Proposal 119: Support Proposal 120: Support Proposal 121: Support  
Proposal 122: Support Proposal 123: Support Proposal 124: Support Proposal 125: Support Proposal 126: Support

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**Submitted by:** Darin Gilman

**Organization Name:**

**Community of Residence:** Cordova, Alaska

**Comment:**

Proposal 59- I am against this proposal. Making it an archery only hunt takes away opportunity for local residents that would like to harvest a goat. This area is the most easily accessible, by making it an archery only hunt you limit elderly or younger hunters from participating in goat hunts in the area.

Proposal 63- I support this proposal, it would allow hunters to shoot problem brown bears while they are hunting for deer in unit 6 on Hawkins and Hinchinbrook Islands. It is common to run into brown bears during the first two weeks of October especially during odd years when the pink salmon runs are stronger. This would allow retention of bears in defense of life and property if there was an altercation while deer hunting. The bag limit would not change and would have a minimal impact on sustained yield.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Oppose Proposal 63: Support

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# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 104

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area. Please select the proposals that you are in support of (select all that apply).*

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
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- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## Other areas setback proposals:

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.



## Comments:

I'm an outdoor enthusiast and part time photographer. As such I often hike in the dark or low light. I've been to Alaska many times and decided to try Cooper Landing. It's great here but not safe for me or my kids. I'll likely take my tourist dollars somewhere safer. I hope your commentary finds a solution that respects the taxation and freedom of hunters, but avoids risks to dogs, kids and night blind landscape photographers.

(feel free to add extra pages of comments)

Printed Name (First and last)\*:

Zach Goldberg

Organization (if any)

Frozen Foto

Signature\*:

Zach Goldberg

Email\*:

[Redacted]

Street Address

[Redacted]

City\*:

Isaquah

State\*:

WA

Zip code:

98027

\*Indicates it must be filled in to be accepted.



I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area. Please select the proposals that you are in support of (select all that apply).*

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

#### **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 105

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Thomas Gossard

Organization (if any) \_\_\_\_\_

Signature\*: Thomas Gossard

Email\*: \_\_\_\_\_

Street Address: \_\_\_\_\_

City\*: Cooper LNDG

State\*: AK

Zip code: 99512

\*Indicates it must be filled in to be accepted.





**Submitted by:** Michael Gould

**Organization Name:**

**Community of Residence:** Cooper Landing, AK

**Comment:**

I live in Cooper Landing, hike and bike the trails in summer and winter, and support the following proposals to reduce the incidence of people, and especially pets, having accidental encounters with traps:

145 - 1/4 mile hunting and trapping buffers from mouths of new highway wildlife crossing on the upcoming Cooper Landing bypass. If the crossings are successful they will funnel and concentrate wildlife to the crossings. Hunting and trapping here would be unethical and unsportsmanlike.

149 - 100 yard trapping setbacks from Cooper Landing area campgrounds. This would include Tern Lake, Quartz Creek, Crescent Creek, Cooper Creek and Russian River Forest Service campgrounds. Visitors with children and pets use these campgrounds extensively and need to be able to do so safely. In winter the roads in some of the campgrounds are groomed for cross country skiing and people take their dogs.

150 - 100 yard setbacks from highway pullouts in Cooper Landing. The pullouts along Quartz Creek and the Kenai River are used by trout and silver salmon fishermen even in winter. Fishermen often take dogs out with them.

151 - 100 yard setbacks from recreational areas in the Summit Lake Recreational Area. This area sees considerable winter use by cross country skiers who are often accompanied by dogs.

152 - 100 yard setbacks from some high-use Cooper Landing Trails. These trails are used by hikers and skiers with dogs in winter.

153 - 100 yard setbacks from some Kenai Lake beaches. People walk some beaches more in winter than summer, as the lower water level makes them accessible, and take their dogs with them.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 107

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewing Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 107

(feel free to add extra pages of comments)

Printed Name (First and last)\*: KEN GREEN

Organization (if any) HOME OWNER- COOPERLANDING

Signature\*: Ken green

Email\*: [REDACTED]

Street Address: [REDACTED]

City\*: Cooper Landing State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.



Although I am in favour of the Proposals for Trapping Set Back Rules for Cooper Landing, Moose Pass and Homer, I am not so naïve as to believe that the Alaska Board of Game will give these Proposals much consideration.

I would like to draw your attention to the opinion letter below that was published in the Anchorage Daily News. As long as there are obstructions to discussion and communications *Before* trapping rules proposals are submitted to the AK BOG, there can be little progress. Discussions and compromises need to be dealt with prior to a proposal's submission.

It would appear that in the long run Trappers could eventually lose more trapping privileges as Alaska Communities become more solid in their opposition to "free-range" trapping in their areas. If proposals are considered too extravagant by the BOG and the ATA, then these entities need to confer with local community committees.

The BOG and ATA should consider that as time progresses local communities may, simply by the force of numbers and changing attitudes, be able to impose their Community Rights on an equal standing as Trapping Rights, which today seem to trump other rights. This could result in more losses for trappers than if they are more willing to deal with changes and offer concessions in the present.

It would be a great step forward if the BOG recognizes the need and the advantages of compromise on trapping issues.

Thank You,

Ken Green.

Opinion Letter – Anchorage Daily News – Thursday – 2 Feb 2023

## TRAPPING CONUNDRUM

The problem with trapping questions is that some people like trapping; others do not. The mindsets of these opposing sides have little flexibility. Some people are trappers, others simply are not. But this is not the issue.

The issue that needs concern is an interpretation of safe trapping practices and boundaries, and defining if and what rules should or could be instated or updated. Trappers mostly claim without question that it's their "right" to trap wherever they choose — others support trapping nowhere. Finding common ground between the two extremes is the challenge.

Presently, pro-trappers are in key positions of influence and little to no progress is being made concerning compromises. Trappers claim trappers' rights loudly and assertively, backed by people in powerful positions and with strong financial support.



"Public safety," often used as a reason to limit trap setting, is a term easily vilified as "overreach" by trapping associations, fish and game boards, and government agencies.

Public safety is not the issue.

Community rights are the issue. It is time for Alaska communities where residents feel threatened by trapping concerns to demand their community rights — not for public safety, but because communities have rights. It is time to believe in and stand up for Alaska's community rights.

— Ken Green Cooper Landing



**Submitted by:** Mary Griffith

**Organization Name:**

**Community of Residence:** Seward, Alaska

**Comment:**

I am writing to support proposals 145-147 and 149-154 to create 100 yard setbacks around certain designated multi-use trails, and to require trappers to post signs advising that trapping is occurring in the area. In Alaska, there are far more people recreating in winter on public lands than there are trappers, especially along the road system. The management of our public lands ought to change to keep up with changing use. I am a skier and hiker, and enjoy recreating on groomed and multi-use winter trails. I don't appreciate that current trapping regulations allow trapping as close as six feet for such trails. Often the argument is that such traps are 'legal not ethical' and that ethical trappers would not place traps in such busy areas where dogs and potentially young children could encounter them. As the aunt of a 5-year old with developmental disabilities, I worry about this. If ethical trappers would not place traps in such heavy-use locations, I don't understand why the Board of Game would have an issue with such setbacks. I ask the Board of Game to listen to local concerns that have been repeatedly brought to the board, and require setbacks around multi-use winter trails.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Support

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**Submitted by:** Carol Griswold

**Organization Name:**

**Community of Residence:** Seward, Alaska

**Comment:**

Dear ADFG Board of Game,

Proposals 164, 165, 166, 167, 168, 169, 170, 171, 172

I support the reduction of bag limit for goldeneye, bufflehead, long-tailed ducks, and harlequin ducks in Units 7, 15, and 15C.

I support accurate reporting of sea duck harvest in Units 6, 7, 15, and 15C.

As a wildlife photographer and birder, I have noticed tremendous declines in sea duck numbers including common goldeneyes, Barrow's goldeneyes, bufflehead, long-tailed ducks, harlequin ducks, black scoters and surf scoters. Data from the annual Audubon Christmas Bird Count in Homer and Seward, confirms this alarming decline. There used to be rafts of these species overwintering in Resurrection Bay, now they are represented by a fraction of those numbers.

As stated by the Homer Fish and Game Advisory Board, it would be prudent to address conservation concerns conservatively and reduce the bag limits on the above species.

Sincerely,

Carol Griswold

Seward, Alaska

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Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support  
Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support

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Dear ADFG Board of Game,

D. Methods and means of taking big, game, fur animals, and furbearers...including requirements for trap identification, signage, breakaway mechanisms, minimum size for jaw spread, and restrictions on trapping near trails, trailheads, roads, and dwellings.

G. Restricted Areas, including Areas closed to hunting and trapping, including proposed areas near roads, trails, beaches, structures, and campgrounds including the Lower Kenai Controlled Use Area, management areas including

Proposals 146, 147, 148, 149, 150, 151, 152, 153, 154

I support establishing regulations to help mitigate conflicts between trappers and other recreational users on the Kenai Peninsula. Require trap identification, signage warning of active trapping in area, breakaway mechanisms, minimum size for jaw spread, and restrictions on trapping along highly used public trails, public beaches, campgrounds, certain

snowmachine and Nordic ski trails, multi-use trails, along highway pullouts, backcountry access points, trailheads, winter trails, and other developed recreational facilities and dwellings.

Actively encouraging “ethical and safe trapping practices” and encouraging trappers “to be cognizant of potential conflicts and to follow the trapper’s Code of Ethics” is not working.

Use of these public trails, beaches, campgrounds, and other developed facilities has greatly increased since the historic days of the solitary trapper. Outdoor recreational opportunities have expanded to include fat bikes, skiers, hikers, photographers, wildlife watchers, ice skaters, ice climbers, and snowmachiners. Many of these users have kids and dogs. It’s past time to recognize the need for setbacks and regulations at these popular areas and establish basic regulations that are fair to both the trappers and recreational users.

Thank you,

Carol Griswold

Seward, Alaska

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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G. Restricted Areas, including Areas closed to hunting and trapping, including proposed areas near roads, trails, beaches, structures, and campgrounds including the Lower Kenai Controlled Use Area, management areas including

Proposals 146, 147, 148, 149, 150, 151, 152, 153, 154

I support establishing regulations to help mitigate conflicts between trappers and other recreational users on the Kenai Peninsula. Require trap identification, signage warning of active trapping in area, breakaway mechanisms, minimum size for jaw spread, and restrictions on trapping along highly used public trails, public beaches, campgrounds, certain snowmachine and Nordic ski trails, multi-use trails, along highway pullouts, backcountry access points, trailheads, winter trails, and other developed recreational facilities and dwellings.

Actively encouraging “ethical and safe trapping practices” and encouraging trappers “to be cognizant of potential conflicts and to follow the trapper’s Code of Ethics” is not working.

Use of these public trails, beaches, campgrounds, and other developed facilities has greatly increased since the historic days of the solitary trapper. Outdoor recreational opportunities have expanded to include fat bikes, skiers, hikers, photographers, wildlife watchers, ice skaters, ice climbers, and snowmachiners. Many of these users have kids and dogs. It’s past time to recognize the need for setbacks and regulations at these popular areas and establish basic regulations that are fair to both the trappers and recreational users.

Thank you,

Carol Griswold

Seward, Alaska



*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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Dear ADFG Board of Game,

I support Proposal 104: Close Chugach State Park and Glacier Creek drainage in Unit 14 to lynx hunting and trapping.

The loss of lynx hunting and trapping opportunities in Chugach State Park and Glacier Creek drainage in Unit 14C will not have a significant effect; access is difficult, the harvest is small, and there is no financial impact to adopt this proposal. Conversely, the popularity of Chugach State Park and Glacier Creek drainage for winter recreation has exploded with winter fatbikers, backcountry skiers, hikers, mountain climbers, icefall climbers, wildlife photographers, birders, and snowmachiners, including kids and dogs.

Not having to worry about losing a pet (or kid) to a trap or being shot, far outweighs the small benefit for a small number of trappers or hunters.

The economic benefits of recreational tourism are far greater than that for trappers or hunters.

I appreciate your support of Proposal 104.

Sincerely,

Carol Griswold

Seward, Alaska

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 104: Support

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**Submitted by:** Richard Gustafson

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

I have been an Alaska resident since 1971 and lived on the southern Kenai Peninsula since 1982. During that time period I have seen many changes to wildlife populations and land use by Alaska residents and nonresidents. This growth has led to conflicts between user groups.

I support the following proposals to help reduce conflicts between user groups.

#145- The 1/4 mile set back buffer for both hunting and trapping make sense for the wildlife underpass and overpass crossings in the new Cooper Landing bypass. These underpasses and overpasses benefit wildlife by reducing the possibility of crashes of cars and trucks and the travelers on the highway. The down side is that wild life are funneled into these small areas thus benefiting hunters and trappers. To me it is important to have set back buffers for those areas. Not having buffers would be like shooting fish in a barrel or the same as hunting the same day airborne. The reduced opportunity argument is weak. Far more area is taken up by the new highway than the 1/4 mile set backs in the proposal and the proposed set backs are small when compared to the total area of the hunting unit.

#146, #147, #148, 149, #150, #151, #152, #153 . The set backs make sense on all the trails and campgrounds in these proposals. Over the 41 years that I have lived in the area there has been a great increase in use of these trails by hikers, snowshoers, skiers, bikers and the camping public. There has also been an increase of new residences and cabins. This increase in population and use has resulted in conflicts between trappers and other users and residents. Thus to reduce user group conflicts setbacks are needed on these trails, campgrounds and recreation areas. No one wants to see pets caught in traps.

#154 Also, it makes since for trappers to inform the public who use the trails and campgrounds that they are trapping in an area.

I am opposed to proposal #162. I cross country ski at Lookout Mountain regularly. Finally in 2021 and 2022 I started seeing a few small flocks of ptarmigan. So far in 2023 I have not seen any. Now is not the time to call the populations of rock and willow ptarmigan recovered. The Department needs more data other than harvest data to declare the population recovered and liberalize the season.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 162: Oppose

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**Submitted by:** Penelope Haas

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

See attached for reasons.

Proposal 145: Close areas to hunting and trapping within 1/4 mile of parts of the Sterling Highway in Units 7 and 15. SUPPORT.

Proposal 146: 100 yd. setbacks for traps from 3 popular winter trails in Kachemak Bay State Park. SUPPORT.

Proposal 147: 100 yd. setbacks for traps from mapped KNSC ski & mapped multi-use Snomads trails in Homer area. SUPPORT.

Proposal 156: Close beaver trapping in the Anchor River and Deep Creek Drainages in Unit 15C for six years with a required review before re-opening. SUPPORT.

Proposal 160: Limit beaver trapping to one set per lodge and only one beaver may be removed per lodge in Units 7 and 15. All lodges that have been or are being trapped in the current season must be visually marked with a pole set vertically in the ice. SUPPORT.

Proposal 162: Extend the ptarmigan season in a portion of Unit 15C to August 10th - March 31st. OPPOSE.

Proposal 163: proposal to roll back existing protections for Sea Ducks in Kachemak Bay: OPPOSE.

Proposals 164-170: proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin & Long-tailed Duck: SUPPORT.

Proposal 171: Direct ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6,7 & 15: SUPPORT.

Proposal 172: Require mandatory harvest reporting for sea ducks in Kachemak Bay Unit 15C: SUPPORT

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 156: Support Proposal 160: Support  
Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support  
Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support  
Proposal 172: Support

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Friday, March 3, 2023

Dear Members of the Board of Game:

I have been an Alaska resident for 16 years. I am an avid hunter, sport and commercial fishermen. I run my own business and built my own off-grid home. I have spent years talking with all kinds of people about some of the proposals before you. I hope you will consider my comments as you deliberate on these important issues that will have such a large impact on hunters, trappers, and residents of the Kenai Peninsula.

Thank you for your consideration,

Penelope Haas

**Proposal 145:** Close areas to hunting and trapping within 1/4 mile of parts of the Sterling Highway in Units 7 and 15. **SUPPORT.**

**Proposal 146:** 100 yd. setbacks for traps from 3 popular winter trails in Kachemak Bay State Park. **SUPPORT.**

**Proposal 147:** 100 yd. setbacks for traps from mapped KNSC ski & mapped multi-use Snomads trails in Homer area. **SUPPORT.**

**Proposal 156:** Close beaver trapping in the Anchor River and Deep Creek Drainages in Unit 15C for six years with a required review before re-opening. **SUPPORT.**

**Proposal 160:** Limit beaver trapping to one set per lodge and only one beaver may be removed per lodge in Units 7 and 15. All lodges that have been or are being trapped in the current season must be visually marked with a pole set vertically in the ice. **SUPPORT.**

**Proposal 162:** Extend the ptarmigan season in a portion of Unit 15C to August 10th - March 31st. **OPPOSE.**

**Proposal 163:** proposal to roll back existing protections for Sea Ducks in Kachemak Bay: **OPPOSE.**

**Proposals 164-170:** proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin & Long-tailed Duck: **SUPPORT.**

**Proposal 171:** Direct ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6,7 & 15: **SUPPORT.**



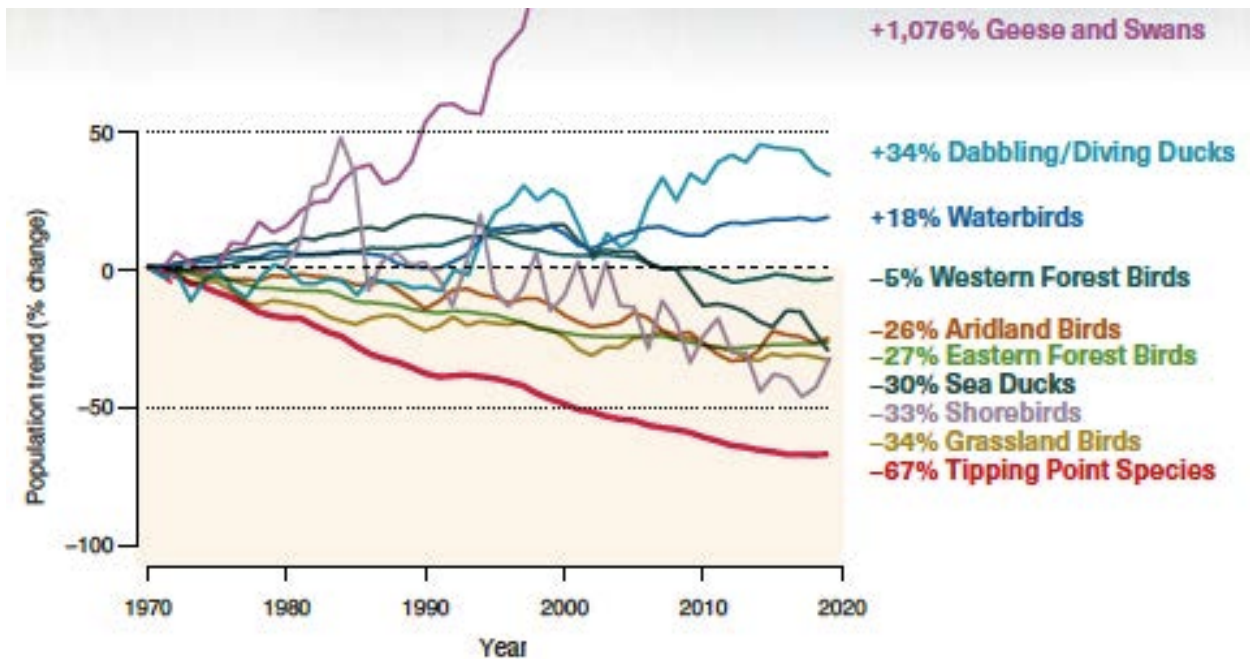
**Proposal 172:** Require mandatory harvest reporting for sea ducks in Kachemak Bay  
Unit 15C: **SUPPORT.**

## **OPPOSE Proposal 163. Rescind the bag limit restrictions for sea duck hunting in Unit 15C.**

- This proposal would change the bag limit restrictions put in place in 2010 to protect vulnerable populations of sea ducks. They want to change the current regulation that says “2 per day, 4 in possession of harlequin or long-tailed ducks, and no more than 1 per day, 2 in possession of eiders (king or common). In addition, nonresidents may not take or possess more than 4 each of any scoter or merganser species.”
- This proposal not supported by the Homer Fish and Game Advisory Committee. It is not supported by local sea duck hunters or commercial guides, because it is not necessary or prudent to increase harvest on these populations.
- Anecdotal evidence from long-time local residents and statistics from the The U.S. Committee of the North American Bird Conservation Initiative “State of the Birds” 2022 report (which shows a national decline in sea duck populations of 30% from 1970 to 2022) indicates that there has been a significant decline in sea duck populations in K-Bay. We should be working to recover these populations, and bag restrictions are one of our only tools.
- Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is “to protect and preserve habitat” and the Kachemak Bay Management Plan says that “priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations.”
- Hunters here are happy with the status quo. There is no need for change.

## **SUPPORT Proposals 164-170. Proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin & Long-tailed Duck.**

- A bag limit reduction on bufflehead, goldeneye, and harlequin is needed to ensure hunt opportunities now and in the future.
- These limits will not hurt the businesses of hunting guides operating in the bay. They will not hurt the ability of folks to harvest food.
- Anecdotal evidence from long-time residents and statistics from the The U.S. Committee of the North American Bird Conservation Initiative “State of the Birds” 2022 report (which shows a national decline in sea duck populations of 30% from 1970 to 2022) indicates that there was a significant decline in sea duck populations in K-Bay in the 1990s. We should be working to try to recover populations.
- Populations of sea ducks are slow to recover from over-harvest, unlike other “small game,” because of they have high site-fidelity (they come back to the same place



Trends for breeding bird species by group or by habitat during 1970–2019, except for the shorebirds trend, which begins in 1980. For details, see pages 6–13.

every year), they don't reproduce until they are 2-3 years old, and they generally only lay one clutch per year.

- Harvest can jump significantly in K-Bay, with the addition of more guides and people, as we saw clearly in the winter of 2021. ADF&G does not have the ability to limit the number of guides operating in K-Bay, and the addition of even one more guide to can do real damage to populations (one boat, five clients, each client harvesting 8 a day, under current regs.,  $24 \text{ birds in } 3 \text{ days} \times 5 = 120$ ).
- Limiting harvest is one of our only mechanisms for protecting populations and supporting their recovery.
- Goldeneye and Bufflehead live in inside waters and so are particularly prone to over-harvest.
- While ADF&G managers argue that Pacific Flyway counts are the best way to manage K-Bay sea ducks, we believe local management is useful and necessary because:
  - Sea duck populations have exceedingly high levels of site fidelity--they come back to the same place every year.
  - Many of Alaska's sea ducks do not go down to the Lower 48 to nest, where Pacific Flyway surveys are conducted. Instead, many of our birds go up to Alaska's northern boreal forests and deltas to lay their eggs. The Pacific Flyway surveys are not even counting them!
  - Kachemak Bay is arguably the easiest place to access sea ducks in all of Alaska.
  - "Kachemak Bay is the most important marine bird habitat in lower Cook Inlet (Erikson 1977) and there are no comparable areas in upper Cook Inlet. During winter months over 90% of the marine birds in lower Cook Inlet are found in



Kachemak Bay (Erikson 1977). Few birds inhabit the offshore waters of lower Cook Inlet in winter, and the extensive inshore ice in the upper inlet and along the western shore is avoided by most marine birds..." ("Kachemak Bay and Fox River Flats Critical Habitat Area Management Plan").

- Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is "to protect and preserve habitat" and the Kachemak Bay Management Plan says that "priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations."
- We do not have reliable local or national data on populations or harvest of sea ducks, so we should act conservatively.

## **SUPPORT Proposal 171. Direct the Department of Fish and Game to institute means and methods to record sea duck harvest as accurately as possible in Units 6, 7 and 15.**

- We should keep tabs on harvest, so that we can know if there is a spike and respond to protect populations. It's like a flag that goes up.
- Regulatory language could be modeled on similar regulations in the State of Washington, which has a mandatory online hunt report system: [fishhunt.dfw.wa.gov](http://fishhunt.dfw.wa.gov)
- Harvest can jump significantly in K-Bay with the addition of even one more guide, (one boat, five clients, each client harvesting 8 a day, under current regs., 24 birds in 3 days x 5 = 120). But F&G does not have the ability to limit the number of guides working in K-Bay.
- Using harvest data to manage populations is common and common-sense. For example, black bear populations are managed though harvest data alone (since the buggers are hard to count from the air).
- The existing reporting system, HIP, does not give managers nearly enough information. It invites voluntary reporting from a very small, randomized group of hunters from all across the state. ADF&G staff have acknowledged that HIP doesn't give us enough information to make decisions.
- Local hunting guides are in favor of this proposal, because they keep track of harvest anyway, and because it may even dispel some of the concerns of over-harvest.
- ADF&G has said that they do not manage sea ducks based on local populations or harvest because they are migratory waterfowl. They would rather use data from the Pacific Flyway and extrapolate from these counts. Sea ducks, however, have a very high degree of site fidelity; many of our local species are not even included in the Pacific Flyway counts; many of our populations never even go to the lower 48, where most of the flyway data comes from, and many are nesting in boreal tree cavities when surveys are done (pretty hard to see a duck in a tree).
- Anecdotal evidence from long-time residents and statistics from the The U.S. Committee of the North American Bird Conservation Initiative "State of the Birds" 2022 report (which shows a national decline in sea duck populations of 30% from 1970 to



2022) indicates that there was a significant decline in sea duck populations in K-Bay in the 1990s. We should be working to try to recover populations. We should monitor harvest within K-Bay because populations will not recover from consecutive years of over-harvest—high site-fidelity and low reproduction rate.

- It is ideal to pair harvest data with population trends. Homer residents would like to work with ADF&G to pair harvest data with our K-Bay citizen science population surveys to improve harvest management in our Critical Habitat Area and State Park waters. 2023 was our 3rd Annual Sea Duck Survey, with 10 boats and almost 40 participants, the accuracy of our data is evident in the fact that we always double count an area with two different boats and get very similar survey results.
- While ADF&G managers argue that Pacific Flyway counts are the best way to manage K-Bay sea ducks, we believe local management is useful and necessary because:
  - Sea duck populations have exceedingly high levels of site fidelity--they come back to the same place every year.
  - Many of Alaska's sea ducks do not go down to the Lower 48 to nest, where Pacific Flyway surveys are conducted. Instead, many of our birds go up to Alaska's northern boreal forests and deltas to lay their eggs. The Pacific Flyway surveys are not even counting them!
  - Kachemak Bay is arguably the easiest place to access sea ducks in all of Alaska.
  - "Kachemak Bay is the most important marine bird habitat in lower Cook Inlet (Erikson 1977) and there are no comparable areas in upper Cook Inlet. During winter months over 90% of the marine birds in lower Cook Inlet are found in Kachemak Bay (Erikson 1977). Few birds inhabit the offshore waters of lower Cook Inlet in winter, and the extensive inshore ice in the upper inlet and along the western shore is avoided by most marine birds..." ("Kachemak Bay and Fox River Flats Critical Habitat Area Management Plan").
  - Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is "to protect and preserve habitat" and the Kachemak Bay Management Plan says that "priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations."
  - We do not have reliable local or national data on populations or harvest of sea ducks, so we should act conservatively.

## **SUPPORT Proposal 156. Close beaver trapping in the Anchor River and Deep Creek Drainages in Unit 15C for six years with a required review before re-opening.**

- The Anchor River beaver population is about gone as far as research shows. It needs some time to recover.
- According to ADF&G, historically the Anchor River drainage has supported a significant harvest of beavers. In 1976, almost half (64 of 136) of the beavers taken in Unit 15 came from the Anchor River drainage system. The last documented harvest of





beavers in this unit was 1 beaver in 2011; prior to this, a beaver had not been harvested since 2006 when 4 beaver were taken, despite active trappers in the area.

- Beaver harvest across Unit 15C has declined significantly in recent years, from an average of 22 beavers per year (2012-2016) to 5 in 2017. Trappers reported to local staff low numbers and poor recruitment along traditional trap lines in 2017.

- ADF&G does not conduct surveys for beavers on a regular basis on the Kenai Peninsula. In 2018, a beaver survey was flown covering the Anchor River and surrounding drainages. One active site was found within the Anchor River drainage. Surrounding drainages held multiple active sites.

- It is in the public interest to rehabilitate beaver populations on the Kenai Peninsula for the following reasons:

- Beavers make critical habitat for baby salmon and trout.
- The habitat beavers create is good for moose populations.
- Beavers improve water quality and mitigate flooding (and associated erosion and landslides) and everyone wins!
- They store water during drought - remember 2019? Summers on the Kenai are on a warming and drying trend. The water that beavers store and habitat that beavers create are essential for humans, healthy salmon and trout populations, and help mitigate the risk of large-scale wildfire.

## **SUPPORT Proposal 160: Limit beaver trapping to one set per lodge and only one beaver may be removed per lodge in Units 7 and 15. All lodges that have been or are being trapped in the current season must be visually marked with a pole set vertically in the ice.**

- Trapping appears to be a major factor in the extirpation of beavers in many areas of the Kenai Peninsula.
- Trapping records in Units 7 and 15 show that beaver populations have declined significantly from historic times (1950-1970) to now is significant.
- This is a carefully crafted proposal to allow for beaver trapping to continue (as many members of the Board of Game want to see) but to try to make sure that we do not continue to over-harvest. It has been tested in the Kenai National Wildlife Refuge to good effect.
- Multiple trappers in one area can contribute to over-harvest of beaver lodges.
- The low numbers of beavers around the road system is a strong indicator that access (trappers using the roads) is driving down beaver populations.
- It is in the public interest to rehabilitate beaver populations on the Kenai Peninsula for the following reasons:
  - Beavers make critical habitat for baby salmon and trout.
  - The habitat beavers create is good for moose populations.



- Beavers improve water quality and mitigate flooding (and associated erosion and landslides) and everyone wins!
- They store water during drought - remember 2019? Summers on the Kenai are on a warming and drying trend. The water that beavers store and habitat that beavers create are essential for humans, healthy salmon and trout populations, and help mitigate the risk of large-scale wildfire.

## **OPPOSE Proposal 162. Extend the ptarmigan season in a portion of Unit 15C to March 31.**

- We shortened the season for a good reason in 2014-2015 for a good reason, and there is not a good reason to revert back to a long season.
- The harvest that is advocated in this proposal is what is known as “additive”—that means that when you harvest a ptarmigan in the fall, you don’t have such a big impact on the population, since the winter is the biggest killer, but if you harvest in the spring, you are taking the birds from the population that survived the winter, the ones that should reproduce, and you have a way bigger impact on the population health.
- The impetus for a shorter season came when the late Bruce Willard submitted a proposal to the BOG for their 2014-2015 meeting cycle to shorten the ptarmigan hunting season in a portion of 15C because of a “significant decline in ptarmigan numbers has occurred in Unit 15C north of Kachemak Bay”. The ADF&G 2014 ptarmigan breeding survey validated that very low breeding densities in this area was a long-term trend, not just a one year event.
- Springtime is way too easy to hunt ptarmigan in 15C—snow machines with plenty of snow, warmer temperatures and more light can cover enormous distances and really cut down the ptarmigan population. That’s what happened in the early 2000s when the reduced season was instituted, and that is what will happen again if we go back to the way things were.
- After several years of no spring ptarmigan hunt, it appears as if the ptarmigan population in the hills above Homer is increasing. The plan is working. But the message to the BOG should be don’t fix what isn’t broken. Keeping the status quo should result in greater abundance of ptarmigan in this area, to the benefit of both hunters and bird watchers. Going back to allowing a spring hunt could quickly revert to low populations of ptarmigan and limited opportunity for outdoors people to enjoy our state bird.
- Bag limits have little effect as most hunters take an average of 3 birds/trip. So it is the number of hunters, timing of season, and access that really drives effects from hunting.
- The shorter season we have now allows for a healthy fall/early winter hunt. If ptarmigan populations are healthy, those hunts will be good. And that’s how it should work



## **SUPPORT Proposal 145. Close areas to hunting and trapping within 1/4 mile of parts of the Sterling Highway in Units 7 and 15.**

- The highway construction plans include multiple wildlife underpasses and Alaska's first wildlife overpass. Fencing is meant to keep wildlife off the road and funnel them through crossings, but current regulations allow for hunting and trapping on these crossings. Make these multi-million dollar crossings safe passages for wildlife.
- Without a change in regulation, hunting and trapping would be permitted on and at the entrance/exit of multi-million dollar structures meant to create safe passage across the highway; underpasses and bypasses that are meant to benefit wildlife, could turn into a population sink.
- Ensure that the \$10+ million investment of public funds to help wildlife navigate an increasingly congested part of the Kenai Peninsula is honored by State hunting and trapping regulations.

## **SUPPORT Proposal 146-147: 100 yd. setbacks for traps from 3 popular winter trails in the Homer area.**

- Local trappers and other trail users worked together to develop these proposals and they simply put into the rules what ethical trappers are already doing.
- This is not a burdensome setback, particularly when most trappers on the Homer side are on snow machines.
- More than 8 pet dogs have been trapped recently on popular Homer trails. This is a real problem!
- With a growing population on the lower Kenai Peninsula, and particularly in Homer, an increase in non-consumptive users on multi-use trails, conflict in trapping areas is becoming more common in Unit 15C. If nothing is changed, more dogs will be trapped, causing unnecessary harm to users, and huge public outcry.
- User conflicts are time consuming and energy draining for all involved. Already overtaxed and underfunded, ADF&G employees and State Park staff will be increasingly burdened.



**Submitted by:** Kat Haber

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I support proposals #145, #146, #147 to protect our wildlife from over trapping on the Kenai Peninsula.

- Over passes are proven to dramatically decrease roadkill.
- The further from these high trafficked pathways the better for protecting our wildlife.
- Wildlife is a major draw for why we live in Alaska.
- We are counting on you, Board of Game, to protect our animals for 7 generations to come.

Thank you for your service.

Kat Haber

Past President, Center for Alaskan Coastal Studies

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support

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## Cooper Landing, AK Trap Setbacks



PC 113

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

***Please select the proposals that you are in support of (select all that apply).***

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

### **Other areas setback proposals:**

- ☐ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☐ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 113

Want to allow trapping while protecting pets

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Amy Haddow

Organization (if any):

Signature\*: E Hahn

Email\*: [Redacted]

Street Address\*: [Redacted]

City\*: Seward State\*: AK Zip code: 99664

\*indicates it must be filled in to be accepted.



PC114

**Submitted by:** Leslie Hafemeister

**Organization Name:**

**Community of Residence:** Fairbanks, Alaska

**Comment:**

Regarding proposal 146 and 147. The usage of trails and outdoor activities for hikers, skiing, mushing, biking etc... have increased greatly, with a good majority including their animal companions and young kids. Most trappers are using some form of motorized vehicle for accessing traps and have plenty of areas they can use away from the designated set backs. This is an attempt to get along with trappers and seems they would be willing to reciprocate the goodwill. Thank you

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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PC115

**Submitted by:** William Hague

**Organization Name:**

**Community of Residence:** Homer

**Comment:**

The proposal uses Snomads as if the Snomads support the proposal. The writers of the proposal did not contact Snomads and do not have permission to make it appear that Snomads support their position.

Homer Snomads work to maintain access to multiple users. Snomads prefer to not be involved in this proposal.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Oppose Proposal 56: Oppose

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Esther Chiang, Riley Glancy, Nikita Hahn, Hannah Hicks, Linfeng Li, Zhangyanyang Yao

**RE: Proposal 155: 5 AAC 92.550 Areas closed to trapping.(close 15c)**

Our team is in support of Proposal 155 to close beaver trapping in Unit 15C as it will provide time for the beaver population to regenerate. Research over the past several decades shows that beaver activities can alleviate environmental stress linked with climate change. This has been observed specifically in regions experiencing rising temperatures and reduction of annual precipitation. An increase in beaver populations in Unit 15C would provide beneficial ecosystem services such as recharging groundwater, increasing biodiversity by creating heterogeneous habitats, reducing stream temperature, and improving carbon sequestration. As the proposal already mentioned, there is an evident decrease in salmon populations throughout Unit 15C. Beaver habitat provides great benefits to salmon populations, allowing them to swim through dams to reach Kachemak Bay and return to respawn in cooler, freshwater habitat provided by beaver dams and ponds.

Closing the 15C area and subsequently allowing the beaver population to thrive would also provide other social benefits such as educational and economic opportunities for the local community.

**RE: Proposal 156: 5 AAC 84.270. Furbearer trapping.**

Our team is in support of Proposal 156 as amended “Close beaver trapping in the Anchor River, Deep Creek and Fritz Creek drainages in Unit 15C for six years as follows: Close all beaver trapping in the Anchor River, Deep Creek and Fritz Creek drainages in Unit 15C for two board cycles with a required sunset review.”

Beavers were once abundant in these drainages due to the immense suitable habitat mentioned in Proposal 156. During six weeks of field research assessing part of the Fritz Creek upstream drainage, our team discovered evidence of previous beaver activity and confirmed it provides suitable beaver habitat. However, our research indicates beavers have also been extirpated from the Fritz Creek Drainage we assessed; we found **no evidence** of current beaver populations. Removal of beaver can directly lead to negative impacts to both hydrologic and hydraulic function including stream incision, water availability, and stream biodiversity.

Specifically, water availability has been decreasing for many years due to drying trends and reduced precipitation within the Kenai Peninsula. Based on our field work in the Fritz Creek watershed, the current water depth of the stream is low with a typical depth of 1-3 inches. Additionally, our research shows the reaches we assessed of Fritz Creek stream to be deeply incised due to hydrodynamical erosion of low water flow. Closing beaver trapping in the Fritz Creek watershed accompanied by ongoing action of beaver reintroduction will facilitate their settlement, recharge the water level, reduce incision, and overall help restore the stream. The





restoration of beaver in Fritz Creek would also benefit peatland accumulation, helping to reduce carbon and mitigate the impacts of climate change.

**RE: Proposal 160: 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.**

Our team is in support of Proposal 160 to limit trapping to one beaver set per lodge. It is important to protect beaver colonies due to their strong family relationships. Placing a limit on the amount of trapping that can occur within one lodge will allow for the beaver colony to continue to grow in size. Beaver populations support a healthy ecosystem, so removal of entire colonies would drastically change the environment and landscape. Visual identifiers are essential components of communication to alert that a lodge has met its trapping capacity for the season.



**Submitted by:** Carol Harding

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I support Proposition #146 & #147 for 100 yard setbacks on Homer Trails. Times have changed and there are many more people on trails than there were 50 years ago. It is inexcusable for traps to be set so close to trails that they capture & injure dogs!

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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see attached

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support  
Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support  
Proposal 172: Support

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Alaska Board of Game  
PO Box 115526  
Juneau, AK 99811-5526  
<https://www.adfg.alaska.gov>

Re: Sea Duck Proposals 162 through 172

March 2, 2023

To whom it may concern:

I have lived in Homer, Alaska, for almost 30 years, and have watch with alarm the precipitous decline of sea ducks in Kachemak Bay. Birds are a significant part of the Alaska ecosystem. While some species are a human food source, many enrich our lives through their beauty and song. Birds are an important local resource in the Kachemak Bay area that we need to protect.

The Board of Game is about to vote on a series of proposals that might adversely affect the populations of game birds and waterfowl that reside in and around Kachemak Bay. Proposals and our support or opposition are listed below

**Proposal 162:** Lift hunting restrictions on ptarmigan on the Homer Bench: **OPPOSED**  
The spring hunt for ptarmigan in the hills above Homer was closed due to the heavy harvest of birds mainly by hunters on snowmachines having easy access to small flocks in willow patches. Ptarmigan have slowly started to repopulate the area. However, recovery is far from justifying any harvest. Relaxing restrictions would allow the existing ptarmigan to be easily wiped out again because of the number of hunters and snow machines that are likely to access the area.

**Proposals 164-170:** proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin & Long-tailed Duck: **SUPPORT**

**Proposal 171:** Direct ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6,7 & 15: **SUPPORT**

**Proposal 172:** Require mandatory harvest reporting for sea ducks in Kachemak Bay Unit 15C: **SUPPORT**

**Proposal 163:** proposal to roll back existing protections for Sea Ducks in Kachemak Bay: **OPPOSE**.

I have taken the above stances for the following reasons:

Kachemak Bay is an ADF&G Critical Habitat Area, whose legislative purpose is “to protect and preserve habitat” and the Kachemak Bay Management Plan says that



"priority should be given to encouraging rehabilitation of depleted indigenous fish and wildlife populations" (5 AAC 95.610).

"Kachemak Bay is the most important marine bird habitat in lower Cook Inlet (Erikson 1977) and there are no comparable areas in upper Cook Inlet. During winter months over 90% of the marine birds in lower Cook Inlet are found in Kachemak Bay (Erikson 1977). Few birds inhabit the offshore waters of lower Cook Inlet in winter, and the extensive inshore ice in the upper inlet and along the western shore is avoided by most marine birds..." ("Kachemak Bay and Fox River Flats Critical Habitat Area Management Plan").

Respectively submitted,

Carol Harding



Homer, AK 99603



PC118

**Submitted by:** Jennifer Harpe

**Organization Name:**

**Community of Residence:** Cooper Landing, AK

**Comment:**

I support set backs for trappers. By all means we should be able to find a compromise in a rapidly changing demographic of users. Trappers use all forms of vehicles to get to their traps so it really shouldn't be the biggest of deal.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC119

**Submitted by:** Adam Harris

**Organization Name:**

**Community of Residence:** Eagle River, AK

**Comment:**

Re: Prop 204

19C has been an area of interest by many for a while. The writing was on the wall where the sheep populations were headed. Resident hunters deserve priority and non-resident hunters have harvested substantially more sheep in this area. Any limitations in hunting should first and foremost be directed at non-residents. This has been suggested multiple times yet the BOG continues to ignore these requests. Now the time has come to make restrictions on harvests, yet the proposal is to not let anyone hunt sheep in the area. When restrictions are warranted, NON RESIDENTS MUST BE FIRST to be restricted, not at the same time as residents!

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 78: Support Proposal 204: Oppose

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Proposal 57 - SUPPORT

Proposal 57 is to allow the ethical recovery of fur animals under small game regulations for the Southcentral region. Currently under the trapping regulations statewide, dead fur animals may be retrieved by a dog. This can be found on page 13 of the current trapping regulation booklet (see attached). I have also attached a portion of page one of the current small game regulation booklet to these comments. The recovery of fur game such as fox, lynx, coyote etc, should not be limited to the trapping regulations only but should also be allowed in hunting regulations where fur animals are regulated. There is no downside to the recovery of valuable mortally wounded fur animals after they have been shot. A well trained hunting dog is just as good at tracking, finding and retrieving a wounded fox as it is retrieving a wounded hare or a wounded duck. Why should calling in a fox, shooting it, and sending a dog to recover it, be any different than calling in a duck, shooting it, and sending a dog to recover it? Recovery of game is of utmost importance and a well trained retrieving dog is an extremely valuable asset, whether it be upland birds, waterfowl, small game or fur animals. It is important to note that this proposal DOES NOT advocate for using a dog to pursue fur animals but only to recover them after they have been shot. I personally have used a dog in multiple states to recover fur animals that I either could not find or could not get to after they had been shot. If I had not had a well trained dog I would have lost a lot of valuable fur.

Thank you for your consideration of this and all other proposals.

Respectfully,

Mike Harris



## Methods for Trapping

You may use any method to take furbearers with a trapping license unless it is prohibited below. The following methods and means are illegal for taking furbearers;

### YOU MAY NOT:

- shoot from, on, or across a highway;
- use poisons or a substance that temporarily incapacitates wildlife, except with written permission from the Board of Game or with the use of an Electronic Control Device (ECD) Taser-type device that temporarily incapacitates game, except under a permit issued by the department;
- take a wolf or wolverine with a firearm until after 3:00 a.m. following the day in which you have flown in an airplane; however, you may shoot a wolf or wolverine caught in a trap or snare on the same day you have flown;
- use a helicopter to transport you, your trapping equipment, or any furbearer; however, a helicopter may be used during emergency rescue operations in a life-threatening situation;
- use an aircraft, snowmachine, motor-driven boat, or other motorized vehicle for the purpose of driving, herding, or molesting furbearers;
- take furbearers with the use or aid of a machine gun, set gun, or a shotgun larger than 10 gauge;
- take furbearers with the aid of a pit, fire, light (other than sunlight or moonlight), laser sight (excluding rangefinders), electronically-enhanced night vision, any forward looking infrared device, any device that has been airborne, controlled remotely, or communicates wirelessly, and used to spot or locate game with the use of a camera or video device, any camera or other sensory device that can send messages through wireless communication, artificial salt lick, explosives, expanding gas arrow, bomb, smoke, deer urine, elk urine, chemical (excluding scent lures), or a conventional steel trap with an inside jaw spread over 9 inches. Exceptions: Killer-style (body-grip) trap with a jaw spread of less than 13 inches may be used. Artificial light may be used for the purpose of taking furbearers Nov 1- Mar 31 in Units 7 and 9-26 during an open season;
- use wireless communication to take a specific animal until after 3:00 a.m. following the day after the use of the device;
- disturb or destroy beaver houses or any furbearer den (except that muskrat pushups or feeding houses may be disturbed in the course of trapping);
- use a dog (except to retrieve dead furbearers);
- use a hook, net or fish trap (except a blackfish or fyke trap);
- wear foot gear with felt soles or other absorbent fibrous material in freshwater streams;
- take furbearers from a motorized land vehicle - you must be off or out of any motorized land vehicle before shooting, see exceptions for taking wolves and wolverines on next page;
- shoot furbearers from a motor-driven boat unless the motor has been shut off and the progress from the motor's power has ceased; see exceptions for taking wolves on next page.

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## Fur Animals, Small Game, Unclassified Game, and Deleterious Exotic Wildlife

- If you want to take fisher, marmot, marten, mink, muskrat, river otter, or weasel, you must buy a trapping license and follow trapping regulations.
- You may take beaver, coyote, fox, lynx, squirrel, wolf, or wolverine under either a hunting license or a trapping license, but you must follow the seasons, bag limits, and methods and means permitted by that license.
- See page 22 for salvage requirements.
- In Unit 18, lead shot size T (.20" diameter) or smaller is prohibited. Taking game under provisions of either a hunting or trapping license using a shotgun or using loose shot in a muzzleloading firearm is ONLY ALLOWED using nontoxic shot size T (.20" diameter) or smaller, and hunters may not be in immediate possession of lead shot.
- Portions of Units 20, and 24-26 are within the Dalton Highway Corridor Management Area (DHCMA) and additional restrictions apply. See page 105.

## Fur Animals

- Fur animals **MAY NOT** be taken under the hunting regulations by the following methods:
  - with a dog (except coyote in Unit 20D after registering with ADF&G), trap, snare, net, or fish trap;
  - by disturbing or destroying dens;
  - the same day you have been airborne, unless you are at least 300 feet from the airplane;
  - with a nonresident small game license.



PC121

**Submitted by:** Emily Heale

**Organization Name:**

**Community of Residence:** Kenai, Alaska

**Comment:**

I support the proposal #145-154 for trap setbacks.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC122

**Submitted by:** Carla Hebert

**Organization Name:**

**Community of Residence:** Anchorage, AK

**Comment:**

Support the Proposed Rule: Hunting and Trapping in National Preserves: Alaska (NOS-2023- 0001-0001)

Support Alternative 2 in the Draft Environmental Assessment: Revisiting Sport Hunting and Trapping on National Park System Preserves in Alaska

As an Alaskan, I support the above rules. Bear baiting and hunting during denning/baby seasons are unethical forms of hunting. The proposed rule will not affect legal and ethical hunting. It will also not impact our native communities from essential subsistence activities. Our family wants to be able to enjoy our wild spaces and our wildlife without worry and disgust at these behaviors .

Thank you.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 160: Support

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PC123

**Submitted by:** Alison Lee Hedberg

**Organization Name:**

**Community of Residence:** Indian Alaska

**Comment:**

I am and have been a resident in Rainbow Valley off and on for 40+ years. Our community's private property stretches one mile East to West from up one hill side to up the other. Our homes are located throughout this area. Several homes have children.

No one from outside the community would know where our private property boundaries are. Hunters would likely trespass attempting to reach the upper elevations above our property and have no idea where the homes are.

PLEASE do not include our valley in your plans to open any hunting, most importantly bear hunting.

Thank-You,

Alison L Hedberg

PO Box 111446

Anchorage AK 99511-1446

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 98: Oppose

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PC124

**Submitted by:** Sue Hedge

**Organization Name:**

**Community of Residence:** Anchorage, AK

**Comment:**

Proposal #145. I support this proposal. The safe passage of wildlife depends on the 1/4 mile buffer from hunting and trapping. It only makes sense that the small area is honored by hunters and trappers to give animals a chance to leave the busy Highway area.

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Proposal 145: Support with Amendment

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**Submitted by:** Alex Hedman

**Organization Name:**

**Community of Residence:** Eagle River, AK

**Comment:**

I oppose the following proposal:

82/83 - retain archery-only restriction; one of the few areas with a weapons-specific requirement for sheep hunting.

102 - oppose lengthening brown bear season.

103 - oppose bear baiting in this popular recreational area; potential for increased person-bear interaction as bears congregate on the handful of proposed bait stations is not worth the risk.

I support the following proposals:

59 - great comments...safer, longer seasons, better target animal identification.

60 - concur that archery-only deer season 1-15 Nov would mirror existing template already demonstrated on Kodiak.

61 - agree that decreasing bag limits by one deer may increase the overall quality/size of animals; request ADFG biologists validate said theory though.

69 - a viable/huntatable population of Roosevelt Elk would be fantastic...assuming ADFG biologists do not foresee any negative impacts to existing ecosystems. The brown bears would appreciate it too!

75 - 100% agree with [REDACTED]; a wounded bear needs to count against your 4-year reset.

77 - I think this is a great way to recoup bear populations and ensure hunting this species remains an opportunity available to future generations.

81 - concur 100%; break-away mechanism will help reduce "by-catch" and could help strengthen the image of trapping within the non-hunter/trapper community.

84 - concur, but agree that ADFG biologists need to assess population density.

85 - concur, if population density supports.

90 - agree that there do appear to be increasing number of bear encounters. Recommend archery or restricted-weapons hunt be implemented as it will be less impactful to local neighborhoods/housing than a rifle season.

91/92/93 - concur that archery should be included in "shotgun only" or "muzzleloader only" hunts.

96 - similar to proposal 93 with a lot of overlap; recommend using Prop 93 as the base model.

99/100/101 - new or extended brown bear seasons in a relatively highly populated area; archery tackle will decrease the risk of hunter/hiker interaction.

106/107 - ATV usage has already ruined much of the unique "Alaskan hunting experience"; now an expensive fly-in hunt is often the only way to experience the iconic Alaskan hunting experience. I do not believe this is a case of discrimination against veterans or those with disabilities.

I support the following proposals with amendments:

109 - use proposal 108 as the model, and open/close sheep registration hunts in GMU 15. Better yet, use archery-only as a control method, as outlined in proposals 110-113. Negates the need for proposal 115.

118 - combine with archery seasons.

127 - do not extend the season, adjust dates to account for later rut.

133 - 100%. Get out of your boat.

203 - due to the high probability of recreational users being within range of any hunter within Kincaid Park, offer this limited-mobility hunt, but with the use of archery tackle...this will require further research as as to how to implement said archery tackle.

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**Submitted by:** Jerry Herrod

**Organization Name:**

**Community of Residence:** anchorage, alaska

**Comment:**

Proposal 162-

I oppose. The author states that one good spring hatch would constitute expansions on harvest. I disagree because one good spring hatch does not scientifically support expansion of harvest permanently in the regulations.

The harvest regulations are there for a reason. I would prefer to always have a huntable population of ptarmigan with lower harvest rather than a higher harvest and lower huntable numbers.

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PC127

**Submitted by:** Christi Heun

**Organization Name:**

**Community of Residence:** Palmer, AK

**Comment:**

Trappers are not the only user group in Alaska, in fact, it's a pretty small proportion of the population that traps. The trapping community is overrepresented on the BOG and the BOG is not listening to the general public's commentary. I respect the culture of trapping in Alaska. I support it's continued presence. But I only support it responsibly. that means, mandating traps be a safe distance away from high recreation areas like trails where vastly more people are recreating besides trappers. Listen to the rest of the population, require safe distances for trap lines from trail.

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Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC128

**Submitted by:** Bretwood Higman

**Organization Name:**

**Community of Residence:** Seldovia, AK

**Comment:**

I would like to write in support of proposal 160, to limit beaver trapping. Beavers are a uniquely important part of ecosystems, helping maintain groundwater, natural fire-breaks, and aquatic habitat. They have been overhunted in some areas of the Kenai Peninsula, and are actually extinct in some areas where they were known to reside historically. I've visited the remains of beaver dams near Homer that were likely occupied just a few decades ago but now are far from the nearest beaver.

Limiting trapping pressure is one way to improve the capacity of beavers to expand back into these degraded ecosystems.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 150: Support

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Nancy Hillstrand

3/3/23

Homer, Alaska 99603

Dear Chair Burnett and Board of Game members,

**Please adopt regulations advisable for conservation and protection purposes governing the taking of sea ducks in Kachemak Bay Critical Habitat Area using the Boards statutory guidance.<sup>1</sup>**

Present sea duck management is like placing deer, elk, moose, goats and bison into one aggregate bag limit using overall population spatial scale from Alaska to Mexico using uncertain subjective data to guide local sustainability. Federal overall flyway populations has little meaning for the function of Alaska's Game Management Unit system for local areas.

In past board meetings it was estimated that 1/3 of all waterfowl harvest occurs in Kachemak Bay. Efforts to perpetuate Resident Sea ducks above chronic depressed status in GMU 15 will require preventing additive factors suppressing populations. **Uncertainty means precaution.**

My perspective is from 43 years studying wintering sea ducks and numerous hunts at my remote home in a narrow fjord of Kachemak Bay. This view has given me some insight to consider as generations of birds migrate through and residents stay for the winter.

Thank you for your valuable time, to consider unique biology, ecology and behaviour of 13 sea duck species in **7 Genera**, called Tribe Mergini. Sea ducks are not as resilient as dabblers so require your attention.

<https://seaduckiv.org/>

Sincerely

Nancy J. Hillstrand

#### **ISSUE: SENSITIVE REPRODUCTIVE STRATEGY**

Sea duck life histories are characterized by high adult survival, delayed maturation, and low reproductive capacity, suggests population abundance of these species may be sensitive to factors influencing adult survival (e.g., harvest).

Precaution is warranted with severe uncertainty of scanty data.

<https://journals.plos.org/plosone/article/file?id=10.1371/journal.pone.0175411&type=printable>

This reproductive strategy seeks sheltered undisturbed ice-free waters for safety and investment in longevity.

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<sup>1</sup> AS 16.20.510. Regulations in Critical Habitat Areas. - The Board of Fisheries and the Board of Game, where appropriate, shall adopt regulations they consider advisable for conservation and protection purposes governing the taking of fish and game in state fish and game critical habitat areas.



**ISSUE: KACHEMAK BAY IS A STATE CRITICAL HABITAT AREA** in 15C recognized as wintering ice free habitat for sea duck species. Kachemak Bay accommodates 90 percent of the overwintering seabird and waterfowl populations in all of Lower Cook Inlet.

<https://www.adfg.alaska.gov/index.cfm?adfg=kachemakbay.main>

5 AAC 95.610 Kachemak Bay and Fox River Flats Critical Habitat Management Plan.

[https://www.adfg.alaska.gov/static/lands/protectedareas/\\_management\\_plans/kachemak\\_bay.pdf](https://www.adfg.alaska.gov/static/lands/protectedareas/_management_plans/kachemak_bay.pdf)

One-quarter of all legislatively designated alaska state critical habitats are represented in 15c (4 of 17) with the distinct **purpose for “perpetuation of fish and wildlife.”**

<https://www.adfg.alaska.gov/index.cfm?adfg=conservationareas.locator>

**ISSUE: LEGISLATIVE GUIDANCE FOR BOARD OF GAME REGULATIONS IN CHA’S IS AS 16.20.510 “CONSERVATION AND PROTECTION” PURPOSES.**

AS 16.20.510. Regulations in Critical Habitat Areas. - The Board of Fisheries and the Board of Game, where appropriate, shall adopt regulations they consider advisable for conservation and protection purposes governing the taking of fish and game in state fish and game critical habitat areas.

**ISSUE: SUPPRESSION OF INEXPERIENCED JUVENILES IN PRODUCTION YEARS**

The appearance of one good survival year of juveniles makes birds much more noticeable to hunters, this does not indicate stable populations. This indicates the critical time to be patient to nurture these gawky young to gain experience for populations to grow back. Since sea ducks invest in longevity rather than reproduction of large broods like dabblers, Sea duck production is highly variable requiring conservative management and precaution to regain then maintain stability away from depressed status. Production may not occur again for a decade. Robust populations are in all Alaskans interest to enjoy.

**ISSUE: EVALUATION OF METHOD AND MEANS EMPLOYED IN THE PURSUIT OF SEA DUCKS**

<https://shootingsportsman.com/fooling-fowl/> states in bold:

**“The first and best skill to master when waterfowling is to sit still”**

The method and means presently employed for hunting sea ducks, does not resemble waterfowling. The use retrieval boats in continual motion, inadvertently drive, herd, and harass birds for hours at a time into decoys or run them onto clients on points with a motorized vehicle. There is a loophole in this method and is not legal harvest of wildlife.

With approximately 1400 boats in the Homer Harbour With hundreds of 20-30 knot boats outfitted for charter. High bag limits, easy fast access, continually moving boats, in these remote bays with no guide for conservation is far from fair chase.



Consider three 30 knot moving cabin cruisers, in one narrow 2500 foot wide bay, 4 groups of 4 guys shooting on either side while boats zig zag to tag team retrieval of cripples and kill, during a frenzy of over 250 shots per hour taking place. Fun? Sure. It is called sky blasting. However, the birds are in the air for hours seeking refuge at decoys while the boats play pin ball with them. This is not conservation nor fair chase. This is not waterfowl hunting.

Please evaluate how to fine tune this method and means and tighten this loophole of persistent moving boats used for retrieval of cripples and kill during shooting. The significant disturbance in wintering habitat of narrow bays with no escape weakens birds trying to conserve energy to survive icy winters. It disperses birds away from their known habitats and is a factor of decline,<sup>2</sup> known since 1710.<sup>3</sup>

#### **ISSUE: SITE FIDELITY<sup>4</sup>**

Many sea duck species, exhibit **strong site fidelity to known safe wintering** habitats like 15C Kachemak Bay. Mates come and join them and young often follow the females to their bays. Longevity in these bays can be 10-20 years in familiar surroundings where they feel safe and know there is ample food and fresh water. They remain very quiet to conserve energy, paddling along the coastline while diving for food.

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#### **<sup>2</sup> In 1912 Forbush moving boats as a means of disturbance and decline:**

“The use of boats in chasing wild-fowl and in shooting them on feeding grounds results in driving them away. Wherever this is practiced continually the birds become scarce.”

#### **Ducks Unlimited also states disturbance clearly:**

While hunting pressure is probably the least understood variable in the waterfowl distribution equation, we know that waterfowl do not like disturbance and will abandon heavily disturbed areas for others where they can find food and rest. Furthermore, hunting has changed in the past few decades. **Advances in equipment and technology have granted easier access to nearly all places’** waterfowl occur.

**USFW report 13.2.15,** “a review of several thousand journal articles and books revealed most disturbances to waterfowl created by water users chiefly boaters, anglers, hunters, researchers”.

<sup>3</sup> “This fact of boats chasing wildfowl was recognized early in Massachusetts, and a law to prevent it was enacted in 1710; but this lapsed after the revolution.”

<sup>4</sup> Annual Winter Site Fidelity of Barrows Goldeneye in the Pacific  
<https://wildlife.onlinelibrary.wiley.com/doi/epdf/10.1002/jwmg.21767>

Patterns in winter site fidelity and polycyclic aromatic hydrocarbon exposure risk in Barrow’s goldeneye (Bucephala islandica) in the Pacific Northwest  
[https://summit.sfu.ca/flysystem/fedora/sfu\\_migrate/16388/etd9508\\_MWillie.pdf](https://summit.sfu.ca/flysystem/fedora/sfu_migrate/16388/etd9508_MWillie.pdf)

Site fidelity and the demographic implications of winter movements by a migratory bird, the harlequin duck  
<https://www.sfu.ca/biology/wildberg/papers/IversonandEslerIAB06.pdf>





With hunting mortality additive as per the Flyway Councils, localized depletion within areas of strong site fidelity can happen very rapidly from systematic removals from commercial hunting for profit to serve clients bags going bay to bay.

#### **Annual Winter Site Fidelity of Barrows Goldeneye in the Pacific**

Goldeneyes from southcentral Alaska, USA, expressed greater inter-annual fidelity relative to birds from northern or southern British Columbia, Canada, and southeast Alaska.

<https://wildlife.onlinelibrary.wiley.com/doi/epdf/10.1002/jwmg.21767>

**PROPOSAL 162 OPPOSE** extending the ptarmigan season two months longer will mean managing ptarmigan at a depressed level like is occurring with sea ducks.

ADFG research has shown that any mortality on ptarmigan after mid-January is additive and could cause population declines and return to depressed status just recovering from grave depletion. Residents are beginning to see them in places they haven't in many years yet many areas remain vacant. Like with sea ducks the misperception of a good survival year making birds much more noticeable, is the driving force behind this proposed change. **It is the number of hunters, timing of season, and access by snowmobile running over them under the snow that really drives adverse effects from hunting. This season should not be lengthened and needs to remain the same to allow these birds to sustain their populations.**

**PROPOSAL 163 OPPOSE.** Rescinding bag limit restrictions for sea duck hunting in Unit 15C

Unlike the rest of the Waterfowl Gulf Coast Management Zone, GMU 15C is very accessible, connected by road system to the most populated cities of Alaska.

With approximately 1400 boats in the Homer Harbour With hundreds of 20-30 knot boats outfitted for charter. High bag limits, easy fast access, continually moving boats, in these remote bays with no guardrails requires more restrictive bag limits.

Unlike the rest of the Waterfowl Gulf Coast Zone

Kachemak Bay is very special as it has many overlapping jurisdictions for conservation:

**Kachemak Bay State Critical Habitat Area;**

**Kachemak Bay State Special Purpose Site Park;**

**Kachemak Bay National Estuarine Research Reserve;**

**NOAA Kachemak Bay Habitat focus Area;**

**International Reserve of the Western Hemisphere shorebird reserve Network;**

**Alaska Maritime Wildlife Refuge;**

**Kenai National Wildlife Refuge;**

#### **WHAT IS THE POINT OF THE WORLD CLASS HABITAT WITHOUT ROBUST POPULATIONS OF INHABITANTS?**

Sea ducks are locally recognized as being severely depleted. There is no monitoring nor waterfowl biologist within 250 miles of these wintering habitats. ADFGs severely uncertain information is subjective and warrants the precautionary approach for protection and



conservation in this Critical Habitat designed for all beneficial uses.

#### **PROPOSAL 164 AND 165 SUPPORT REDUCED BAG FOR GOLDENEYE**

Reduce the bag limit for goldeneye in Units 7 and 15.

1. ADFG has recognized a downward trend in goldeneye.
2. Barrows Goldeneye world population of 150,000-250,000 are in a general bag limit with dabblers numbering 40,000,000 million
3. East Coast Barrows are listed as concern and is closed.
4. Washington and British Columbia goldeneye bag limits- 2 per day in recognition localized population depletion
5. Barrows goldeneye have restricted range as compared to Common goldeneye
6. Goldeneyes are not differentiated by species in data sets<sup>5</sup>

<https://www.pacificflyway.gov/Documents/Databook.pdf>

7. Studies in Kachemak Bay show Strong Site Fidelity

##### **Annual Winter Site Fidelity of Barrows Goldeneye in the Pacific**

Goldeneyes from southcentral Alaska, USA, expressed greater inter-annual fidelity relative to birds from northern or southern British Columbia, Canada, and southeast Alaska.

<https://wildlife.onlinelibrary.wiley.com/doi/epdf/10.1002/jwmg.21767>

#### **PROPOSAL 166 AND 167 SUPPORT REDUCED BAG FOR BUFFLEHEAD**

Reduce the bag limit for bufflehead in Units 7 and 15

1. Bufflehead is Genera Bucephala, of the same genus as Goldeneye shows the same sensitive ecology and site fidelity.
2. Washington and British Columbia bag limits are at 2 per day in recognition of the inability to recover from localized population depletion.

#### **PROPOSAL 168 AND 169 SUPPORT REDUCED BAG FOR HARLEQUIN**

Reduce the bag limit for harlequin in Unit 15C

1. There is very little information on these birds.
2. Rough estimates by the SDJV are 150,000 -250,000.
3. Harlequin are very susceptible to hunting pressure because they are very tame.
4. Washington hunters recognize susceptibility- **Harlequin season closed**
5. BC Canada hunters recognize susceptibility- **Harlequin season closed**

In 2021, two Kachemak Bay Guides stated they felt harlequin needed to be reduced to one (1) to minimize clients' need to take more than one for their trophy.

#### **PROPOSAL 170 SUPPORT REDUCED BAG FOR LONG TAIL DUCK**

Reduce the bag limit for long-tailed duck in Units 7 and 15.

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<sup>5</sup> Olson, S. M. Compiler. 2022. Pacific Flyway Data Book, 2022. U.S. Department of Interior, Fish and Wildlife Service, Division of Migratory Bird Management, Helena, Montana.page



1. There are no comprehensive surveys of their abundance. Because they, like other sea ducks, inhabit offshore areas more than other waterfowl during winter,
2. long-tailed ducks are also poorly monitored by mid-winter surveys for waterfowl.
3. Long-tail ducks were the common sound in Kachemak Bay. The bay is now silent.
4. After the harvest was lowered to 2 we began to see a small population growing back off the Homer Spit that had been absent for decades.

#### **PROPOSAL 171 AND 172 SUPPORT ACCURATE REPORTING OF SEADUCK HARVEST**

ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6, 7 and 15. To gain sorely needed data.

Sea duck Joint Venture Harvest Assessment:

*Sustainability of current or potential sea duck harvest levels is largely unknown. Compared to most other waterfowl species, estimates of the number of sea ducks harvested and total number of hunters taking sea ducks is less precise, making it difficult to accurately assess the level of take and measure the impact of harvest on their populations.*

<https://seaduckjv.org/science-resources/sea-duck-harvest-assessment/>

1. ADFG is managing in the blind with no data.
2. Guess work by authorities is not an acceptable metric to use while locals watch population decline further with no guardrails to prevent excessive take events like what happened in 1995, 1996, 2002, and 2021 to eliminate repeated suppression of populations.
3. Overall flyway population spatial scale is meaningless in **resident species** with strong site fidelity that return to the same bays year after year.
4. ADFG's Science in the Last Frontier has a program using an app for other species that can be adjusted for this application called:

**Welcome to ADF&G Online Harvest Reporting**

<https://harvest.adfg.alaska.gov/>

#### **HIP PROGRAM IS FAULTY KNOWN BY TOP WILDLIFE INSTITUTIONS**

5. The HIP programs is recognized flawed, especially in Alaska.  
For instance, only one harlequin wing was returned to the wing bee giving meaningless data to authorities  
Accuracy is still years out to attempt to refine this HIP data collection. It is unreliable.

Wildlife Management Institute in 2020 explains:

<https://wildlifemanagement.institute/outdoor-news-bulletin/september-2020/making-progress-improve-harvest-information-program-hip>

Association of Fish and Wildlife Agencies HIP Working Group explains and shares a survey to show how wide this problem is:

<https://www.fishwildlife.org/afwa-acts/afwa-committees/harvest-information-program-work-group>



#### HIP Survey response showing lack of understanding of HIP program

- Most participants in each focus group did not know the purpose of HIP (66 of 67 participants thought the purpose of HIP was to estimate harvest);
- Most participants thought that HIP survey questions were easy but that it was hard to recall information;
- It was more difficult to predict harvest than to recall harvest totals;
- Participants wanted to know how their participation benefited hunters;
- There was confusion about state and federal agency roles;
- Email is a good way to communicate but it was hard to separate this communication from spam;
- Survey reminders were supported, preferably if participants could customize when reminders were sent;
- There was a sense of responsibility;
- There were concerns about the accuracy of data (date, amount, locations if asked after season)
- There was confusion of how group hunts were reported (double counting);
- There was concern that data would result in reduced bag limits, season restrictions, and LE;
- There were mixed reasons for why inaccurate information was provided; and
- Regarding survey enhancement registration created the most frustration. Data entry was viewed as easy, the submission process was seen as straight forward, but there was a fear that data entry would be time consuming.



**Submitted by:** Drew Hilterbrand

**Organization Name:**

**Community of Residence:** Ninilchik, Alaska

**Comment:**

#67 Oppose. My understanding is that draw permit allocation is the primary management tool for these permits, the late season weapons restricted registration permits are in place so that if harvest quotas are not met during the regular season any surplus could be utilized by means of registration permit.

#78 Oppose. ALL recipients of draw permits are required to submit applications for the draw permits. This proposal simply stems from how the application process works particularly for nonresident applicants who are hunting with a guide that has an exclusive use federal permit in the Kodiak refuge.

#79 Oppose. There are typically more resident permits that go unhunted than nonresident. There is an alternate list in place for nonresident permit recipients and as a result most permitted hunts take place. Create an alternate list for residents so that permits awarded to residents that are unable to hunt may be reallocated to residents that can take part.

#134-142 Support. Given the number of moose that brown bears are responsible for killing each year and the population density of bears on the Kenai Peninsula I believe it would be in the best interest, of all that enjoy the ability feed our families with wild game, to lengthen brown bear seasons. Not only will this reduce the predation on our moose population it will provide additional recreational hunting opportunity for local residents.

#144 Support. I believe it is imperative that "recreational facilities" and "permanent dwelling" should be clearly defined. There is no reason that something of this importance should be left to the individual trooper's "interpretation".

#145-153 Oppose. Yet another thinly veiled attempt by anti trappers to restrict the rights of legal trappers to pursue the long held tradition of trapping in our great state. In reality most the these "user conflicts" arise due to the unwillingness of pet owners to control their animals which regularly harass already stressed wildlife in the winter. Moose in particular.

#155-156 Oppose. There are far more beaver on the lower Kenai Peninsula than most people realize. Simply because they aren't visible from the road or atv/snowmachine trails doesn't mean they no longer exist. Beaver regularly disperse and will abandon their lodges/ponds when they have cut and eaten most of the easily accessible food in relation to their dwelling.

#205 Oppose. Unless the department sees a clear decline in the harvestable surplus I would see no reason to go to drawing permit only for this area.

While it falls outside of the BOG authority to regulate, I believe the bigger issue here is the overcrowding caused by unlimited and largely unrestricted transporters.

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Proposal 67: Oppose Proposal 68: Support Proposal 73: Support Proposal 75: Support Proposal 76: Support Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Oppose Proposal 105: Oppose Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Support Proposal 109: Oppose Proposal 110: Oppose Proposal 114: Oppose Proposal 119: Oppose Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose Proposal 125: Oppose Proposal 126: Oppose Proposal 129: Support Proposal 130: Support Proposal 133: Support Proposal 134: Support Proposal 135: Support Proposal 136: Support Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 141: Support Proposal 142: Support Proposal 143: Oppose Proposal 144:

Support Proposal 145: Oppose Proposal 146: Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose  
Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose Proposal  
155: Oppose Proposal 156: Oppose Proposal 158: Oppose Proposal 159: Support Proposal 160: Oppose Proposal 162:  
Oppose Proposal 200: Oppose Proposal 203: Support Proposal 204: Support Proposal 205: Oppose

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**Submitted by:** Lewis Hinnant

**Organization Name:**

**Community of Residence:** Fritz Creek, Alaska

**Comment:**

I am an Alaskan resident, bow and rifle hunter and outdoor guide.

I am writing in SUPPORT of the following Proposals:

145 (Support). It is absolutely absurd to allow hunting and trapping in a designed wildlife corridor. This is unsportsmanlike and encourages the laziest and worst ethics in hunting.

146 (Support) I use KBSP regularly, often with my dog. There is so much land available for trapping, and a 100 yd setback is a modest proposal that any ethical trapper would have no problem with. Again, allowing trapping closer to the trail is encouraging lazy and unethical trappers.

147 (Support) These ski trails are treasured outdoor rec sites for local residents. Just a couple of weeks ago one of my co-workers had her dog caught in a trap near a trail. Again, allowing trapping this close to heavy used trails is lazy and unethical.

149 (Support) This is a campground. Come on. People from all over the world camp here, with their kids, dogs, etc. They shouldn't be dodging traps! Who in their right mind would oppose this proposal?

150 (Support). Same as above. This is along a highway. If these trappers are too lazy to walk 100 yards then they should get back on the couch and play video games instead of trapping.

151 (Support) same as above. High use rec areas should not be surrounded by traps. No ethical trapper would be so lazy.

152 (Support) Cooper Landing residents and visitors deserve a safe environment to live in. 100 yds is a modest proposal. It should be much further here.

153 (Support) Its a beach! Who is expecting to encounter a trap while near a beach!?

154 (Support) Signs. At least have these trappers put up signs. They're benefiting from public resources at all of our expense and safety. Are they too pathetic to put up a sign?

156 (Support) Recent scientific studies have made clear that beaver dams significantly improve the upstream ecosystem, supporting a wide variety of wildlife. If we want moose breeding grounds to exist, we need to protect the beaver.

157 (Support) Same as above. A skilled trapper or hunter won't even be affected by this.

158 (Support) Coyote trapping is ridiculous. I'm a farmer and livestock owner, and I use fences to great affect. Shortening the season is the least we can do.

160(Support) Again, beaver are essential to the entire ecosystem, retaining water in upland peat environments, supporting a variety of wildlife. The precedent set by KNWR should be repeated statewide.

For too long, ADFG has bent over backwards to support a tiny, vocal minority of hunters and trappers, some of which haven't the slightest notion of ethics or sportsmanship. It is time to set a precedent that reflects the needs of all Alaskans, and asks a bit more from the hunting and trapping community. If they can't walk 100 yards, they shouldn't be in the bush.

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Proposal 55: Support Proposal 56: Support Proposal 57: Oppose Proposal 58: Support Proposal 59: Support Proposal 60: Support Proposal 61: Support Proposal 62: Oppose Proposal 63: Oppose Proposal 64: Oppose Proposal 65: Oppose Proposal 66: Support Proposal 67: Support Proposal 68: Support Proposal 71: Support Proposal 72: Support Proposal 73: Support Proposal 74: Support Proposal 75: Support Proposal 76: Oppose Proposal 77: Support Proposal 78: Support Proposal 79: Oppose Proposal 81: Support Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Support Proposal 85: Support Proposal 86: Oppose Proposal 87: Support Proposal 88: Support Proposal 89: Oppose Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Support Proposal 95: Oppose Proposal 96: Oppose Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose Proposal 101: Oppose Proposal 102: Oppose Proposal 103: Oppose Proposal 104: Support Proposal 105: Support Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Oppose Proposal 109: Support Proposal 110: Support Proposal 111: Support Proposal 112: Support Proposal 113: Support Proposal 114: Support Proposal 115: Support Proposal 116: Support Proposal 117: Support Proposal 118: Oppose Proposal 119: Oppose Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose Proposal 125: Oppose Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Oppose Proposal 129: Oppose Proposal 130: Support Proposal 131: Oppose Proposal 132: Oppose Proposal 133: Support Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 141: Oppose Proposal 142: Oppose Proposal 143: Support Proposal 144: Support Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 159: Oppose Proposal 160: Support Proposal 161: Oppose Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support Proposal 173: Oppose Proposal 174: Oppose Proposal 175: Oppose Proposal 176: Oppose Proposal 177: Oppose Proposal 178: Oppose Proposal 179: Oppose Proposal 180: Oppose Proposal 181: Oppose Proposal 182: Oppose Proposal 183: Oppose Proposal 184: Oppose Proposal 185: Oppose Proposal 186: Oppose Proposal 187: Oppose Proposal 188: Oppose Proposal 200: Oppose Proposal 203: Oppose Proposal 204: Support

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PC132

**Submitted by:** Mary Hogan

**Organization Name:**

**Community of Residence:** Homer Ak

**Comment:**

I support proposals 145-154 regarding setbacks for trapping on popular trails.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Support Proposal 56: Support Proposal 57: Support Proposal 58: Support Proposal 59: Support Proposal 60: Support Proposal 61: Support Proposal 62: Support Proposal 63: Support Proposal 64: Support Proposal 65: Support Proposal 66: Support Proposal 67: Support Proposal 68: Support Proposal 69: Support Proposal 70: Support Proposal 71: Support Proposal 72: Support Proposal 73: Support Proposal 74: Support Proposal 75: Support Proposal 76: Support Proposal 77: Support Proposal 78: Support Proposal 79: Support Proposal 80: Support Proposal 81: Support Proposal 82: Support Proposal 83: Support Proposal 84: Support Proposal 85: Support Proposal 86: Support Proposal 87: Support Proposal 88: Support

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PC133

**Submitted by:** Jeffrey Holchin

**Organization Name:**

**Community of Residence:** Taylorsville NC

**Comment:**

As a nonresident bowhunter who enjoys the bowhunting opportunities in Alaska as much as possible, I am opposed to proposal 82 but in favor of proposals 67, 71 and 72, 87, 91 92 and 93, 99 and 100, 101, 110-113 and 119-126, which will provide more bowhunting opportunities. Thanks for this opportunity to register my opinion.

Jeffrey Holchin

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 67: Support Proposal 71: Support Proposal 72: Support Proposal 87: Support Proposal 91: Support Proposal 93: Support Proposal 99: Support Proposal 100: Support Proposal 101: Support Proposal 110: Support Proposal 111: Support Proposal 112: Support Proposal 113: Support Proposal 119: Support Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support Proposal 124: Support Proposal 125: Support Proposal 126: Support



PC134

**Submitted by:** Claire Holland LeClair

**Organization Name:**

**Community of Residence:** Anchorage, Alaska

**Comment:**

Proposal #98-Oppose

I am a member of the Rainbow Valley community and I oppose Proposal #98 which would establish a brown bear hunt in the Rainbow Creek valley. The approximately 160 acres of private property within the valley is owned by the Rainbow Valley Homeowner's Association and there are seventeen homes spread throughout the area. Establishing this hunt would be a hazard to the families living in the valley as well as encourage trespass on private property. Establishing this hunt would also be a hazard to the general public. The public lands within the Rainbow Creek drainage, all part of Chugach State Park, have been closed by state regulation to the use of weapons because they are accessed and well used by the public year-round for recreation. Chugach State Park was established by the legislature to "provide areas for the public display of local wildlife" (AS 41.21.121).

Proposal #103-Oppose

I am opposed to Proposal #103 which seeks to establish a bear bait hunt in the McHugh Creek drainage for black and brown bear. Attracting bears to food not otherwise available to them naturally would result in bears altering their foraging behavior by seeking food from other human-provided sources, such as the community of Rainbow Valley, one valley to

the south of McHugh. The Rainbow Valley community is no stranger to bears and we have peacefully coexisted with them for years in large part by preventing bears from associating us and our homes with food.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 98: Oppose    Proposal 103: Oppose

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I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of  valley wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of  Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

#### **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.



## Comments:

Copee Landing residents have over-hellay support set-backs around our Community. These proposals have been sub-mitted to the BOC for many, many years. What more does it take for our community to have safe trails for our Community users. Please respect the wishes of our Community.

Thank you!

ps. Please, listen to our Communities wishes for set-backs. These set-backs will not hinder trapping or subsistence uses!

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Ted Holsten

Organization (if any) C.L. Safe Trails

Signature\*: [Signature]

Email\*: [Redacted]

Street Address: [Redacted]

City\*: Copee Landing

State\*: AK

Zip code: 99572

\*Indicates it must be filled in to be accepted.



PC136

**Submitted by:** Kathy Sarns Irwin

**Organization Name:** Homer Safe Trails

**Community of Residence:** Homer Alaska

**Comment:**

We support Proposal 147

Non Trappers worked with trappers on this proposal. The proposed 100 yd setbacks would provide a guidelines for all trail users and help prevent user conflicts on the most popular recreational trails around Homer, AK. Implementing these setbacks would help develop a new constituency of user groups working together for the common solution of sharing these trails.

We support Proposal 146

The 100 yd setback would provide guidelines for all trail users and help prevent user conflicts on the most popular recreational trails in Kachemak Bay State Park. If this is not implemented there will be more conflicts in the future on these popular trails.

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Proposal 146: Support Proposal 147: Support

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PC137

**Submitted by:** Sandra Cronland

**Organization Name:** Homer Trails Alliance

**Community of Residence:** Homer, Alaska

**Comment:**

We are writing to support Proposals 146 and 147 in the Homer area. The Homer Trails Alliance is a 501c3 organization with the mission of promoting, maintaining and developing trails on the North side of Kachemak Bay from Anchor Point to Fox River. Making sure that all trails used in our area are safe is of utmost importance. Trail counters on several of our most popular trails indicate that there are 700-1000 people using our non-motorized trails each week in the summer, and there is an even greater number of users in the winter, plus there are many more miles of winter trails enjoyed by skiers, snowshoers and snowmachine enthusiasts. Many of the people who enjoy the outdoors also take their dogs with them. We strongly support the 100 yard set back for trapping along the trails that are groomed and maintained by skiers and snow machiners in our area. The trappers do not set and maintain their own trails, they are using the trails maintained by other organized groups that are out recreating with their families and pets. "The Mission Statement of the US Forest Service, states that to manage its lands and balance the short term and long term need of people and nature, this can be accomplished by: working in collaboration with communities and our partners." We feel that this type of collaboration should be at the top of Alaska Fish and Game priorities when addressing this issue . Thank you very much. Homer Trails Alliance

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Proposal 146: Support with Amendment Proposal 147: Support with Amendment

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PC138

**Submitted by:** Patck Houlihan

**Organization Name:**

**Community of Residence:** Anchor Point AK

**Comment:**

I am writing to express my support for proposals, 146 and 147 trapping setbacks of 100 yards from trails.

I have had my own dog caught in a trap, baited with meat within 30 yards of a very major trail. I think the number of users, including users with pets and children has increased dramatically since the time when trapping was established with no setbacks from trails.

Please consider supporting both of these proposals to create a margin of safety, and a buffer free from trapping on our trails

Thank you,

Patrick Houlihan

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Proposal 146: Support Proposal 147: Support

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PC139

**Submitted by:** Susan Houlihan

**Organization Name:**

**Community of Residence:** Anchor Point, AK

**Comment:**

Regarding Proposal 146 and 147. I am in support of a 100 yd setback on both KNSC ski trails and the multiuse Snowmad trails in Unit 15C and a 100 yard set back for trapping on the Grewingk Glacier Lake Trail, Saddle Trail and Diamond Creek Trail Kachemak Bay State Park. My dog has been caught in a trap on the watermelon trail while hiking. It was baited and the trap was visible from the trail. She required vet treatment. And it was traumatic for us both. Setting traps, and baited ones at that, so close to frequently used ski, snowmachine and hiking trails should be prohibited. I'm all for supporting traditional means of harvest, but with an increase in human population, and pets, and outdoor recreation, 100 yd minimum setbacks should be strictly enforced. Thank you for your consideration.

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Proposal 146: Support Proposal 147: Support

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PC140

**Submitted by:** Mitchell Hrachiar

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

There are more trail users than Trappers.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 147: Support

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PC141

**Submitted by:** Dr. J. A. Huesemann

**Organization Name:**

**Community of Residence:** Sequim, WA

**Comment:**

Alaska is the last refuge for large predators such as wolves and bears. Both the federal government and the state should be doing everything possible to support these animals, protect their habitats, and increase their numbers. The lower 48 states are rapidly becoming overrun with increasing numbers of people from both legal and illegal immigration. Habitats are being destroyed and wildlife, especially predators, have no place to go. Alaska can stand strong against this human tide of destruction by protecting its wildlife -- especially wolves and bears who need vast spaces and a healthy prey base. It's also good for business -- tourists who want to see what the world was and still can be.

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Proposal 55: Oppose Proposal 56: Oppose Proposal 57: Oppose Proposal 58: Oppose Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Oppose Proposal 62: Oppose Proposal 63: Oppose Proposal 64: Oppose Proposal 65: Oppose Proposal 66: Oppose Proposal 67: Oppose Proposal 68: Oppose Proposal 69: Oppose Proposal 70: Oppose Proposal 71: Oppose Proposal 72: Oppose Proposal 73: Oppose Proposal 74: Oppose Proposal 75: Oppose Proposal 76: Oppose Proposal 77: Oppose Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Oppose Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Oppose Proposal 85: Oppose Proposal 86: Oppose Proposal 87: Oppose



Proposal 88: Oppose Proposal 89: Oppose Proposal 90: Oppose Proposal 91: Oppose Proposal 92: Oppose Proposal 93: Oppose Proposal 94: Oppose Proposal 95: Oppose Proposal 96: Oppose Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose Proposal 101: Oppose Proposal 102: Oppose Proposal 103: Oppose Proposal 104: Oppose Proposal 105: Oppose Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Oppose Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 112: Oppose Proposal 113: Oppose Proposal 114: Oppose Proposal 115: Oppose Proposal 116: Oppose Proposal 117: Oppose Proposal 118: Oppose Proposal 119: Oppose Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose Proposal 125: Oppose Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Oppose Proposal 129: Oppose Proposal 130: Oppose Proposal 131: Oppose Proposal 132: Oppose Proposal 133: Oppose Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 140: Oppose Proposal 141: Oppose Proposal 142: Oppose Proposal 143: Oppose Proposal 144: Oppose Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Oppose Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Oppose Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 159: Oppose Proposal 160: Support Proposal 161: Oppose Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Oppose Proposal 165: Oppose Proposal 166: Oppose Proposal 167: Oppose Proposal 168: Oppose Proposal 169: Oppose Proposal 170: Oppose Proposal 171: Oppose Proposal 172: Oppose Proposal 173: Oppose Proposal 174: Oppose Proposal 175: Oppose Proposal 176: Oppose Proposal 177: Oppose Proposal 178: Oppose Proposal 179: Oppose Proposal 180: Oppose Proposal 181: Oppose Proposal 182: Oppose Proposal 183: Oppose Proposal 184: Oppose Proposal 185: Oppose Proposal 186: Oppose Proposal 187: Oppose Proposal 188: Oppose

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PC142

**Submitted by:** Steve Hughes

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

February 25, 2023

Hello Alaska Board of Game Members,

I have been a resident of Kachemak Bay since the early 1980's and frequently travel between Homer and Jakolof Bay to access my cabin. Among my greatest pleasures is exploring the shoreline on the south side of the Bay and watching the marine and land wildlife.

I am concerned about the apparent decline in Sea Duck populations and urge you to support proposals 164 and 166 which would reduce the Bag Limits for Goldeneye and Bufflehead Ducks from 8 per day to 4 per day, allowing a total of 8 in possession.

To protect Kachemak Bay's Critical Habitat status and help restore Duck populations I hope you will oppose proposal 163. It is not the time to lift these fair and conservative restrictions.

I also urge you to maintain the current hunt dates for Ptarmigan and oppose proposal 162 which would extend those dates.

Thank you for your efforts to protect the avian inhabitants of Kachemak Bay and help maintain the amazing diversity of wildlife here.

We live along one of the most beautiful and accessible natural areas in Alaska. The ease of access makes it a wonderful place to visit for locals and people worldwide, but it can also make it vulnerable to exploitation and over harvest. That's why we need you to help protect it.



Thank you,

Steve Hughes

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Proposal 145: Support Proposal 146: Support Proposal 147:  
Support Proposal 160: Support Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 166:  
Support Proposal 169: Support Proposal 171: Support

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Mailing Address:  
P.O. Box 8783  
Kodiak, AK 99615



Physical Location:  
2409 Mill Bay Road  
Kodiak, AK 99615

Phone: (907) 486-8077  
Fax: (907) 486-5056  
Website: [kodiakanimalshelter.org](http://kodiakanimalshelter.org)

March 3, 2023

Re: Alaska Board of Game Proposal 81

Dear Chairman Burnett and Members of the Board,

Thank you for your consideration of Proposal 81 which was submitted by the Humane Society of Kodiak Board of Directors. We believe this proposal represents a simple, commonsense change that will meaningfully reduce negative interactions with non-target animals, and reduce user group conflict without unduly burdening trappers. While the potential for bycatch of nontarget game species (i.e., bears and deer) in snares exist throughout the Kodiak Archipelago, conflict between user groups related to domestic animals (i.e., dogs and livestock) seems most prevalent on the Kodiak Road System, therefore the geographic scope of this proposal has been limited to reflect that.

This proposal has been well received by the Kodiak community at large and the Kodiak AC recently voted unanimously to support it. Kodiak has a long and rich history of furbearer trapping; we wish to see this continue but would also like to see methods evolve in a way that protects our other valuable game species as well as our domestic animals.

Thank you again for your consideration.

Sincerely,

Humane Society of Kodiak Board of Directors  
Lorraine Stewart, President  
Cindy Trussell, Vice President  
Linda Lance, Treasurer  
Nat Nichols, Secretary  
Karen Yashin  
Chris Hicks



PC144

**Submitted by:** James Hundley

**Organization Name:**

**Community of Residence:** Willow

**Comment:**

Regarding proposal 176 to authorize up to 2000 cow moose permits for 14A/B

My home is in the northwest part of 14A on the Susitna River. We have had 4 years in row of heavy snow that has caused significant winter kill to the moose population in our area. I watched them die for 3 years and now there are few to see. If the last data was from 2020 I think you should reconsider the proposal. This area is accessible by boats , ATVs and snow machines from willow and Big lake making it popular with permit holders. I have not seen a cow moose for the last two years during hunting season. This area is primarily roadless so the argument about vehicle collisions is not a very good one. Thank You James Hundley

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 176: Oppose

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PC145

**Submitted by:** John Hyde

**Organization Name:**

**Community of Residence:** Juneau, AK

**Comment:**

I support proposal 145. Allowing hunting and trapping from within a mile of any established crossings is contrary to the intent of the crossings themselves. Allowing hunting and trapping along these corridors only benefits hunters and trappers who already have access to millions of acres in the state. These crossings are intended to help preserve the health of wildlife populations which will benefit hunters and trappers more in the long run. Healthy wildlife populations and responsible and effective wildlife management go hand in hand.

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Proposal 145: Support

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PC146

**Submitted by:** Pat Irwin

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I support proposal 147 - the 100yrd setback for trapping on mapped/established popular public Snomads and KNSC XC Ski trails. Local Homer trappers working with Homer Safe Trails agree that 100 yards is a good compromise to keep all trail users and their pets safe from traps. The trappers I know don't want to trap dogs if they can avoid it and 147 can insure that.

Thanks for considering this agreement between all trail users

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 147: Support

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PC147

**Submitted by:** Brenda Jager

**Organization Name:**

**Community of Residence:** Homer

**Comment:**

I support proposals 146 and 147. As an active outdoors woman in the Homer area I would like to be able to hike, snowshoe and skijor with my dog. As a former musher I have always been active in the outdoors with my dogs. I moved to the Homer area ten years ago to continue this lifestyle with a much smaller number of canines. I support the right to trap and hunt but feel we must have limits that ensure the safety of ourselves and our pets.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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**Submitted by:** Cameale Johnson

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I strongly urge the Board of Game to adopt Proposals 146 & 147, the 100yd setback from trails. It is dangerous & unconscionable to allow trapping so close to trails used by people & dogs. Dogs are trail users and use has increased considerably increasing the risk of a dog getting caught in a trap. Please help prevent any more tragic events happen by adopting Proposals 146 & 147. Regards, Cameale Johnson

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

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**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS, 673D AIR BASE WING  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA**



PC 149

MEMORANDUM FOR ALASKA DEPARTMENT OF FISH AND GAME  
ALASKA BOARD OF GAME

FROM: 673 ABW/CC  
10471 Sijan Ave  
JBER, AK 99506

SUBJECT: ALASKA BOARD OF GAME REGULATION PROPOSAL 91 (EG-F22-125)

1. Proposal 91 (EG-F22-125):

Issue:

Drawing permit hunt DL455 already allows the take of one black bear by shotgun only. Archery is a step down in weapon efficacy and should be considered as a means of take for this hunt. There are currently multiple archery hunts that already take place on JBER and there is no reason DL455 should exclude archery equipment. If this regulation change were to be adopted, hunters who draw this permit would be able to hunt with either a shotgun or a bow rather than only being limited to using a shotgun.

Proposed Solution:

Add bow and arrow to the legal means of take for DL455 in unit 14C as follows:

DL455

Unit 14C, portions of Joint Base Elmendorf-Richardson Management Area (former Fort Richardson portion)

One bear by shotgun or bow and arrow only by permit Sept 1-June 15

2. DL455 occurs in the GMU 14C Joint Base Elmendorf-Richardson (JBER) Management Area, managed by the United States Air Force, 673d Air Base Wing. JBER has considered and does not support proposal EG-F22-125 on the following grounds:

a. DL455 is restricted to shotgun only, a determination made in the planning and decision process in 2014 to implement a black bear hunt compatible with military mission and safety requirements. Base access procedures and hunting areas, methods, means, and conditions are designated by the 673 Civil Engineer Squadron in consultation with the Alaska Department of Fish and Game, JBER Range Control, and the 673 Security Forces Squadron with endorsement of the 673 Air Base Wing Commander.

b. The use of military land for recreation is subject to safety, security, and the military mission. It is the policy of JBER to provide public access for outdoor recreation activities and the harvest of fish and wildlife when compatible with the military mission and natural resource management objectives.



Allowing archery as a means of take in DL455 increases wounding loss potential and safety conflict. The proposal identifies archery as a step down in weapon efficacy, to which JBER concurs. Inability to quickly follow-up with a second or third shot introduces higher wounding loss potential which may result in a dangerous and aggressive black bear. A wounded black bear presents safety risks to the hunter, soldiers that may be performing land navigation and maneuvering exercises or occupying bivouac sites, as well as any other individuals in the vicinity, both on and off installation.

c. JBER currently offers five archery draw hunts (DM424, DM426, DM427, DM428, and DM430) which are moose only. Wounded moose that require trailing present less of a safety risk than wounded black bears.

d. While JBER Conservation Law Enforcement Officers and Military Conservation Agents are dispatched to locate black bears that hunters have reported as wounded, JBER does not possess the resources to respond to an increase in wounded black bear reports.

e. For all draw hunts on JBER, hunters are required to pass a weapons proficiency test. Allowing both shotgun and archery to DL455 will increase resources required to qualify hunters on shotgun and archery proficiencies. JBER does not possess the resources to support this change.

3. For the reasons stated in this letter, JBER does not support adding bow and arrow as a legal means of take to DL455 as proposed.

DAVID J. WILSON  
Colonel, USAF  
Commander



**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS, 673D AIR BASE WING  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA**



PC 149

March 2, 2023

MEMORANDUM FOR ALASKA DEPARTMENT OF FISH AND GAME  
ALASKA BOARD OF GAME

FROM: 673 ABW/CC  
10471 Sijan Ave  
JBER, AK 99506

SUBJECT: ALASKA BOARD OF GAME REGULATION PROPOSAL 93 (EG-F22-114)

1. Proposal 93 (EG-F22-114):

Issue:

Low participation and hunter success in GMU 14C black bear drawing hunts. The current regulations limit hunter to shotgun and shotgun/muzzleloader only in DL455/457, respectively. This deters a large pool of certified black bear archery hunters from applying to hunt this underutilized resource in an area that already has a successful archery hunt for moose.

Proposed Solution:

Add certified bowhunters to applicants for drawing hunts DL455 and 457.

"... (3) Unit 14(C), JBER Management Area 1 bear every regulatory year, by drawing permit Sept 1 – June 15 Sept 15 – June 15 only; by shotgun **and archery** only; (General hunt only) up to 25 permits may be issued Unit 14(C), that portion Sept. 1 – May. 31 known as the Anchorage (General hunt only) Management Area 1 bear by drawing permit only. Shotgun, **archery**, or muzzleloader only; weekdays only; up to 20 permits may be issued in the McHugh Creek area and up to 20 permits may be issued in the Upper Campbell Creek area..."

The option to also hunt with a shotgun or shotgun/muzzleloader would remain unchanged, allowing for follow up shots (if needed). This solution presents arguably less wounding loss potential than archery-only hunts (e.g., DM424).

2. DL455 occurs in the GMU 14C Joint Base Elmendorf-Richardson (JBER) Management Area, managed by the United States Air Force, 673d Air Base Wing. JBER has considered and does not support changes to DL455 in proposal EG-F22-114 on the following grounds:

a. DL455 is restricted to shotgun only, a determination made in the planning and decision process in 2014 to implement a black bear hunt compatible with military mission and safety requirements. Base access procedures and hunting areas, methods, means, and conditions are designated by the 673 Civil Engineer Squadron in consultation with the Alaska Department of Fish and Game, JBER Range Control, and the 673 Security Forces Squadron with endorsement of the 673 Air Base Wing Commander.

b. The use of military land for recreation is subject to safety, security, and the military mission. It is the policy of JBER to provide public access for outdoor recreation activities and the harvest of fish and





wildlife when compatible with the military mission and natural resource management objectives. Introducing archery to DL455 increases wounding loss potential with use of a less efficient weapon and inability to quickly follow-up with a second or third shot. While a hunter could follow up a bow shot with shotgun as proposed, bowhunters who choose not to carry a shotgun would not have this option, thereby increasing wounding loss potential. Wounded black bears are potentially aggressive and present safety risks to the hunter, soldiers that may be performing land navigation and maneuvering exercises or occupying bivouac sites, as well as anyone else in the vicinity, both on and off installation.

c. While JBER Conservation Law Enforcement Officers and Military Conservation Agents are dispatched to locate black bears that hunters have reported as wounded, JBER does not possess the resources to respond to an increase in wounded black bear reports.

d. Hunters are required to pass a weapons proficiency test for all draw hunts on JBER. Allowing both shotgun and archery to DL455 will increase resources required to qualify hunters on shotgun and archery proficiencies. JBER does not possess the resources to support this change.

3. For the reasons stated in this letter, JBER does not support adding certified bowhunters to applicants for draw hunt DL455 as proposed.

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DAVID J. WILSON  
Colonel, USAF  
Commander



**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS, 673D AIR BASE WING  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA**



PC 149

MEMORANDUM FOR ALASKA DEPARTMENT OF FISH AND GAME  
ALASKA BOARD OF GAME

FROM: 673 ABW/CC  
10471 Sijan Ave  
JBER, AK 99506

SUBJECT: ALASKA BOARD OF GAME REGULATION PROPOSAL 96 (EG-F22-140)

1. Proposal 96 (EG-F22-140):

Issue:

Provide more black bear archery hunting opportunities in 14C. This is specifically for archers who have drawn a moose tag and could take a black bear while in the field if the opportunity presented itself. It is another way/opportunity to reduce the black bear predation on moose calves in 14C.

Proposed Solution:

Add a black bear archery registration hunt for residents & non residents in the Joint Base Elmendorf-Richardson management hunt area. These registration permits would be made available only to those hunters who draw a moose tag and hunt by bow and arrow. The permits and hunt period would remain valid while the moose draw tag is valid.

2. DL455 occurs in the GMU 14C Joint Base Elmendorf-Richardson (JBER) Management Area, managed by the United States Air Force, 673d Air Base Wing. JBER has considered and does not support proposal EG-F22-125 on the following grounds:

a. The existing black bear hunt on JBER (DL455) is restricted to shotgun only, a determination made in the 2014 planning and decision process to implement a black bear hunt compatible with military mission and safety requirements. Base access procedures and hunting areas, methods, means, and conditions are designated by the 673 Civil Engineer Squadron in consultation with the Alaska Department of Fish and Game, JBER Range Control, and the 673 Security Forces Squadron with endorsement of the 673d Air Base Wing Commander.

b. The use of military land for recreation is subject to safety, security, and the military mission. It is the policy of JBER to provide public access for outdoor recreation activities and the harvest of fish and wildlife when compatible with the military mission and natural resource management objectives. Allowing archery as a means of take through a black bear registration hunt increases wounding loss potential and safety conflict. Inability to quickly follow-up with a second or third shot may result in a wounded and dangerous, aggressive black bear. A wounded black bear presents safety risks to the hunter, soldiers that may be performing land navigation and maneuvering exercises or occupying bivouac sites, as well as anyone else in the vicinity both on and off installation.



c. JBER currently offers five moose draw hunts (DM424, DM426, DM427, DM428, and DM430) totaling to 98 permits for the 2023-2024 regulatory year. Adding a registration black bear hunt for JBER's moose draw hunt winners would significantly increase potential wounded black bear reports. JBER Conservation Law Enforcement Officers and Military Conservation Agents are dispatched to locate black bears that hunters report as wounded; however, JBER does not possess the resources to respond to an increase in wounded black bear reports.

3. For the reasons stated in this letter, JBER does not support adding a black bear archery registration hunt to the Joint Base Elmendorf-Richardson Management Area within 14C as proposed.

DAVID J. WILSON  
Colonel, USAF  
Commander



**DEPARTMENT OF THE AIR FORCE  
HEADQUARTERS, 673D AIR BASE WING  
JOINT BASE ELMENDORF-RICHARDSON, ALASKA**



PC 149

MEMORANDUM FOR ALASKA DEPARTMENT OF FISH AND GAME  
ALASKA BOARD OF GAME

FROM: 673 ABW/CC  
10471 Sijan Ave  
JBER, AK 99506

SUBJECT: ALASKA BOARD OF GAME REGULATION PROPOSAL 100 (EG-F22-141)

1. Proposal 100 (EG-F22-141):

Issue:

Create an archery brown bear hunting opportunity on Joint Base Elmendorf-Richardson Management Area.

Proposed Solution:

Provide a archery only drawing hunt for both residents and non residents. 1 bear every 4 regulatory years by bow and arrow only. Season to be open from September 1<sup>st</sup> through May 31<sup>st</sup>.

2. The Joint Base Elmendorf-Richardson (JBER) Management Area occurring in GMU 14C is managed by the United States Air Force, 673d Air Base Wing. JBER has considered and does not support proposal EG-F22-141 on the following grounds:

a. The use of military land for recreation on JBER is subject to safety, security, and the military mission. It is the policy of JBER to provide public access for outdoor recreation activities and the harvest of fish and wildlife when compatible with the military mission and natural resource management objectives.

b. Archery is a step down in weapon efficacy and increases wounding loss potential with an inability to quickly follow-up with a second and third shot. Aggressive wounded brown bears present significant safety risks to the hunter, soldiers that may be performing land navigation and maneuvering exercises or occupying bivouac sites, and anyone else in the vicinity both on and off installation. This would negatively impact military training as well as increase the risk to human safety.

c. Wounded brown bears present additional safety risk to JBER Conservation Law Enforcement Officers, Military Conservation Agents, and biologists who would be dispatched to locate wounded bears.

d. For all draw hunts on JBER, hunters are required to pass a weapons proficiency test and attend orientation and equipment inspection. JBER does not possess the resources to support this addition.



3. For the reasons stated in this letter, JBER does not support adding an archery brown bear hunt to the Joint Base Elmendorf-Richardson Management Area within 14C as proposed.

DAVID J. WILSON  
Colonel, USAF  
Commander



**Submitted by:** Ina Jones

**Organization Name:**

**Community of Residence:** Homer

**Comment:**

I do not support proposal 146 and 147. This is targeting and favoring one type of user over another. Dogs should be on leash at all times on all trails. On public lands. Unleashed dogs put all wildlife at risk, especially in the winter months. The trails are not surveyed and there is no one trail that is used in the so called public access. People bob around on and off trails all of the time and their dogs do the same. If the dogs are on leash at all times this entire problem is a moot point. On trails across the bay, unleashed dogs can chase bears in summer, which puts the owner at risk of being charged and harmed by bears. This results often in the death of the bear. (or moose as the case may be). For the safety of all animals and owners. Just enforce the laws already on the books and keep all dogs on leash. At all times on public land.

Why should 8 incidences have more weight then the hundreds of users that have no incidences.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Support Proposal 56: Support Proposal 57: Support Proposal 59: Oppose Proposal 60: Support Proposal 61: Support Proposal 62: Oppose Proposal 63: Support Proposal 64: Oppose Proposal 117: Oppose Proposal 118: Support Proposal 119: Oppose Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose Proposal 125: Oppose Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Oppose Proposal 129: Oppose Proposal 130: Oppose Proposal 131: Oppose Proposal 132: Support Proposal 133: Support Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 140: Oppose Proposal 141: Oppose Proposal 142: Oppose Proposal 143: Oppose Proposal 144: Oppose Proposal 145: Oppose Proposal 146: Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose Proposal 155: Support Proposal 156: Support Proposal 157: Support Proposal 162: Oppose



**Submitted by:** Kenneth Jones

**Organization Name:**

**Community of Residence:** Cordova

**Comment:**

Please see attached

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Oppose Proposal 62: Oppose Proposal 63: Support

Esteemed Board of Game members,



PC 151

I appreciate the opportunity to provide written comment on the proposals in front of you. I am a life long alaskan and community member of Cordova, located in unit 6. I am also a licensed big game transporter, and a waterfowl and sport fish guide.

I am commenting today on the unit 6 proposals. I oppose proposal 59, 60, 61, and 62. I support proposal 63.

Bow hunting is not common in unit 6, the proposal 60 seeking exclusive access during peak rut would have a detrimental impact on my business as a transporter. The population is not crashing and this drastic change is not warranted for any conservation measure. This proposal is simply seeking a reallocation to a very small fraction of the hunter population which choose to use bows. There is nothing stopping them from bow hunting currently. I fail to see why they would need to shut down rifle season to be successful with a bow. Likewise opening a bow only hunt for goats does not make sense, most of the goat units never shut down, the proposal 59 is simply seeking opportunities for a minority of hunters in a choice area.

Likewise I oppose changing the limits to deer harvest as outlined in proposal 61. Currently there are more deer killed every winter by natural causes than by hunt pressure. While the proposer suggests that sport hunters do not require 5 deer, here in Cordova many families could use 5 deer to feed themselves through winter if they do not get a moose draw. Reducing the bag limit would not drastically improve the deer population and one winter die off would negate any impact that this change would have.

I also oppose the departments cow moose hunt proposal 62. They may try to claim this is house keeping but there should not be a state managed cow moose hunt in 6C. Wolves have been sighted more frequently in the entirety of unit 6 as the glaciers recede and trapping becomes less popular. We are having issues in 6a with calf recruitment and I do not feel that any cow harvest in 6C is warranted. The area can support much more than the 6-800 moose the department manages for.

I support proposal 63, expansion of the brown bear season. This makes total sense to align brown bear hunting with the start of "any deer" season. Currently if you are out deer hunting you cannot legally take a charging bear without utilizing the burdensome DLP process. Aligning these two season start dates would benefit outdoorsmen who want the ability to protect themselves but also get to keep the trophy from doing all the work associated with skinning out and packing out a bear hide and skull. Brown bear populations in unit 6D can support this change. Currently in units 6a-c the season is sept 1, only in 6D where the deer are do you have to wait all the way till oct 15th to harvest a brown bear. I would almost say that this proposal doesn't go far enough and the board should consider a sept 1 date to align with the rest of unit 6.

Again, Thank you for the opportunity to comment.



**Submitted by:** Tyler Jones

**Organization Name:**

**Community of Residence:** Anchorage, AK

**Comment:**

I am writing in support of proposals 148-154. I love to recreate outdoors with my dogs. I have no problem with folks trapping out there. I do however have a problem with irresponsible trapping close to trails where people run, bike, hike etc with their animal companions. Let's keep people and their pets safe, shall we?

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



**Submitted by:** Rob Jones Jr.

**Organization Name:**

**Community of Residence:** Chugiak, AK

**Comment:**

This comment is for Proposal number 204. This board generated proposal is to close GMU 19C to all Dall Sheep hunting for 5 years, 2023-2027. I am opposed to the proposal because I believe closing an area that has a bag limit of one legal Ram for both residents and non residents will not help the declining population of Dall Sheep in the area. This decline of the population in my opinion is not an overhunting issue. It is in my opinion an environmental issue. I believe the past few winters of large temperature variations, heavy snowfall in late winter and early spring, and the increase of predators in the area is the main factors of the decline. From a reliable source the hunter harvest of legal Rams taken in 2022 in game management unit 19C was 29 Rams. 26 Rams were taken by Non residents and 3 were taken by residents. This historically is a very low number for both residents and non residents. Residents are allowed to hunt anywhere in the state that is open to hunting. Guides are restricted to Guide Use Areas. These by comparison to the state of Alaska is very small. Some Guides in GMU 19C and not all are very committed to this area because of investment in the area, better knowledge in that area, other non hunting commitments to the area. As for the big difference of the non resident harvest compared to the resident harvest I believe that and saw for myself last hunting season 2022 a noticeable decline in hunting activity in the area during the August part of the season which would be one factor for the reduced success rate in general. One thing that could be done by the Board of Game in the area to help slow the decline of sheep would be to extend seasons and bag limits on predators including Wolverine.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 204: Oppose





From: Kachemak Bay Birders  
<https://kachemakbaybirders.org>

To: Alaska Board of Game  
PO Box 115526  
Juneau, AK 99811-5526  
<https://www.adfg.alaska.gov>

February 15, 2023

To Board of Game:

Kachemak Bay Birders (KBB), established in 2008, is an informal, all-volunteer organization of approximately 320 members who are interested in birds, birding, and the conservation of birds. Our mission is *"To promote the enjoyment and protection of Kachemak Bay native birds and their habitat through citizen science, field trips, education and stewardship."* KBB is sponsored by US Fish & Wildlife Service.

Birds are a significant part of the Alaska ecosystem. While some species are a human food source, many enrich our lives through their beauty and song. Birders provide an often-overlooked boost to the economy as well, and an incentive for conserving habitat. According to research by the University of Alaska Fairbanks and Audubon Alaska, nearly 300,000 birders traveled to Alaska and spent about \$378 million statewide in 2022. Birdwatching supported roughly 4,300 jobs in the state that year. Providing pest control, public health, seed dispersal, ecotourism, environmental monitoring—these are a few of the many other ways birds benefit humans. Birds are an important local resource in the Kachemak Bay area that we need to protect. Our positions on the proposals cited below advocate for healthy populations of specific bird populations.

The Board of Game is about to vote on a series of proposals that might adversely affect the populations of game birds and waterfowl that reside in and around Kachemak Bay. Proposals and our support or opposition are listed below;



1. Proposal 162: Lift hunting restrictions on ptarmigan on the Homer Bench  
**OPPOSED** The spring hunt for ptarmigan in the hills above Homer was closed due to the heavy harvest of birds mainly by hunters on snowmachines having easy access to small flocks in willow patches. Ptarmigan have slowly started to repopulate the area. However, recovery is far from justifying any harvest. Relaxing restrictions would allow the existing ptarmigan to be easily wiped out again because of the number of hunters and snow machines that are likely to access the area.

2. Proposal 163: Rescind bag limit restrictions for sea duck hunting in 15C **OPPOSED**

\*Justification provided below

3. Proposals 164-170: proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin & Long-tailed Duck: **SUPPORT**

KBB is in support of the Homer ADF&G Advisory Committee's positions for the following reasons:

- \* Reliable data on bird populations or harvest numbers do not exist, so we should act conservatively.
- \* Populations of sea ducks are slow to recover from overharvest because of high site-fidelity and small clutch sizes.
- \* ADF&G lacks the ability to limit the number of guides working in Kachemak Bay, and the addition of more guides to the bay could easily reduce populations.
- \* Limiting harvest is one of our only mechanisms for protecting these local populations.
- \* Long-time residents report a significant decline in sea duck populations in Kachemak Bay.
- \* Bag limits on these species will not impact the harvest of waterfowl desirable for food.
- \* Bag limits on these species will not hurt the businesses of waterfowl hunting guides operating on Kachemak Bay according to testimony given at Homer F&GAC meetings.

4. Proposal 171: Direct ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6,7 & 15 **SUPPORT.**

\*We understand the financial and personnel limits in the F&G Department, but advocate at least locally for harvest data that will be acceptable to the department to justify keeping or removing bag limits.



5. Proposal 172: Require mandatory harvest reporting for sea ducks in Kachemak Bay  
Unit 15C **SUPPORT**

- \* ADF&G has no idea how many ducks are harvested in the Kachemak Bay area. As a result, they don't have any idea as to whether current bag and possession limits are sustainable.
- \* ADF&G does not consider other factors that might have an impact on sea duck populations, like climate change.
- \* The bag and possession limits need to be based on local conditions, regardless of the cause of mortality.
- \* Current harvest regulations are based on past population estimates and not on current numbers and conditions.
- \* ADF&G has limited staff and resources to monitor waterfowl populations statewide and relies on USF&W estimates of overall statewide populations. This results in the assumption that local populations are healthy when local observations and citizen science indicate the contrary.

As an organization Kachemak Bay Birders urges the Board of Game to consider our support and opposition for the proposals cited above and its concurrence with the recommendations of the Homer Fish and Game Advisory Committee. The birds do not have a voice at your meetings and we advocate for them.

Respectfully submitted,

Cindy Sisson  
Chair, Kachemak Bay Birders

# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 155

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Road and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 155

As a former trapper I feel that keeping traps away from trails and public use areas is responsible and respectful.


Trapping is not something to be taken lightly. We should always consider the risk to life & property before setting a trap line.

These set backs only help novice or lazy trappers to understand how to operate safely.

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Edward Kahles

Organization (if any)

Signature\*: 

Email\*: 

Street Address: 

City\*: Cooper Landing State\*: AK Zip code: 99582

\*Indicates it must be filled in to be accepted.



**Submitted by:** Anne Kahn

**Organization Name:**

**Community of Residence:** Homer & Lake Clark, AK

**Comment:**

Trapping setbacks of 100 yards should be the mandatory minimum for all public use trails in the state. I support Proposals 146 and 147.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 103: Support Proposal 104: Support Proposal 105: Support Proposal 106: Oppose Proposal 107: Oppose  
Proposal 108: Support Proposal 110: Support with Amendment Proposal 115: Oppose Proposal 117: Support  
Proposal 128: Support Proposal 129: Support Proposal 130: Oppose Proposal 131: Support Proposal 132: Support  
Proposal 133: Support Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal  
138: Oppose Proposal 139: Oppose Proposal 140: Oppose Proposal 141: Oppose Proposal 142: Oppose Proposal 143:  
Oppose Proposal 144: Oppose Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support  
Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support  
Proposal 154: Support Proposal 155: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support  
Proposal 159: Oppose Proposal 160: Support Proposal 161: Support Proposal 162: Oppose Proposal 163: Oppose  
Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support  
Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support

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# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 157

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **#145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **#148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 157

(feel free to add extra pages of comments)

Printed Name (First and last)\*: ROBERT KAMP

Organization (if any) \_\_\_\_\_

Signature\*: [Signature]

Email\*: [Redacted]

Street Address: [Redacted]

City\*: COOPER LANDING State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.





PC158

**Submitted by:** Elizabeth Kandror

**Organization Name:**

**Community of Residence:** Homer

**Comment:**

I am against trapping beavers. They help store water and restore wetlands. In this day and age we do not need to use hides.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

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PC159

**Submitted by:** Margaret Kao

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I support Proposal #146 and #147. Public trails used for recreational purposes should definitely have regulations around where traps can be. The 100 yard setback requested by these two proposals is a necessary safety precaution for people that use these public trails.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Oppose Proposal 147: Oppose

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PC160

**Submitted by:** David Kaufmann

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I am writing in support of proposals 146 and 147. Both of these proposed rules seem like they should be common sense. 100 yard buffer for trapping on highly trafficked trails is a no brainer.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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PC161

**Submitted by:** Dianne MacLean

**Organization Name:** Kenai Peninsula Chapter of the Alaska Trapper's Association

**Community of Residence:** Soldotna, AK

**Comment:**

Honorable Board Members,

(Proposal 145 Oppose)

The Kenai Peninsula Trapper's Association opposes proposal 145 because it adds unnecessary regulation for a largely unheard of issue. Crossings on the Kenai Refuge already prohibit trapping within a mile of the road. Wildlife use of crossings during daylight hours has not been significant; hunters and trappers are not drawn to these installations to hunt or trap.

(Proposals 146-154 opposed)

The Kenai Peninsula Trapper's Association opposes these proposals because they add unnecessary regulation to solve the problem of loose-running dogs being caught in traps. Loose-running dogs are a serious menace to moose and other wildlife and are a nuisance to other trail users. The Alaska Trapper's Association is providing signage to notify both hikers and trappers of the need for sensible consideration of other user groups on shared trails and to notify the public and especially users of legitimately off-leash dogs (hunting dogs) that trapping activities are underway in the area. We feel this approach is already helping to avoid dog/trap conflicts and encourage giving more time before adding the burden of more regulation to either trappers or to families with dogs.

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**Submitted by:** Mairiis Kilcher

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

As a lifetime resident of Homer (1944 until today), I have seen with my own eyes the literal disappearance of what once were rafts of thousands of sea ducks all up and down Kachemak Bay, specifically long tail ducks which numbered in the many thousands all winter long.. Now I scarcely can find one, and as a lifetime bird observer I find that very disturbing.

These birds WINTER here, and do not migrate as part of the Pacific Flyway. Their chances of getting decimated and not recovering their populations is far greater than for migrating ducks

FURTHER, to ensure future generations can enjoy our local wildlife, and its many benefits to the environment (many of which are unknown, until it is too late) I am imploring the BOG to consider considering more long term conservation measures for the preservation of our sea ducks which up to now have been used as free fishing bait, sport targets, and not valued in their own right. As with other species, the economic, short time gain of a few should not trump the long term viability of a species nor deprive future generations from the opportunity of enjoying them. As well, The very idea of having them under the purview of the board and GAME seems confusing, since they are not used for subsistence, but mainly slaughtered for non game uses.

I SUPPORT proposals, 164, 166, 169, 171 restricting bag limits for that reason.

I am OPPOSED to proposal 163, rescinding any bag limit restrictions, for that reason

Thank you for accepting my comments.

A long time Alaskan,

Mossy (Mairiis) Kilcher.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 163: Oppose Proposal 164: Support Proposal 166: Support Proposal 169: Support Proposal 171: Support  
Proposal 172: Support

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**Submitted by:** H. Sharon Kim

**Organization Name:**

**Community of Residence:** Seward, AK

**Comment:**

I SUPPORT the following proposals:

-Proposal #148 - I often recreate on trails in Seward and having a 100 yd setback will help prevent my dog getting trapped while we use the trails. I do not use a leash and he is good under voice command, but he would definitely be attracted by smells if they were too close to the trails.

-Proposal #145 - the 1/4 mile hunting and trapping buffers from wildlife crossings make a lot of sense and will ensure wildlife use the crossings without being deterred.

-Proposal #149 - setbacks from campgrounds will make it less likely that pet dogs aren't accidentally captured while people camp.

-Proposal #150 - a 100 yd setback helps to not catch people's dogs that are out from cars.

-Proposal #146, 147, 151, 152, and 153, - a 100 yd setback helps to prevent dogs from getting pulled off the trail to investigate strange smells and get trapped.

-Proposal #154 - I support signing where trapping is occurring, because that would let dog owners know to be extra careful with their dogs on specific trails, or even cause them to use other areas that are not being trapped. This would help to prevent dogs from inadvertently being trapped.

I believe that approving the proposals listed above will greatly assist the safety of our dogs, and will also help trappers and hikers/skiers with dogs to use similar areas without major conflict.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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**Submitted by:** Gabe King

**Organization Name:**

**Community of Residence:** Seldovia ak

**Comment:**

I am a 32 year local water Fowler and water fowl guide for 16 years.

I would like to voice my concerns over the proposals to cut harlequin and old squaw limits in half for kachemak bay again.

- kachemak bay already has very conservative bag limits

-there's no biological reason for reducing bag limits again. Both species seem to be healthy and consistently in good numbers.

- a 1 A day bag limit is too close to 0, and that's what a small handful of folks want for no good reason.

-the claim that hunting pressure is becoming overwhelming is just not true. the sea ducks are hunted November - December 16 and I only see 2-4 other parties a year during that time.

-the surveys are showing that these birds are in healthy numbers.

- allot of misinformation is being used to push an agenda of a few.

I will be one of the first to spark up if things change and I have concerns for populations. I love duck hunting and being able to do what I love.

Thanks for reading.

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I just wanted to leave my phone number attached to the previous comment on sea duck proposals in Kachemak Bay in case anybody ever wanted to discuss more. Thanks

Gabe king [REDACTED]

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I am a full time resident and Waterfowler of kachemak bay for 28 years now and have genuine care and respect for the sea ducks in kachemak bay.

Proposals 164-170

I ask the board to review the supposed "facts" that are brought up to support these proposals before making a decision. The will or end game of this group is to shut duck hunting down completely in the bay. They have proven that in their attempts at an emergency closure in the bay. I haven't taken the time to look at their survey but I am skeptical it would be unbiased. And the fact that they don't survey most of the highest duck density areas like China poot bay, Halibut cove lagoon, head of kachemak bay, and the open waters makes there survey seem a bit odd. My livelihood counts on the healthy stocks of these birds and I believe they are healthy. Sea duck harvest only occurs for about a month and a half. Cutting limits to 1 is getting too close to zero, uncalled for in my opinion and would negatively impact my ability to make a living.

Thanks for reading.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 164: Oppose Proposal 165: Oppose Proposal 166: Oppose Proposal 167: Oppose Proposal 168: Oppose Proposal 169: Oppose Proposal 170: Oppose

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**PC165**

**Submitted by:** Tom Kirstein

**Organization Name:**

**Community of Residence:** Fairbanks, Alaska

**Comment:**

Thank you.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 77: Support Proposal 78: Oppose

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March 2023 Meeting

The Alaska Board of Game

Dear Chairman and Members

Written Comments:

My name is Tom Kirstein, I live in Fairbanks and I would like to address the following proposals that concern unit 8, Kodiak Island. Thank you for this opportunity and for your service to the board of game process!

I have professionally guided on Kodiak Island over 40 years within the Kodiak National Wildlife Refuge.

Proposal 77: Support this proposal

If the Department is wanting to protect the harvest of Female Bears in this area using the skull size minimums for Females being 9 inches wide by 15 inches long, total of 24 inches, or any legal Male Bear. There should be consideration for an age limit applied to the skull size for very old Female Bears that do not make the minimum score of 24 inches. The age should be something over 20 years, this can be established using the sealing data from Female bear harvest records. There shouldn't be a permit reduction loss for resident or non-resident hunters that harvested a very old Female bear that no longer are birthing cubs!

The efforts by the Kodiak Fish and Game Department to educate hunters with information about sexing bears and promote the harvest of Male bears should this proposal be adopted will be a factor for success!

Other considerations:

The Fall Bear Season starting earlier would offer more harvest of Male Bears. Starting the Fall Season earlier would have to apply to all of Kodiak Island Units. There are more bears available early, sow's with cubs are protected by regulations, more Male bears available, easier sexing bears in the Fall season because of shorter hair conditions. The current season being late October most years has unfavorable cold weather conditions which makes difficult hunting conditions and harvesting Female bears more likely.



Last year the Department reported that the Male Harvest of bears was up to 84 percent. Likely there are many more bears than estimated and harvesting more Male bears would help reduce the predation on Females and those Females with cubs.

Proposal 78

Oppose this proposal

The Kodiak Island drawing permit system started in 1976. With well over 40 years of a permit drawing allocation for bear permits which has been very successful. This proposal would have a detrimental effect on allocation of bear permits for Kodiak Island Guiding businesses should it pass. The allocation process of permits for Kodiak Island needs to remain as designed because it works well for the state of Alaska! The allocation of bear permits on Kodiak Island was designed to offer stewardship of bear hunting opportunities by professional guides who conduct those adventures. The unintended consequences to so many support businesses, non-resident hunters, land and game managers would likely create unnecessary hardship should this take place.

This proposal is more about disrupting the current allocation process for the guiding industry and non-resident hunters. Kodiak Island is unique, it is the shining example in Alaska and one of the oldest permit allocations for a big game species that works well for resident and non-resident hunters alike.

Other Considerations:

Address the fee structure for all permits issued by the Department of Fish and Game and require fees be paid whenever a permit of any type is issued to a resident or non-resident. Likely this will have to be approved by the Alaska Legislature however.

Board Members, thank you for serving on the Board of Game, it is very much appreciated!

Tom Kirstein

[REDACTED] Fairbanks, Alaska 99708, Phone: [REDACTED]





PC166

**Submitted by:** Doug Knock

**Organization Name:**

**Community of Residence:** Anchorage, Alaska

**Comment:**

I support trap setbacks from multi-use areas in the Cooper Landing area. We are frequently on the Cooper Landing trails with our dogs. We own a place on Snug Harbor road.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC167

**Submitted by:** Erin Knotek

**Organization Name:**

**Community of Residence:** Cody Wyoming

**Comment:**

I am in support of proposal 145, 149-154 for set backs for trapping. Although my address is listed as Cody Wyoming , I lived in Moose Pass, Alaska for 31 years. I still own property at mile 36 of the Seward Highway. I cannot help but feel my dog Bella is one of many dogs who was a catalyst for this. In 2018, American Kennel Club PNAC MACH2 PACH Terns Isabella Tessa, “Bella” was trapped feet from me on a well traveled trail by Tern Lake. She was a highly trained dog. All those letters before her registered name indicate she was a champion and one at a national level. She was Alaska’s first American Kennel Club agility champion. On a daily walk she was trapped feet from the trail out of trapping season in a. Illegally set trap. I am of the opinion there needs to be set backs so families can go on an outing without the fear of their family pet being trapped. My situation ended well and Bella was released. If it was a conibear trap, she would have been dead long before her 17 years she went into live. It is time for Alaska to update their regulations. It is time to hold trappers responsible and have them regulated more. It is time to realize that it is not responsible to allow trapping feet from a trail. We don’t allow gun discharge within certain ranges of highways and such. Yet, trapping has no such regulations. Please make a change.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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**Submitted by:** Laura Kobelnyk

**Organization Name:**

**Community of Residence:** Cooper Landing, Alaska

**Comment:**

I don't trap nor do I have a dog. I have 4 small kids who "like to run" and we have NEVER had any issues with traps. The only safety problems we have encountered have been with unleashed dogs on the trails and in our yard. Perhaps a more appropriate proposal would be leash laws. To me, this all sounds like dog owners want a green light to let their dogs run loose which is exactly the opposite of "safe trails". I oppose all trap setbacks; traps are not the problem.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Oppose Proposal 56: Oppose Proposal 57: Oppose Proposal 58: Oppose Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Oppose Proposal 62: Oppose Proposal 63: Oppose Proposal 64: Oppose Proposal 65: Oppose Proposal 66: Oppose Proposal 67: Oppose Proposal 68: Oppose Proposal 69: Oppose Proposal 70: Oppose Proposal 71: Oppose Proposal 72: Oppose Proposal 73: Oppose Proposal 74: Oppose Proposal 75: Oppose Proposal 76: Oppose Proposal 77: Oppose Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Oppose Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Oppose Proposal 85: Oppose Proposal 86: Oppose Proposal 87: Oppose Proposal 88: Oppose Proposal 89: Oppose Proposal 90: Oppose Proposal 91: Oppose Proposal 92: Oppose Proposal 93: Oppose Proposal 94: Oppose Proposal 95: Oppose Proposal 96: Oppose Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose Proposal 101: Oppose Proposal 102: Oppose Proposal 103: Oppose Proposal 104: Oppose Proposal 105: Oppose Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Oppose Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 112: Oppose Proposal 113: Oppose Proposal 114: Oppose Proposal 115: Oppose Proposal 116: Oppose Proposal 117: Oppose Proposal 118: Oppose Proposal 119: Oppose Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose Proposal 125: Oppose Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Oppose Proposal 129: Oppose Proposal 130: Oppose Proposal 131: Oppose Proposal 132: Oppose Proposal 133: Oppose Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 140: Oppose Proposal 141: Oppose Proposal 142: Oppose Proposal 143: Oppose Proposal 144: Oppose Proposal 145: Oppose Proposal 146: Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose Proposal 155: Oppose Proposal 156: Oppose Proposal 157: Oppose Proposal 158: Oppose Proposal 159: Oppose Proposal 160: Oppose Proposal 161: Oppose Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Oppose Proposal 165: Oppose Proposal 166: Oppose Proposal 167: Oppose Proposal 168: Oppose Proposal 169: Oppose Proposal 170: Oppose Proposal 171: Oppose Proposal 172: Oppose Proposal 173: Oppose Proposal 174: Oppose Proposal 175: Oppose Proposal 176: Oppose Proposal 177: Oppose Proposal 178: Oppose Proposal 179: Oppose Proposal 180: Oppose Proposal 181: Oppose Proposal 182: Oppose Proposal 183: Oppose Proposal 184: Oppose Proposal 185: Oppose Proposal 186: Oppose Proposal 187: Oppose Proposal 188: Oppose Proposal 200: Oppose Proposal 203: Oppose Proposal 204: Oppose Proposal 205: Oppose Proposal 207: Oppose Proposal 208: Oppose

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# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Kodiak National Wildlife Refuge  
1390 Buskin River Road  
Kodiak, Alaska 99615-6825  
(907) 487-2600



RC 169

27 February 2023

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

Dear Members of the Alaska Board of Game:

The Kodiak National Wildlife Refuge (NWR) appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game during its March 2023 meeting addressing Southcentral Region concerns. We reviewed the proposals pertaining to the Kodiak Area (GMU 8) and offer the following comments.

**Proposal 65 (5 AAC 85.040) – Oppose**

The Aliulik area is an important part of the current registration hunt area (RG480) for Mountain Goat. This proposal, if approved, would decrease the effectiveness of agency management of RG480 where the goal is to prevent the herd from exceeding habitat capacity by decreasing the size of the population via hunter harvest. Results of joint ADF&G-NWR surveys indicate that current regulations have decreased the rate of population increase but further decrease is needed. Because of the uneven distribution of access, some areas of RG480 are seldom hunted while others, such as parts of the Aliulik, receive intensive hunting—an expected and acceptable outcome. Moreover, goats from minimally hunted areas are expected to migrate to, and restock, areas with fewer goats.

**Proposal 66 (5 AAC 85.040) – Oppose**

Under current regulations there is no restriction on archery hunting opportunity in RG480. This proposal, if approved, would decrease the effectiveness of agency management of RG480 where the goal is to prevent the Mountain Goat herd from exceeding habitat capacity by decreasing the size of the population via hunter harvest. Because rifles are the primary hunting tool, current regulations have been successful at decreasing the rate of herd growth, as indicated by results of joint ADF&G-NWR surveys; however, the population is still well above objective level. Establishing a separate archery season would substantially decrease goat harvest and increase rate of herd growth.

**Proposal 68 (5 AAC 85.025) – Support**

The NWR supports the ADF&G's proposal to increase its management control of Feral Reindeer harvest via a registration hunt. However, the NWR does not support the upper limit for a population goal the ADF&G proposed (500 animals) as part of its reasoning for the proposal. Results of surveys conducted by the ADF&G and partnering agencies indicate that the population has not exceeded an estimated 400 animal since the 1990s. This result most likely suggests that habitat is the primary factor limiting herd productivity and size. We therefore recommend the ADF&G to base its goal upon the historic range in variation of herd size (e.g., 300-400 animals).

**Proposal 69 (5 AAC 85.035) – Oppose**

Kodiak Brown Bear is the top management and conservation priority of the NWR and the ADF&G in GMU 8. Establishment of huntable population of Roosevelt Elk on Kodiak Island would have two important adverse effects on bears and their habitat. First, there would be conflict incidents between elk hunters and bears. A fraction of these conflicts would result in bears killed under Defense of Life and Property (DLP) regulations. Such hunter related DLPs are the leading cause of documented non-sport mortality of bears in GMU 8, and the rate of conflict and DLP is substantially higher involving elk hunters (in the Afognak Island vicinity) compared to hunters of Sitka Black-tailed Deer. Second, elk introduced to Kodiak Island would selectively use the same berry-producing shrubs in winter that are selectively used by deer. This selective use consists of grazing elderberry stems to consume the inner live tissue, a process called 'barking', and browsing bud-bearing twigs of blueberry. With elderberry, winter barking kills the leaf and fruit bearing stems, which eliminates fruit production and fruit availability to bears. This specific effect is already a serious concern on Kodiak Island. Results of annual habitat surveys conducted there by the NWR since 2015 attributed winter barking by a robust deer population as the primary factor responsible for a landscape level decrease in the production and availability of elderberry fruit. In conclusion, the magnitude of these adverse effects would increase in correspondence with increases in the size and distribution of an elk population. "Train wreck" for bears and their habitat was how one biologist, an authority of Kodiak brown bear, characterized the potential effects of an elk population established on Kodiak Island.

**Proposal 73 (5 AAC 85.030) – Oppose**

The NWR disagrees with the proposal author's contention that the population of Sitka Black-tailed Deer has substantially decreased warranting reduced bag limits. To the contrary, results of NWR surveys indicated that intensive use of key winter browse (e.g., red elderberry) first documented in 2017 has been sustained through 2022, which suggests that the population has not decreased. Furthermore, it is the consensus view of agency biologists that the bulk of the deer population occurs in areas seldom accessed by hunters, is regulated primarily by severe winters, and is therefore not influenced by changes in hunter harvest rates. Finally, approval of this proposal would unnecessarily limit hunter harvest opportunity.

**Proposal 74 (5 AAC 92.220) – Oppose**

If approved, this proposal would have two unacceptable effects. First, it would curtail opportunity for hunters of Sitka Black-tailed Deer that routinely hunt backcountry, bone out their deer kill, and pack out the entire meat load in a single trip. Second, it would increase incidence of hunter-bear conflict because some hunters would require an additional trip to pack the rest of



their kill from the field. This would increase the odds of a bear claiming the carcass before the hunter arrived at the site, and it would increase the odds of a bear tracking the hunter packing out the second load.

#### **Proposal 77 (5 AAC 92.061) – Support**

The conservation of Kodiak Brown Bears is of primary importance to the refuge, to local people, and to the guides and sportsmen of this island. The ADF&G-led and community-created Kodiak Archipelago Bear Conservation and Management Plan ('Bear Management Plan'; ADF&G 2002) is a measure of that commitment. It has served as a valuable foundation for bear management across the archipelago since its inception, outlining management targets and demanding management action when bear densities fail to meet management targets. In the Southwest region of the island, the area for which this proposal was written, the management target established by the Bear Management Plan is 219 independent bears/1000 km<sup>2a</sup>. The best available data—an aerial bear survey taking place each spring, jointly conducted by the NWR and the ADF&G—has found decreasing bear densities throughout the southwest region (comprised of Sturgeon, Karluk, Southwest survey areas, [figure 1](#)) and recent surveys that yield abundances below management targets. Among Southwest region survey areas, the Sturgeon River survey area contains the most complete and most striking data. Within the Sturgeon River area, estimated bear densities were 101 (84-222 90% CI) independent bears/1000 km<sup>2</sup> in 2019—almost half of the 219 independent animals/1000km<sup>2</sup> required in the management target and 48% lower than the number of bears estimated in 2007 (209 [191-375 90% CI] independent animals/1000km<sup>2</sup>; [figure 2](#)). The 2019 figure was also a corroboration of data previously collected in 2018 that produced the same findings, lending further credibility to the data. Based on our Bear Management Plan, the Sturgeon River area warrants management action. Data from the Karluk and Southwest survey areas are less clear but point estimates suggest management attention may be warranted there as well. Independent data from aerial stream surveys that monitor bears on salmon streams during July and August also suggest that the region has undergone change; the number of bears using many (seven of eight) SW and Karluk-area streams has decreased by over half from peak levels ([figure 3](#)) and the proportion of females with cubs (an indicator of population growth) remains low in the Sturgeon area ([figure 4](#)). Given these multiple forms of data suggesting changes in bear abundance and productivity within the southwest region, we support this proposal to reduce female harvest and commend the ADF&G on its commitment to conservatively manage Kodiak's bears to ensure a sustainable population within the bounds set by the Bear Management Plan.

<sup>a</sup> The Bear Management Plan states that "In an effort to maintain the population at its maximum sustainable yield, the CAC [Citizens Advisory Committee] proposes to manage most of the archipelago at or slightly below (10 percent) the current estimated density, as shown in table 5-2" (page 5-4). These management targets were later updated to reflect new data from Van Daele and Barnes 2010 (table 6), presented here as [figure 5](#).



Figure 1. NWR/ADF&G spring aerial survey areas for bear density, SW region areas (Sturgeon, Karluk, Southwest) highlighted within yellow box.

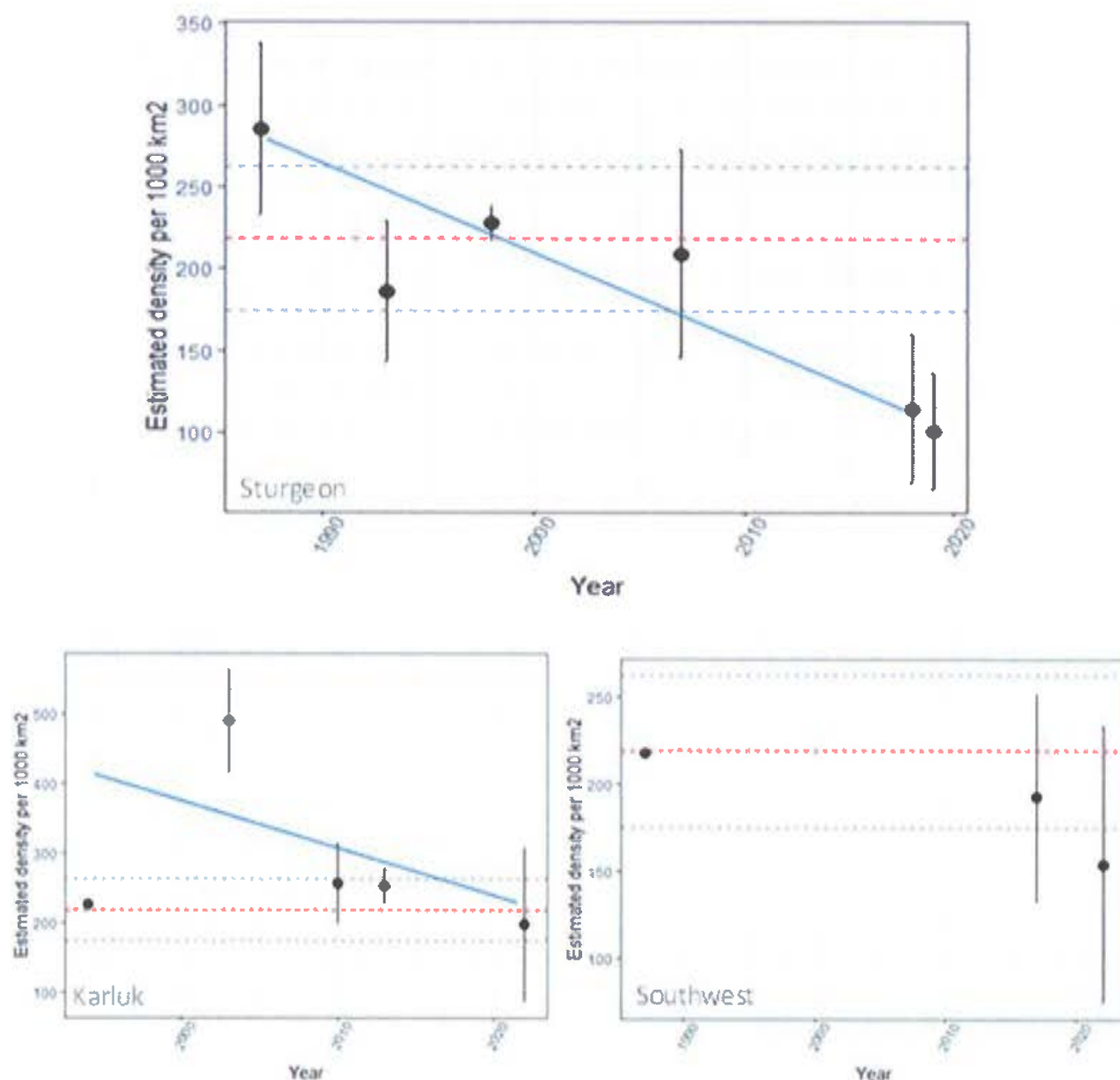


Figure 2. Estimated bear densities (independent bears/1000 km<sup>2</sup>; mean and 90% confidence intervals) for Sturgeon River (upper), Karluk (lower left), and Southwest (lower right) survey areas during spring bear surveys (NWR/ADF&G), 1987-2019, in relation to the management target (red dashed line; from the Bear Management Plan, ADF&G 2002, adapted to updated Van Daele and Barnes 2010). The trend for all areas appears to be decreasing, while the Sturgeon River data are significantly below the management target. More recent estimates for Karluk and Southwest survey areas show wider variation, but also show cause for concern as point estimates are below management targets as well.



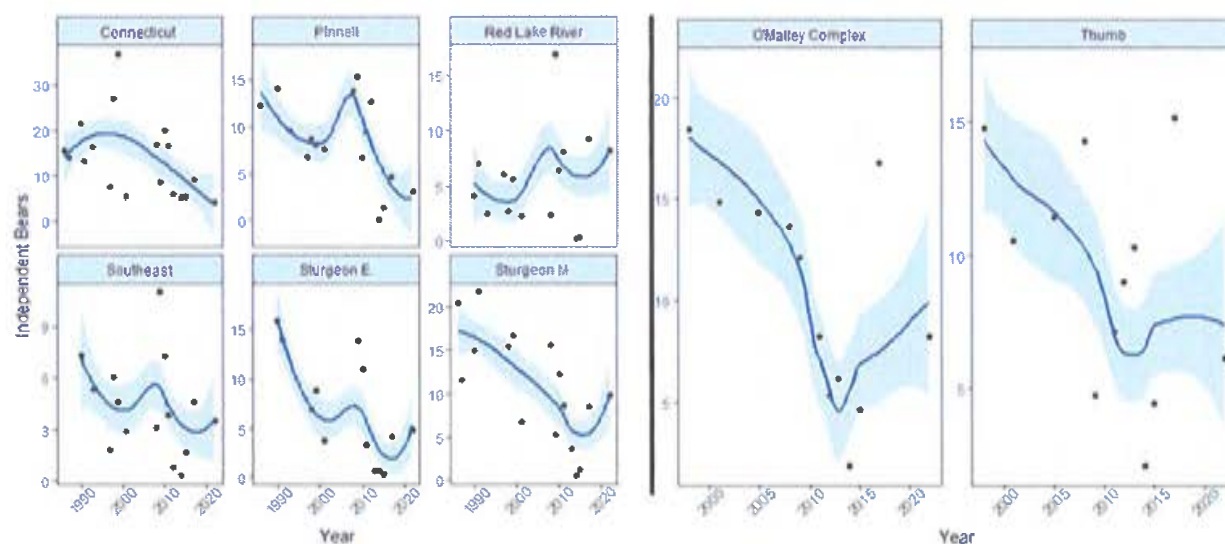


Figure 3. Counts from stream surveys (July/August), 1982-2022. SW area streams (n=6) left, Karluk area streams (n=2) right. Independent bears are all bears excluding cubs. Decreasing trends in bear abundance on most (7/8) salmon streams in the SW and Karluk areas are apparent, with recent numbers reaching less than 50% of historic maxima.

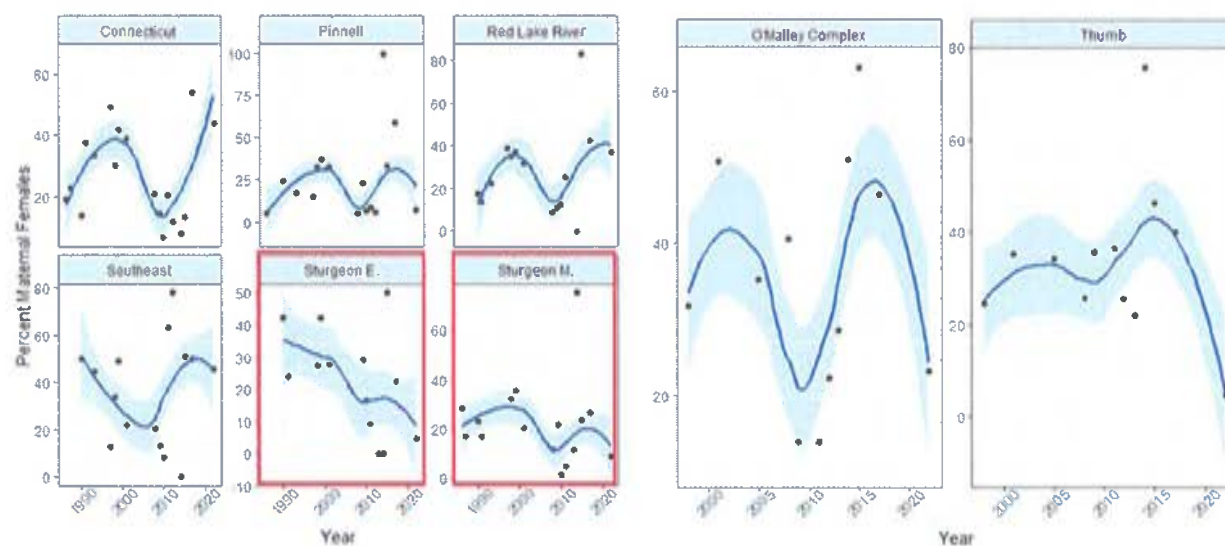


Figure 4. Counts from stream surveys (July/August), 1982-2022. SW area streams (n=6) left, Karluk area streams (n=2) right. Maternal bears are those observed with at least one cub. Sturgeon river area maternal females appear not to have rebounded from a low point around 2010.





Table 6. Estimates of brown bear numbers and density in each management subunit on the Kodiak Archipelago, Alaska, 1995 and 2005 (90% confidence intervals in parentheses).

Bear management subunit	Area (km <sup>2</sup> )	1995 <sup>a</sup>			2005 <sup>b</sup>		
		Density <sup>c</sup>	Independent bears <sup>d</sup>	Total bears <sup>e</sup>	Density <sup>c</sup>	Independent bears <sup>d</sup>	Total bears <sup>e</sup>
Northern Islands	2,281	101 (±25)	231 (±58)	330 (±83)	132 (±33)	300 (±175)	430 (±108)
Northwest Kodiak	2,983	200 (±50)	596 (±149)	808 (±202)	224 (±56)	668 (±167)	908 (±227)
Northeast Kodiak	1,005	63 (±16)	63 (±16)	90 (±23)	70 (±18)	71 (±18)	101 (±25)
East Kodiak	1,738	146 (±30)	253 (±51)	471 (±94)	230 (±46)	400 (±80)	744 (±149)
Southwest Kodiak	3,498	204 (±41)	712 (±142)	1,019 (±204)	219 (±44)	765 (±144)	1,094 (±219)
Adiulik Peninsula	837	219 (±55)	183 (±46)	262 (±66)	208 (±52)	174 (±52)	249 (±62)
TOTAL	12,342	165 (±38)	2,038 (±462)	2,980 (±672)	193 (±42)	2,378 (±519)	3,526 (±790)

a = estimated bear density in 1995 (based on aerial surveys and extrapolation from 1987 - 1994; Barnes et al. 1988, Barnes and Smith 1998).  
b = estimated bear density in 2005 (based on aerial surveys and extrapolation from 1987 - 2005).  
c = estimated density of independent bears per 1,000 km<sup>2</sup>.  
d = estimated number of independent bears (excludes dependent cubs).  
e = estimated number of bears in the harvest subunit (includes dependent cubs and independent bears).

Figure 5. Table 6 from Van Daele and Barnes 2010, which now acts as the updated bear management targets for Kodiak brown bears (2005 data).

### Literature cited

- Alaska Department of Fish and Game. 2002. Kodiak Archipelago Bear Conservation and Management Plan. Alaska Department of Fish and Game, Anchorage, USA.  
<https://www.adfg.alaska.gov/index.cfm?adfg=kodiakbearplan.summary>  
Van Daele L, Barnes VG. 2010. Management of Brown Bear Hunting in Kodiak Island, Alaska. Unpublished report. Alaska Department of Fish and Game.

Thank you for your time to review our comments on these proposals.

Sincerely,

Michael Brady  
Refuge Manager

cc: George Pappas, U.S. Fish and Wildlife Service  
Della Trumble, Kodiak/Aleutians Subsistence Regional Advisory Council  
Paul Chervanek, Kodiak Fish and Game Advisory Committee  
Nathan Svoboda, Alaska Department of Fish and Game



PC170

**Submitted by:** Mary Beth Koster

**Organization Name:**

**Community of Residence:** Seward, Alaska

**Comment:**

I SUPPORT PROPOSALS #145-#154.

Please pass the proposals #145-#154 to require setbacks for trapping. I personally had my dog, Abby, killed in a 330 Conibear trap on January 9, 2022 at Snow River, just outside of Seward, AK.

This setback rule would not have saved her life, only I could have done that, but I can

promote set backs, as they will assist in preventing others from the experiencing the horrific death of their dog the way Abby died as I tried to free her. This is something I hope no one else will ever experience.

Thank you.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC171

**Submitted by:** Mike Carlson

**Organization Name:** Larsen Bay Lodge

**Community of Residence:** Larsen Bay, AK

**Comment:**

Proposal: #73

Position: Oppose

Name and Organization: V. Michael Carlson of Larsen Bay Lodge

Reasoning: I live in "Remainder" Unit 8 (in Larsen Bay, AK) and have hunted in the area for 47 years, since I was 10 years old, both subsistence and commercial. I have not noticed a reduction in deer population that would warrant a reduction in bag limit.

Proposal: #74

Position: Oppose

Name and Organization: V. Michael Carlson of Larsen Bay Lodge

Reasoning: I am a subsistence hunter, transporter and Master Guide on Kodiak Island. I do not think this requirement will reduce wanton waste.

Proposal: #77

Position: Oppose

Name and Organization: V. Michael Carlson of Larsen Bay Lodge

Reasoning: I oppose this proposal because “Southwest” is being defined too broadly. If there is a decline in bear population, it is NOT in areas 16 or 13.

I am a Master Guide and have lived in Guide Use Area 16 (North Karluk River) for over 40 years. In addition to living there, I spend over 160 days per year in the field: both spring and fall bear seasons, fall deer transporting, and summer fishing. I have seen an increase in the brown bear population in this Area over the last 3 years, not a decline. My layman’s theory is that the increase in deer hunting in the Larsen Bay and Uyak Bay areas over the last 3 years has attracted more bears.

I also spend a significant amount of time in Guide Use Area 13 (Karluk Lake) for bear hunts in the fall and fishing in the summer. Additionally, my pilot flies over the area every day in the summer on his way to fish Dog Salmon Creek. This area has always had a very high population of bears, and if anything, we have noticed an increase in population in this area, not a decline. Fall 2022 I saw 60 individual bears in one day.

I am not familiar with the bear populations in other Guide Use Areas, but Guide Use Areas 13 and 16 have high and healthy bear populations such that a “male only” provision is not needed. It is a policy I generally follow with my clients anyway, but an official regulation, with such a severe penalty, is unwarranted. I have passed on many, many opportunities to harvest sows over the years, and will continue to do so aggressively, but this proposal should be denied or limited in geography.

Proposal: #78

Position: Oppose

Name and Organization: V. Michael Carlson of Larsen Bay Lodge

Reasoning: I am a Master Guide in Unit 8. If this proposal is implemented, I request the spring draw be reinstated for non-resident fall brown bear in Unit 8.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 73: Oppose Proposal 74: Oppose Proposal 77: Oppose Proposal 78: Oppose

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**Submitted by:** Michael Larson

**Organization Name:**

**Community of Residence:** Eagle River, AK

**Comment:**

I would like to see more bear hunting opportunities in 14C, specifically brown bears on JBER and within Eagle River Drainages. I do not agree with creating more archery only tags for sheep, a proficient and capable archery hunter has the choice to hunt sheep with a bow and arrow if they choose, no need create special permits extending the season and/or not requiring compliance with the full curl conservation model.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Support Proposal 56: Oppose Proposal 57: Support Proposal 58: Support Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Oppose Proposal 62: Oppose Proposal 63: Support Proposal 64: Oppose Proposal 65: Support Proposal 66: Oppose Proposal 67: Oppose Proposal 68: Oppose Proposal 69: Oppose Proposal 70: Oppose Proposal 71: Oppose Proposal 72: Oppose Proposal 73: Oppose Proposal 74: Oppose Proposal 75: Oppose Proposal 76: Support Proposal 77: Oppose Proposal 78: Oppose Proposal 79: Support Proposal 80: Support Proposal 81: Support Proposal 82: Oppose Proposal 83: Support Proposal 84: Oppose Proposal 85: Oppose Proposal 86: Oppose Proposal 87: Oppose Proposal 88: Oppose Proposal 89: Oppose Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Support Proposal 95: Support Proposal 96: Support Proposal 97: Support Proposal 98: Support Proposal 99: Support Proposal 100: Support Proposal 101: Oppose Proposal 102: Support Proposal 103: Oppose Proposal 104: Oppose Proposal 105: Oppose Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Oppose Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 112: Oppose Proposal 113: Oppose Proposal 114: Oppose Proposal 115: Support Proposal 116: Support Proposal 117: Support Proposal 118: Oppose Proposal 119: Oppose Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose Proposal 125: Oppose Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Oppose Proposal 129: Oppose Proposal 130: Oppose Proposal 131: Oppose Proposal 132: Oppose Proposal 133: Oppose Proposal 134: Support Proposal 135: Support Proposal 136: Support Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 140: Oppose Proposal 141: Support Proposal 142: Support Proposal 143: Oppose Proposal 144: Oppose Proposal 145: Oppose Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Oppose Proposal 156: Oppose Proposal 157: Oppose Proposal 158: Oppose Proposal 159: Support Proposal 160: Oppose Proposal 161: Oppose Proposal 162: Support Proposal 163: Oppose Proposal 164: Oppose Proposal 165: Oppose Proposal 166: Oppose Proposal 167: Oppose Proposal 168: Oppose Proposal 169: Oppose Proposal 170: Oppose Proposal 171: Oppose Proposal 172: Support Proposal 173: Oppose Proposal 174: Oppose Proposal 175: Oppose Proposal 176: Oppose Proposal 177: Oppose Proposal 178: Oppose Proposal 179: Oppose Proposal 180: Oppose Proposal 181: Oppose Proposal 182: Oppose Proposal 183: Oppose Proposal 184: Oppose Proposal 185: Oppose Proposal 186: Oppose Proposal 187: Oppose Proposal 188: Oppose

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PC173

**Submitted by:** Philip Latteier

**Organization Name:**

**Community of Residence:** Eagle River, AK

**Comment:**

I support more archery opportunities

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 67: Support Proposal 71: Support Proposal 72: Support Proposal 82: Oppose Proposal 87: Support  
Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 99: Support Proposal 100: Support  
Proposal 101: Support Proposal 119: Support Proposal 120: Support Proposal 121: Support Proposal 122: Support  
Proposal 123: Support Proposal 124: Support Proposal 125: Support Proposal 126: Support



PC174

**Submitted by:** John LeClair

**Organization Name:**

**Community of Residence:** Indian, Alaska

**Comment:**

Proposal #98-Oppose

I am a member of the Rainbow Valley community and I oppose Proposal #98 which would establish a brown bear hunt in the Rainbow Creek valley. The approximately 160 acres of private property within the valley is owned by the Rainbow Valley Homeowner's Association and there are seventeen homes spread throughout the area. Establishing this hunt would be a hazard to the families living in the valley as well as encourage trespass on private property. Establishing this hunt would also be a hazard to the general public. The public lands within the Rainbow Creek drainage, all part of Chugach State Park, have been closed by state regulation to the use of weapons because they are accessed and well used by the public year-round for recreation. Chugach State Park was established by the legislature to "provide areas for the public display of local wildlife" (AS 41.21.121).

Proposal #103-Oppose

I am also opposed to Proposal #103 which seeks to establish a bear bait hunt in the McHugh Creek drainage for black and brown bear. Attracting bears to food not otherwise available to them naturally would result in bears altering their foraging behavior by seeking food from other human-provided sources, such as the community of Rainbow Valley, one valley to the south of McHugh. The Rainbow Valley community is no stranger to bears and we have peacefully coexisted with them for years in large part by preventing bears from associating us and our homes with food.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 98: Oppose Proposal 103: Oppose



**Submitted by:** Kathryn Lessard

**Organization Name:**

**Community of Residence:** Cooper Landing, AK

**Comment:**

These proposals are designed to severely restrict trapping and allow for unrestrained dogs to run free on our trail systems, roadways, in campgrounds, and developed recreation areas. They fail to demonstrate that trapping is a public safety hazard unlike unrestrained dogs.

Unrestrained dogs are a safety risk for our wildlife, other trail users, and other dogs. There are millions of dog bites and 30-50 human deaths yearly in the US. As a school nurse for 20 years, I have treated quite a few serious dog bites and no trapping injuries. As a grandmother of 5 and a frequent trail user, I frequently encounter loose running dogs uncontrolled by their humans and am concerned for the safety of said children.

People who allow their dogs to run up to 100 yards off trail are not being responsible dog owners. There is no trap set back that will be very effective without a leash law.

I encourage the board to reject these proposals.

Kathryn Lessard

Cooper Landing

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Oppose Proposal 146: Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose



**Submitted by:** Tom Lessard

**Organization Name:**

**Community of Residence:** Cooper Landing, Alaska

**Comment:**

Proposals 148, 149, 150, 151, 152, 153, 154

I have followed the debate concerning Cooper Landing trapping for some years now.

What was originally presented as an attempt to find a home town compromise has grown like the Blob.

Recently Cooper Landing Safe Trails vowed (paraphrasing here) to 'keep pushing, keep the pressure, keep the presence to secure trapping closures in Units 7 and 15, all the way to Homer'; peninsula-wide.

So apparently these demands for closures will never end.

However, there are many Cooper Landing residents who are not so hard-driven against trapping. They just don't want their dogs caught.

To that end, an informal signage program has been in place for maybe 8 years running. The signs address both trappers and dog owners. The intent of the signs is to raise awareness and reduce conflict. The signs are posted in several key locations around Cooper Landing. To my knowledge, zero dogs have been caught in traps wherever the signage exists. Signage is the one thing that all parties seem to agree with. I think the signage has created a workable middle ground.

I also believe large baited/scented Conibears such as 'bucket sets' set low to the ground or on the ground, have no place in the residential areas. However I think large elevated, submerged or under ice Conibears are OK.

About 1 year ago I participated in a BOG committee that addressed trapping closure proposals in the Mat-Su. Both sides agreed that several dog-safe trapping methods should be allowed within 150 ft of certain trails and that all trapping should be allowed beyond 150 ft.

If the Board decides to form another committee to explore this idea further, I am open to participation.

Tom Lessard

Cooper Landing

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*



PC177

**Submitted by:** Yvonne Leutwyler

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I am commenting on proposals 146 and 147 (100 yard setbacks for traps on public-use trails in the Homer area):

I am IN FAVOR of both proposals.

The trails listed in the proposal do have heavy recreational multi-use. I am familiar with them and am using them frequently.

Requiring a 100 yard setback from these trails for traps is a reasonable compromise to prevent dogs from being accidentally caught in traps. It's a general "trail safety" measure to assure best practices for a variety of users. It does NOT limit trapping, but simply add an "easement" on where traps may legally be set along established areas.

Thank you for considering these proposals.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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PC178

**Submitted by:** Eugene Levine

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

I agree with the proposals 145 through 154 to limit trapping around trails and campgrounds in the Homer, Seward and Cooper Landing areas. These areas are heavily used by residents and tourists that contribute a great deal to the economy. I live on Diamond Ridge and have been on the trails that are less than a 1/4 mile from my house when my dog was standing literally less than 3 ft away from when he got caught in a trap. There is no reason for trapping in residential neighborhoods and it could have been my foot caught in the trap instead! And if my horse had been caught in the trap I am sure I would have been thrown from her and perhaps badly injured, less than a 1/4 mile from home.

I consider 100 yd setback from trails and campgrounds for traps to be a minimum and would like to see even more setback, but this would be a good start. There is plenty of room in Alaska for both hunters, trappers, skiers and tourists but we need some regulations.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC179

**Submitted by:** Anna Lewald

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

I support #146 and #147, establishing trapping setbacks for Homer area trails.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 180

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 180

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Jeremy Lewis

Organization (if any) Alaska River Adventures

Signature\*: Jeremy Lewis

Email\*: [REDACTED]

Street Address: [REDACTED]

City\*: Cooper Landing State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.



I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **#145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

#### **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **#148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 181

As a mom and dog owner, safety is my priority. Implementing these setbacks for trapping will give me peace of mind as my family enjoys the Alaskan wilderness!

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Josi Lewis

Organization (if any):

Signature\*: Josi Lewis

Email\*: [REDACTED]

Street Address: [REDACTED]

City\*: Cooper Landing State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.



PC182

**Submitted by:** Jacob Liedman

**Organization Name:**

**Community of Residence:** Eagle River, Alaska

**Comment:**

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 56: Oppose Proposal 57: Support Proposal 58: Support Proposal 90: Support Proposal 98: Support  
Proposal 104: Oppose Proposal 105: Support Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Oppose  
Proposal 109: Oppose Proposal 116: Support Proposal 117: Support Proposal 145: Support Proposal 155: Oppose  
Proposal 156: Oppose Proposal 157: Oppose Proposal 158: Oppose Proposal 159: Support Proposal 161: Support  
Proposal 162: Support Proposal 163: Support Proposal 164: Oppose Proposal 165: Oppose Proposal 166: Oppose  
Proposal 167: Oppose Proposal 168: Oppose Proposal 169: Oppose Proposal 170: Oppose Proposal 172: Oppose

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PC183

**Submitted by:** David Lisi

**Organization Name:**

**Community of Residence:** Cooper Landing, AK

**Comment:**

Commenting on 145, 149-154

I support the setbacks and closures as outlined in these proposals

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support  
Proposal 153: Support Proposal 154: Support

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# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 184

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## Other areas setback proposals:

- ☐ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☐ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 184

OUR DOG DOESN'T RUN LOOSE, BUT WHEN WE TAKE  
A WALK, OR A HIKE, WE WANT TO KNOW THAT  
OUR DOG IS SAFE. THIS IS A REAL FOR FOR US,  
WINTER & SUMMER.

(feel free to add extra pages of comments)

Printed Name (First and last)\*:

DAVID LITTLE

Organization (if any)

Signature\*:

Email\*:

Street Address:

City\*:

COOPER LANDING

State\*:

AK

Zip code:

\*Indicates it must be filled in to be accepted.





PC185

**Submitted by:** Sydney Loomis

**Organization Name:**

**Community of Residence:** Cooper Landing, AK

**Comment:**

I support the buffer so my dogs can be safe.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC186

**Submitted by:** Alexandra Lowber

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I support proposals 146 and 147.

As a dog owner, frequent nordic skier, and responsible hunter, I think the 100 yd boundaries would help keep unnecessary harm from dogs, still allow for trappers to have the access they want/need, and keep the general public safer.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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PC187

**Submitted by:** Carrie Lunardi

**Organization Name:**

**Community of Residence:** Seward, Alaska

**Comment:**

I think traps should be a distance away from highly trafficked areas.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Support Proposal 56: Support Proposal 57: Support

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support

Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC188

**Submitted by:** Mark Luttrell

**Organization Name:**

**Community of Residence:** Seward Alaska

**Comment:**

Board of Game members:

I fully support proposals 145-154 which seek to prevent user conflicts on popular multi use trails, beaches and campgrounds on the Eastern Kenai Peninsula.

Trappers comprise a tiny fraction of Alaskans yet enjoy a near absence of regulation. Dogs suffer horribly, as do their owners, by this laxity. Trappers have long tried to police themselves, teaching others to follow a code of ethics, but a code of ethics is a swell idea but it has no teeth and judging the many dog deaths and maimings, isn't working.

As a non-consumptive users of trails all year long, I want to know that my dog will be safe in popular areas.

Trap setbacks at specific locations are one solution. The Cooper Landing Safe Trails group and Seward and Homer residents have put in years of work defining exactly the locations of these setbacks. It's completely manageable by land management agencies.

These proposals would establish some safety, community cohesion and fairness.

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support

Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



**Submitted by:** Rhonda Lynn

**Organization Name:**

**Community of Residence:** Cooper Landing, AK

**Comment:**

Proposals 145, 147-148 and 154 I support.

Proposals 149-153 I support with amendment. Explanation below.

I support all trapping setbacks in areas where other user groups frequent. I do not believe that trappers should be the only user group to have rights in these areas. Many other user groups frequent these areas and their rights are being ignored. Every user groups rights need to be considered and all should be able to use these areas in alignment with the US Forest Service's Value Statement. It states that Forest Service land is to be managed for "safety in every way: physical, psychological and social".

I also support the amendment of proposals 149-153 by removing the language which says "a 50 yard setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leg hold Marten traps set in boxes". Our Cooper Landing Fish and Game Advisory Committee said that this wording is too confusing and is what prevented them from supporting these proposals.

My family had lived in Alaska since the 50's and we moved to Cooper Landing in 1978 when we bought Gwin's Lodge. Trapping along areas where other user groups frequent has been a problem since then, but it is only getting worse. Many more user groups now travel to Cooper Landing for winter recreation and are using the areas where traps pose a danger. Providing setbacks ensures that trappers rights are upheld and they can continue to trap with very little change to the location of their trap lines. It also ensures that the rights of all others user groups are also being recognized.

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support with Amendment Proposal 150: Support with Amendment Proposal 151: Support with Amendment Proposal 152: Support with Amendment Proposal 153: Support with Amendment Proposal 154: Support

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**Submitted by:** Gary Lyon

**Organization Name:**

**Community of Residence:** Homer

**Comment:**

I am commenting in support of Proposals #146 and #147. I am a lifelong hunter and have run traps in the past. I have also had to rescue my dog from leg hold traps two times, not fun! I think the 100 yard setback is a reasonable regulation for trapping.

In the Homer area outdoor recreation is very important for physical and spiritual well-being. There are many popular groomed and maintained ski and snowshoe trails. That is what they are for. Trappers can trap almost anywhere else using snow machines and can easily avoid the public use trails.

This issue is not going away. Trapping setbacks have a LOT of public support and for good reason. People and families want to feel safe having their dogs along on these public use trails.

Anchorage Borough has successfully instituted similar setbacks. It works for them.

Respectfully,

Gary Lyon

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Proposal 162: Lift hunting restrictions on ptarmigan on the Homer Bench.

I am writing in OPPOSITION to this proposal. The spring hunt for Ptarmigan in the hills above Homer was closed due to the over-harvest and consequent scarcity of these birds. The closure has been beneficial in allowing the population to begin to recover. Recovery is no means complete and relaxing these restrictions would hinder further recovery and be a big setback. Pursuing Ptarmigan on snow machines is not fair chase hunting and will likely wipe them out of this limited range.

I have lived in proximity to Ohlson Mountain and Beaver Creek drainage for 45 years. Ptarmigan were commonly seen here in the late 70's and early 80's. And before that I have been told they were even abundant around here. Now their tracks, much less actual birds are rarely seen.

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Proposal 146: Support Proposal 147: Support Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support  
Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support Proposal 169: Support  
Proposal 170: Support Proposal 171: Support Proposal 172: Support

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**Submitted by:** Dianne MacLean

**Organization Name:**

**Community of Residence:** Soldotna, AK

**Comment:**

Honorable Members,

Proposal 157 (opposed)

I am opposed to shortening any season for beaver anywhere on the Kenai Peninsula. Lawful beaver trapping has been minimal for a number of years, due to unusually low prices for beaver pelts in national and international markets. There may be a variety of reasons for low beaver populations in any given area, including possibly brown bear predation on beaver lodges, but legal trapping activity is not one of them. If area biologists feel that beaver populations can sustain harvest at all, then allowing some portion of the season to take place outside of the seasonal dates for the heaviest ice conditions allows a parent to introduce their child to trapping, perhaps briefly after school. Or, allows persons with less mobility than an athlete, to access and do a little beaver trapping. If beaver populations cannot, in the opinion of State area biologists, sustain this low level of trapping activity, then perhaps the season should indeed be closed until populations improve.

Proposal 160 opposed

I am opposed to the application of Kenai Refuge regulations to beaver trapping on all of the Kenai Peninsula. The Refuge regulations have indeed been successful, mainly at making beaver trapping impractical for all but the unemployed. To walk a mile in, to set 1 trap for 1 beaver, then walk a mile back out, is utterly impractical. The Refuge restricts trapping in this way because Refuges do not want any sort of "for profit" activity on refuge lands. They want trappers to be able to harvest a pelt here, or a pelt there, to satisfy a hobby, but not be able to come out "ahead" in their endeavor. Trappers do not want to see these very counter-productive Refuge regulations applied to non-refuge lands.

Thank You.

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*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

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- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
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- ☐ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 192

I think that the proposed setbacks are a reasonable compromise between trappers and other trail users. Trappers can still proceed, but the buffers offer at least some protection to trail users, including children and pets.

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Teri Mader

Organization (if any):

Signature\*: Teri L. Mader

Email\*: [REDACTED]

Street Address: [REDACTED]

City\*: Cooper Landing State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.





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Comments:



PC 193

I think that trappers would have to agree that traps have the potential to do great harm largely to dogs or children. The problem is that kids wander the woods looking for fun and adventure. Dogs do the same but have the added incentive of finding food, largely through smell. So, with baited traps, the stage is set for an inadvertent run-in with a trap set to catch animals. Traps vary in size but most can cause great injury to an extremity to include fractures, severe lacerations, and extreme pain. Also, a child does not have the strength to remove the trap from the wound area. Therefore, he must wait for help in a very dangerous and extremely stressful situation. My point is that trap setbacks and signs indicating areas of active trapping are essential and reasonable methods of preventing injuries.

(feel free to add extra pages of comments)

Printed Name (First and last)\*: TOM MADER

Organization (if any) \_\_\_\_\_

Signature\*: Thomas Mader

Email\*: \_\_\_\_\_

Street Address \_\_\_\_\_

City\* Cooper Landing State\* AK Zip code: 99572

\*Indicates it must be filled in to be accepted.





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Comments:



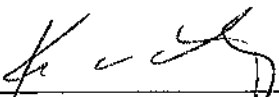
PC 194

I am generally against more regulations but this seems reasonable as many Alaskans travel and hike with their dogs. Dogs should stay with their owners and should not be wandering more than 100yd alone from the trail.

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Keith Mantley

Organization (if any) \_\_\_\_\_

Signature\*: 

Email\*: 

Street Address: 

City\*: Cooper Lndg State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.



**Submitted by:** Lindsay Martin

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I am in support of proposal 146 and 147, to regulate trapping 100 yards from these multiuse trails.

These changes are a great solution for everyone, and sets clear expectations and boundaries. As our population grows, our policies need to continue to evolve to meet changing needs.

Thank you for your time and consideration.

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Proposal 146: Support Proposal 147: Support

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PC196

**Submitted by:** Mildred Martin

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

Re: Proposal 162, Board of Game South central Region Meeting, March 17 – 21, 2023

In 1980, when we returned to permanently live on our property in the hills above Homer, we frequently saw Ptarmigan, especially in the winter, when the snows on Lookout Mountain deepened, they would come to our lands to feed on the willow. I have not seen a Ptarmigan in over 25 years. It is sad.

In 1994, I researched the Mary Lane Trail, the homesteaders used to access these uplands for hunting, and they told me the sky turned white with Ptarmigan in the fall when they hiked up here to hunt, the Ptarmigan came to feed on the low bush blueberries, that still grow up here, but nary a Ptarmigan to be seen now. Except recently my neighbor saw a couple of them, and another got a photo of one.

I was honestly thrilled when I learned that hunting of Ptarmigan had been curtailed, maybe these birds had a chance. But Proposal 162 would reopen it in the spring, just during nesting season, and they would not have a prayer of survival. Today's snowmachines are so fast, Ptarmigan cannot out fly them, they are at best short distance flyers.

I beg of you, please vote no on Proposal 162, and help our Ptarmigan recover.

Thank you.

Sincerely,

Mildfred M. Martin

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Proposal 162: Oppose

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PC197

**Submitted by:** Lisa Maserjian

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I support Proposals 146 and 147. Trapping should not be allowed near public trails. It is not practical to expect all dogs to stay on leashes. Dogs need more exercise than I can give them on a leash. I use e-collars on my dogs to keep them under

control, but they go off trail up to 100 feet. They are not allowed to chase rabbits or moose. Dog owners should not have to worry about their dogs being killed on public trails. Trapping should not be allowed near public trails.

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Proposal 146: Support Proposal 147: Support



PC198

**Submitted by:** David Mastolier

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

Archery seasons across the nation hover at around a 10% success rate, while rifle hunts sit right around 41%.

Competing with rifle hunters is a huge damper on not only the number of archery tags filled but also on the overall enjoyment of the hunt. All of us are seeking a good time out there. Bowhunting is tough enough on its own. For that reason, archery-only seasons give bowhunters an even playing field and give the archery hunters adequate opportunities.

There is also a level of danger that comes from archery hunting with rifle hunters. There are accounts of bowhunters getting hit with bullets during general seasons when rifles are allowed in the field as well as bows. If you're trying to get close with a bow and there is someone up above on a distant ridge with a high-powered rifle pursuing the same animal you are, that could be a potential problem and could lead to disaster.

Putting the two together can cause complications. Bowhunting is all about getting close. It's about putting yourself in the very world where your quarry lives. Staying hidden is key here to not being detected. This can be an issue if there are hunters walking around with rifles at the same time.

Archery-specific seasons or not, there will still be folks that take to the field with their bows during the general season. However, archery-specific seasons mitigate them crossing paths nearly as much, instead of what would happen if all seasons were general ones.

Low harvest rates, better overall experience, and safer. For these reasons, I support the proposals:

67	87	101	119	122	125
71	99	112	120	123	126
72	100	113	121	124	

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Proposal 67: Support Proposal 71: Support Proposal 72: Support Proposal 82: Oppose Proposal 87: Support  
Proposal 99: Support Proposal 100: Support Proposal 101: Support Proposal 112: Support Proposal 113: Support  
Proposal 119: Support Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support  
Proposal 124: Support Proposal 125: Support Proposal 126: Support

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**Submitted by:** Crisi Matthews

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

Items #146 and 147

Being the trails in review are highly used by recreational users and their animals for protection and safety while out in nature I support moving the trapping to one hundred foot setback for both measures so that users may enjoy the trail freely without danger to domestic animals. This still leaves ample room for trapping for those, who use this area for that purpose.

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Dear BOG

I would like to submit this letter to the editor that I wrote regarding Proposal 162. I oppose this proposal for the reasons given below.

Homer News  
Feb. 9, 2023

To the editor

The article in the Jan. 25 issue of the Homer News about the Kenai/Soldotna Fish and Game Advisory Committee meeting on Board of Game proposals was comprehensive but had a very misleading statement in its coverage of Proposal 162 — which seeks to extend the season on ptarmigan by two months in parts of 15C. The article says “the current length and limit for the birds in that area was implemented as a result of low breeding densities in 2014. The population has since rebounded.” This implies that the season was reduced because of one bad year of breeding for 15C ptarmigan, but things have now recovered. That is absolutely not the case. The impetus for a shorter season came when the late [REDACTED] submitted a proposal to the BOG for their 2014-2015 meeting cycle (Proposal 175) to shorten the ptarmigan hunting season in a portion of 15C. He had been advocating for shorter ptarmigan seasons long before the spring of 2014 because he noticed a “significant decline in ptarmigan numbers has occurred in Unit 15C north of Kachemak Bay” over previous years. The ADF&G ptarmigan breeding survey in 2014 validated that very low breeding densities in this area was a long-term trend, not just a one year event.

Furthermore, [REDACTED] said in his proposal, “This decline appears to be associated with ease of access, increased hunting pressure, and limited habitat. The majority of the access and increased hunting pressure is via snowmobile.” It was anticipated that shortening the season to Jan. 31 would cut off the spring snowmobile hunt for ptarmigan when deep snow, warmer temperatures, and better light make it easy for more hunters to cover more miles of ptarmigan habitat. Also, hunting ptarmigan in the spring results in additive mortality (when harvest results in an immediate loss of population). A shorter season would still allow a fall/early winter hunt, result in compensatory mortality (when hunting results in a decline of other causes of mortality, such as winter weather) and better opportunity for ptarmigan populations to recover.

After several years of no spring ptarmigan hunt, it appears as if the ptarmigan in the hills above Homer are not only increasing in population, but actually expanding into other suitable habitat. Those who visit the backcountry above Homer are reporting ptarmigan sightings and tracks where they haven’t been seen for years. The plan has worked. But getting to first base falls short of a score. More time is needed to reestablish resilient ptarmigan populations over a wider spread of suitable habitat. So, the message to the BOG should be don’t fix what isn’t broken. Keeping the status quo should result in greater abundance of ptarmigan in this area, to the benefit of both hunters and bird watchers. Going back to allowing a spring hunt could quickly revert to low populations of ptarmigan and limited opportunity for outdoors people to enjoy our state bird.

George Matz  
Fritz Creek, AK



George Matz

[REDACTED]  
Fritz Creek, AK 99603

Alaska Board of Game  
PO Box 115526  
Juneau, AK 99811-5526

February 28, 2023

Re: BOG Southcentral Region Meeting

**Oppose Proposal 163** which seeks to “Rescind the bag limit restrictions for sea duck hunting in Unit 15C.”

I oppose this proposal because it is based on an outdated understanding of sea duck populations in Kachemak Bay, and it is not a sustainable approach to local waterfowl management. To be sustainable harvest regulations need to be based on what wildlife populations are now, regardless of reasons for change, not how they use to be decades ago.

An example of misunderstanding is the statement in the proposal that says, “There is no documented biological problem indicating low population levels or substantial declines for eiders, harlequin ducks or long-tailed ducks (nor for buffleheads or goldeneyes that are the subject of current discussion by local supporters of restrictions).”

This statement clearly ignores many recent scientific studies that have warned of recent avian population declines in North America, including sea ducks. For example, national attention has been given to a massive study published in *Science* in 2019 entitled *Decline of North American Avifauna* by Rosenberg et al. The study concludes, “Cumulative loss of nearly three billion birds since 1970, across most North American biomes, signals a pervasive and ongoing avifaunal crisis.”

A more recent study building on that is *State of the Birds 2022* which has information specific to sea ducks. Below is information copied from that report.

**State of the Birds 2022**  
**State of the Birds Report Reveals Widespread Losses of Birds in All Habitats—**  
**Except for One**

Published by 33 leading science and conservation organizations [including Ducks Unlimited] and agencies.

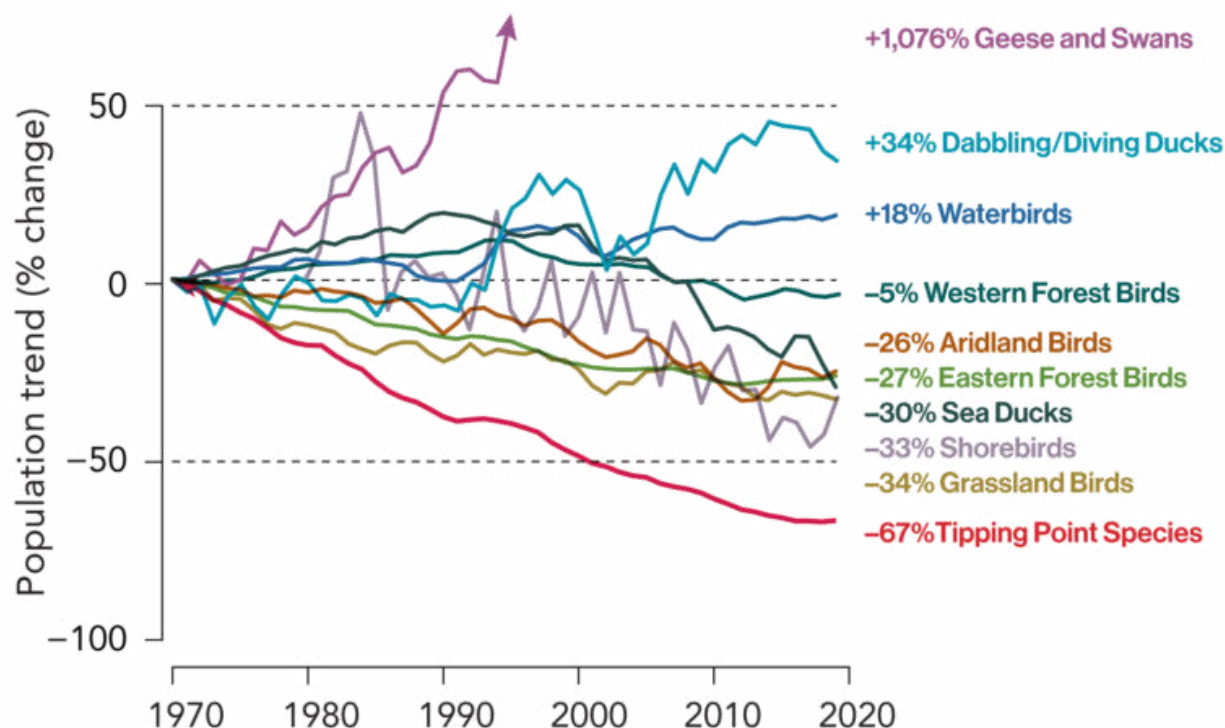
The United States and Canada have lost 3 billion breeding birds since 1970—a loss of 1 in 4 birds, according to research published in *Science* in 2019.





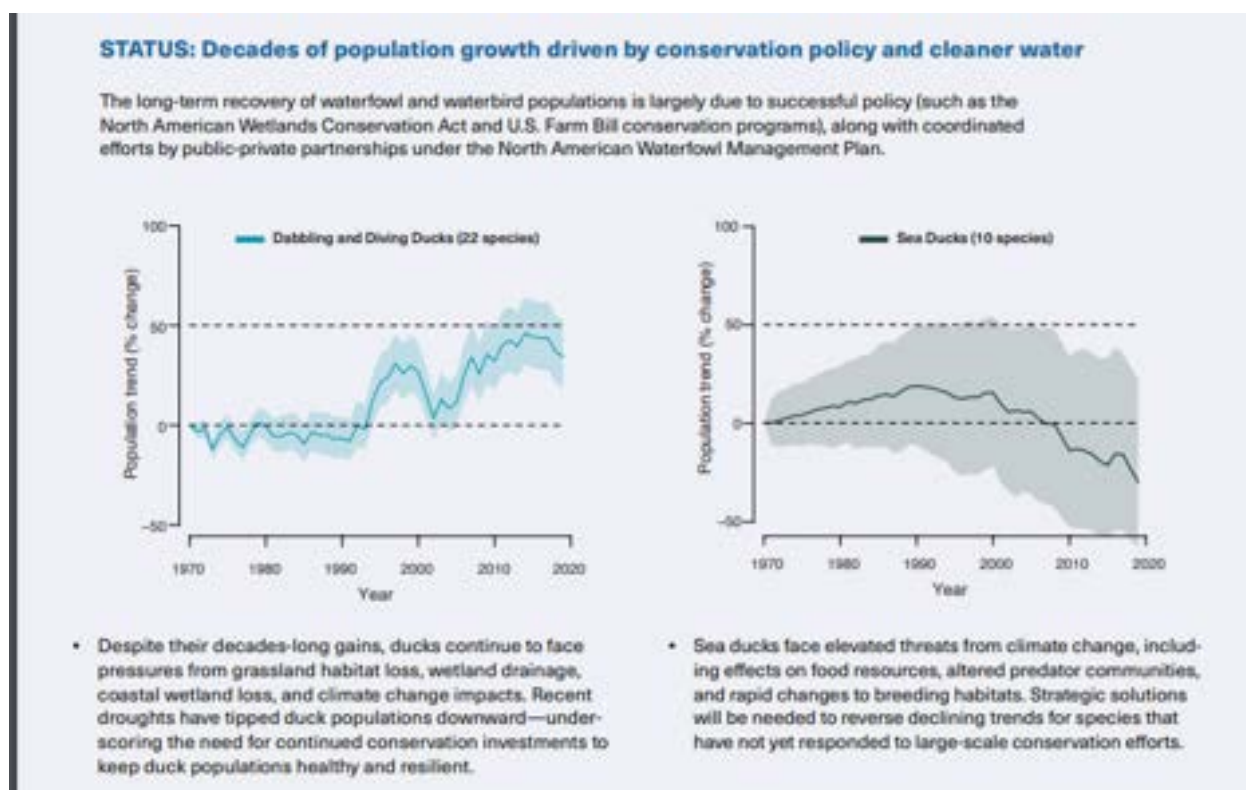
In 50 years, birds have increased overall in wetlands, a singular exception that shows the way forward for saving birds and benefiting people.

Trends for breeding bird species by group or by habitat during 1970–2019, except for the shorebirds trend, which begins in 1980.



Note that there has been a 30% drop in sea duck populations since 1970. Most of that has occurred since 2000.

As illustrated below, sea duck populations have been in decline since the late 1990's, for a variety of reasons. While hunting may be a contributing factor in some cases, other factors also need to be considered. On the other hand, dabbling and diving ducks have seen steady increases starting in the 1990's. The report gives hunters, through their conservation efforts such as protecting wetlands, some of the credit for recovery of dabbling and diving ducks.



The sea duck species included in the chart above includes the following.

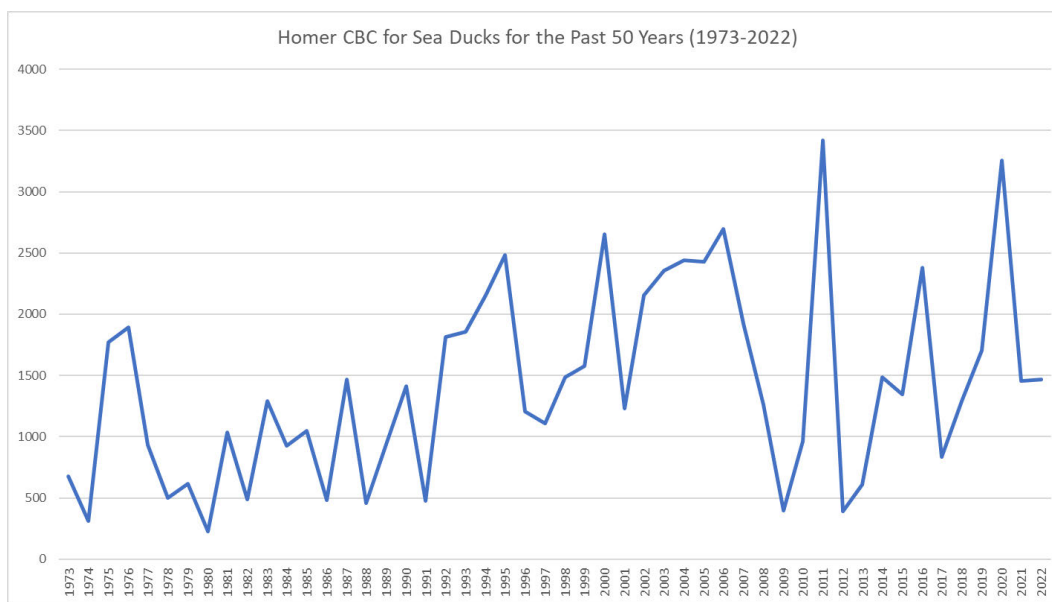
Common Name	Survey	aou	1970 - 2019 Change (%/yr)			3 Generation Change (%/yr)			Tipping Pt	Group
			Trend	2.5% Ci	97.5%Ci	Trend	2.5% Ci	97.5%Ci		
Barrow's Goldeneye	CBC	1520	1.378791	0.668384	2.146883	2.198171	0.115315	4.144726		Sea Ducks
Black Scoter	CBC	1630	-2.46548	-4.34899	-0.52183	-1.99666	-6.64932	3.421374	x	Sea Ducks
Bufflehead	CBC	1530	0.553625	-0.70017	1.817735	1.958054	1.054071	2.912006		Sea Ducks
Common Eider	CBC	1590	-6.3177	-19.287	8.326944	-0.2218	-34.699	51.19761		Sea Ducks
Common Goldeneye	CBC	1510	-0.3054	-1.15867	0.433434	0.352486	-1.38344	2.130719		Sea Ducks
Harlequin Duck	CBC	1550	0.555404	-0.7514	1.885391	0.709002	-3.28695	4.249297		Sea Ducks
King Eider	CBC	1620	-8.27663	-10.0931	-6.34576	-10.2039	-14.5972	-5.88514	x	Sea Ducks
Long-tailed Duck	CBC	1540	-3.63733	-5.47278	-1.74929	-3.71028	-7.32608	0.216084		Sea Ducks
Surf Scoter	CBC	1660	0.187609	-0.22364	0.598399	0.553777	-0.68216	1.756389		Sea Ducks
White-winged Scoter	CBC	1650	-1.25488	-2.83111	0.319645	-0.63442	-5.00216	3.889426		Sea Ducks

Of the ten species listed in the table, six have negative population trends from 1970-2019. All ten species occur in Kachemak Bay, although King Eider are considered rare.

While it should be clear that sea duck populations are in decline in North America, that doesn't necessarily apply to Kachemak Bay. Some verification is needed. But finding datasets in Alaska that go back fifty years or more is rare. However, the Homer Christmas Bird Count (CBC) was started in 1960 and has been done every year since 1973- fifty consecutive years. And as one might expect, waterbirds (including sea ducks) have been prominent species on Homer CBC lists. It should also be noted that several other coastal cities in Alaska have overwintering sea ducks and annual CBC's. Cumulatively, this database could provide a broader statewide perspective of sea duck populations and should be part of ADF&G's analysis.

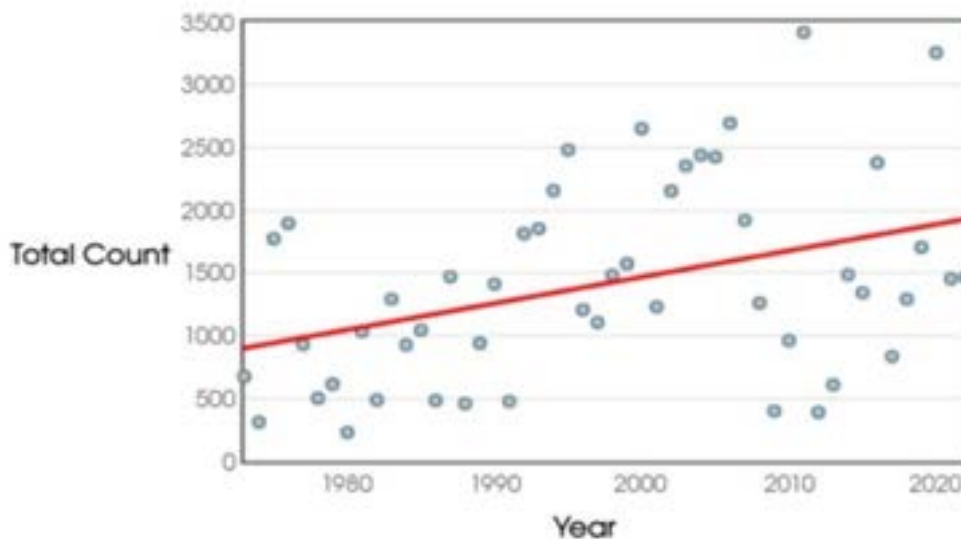


I recently did an analysis of the Homer CBC data to see what trends might be apparent. To get to the bottom-line, the scatter chart below illustrates the total sea duck count for the Homer CBC for the past 50 years. See Appendix A for the text of the full report, Appendix B for spreadsheets, and Appendix C and D for graphs.



As you can see there is a lot of variation from year-to-year, but it appears as if there might be an upward trend for Homer. Illustrated below is a Simple Linear Regression which gives a better sense of the direction.

#### Homer CBC Sea Duck Count for 55 Years (1973-2022)



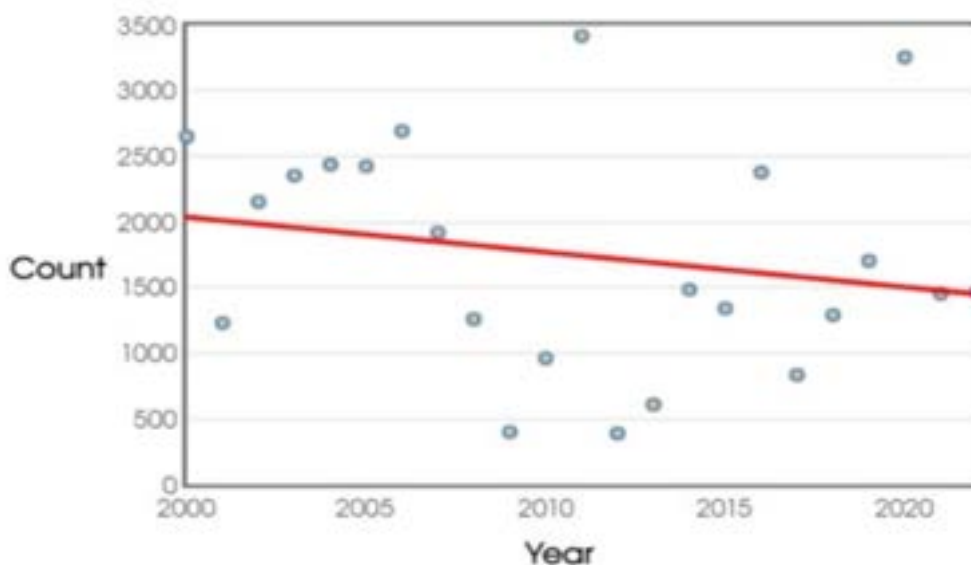
However, as shown in CBC details (<https://www.audubon.org/conservation/science/christmas-bird-count>), in Homer there has also been a steady trend in Homer towards more volunteers. The



number of volunteers went from 1,3, and 4 volunteers the first three years to 34, 35, and 30 volunteers the last three years. Is the upward trend based to some degree on more volunteer participation?

Since 2005 when there were 14 volunteers, the number of volunteers has been in the 20's and 30's, averaging 27.6 for the past 16 years on record. This timeframe happens to roughly coincide with the national decline in sea ducks. So, to minimize the variables in order to test how well sea duck national trends fit the Homer CBC data, it might be better to just compare the two from 2000 on.

**Homer CBC Sea Duck Count 23 Years (2000-2022)**



When that is done, the Homer CBC data closely matches national trends. Going from a count of about 2,000 in the year 2000 to about 1,500 in 2022 is about a 25% decline, slightly less than the national trend for the past 50 years. But if this decline is due in part to breeding habitat loss as stated earlier, I would expect Alaska to be a bit less since what is the national trend because it probably has had less loss of breeding habitat.

Appendix C and D provide a more detailed, species/taxa look at the Homer CBC, both in terms of the last 50 years and since 2000. Contrary to what Proposal 163 claims, the Homer CBC does show declines for several species of sea ducks. During the last 22 years there have been declines with scoters, Long-tailed Ducks, mergansers, Harlequin Duck, and eiders. While the area covered by the Homer CBC includes the Homer Spit, which is a small fraction of Kachemak Bay, there is no reason to expect any substantial difference in sea duck presence between the Homer Spit and other parts of Kachemak Bay.



Proposal 163 disparages “anecdotal or biased claims” and it seems this is meant to apply to databases like the CBC. But CBC data is by no means anecdotal. It has been following essentially the same well tested protocol for the past 122 years. Observations are by established subsections of the counting circle and reviewed by skilled birders before being submitted and entered into the CBC database. This is an open access database that is used by many scientists and avid birders. Audubon, who maintains the database, says that “CBC data have been used in hundreds of analyses, peer-reviewed publications, and government reports over the decades.”

The bottom-line in this discussion is that despite the assertion by Proposal 163 that “The [previous] reductions in bag limits for eiders, harlequin ducks and long-tailed ducks were not based on best available scientific data,” there is solid evidence to the contrary. On national scale the prestigious journal *Science* says otherwise. And on a Kachemak Bay scale, the Homer CBC data for sea ducks seems to reasonably match national data for the past two decades. Also, it shows that there has been a decline with some sea duck species over the last two decades, which generally supports anecdotal observations by astute long-term residents who have been closely watching where they live for many decades and have voiced concern these declines.

To rescind previous sea duck restrictions, as advocated by Proposal 163, would most likely continue the population decline that sea ducks have experienced over the past two decades. That would be unacceptable to most of those who live in the Kachemak Bay area who want to see sea duck populations restored to what they use to be, or as close to that as possible, recognizing that climate change may also be a factor to contend with. This would be to the benefit of sea duck hunters and everyone else.

Sincerely,  
George Matz  
Fritz Creek, AK



## Appendix A

**Kachemak Bay Waterfowl and  
Fifty Years of Homer Christmas Bird Counts**

by  
George Matz

The Christmas Bird Count (CBC), sponsored by the National Audubon Society, is “the longest-running citizen science survey in the world” according to Wikipedia.. The first CBC in 1900 was the inspiration of Frank Chapman who organized 27 volunteer birders to undertake CBCs at 25 sites ranging from cities in the northeastern United States to Toronto, Ontario, to California. The CBC now happens annually in over 20 countries in the western hemisphere. Last year, a pandemic recovery year, there were 2,646 counts with a total number of 76,880 observers comprised of 64,882 in the field and 11,998 at feeders. Birders saw 2,554 species, plus 483 identifiable forms and hybrids and 42,876,395 birds of all species tallied.

The protocol used at the first CBC is essentially the same as what we use now. Between December 14 and January 5, count volunteers follow specified routes through a designated 15-mile (24-km) diameter circle, counting every bird they see or hear over a 24-hour period. These reports are given to a compiler who reviews the data for accuracy and then submits the results to the National Audubon Society who compiles and archives all the results. The longevity of this effort and that a protocol has been consistently followed has created a valuable database for scientific study. Audubon says, “CBC data have been used in hundreds of analyses, peer-reviewed publications, and government reports over the decades.”

The first Homer CBC was in 1960 which used a 15-mile diameter circle with its center in Mud Bay. This circle is still being used. It includes the entire Homer Spit which is all within Homer city limits. However, large portions of this circle include Kachemak Bay waters which are rich in waterbirds, even during the winter because the bay is mostly ice-free (Mud Bay being a frequent exception). Early attempts to bird the waters within the circle by boat were often stymied by winter weather. But rather than have this uncertainty embedded in our count records, use of a boat was discontinued. Now observations of Kachemak Bay waterbirds are mostly done onshore from various spit locations.

Following the inaugural year, Homer CBC's were done in 1962, 1963, 1965, 1971, and then 1973 – 2022, all using the same count circle. Fifty years continuous of data - a rare occurrence for Alaska. Recent years has seen almost an order of magnitude increase in the number of volunteers, thus providing more thorough coverage of the circle area, and perhaps, more sightings than would have been logged if participation were at the level of earlier years. The Homer CBC is now cosponsored by Kachemak Bay Birders and the Alaska Maritime NWR. Dave Erikson, the coordinator/compiler has been involved with the Homer CBC since 1976. Many volunteers have participated for decades. Stability in the coordinator and volunteers helps reduce observer bias. Also, I think long-term support by many citizen science volunteers is more reliable than agency funding.



Given the current concern in the Kachemak Bay area regarding the population status of overwintering sea ducks (including diving ducks), this 50-year Homer CBC dataset can provide valuable insight into long-term population trends. It can also provide a comparison and supplemental data to other sea duck databases, such as the more rigorous ADF&G's Kachemak Bay Wintering Waterfowl Survey. This survey has two components; 1) a near-shore boat-based survey taking several days to cover all the Kachemak Bay shoreline, and 2) is an airplane survey following transects in deeper waters. ADF&G's survey was initiated in 1999, but due to funding limitations is not done every year. There have been only 10 surveys in the last 22 years and scheduling has not been consistent, often with variable gaps.

The attached Excel tables and charts illustrate the trend lines for sea ducks (including diving ducks) that were observed in the Homer Spit area during CBCs over the past 50 years. These tables and charts were derived from an Audubon Christmas Bird Count download for the Homer CBC circle. <https://www.audubon.org/conservation/science/christmas-bird-count>

Sheet 1 for this file has two tables, one being all the waterfowl (geese, swans, and ducks) species included in the Audubon download. The second table has just those species that were observed in at least 50% of the CBC counts. This table doesn't have any geese or swans since these birds rarely occur in Kachemak Bay during midwinter. The ducks include dabblers, divers, and sea ducks. The only dabbler that meets the 50% criteria is the Mallard. But it was not included in further analysis since in winter it is mostly in the Mud Bay area unless that freezes over, in which case the ducks fly to the south side of the bay which is mostly outside the circle. The result is that in warm winters the Homer CBC sees lots of Mallards (one of the top species), but in cold winters there will be few if any. Although ADF&G waterfowl hunting regulations lump diving ducks (Bufflehead, Barrow's Goldeneye, and Common Goldeneye) in with dabblers using the term "general duck", they are considered sea ducks in this analysis.

To simplify matters, Sheet 2 uses the data from Sheet 1 to group these ducks into taxa. For instance, Scoters includes Black, Surf, and White-winged Scoters. This data was then used to generate scatter plots. The scatter plots do a good job of illustrating how variable things may be from year to year, but it is hard to discern whether the population for a taxon is increasing or decreasing. So, below each scatter plot are two charts for each taxon with a simple linear regression analysis. The first chart is for all 50 years and the second chart is from 2000-2022, which coincides with the years when ADF&G did their sea duck surveys. Having two charts illustrates in some cases that the 50-year population trend for a taxon may be increasing, but at a slower rate, or even decreasing, after 2000.

Sheet 3 is the entire Homer CBC download from Audubon which includes all species observed.

In summary, this analysis should provide a better basis for understanding population trends with sea ducks that overwinter on Kachemak Bay. It will also provide better justification for making any changes to the Alaska Waterfowl Hunting Regulations in order to sustain Kachemak Bay populations and opportunity to hunt and observe these beautiful birds.



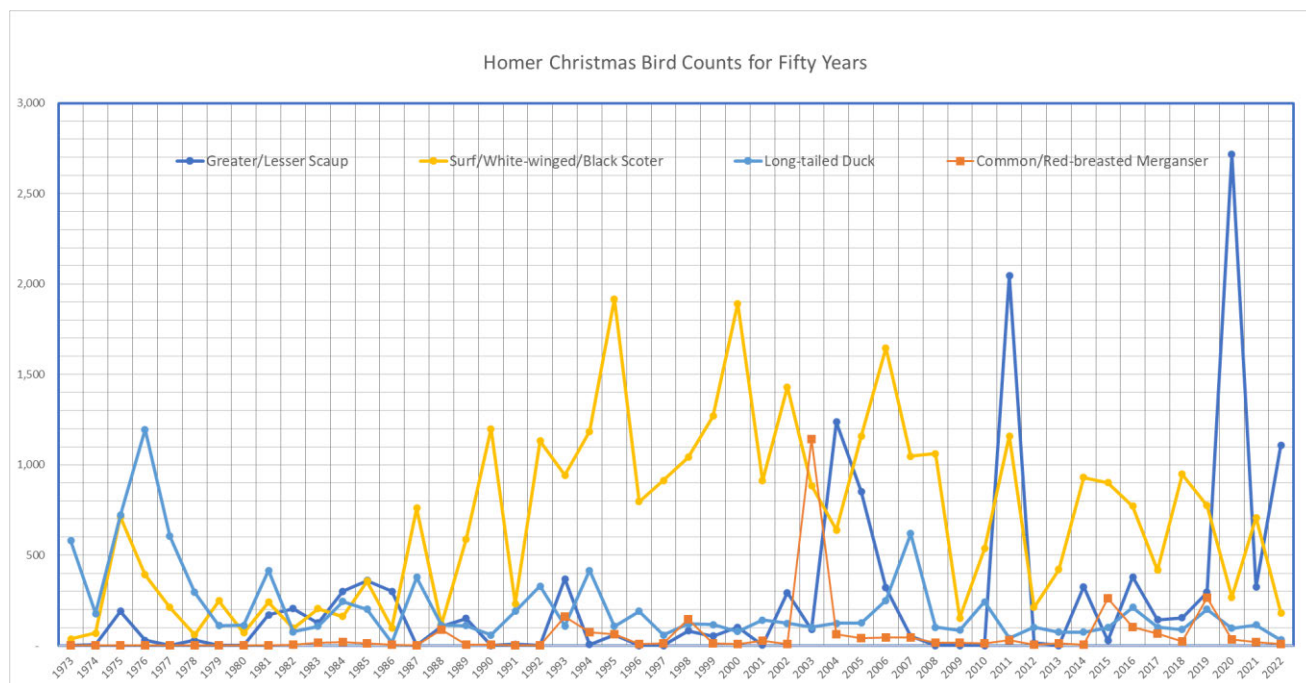
## Appendix B

CBC's End of Year Summary and by Taxon																													
Count Name		Home																											
Count Code		1973	1974	1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000
Malla d'Anas platys hynchos																													
79	74	1974	1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	
4	190	29	4	5			1	1	39	53	9	101	247	220	24	491	21	1	1	21	3	38	1	257	121	82	53		
G eate /Assae /Scap/Aplysia ma [a]fa'n s																													
0	1	190	29	30					130				359	300	1	106	150	8		368	7	61	0						
G eate /Assae /Scap																													
0	1	190	29	0	30	1	1	1	170	204	125	300	359	300	1	106	150	0	8	0	368	7	61	0	0	82	53		
Ste t'e 's de /Polystia sta stelle /																													
8	4	1	29	49					33	8	740	111	39	154	24		26	103	23	180	199	229	204	47	66	20			
Ste t'e 's de /Polystia sta stelle /																													
30	3	13	109	6					33	13	109	6	1	5	16	24	4	36	23	124	38	220	73	96	7	35	17		
Ste t'e 's de /Polystia sta stelle /																													
18	9	44	44	59	0	392	20	107	45	789	112	44	35	178	4	62	126	23	304	237	449	277	142	73	55	17			
He iegu n Duck's on cush st on cush																													
39	33	84	212	24	91	44	11	49	7	31	31	39	12	17	10	16	20	12	36	10	22	19	34	4	19	35			
Wh te w nged Scot (Meian ta ta fana)																													
17	6	44	54	80	52	29	35	30	19	28	35	271	28	33	47	63	504	32	290	689	261	378	30	188	267	97	324		
Black Scot (Meian ta ta fana)																													
14	17	160	306	114	8	58	20	203	75	95	95	47	63	504	32	290	689	156	600	392	818	542	447	97	324				
White Scot (Meian ta ta fana)																													
12	40																80	13	123	193	1	13	85	341					
Sc /Wh te w nged/Black Scot																													
36	69	711	393	212	60	248	72	240	96	205	161	357	99	760	118	589	1188	232	1132	942	1185	1917	796	913	1041	1269			
Sc /Wh te w nged/Black Scot																													
580	178	120	1196	606	294	110	112	415	77	107	245	201	16	377	113	110	59	191	329	1029	415	107	191	58	120	117			
Red hatched/Bacophaga albifrons																													
1	6	26	3						2	2	3	3	8	1															
Common Goldeneye/Bacophaga albifrons																													
3	14	14	20	29	26	16	11	2	37	15	55	28	13	127	17	7	3	5	1	10	24	5	14	15	39	9	34		
Common Goldeneye/Bacophaga albifrons																													
3	2								1	2	4	1	3																
Common/Ba ow's Goldeneye																													
3	17	16	20	29	26	17	13	24	38	18	55	28	13	127	17	7	3	5	1	10	24	5	31	22	39	10	42		
Common/Ba ow's Goldeneye																													
3	17	16	20	29	26	17	13	24	38	18	55	28	13	127	17	7	3	5	1	10	24	5	31	22	39	10	42		
me guse sp./Me gellu/pellu/hodytra/Me gus sp.																													
0	0	0	1	1	0	2	0	2	0	2	4	16	20	13	4	2	89	6	5	2	2	161	7	1	40	1	5	8	
Common/Red hatched Me guse																													
0	0	0	1	1	0	2	0	2	0	2	4	16	20	13	4	2	89	6	5	2	2	161	7	3	63	8	11	146	14
Total																													
676	311	1777	1900	931	507	614	229	1072	541	1301	1028	1292	703	1544	906	961	1411	476	1814	1854	2157	2483	1207	1106	1474	1695			
311	1773	1896	931	502	614	229	1033	488	1292	927	1045	483	1470	469	940	1411	476	1814	1854	2157	2483	1207	1106	1484	1574				
Total less Malla ds																													
2000	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001	1001
Malla d'Anas platys hynchos																													
442	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	121	
G eate /Assae /Scap/Aplysia ma [a]fa'n s																													
101	3	293	90	1237	852	321	51	0	1	2046	15	0	326	28	380	143	155	294	2718	324	1109								
G eate /Assae /Scap																													
3	13	6	3	6	168	247	4	0	1	40	3	1	40	3	1	40	3	1	40	3	1	40	3	1	40	3	1	40	3
Ste t'e 's de /Polystia sta stelle /																													
1	13	6	3	6	168	247	4	0	1	40	3	1	40	3	1	40	3	1	40	3	1	40	3	1	40	3	1	40	3
Ste t'e 's de /Polystia sta stelle /																													
377	18	266	19	6	171	247	4	0	1	40	3	1	40	3	1	40	3	1	40	3	1	40	3	1	40	3	1	40	3
He iegu n Duck's on cush st on cush																													
52	30	13	20	13	20	13	20	13	20	13	20	13	20	13	20	13	20	13	20	13	20	13	20	13	20	13	20	13	
Wh te w nged Scot (Meian ta ta fana)																													
146	77	148	81	323	152	108	82	42	86	26	32	41	30	68	31	24	13	14	23	15	64	3	77	56	3	77	56		
Sc /Wh te w nged/Black Scot																													
483	95	81	139	33	107	80	74	17	2	111	92	22	21	32	14	21	32	14	21	32	14	21	32	14	21	32	14		
Black Scot (Meian ta ta fana)																													
1464	740	1141	657	244	898	1158	600	615	344	615	344	615	344	615	344	615	344	615	344	615	344	615	344	615	344	615	344		
Scote sp./Meian ta ta fana																													
1992	912	1429	885	640	1157	1646	1047	1062	153	536	1159	212	422	929	901	771	418	948	774	267	708	181							
Long ta led Duck/Aythya hynchos																													
79	141	134	101	123	129	250	619	351	85	243	41	161	75	74	100	212	101	89	201	91	114	37	208	6					
Red hatched/Bacophaga albifrons																													
53	29	43	18	59	17	20	20	34	14	12	32	29	13	7	48	30	62	24	13	18	11	18	11	18	11	18	11		
Common Goldeneye/Bacophaga albifrons																													
86	82	8	18	286	46	113	95	14	85	56	113	70	73	44	800	40	28	92	72	222	57	62	22						
Ba ow's Goldeneye/Bacophaga albifrons																													
3	16		11	1	8	2			12	8																			
Common/Ba ow's Goldeneye																													
89	88	8	18	297	47	121	97	2	0	85	68	113	70	83	44	800	41	29	92	76	232	65							
Common/Ba ow's Goldeneye																													
7	15	8	109	64	38	30	23	13	11	23	4	12	5	190	77	27	11	185	7	114	37	208	6						
me guse sp./Me gellu/pellu/hodytra/Me gus sp.																													
2	12	64	24	60	12	15	23	2	16	3	8	1	1	73	26	39	13	26	14	7	12	72	17						
Common/Red hatched Me guse																													
9	27	8	1143	64	17	45	46	16	16	14	31	5	12	7	263	103	66	24	265	33	18	9							
Total																													
3094	1231	2265	2357	6033	5027	2695	1921	1306	410	962	670	389	609	2541	1726	5802	3086	1311	3642	9311	1624	1466	1886	22					
Total less Malla ds																													
2652	1231	2154	2355	2439	2426	2694	1921	1261	400	962	3419	389	609	1486	1343	2380	835	1292	1075	3257	1464	1466	1415	64					
Database fo cha ts																													
Home Chn s Data d Counts fo F Yhea s (1973-2022)																													
1973	0	1974	1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	
G eate /Assae /Scap																													
36	69	711	393	212	60	248	72	240	96	205	161	357	99	760	118	589	1188	232	1132	942	1185	1917	796	913	1041	1269			
Long ta led Duck/Aythya hynchos																													
580	178	120	1196	606	294	110	112	415	77	107	245	201	16	377	113	110	59	191	329	1029	415	107	191	58	120	117			
Red hatched/Bacophaga albifrons																													
1	6	26	3						2	2	3	3	8	1															
Ste t'e 's de /Polystia sta stelle /																													
18	9	44	44	59	0	392	20	107	45	789	112	44	35	178	4	62	126	23	304	237	449	277	142	73	55	17			
He iegu n Duck's on cush st on cush																													
39	33	84	212	24	91	44	11	49	7	31	31	39	12	17	10	16	20	12	36	10	22	19	34	4	19	35			
Wh te w nged Scot (Meian ta ta fana)																													
17	6	44	54	80	52	29	35	30	19	28	35	271	28	33	47	63	504	32	290	689	261	378	30	188	267	97	324		
Black Scot (Meian ta ta fana)																													
14	17	160	306	114	8	58	20	203	75	95	95	47	63	504	32	290	689	156	600	392	818	542	447	97	324				
White Scot (Meian ta ta fana)																													
12	40																80	13	123	193	1	13	85	341					
Sc /Wh te w nged/Black Scot																													
36	69	711	393	212	60	248	72	240	96	205	161	357	99	760	118	589	1188	232	1132	942	1185	1917	796	913	1041	1269			
Sc /Wh te w nged/Black Scot																													
580	178	120	1196	606	294	110	112	415	77	107	245	201	16	377	113	110	59	191	329	1029	415	107	191	58	120	117			
Red hatched/Bacophaga albifrons																													
1	6	26	3						2	2	3	3	8	1															





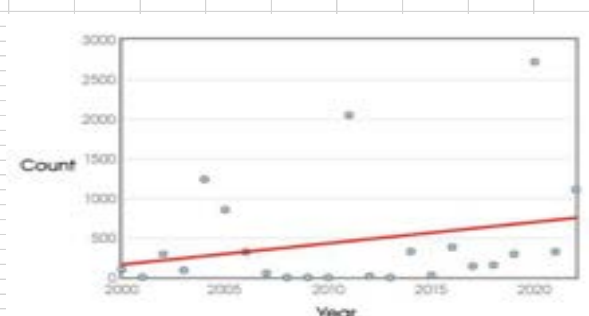
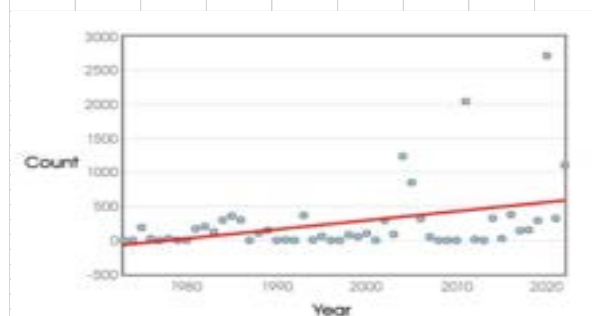
## Appendix C



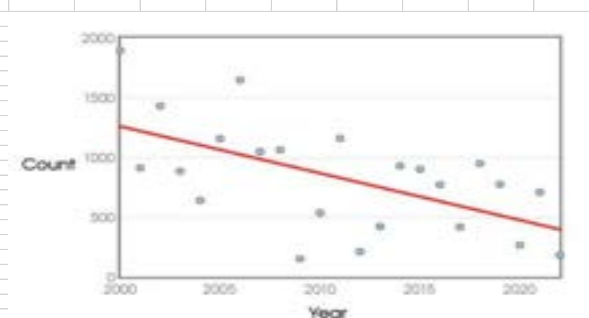
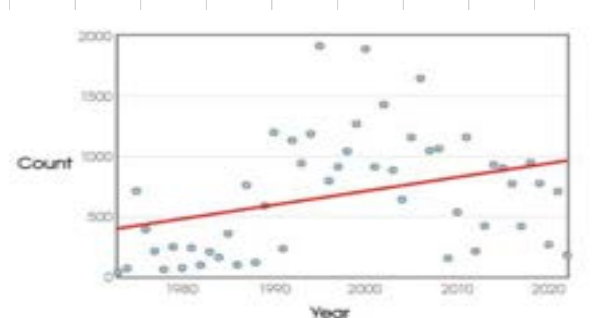


Simple Linear Regression Charts by Species/Taxa

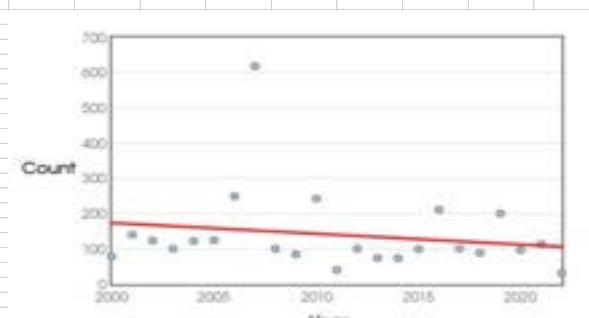
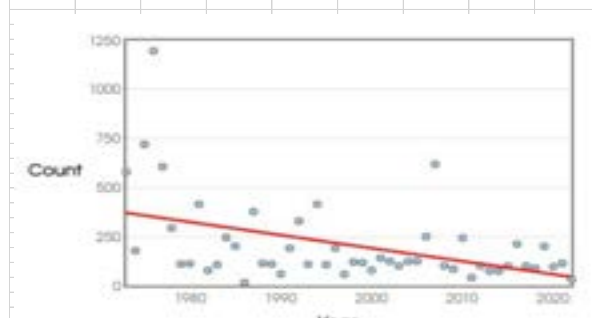
	50 Years	22 Years
Scaup (Greater & Lesser)		



Scoter ( Surf, White-winged, & Black)

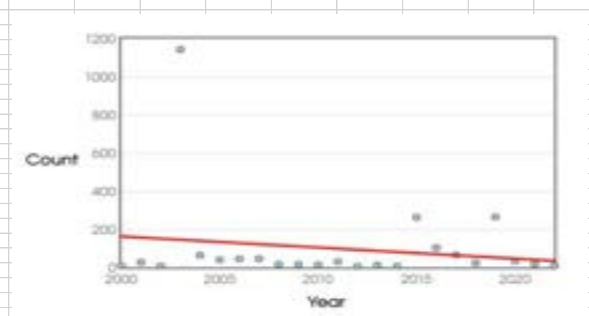
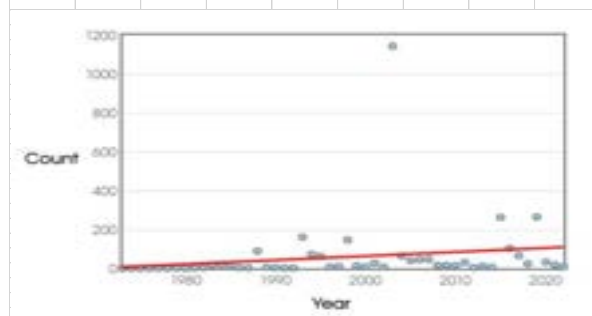


Long-tailed Duck



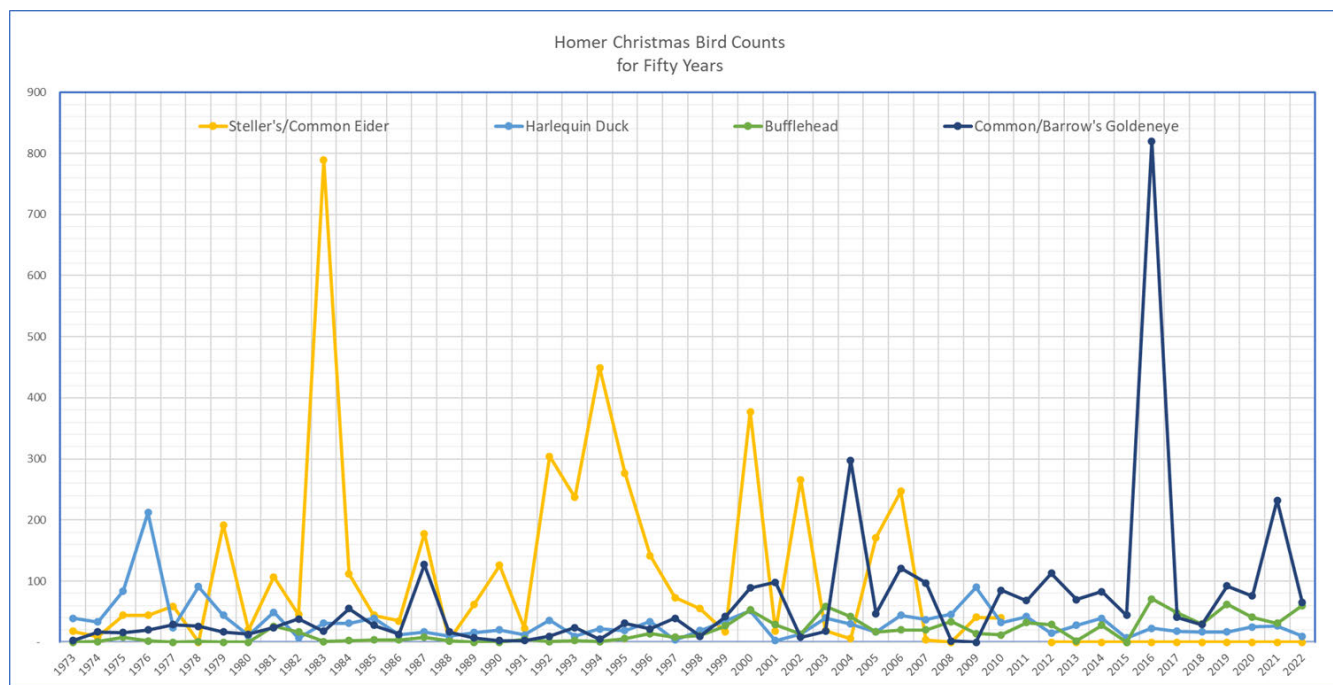
Note: The loss of the fish processing plant from fire in the Homer Harbor in 1998 has probably had an affect on the Long-tailed Duck population that overwinter in Kachemak Bay. The fish waste in th outfall near the entrance to the harbor attracted many ducks including Long-tail Ducks.

Merganser (Common & Red-breasted)



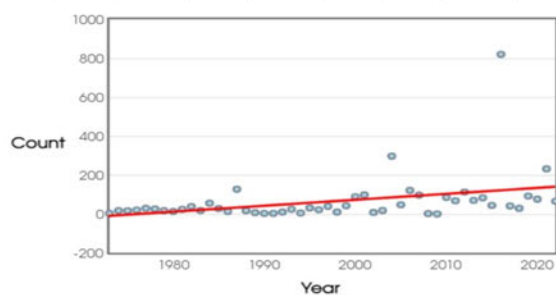


## Appendix D

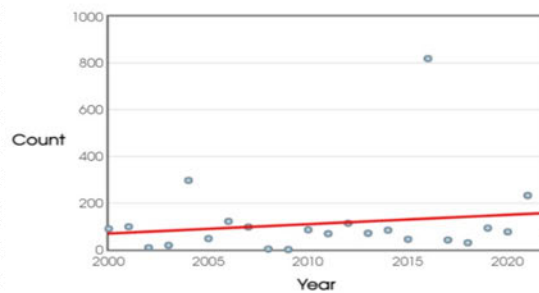




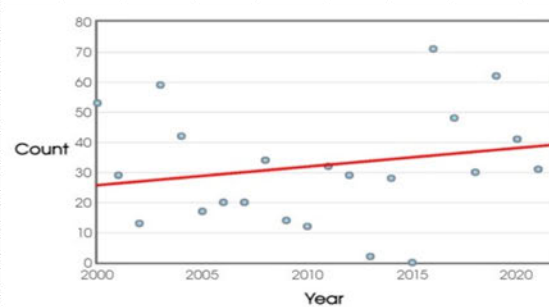
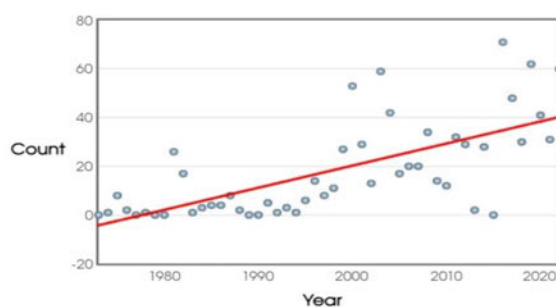
## Simple Linear Regression Charts by Species/Taxa

50 Years  
Goldeneye (Common & Barrow's)

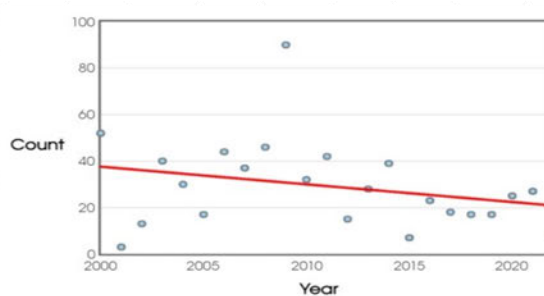
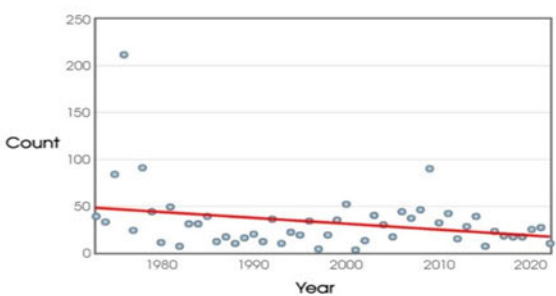
22 Years



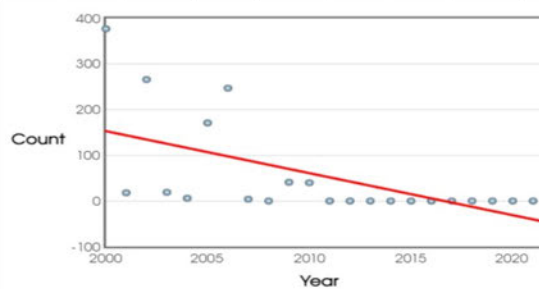
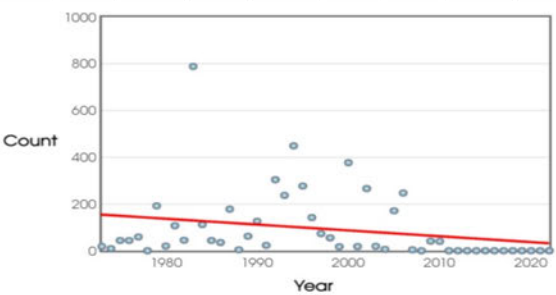
Bufflehead



Harlequin Duck



Eider's (Steller's &amp; Common)





George Matz  
PO Box 15182  
Fritz Creek, AK 99603  
geomatz41@gmail.com

Alaska Board of Game  
PO Box 115526  
Juneau, AK 99811-5526

February 25, 2023

Re: BOG Southcentral Region Meeting

**Proposals 164-170:** proposals regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin & Long-tailed Duck: **SUPPORT**

**Proposal 171:** Direct ADF&G to implement a method for accurate reporting of sea duck harvest for Units 6,7 & 15 **SUPPORT.**

**Proposal 172:** Require mandatory harvest reporting for sea ducks in Kachemak Bay Unit 15C **SUPPORT**

In the interest of obtaining annual information regarding the number of sea ducks that overwinter in Kachemak Bay waters, the Kachemak Bay Birders and the Kachemak Bay Conservation Society jointly sponsored a citizen science project to do a Sea Duck Survey in the nearshore areas on the south side of Kachemak Bay. Our first event on March 3, 2021, followed by another on March 19, 2022, were a success with good participation and observations. Our plan this year was to have the survey earlier (February 25) so that we could submit a report to the BOG before the comment deadline. Unfortunately, despite having an armada of 10 boats and 44 volunteers for this snapshot survey, the weather didn't cooperate, and we had to postpone it until March 11. Not having any new data to submit before the comment deadline, we thought we should at least submit our report for our first two surveys. Attached is that report. Our intent is to use these surveys to support the BOG proposals listed above. Hopefully, we can provide updated information if the weather cooperates with our March 11 survey attempt.



## Kachemak Bay Sea Duck Survey: 2022

Sponsored by  
Kachemak Bay Birders  
Kachemak Bay Conservation Society  
April 2022  
Organized by George Matz

The Kachemak Bay Sea Duck Survey is a DIY project. The need for this project grew out of apprehensions by a number of Kachemak Bay residents when there was new and perhaps excessive (i.e., unsustainable) hunting of sea ducks in the area, particularly on the south side of the Bay, during the 2020 duck hunting season (Sept. 1-Dec. 16). This added to long-held concerns by many seasoned residents that the number of sea ducks that now overwinter in the Kachemak Bay is not what it used to be, and additional hunting pressure will likely drive down local overwintering sea duck populations even further. Over the years, many locals feel that the pattern for Kachemak Bay fish and wildlife resources has been like following stairs down to the basement (sometimes without a light). There are a number of Kachemak Bay fish and wildlife species that now have limited or no harvest, the reasons vary by species.

The apparent consensus that evolved from the discussion that ensued (mostly emails) was that regulations for sea duck harvest in Kachemak Bay must be sustainable based on local overwintering populations, plus include a growth rate that allows populations to recover. While the past may not be replicable, the depleted status quo isn't acceptable. How much recovery is possible probably depends on an ecological assessment to determine, if possible, the current carrying capacity for Kachemak Bay sea ducks. What is also not acceptable to many residents is to manage this resource based just on compliance with Pacific Flyway guidelines. Managing waterfowl on such a large spatial scale can mask local or regional problems (e.g., excessive harvest), particularly for a place like Kachemak Bay that is more accessible than other coastal areas of Alaska.

To determine if current harvest regs are consistent with having a sustainable harvest of Kachemak Bay sea ducks plus a growth rate for population recovery, we need, in addition to trend lines, an approximation of the abundance for sea ducks that overwinter here. Without distinct boundaries, this kind of information can be difficult to discern. However, overwintering sea ducks tend to have strong site fidelity, returning to the same area each fall. Plus, they tend to stay in a limited area. This, plus Kachemak Bay's topography lends itself to a separation of sea duck populations. With good survey coverage, a probable range of abundance for Kachemak Bay sea ducks might be possible. It wouldn't be perfect, but it might be adequate. This, multiplied by accepted sustainable harvest rates, and compared to annual harvest data for Kachemak Bay, could provide a more definitive assessment of the adequacy of current harvest regulations than the status quo. It should also be noted that annual sea duck harvest data is also an issue; relevant, but not part of this specific project.

The investigation last year by an ad hoc committee of Kachemak Bay residents involved in this issue found (some knew) that ADF&G has a Kachemak Bay winter waterfowl survey that started in 1999 in response to questions back then about sea duck populations in Kachemak Bay. Unfortunately, it appears as if monitoring was initiated after the drop in sea duck populations had



already occurred. Trendlines from these surveys became the new norm, but absent any connection to the recent past, which, to be fair, is not well documented.

██████████ Ph.D., ADF&G Waterfowl Biologist described the surveys in a presentation to the Kachemak Bay State Park Citizen Advisory Board on March 10, 2021. He said, “The survey really consists of two components. One is a near-shore boat-based survey, where we had two boats with a team of four to six biologists, who would go down and spend usually 7 to 10 days. They would survey the entire shoreline of Kachemak Bay... trying to get a good count of how many sea ducks are within 200 meters of the shoreline. The other component of this survey, was USFW would send an airplane down with a couple of biologists, and they would spend 1 to 2 days flying transects in the deeper waters across the bay.”

ADF&G has done 10 surveys in March from 1999 to 2019; the years being 1999-2003, 2012-2014, and 2018-2019. Obviously, there hasn't been consistency regarding when the surveys were conducted, which may add another variable to contend with. Because there have been gaps in years covered, these surveys might have missed stochastic events that could have had an impact on Kachemak Bay waterfowl population data and trend lines. For instance, the infamous “blob” from 2014-2016 heated the average temperature of the surface layer of Pacific Ocean waters several degrees Centigrade, which had a devastating impact on marine life and sea duck food sources. For example, millions of birds (mostly pelagic) died of starvation. How the blob might have disrupted the Kachemak Bay sea duck populations and trendlines isn't at all evident in this survey data.

In explaining how ADF&G uses its survey data ██████████ said during his KBSP CAB presentation, “we have to think of these counts as an index of the population. It still tells us something. We can't convert that index to an actual abundance estimate, but because we have those 10 surveys, done over 21 years, we can look at a trend through time - to see if those populations, based on our index counts, are stable, increasing or decreasing.”

Before that, in an email exchange I had with ██████████ he went into further detail about ADF&G surveys and expressed doubts about the value of citizen science projects to ADF&G waterfowl management. These email comments are used with ██████████'s permission.

██████████ said, “Surveying sea ducks is notoriously difficult and I am skeptical that a citizen science effort can produce rigorous data at a spatial scale that is meaningful for management. Your proposed survey design of having 2 boats with trained observers simultaneously but independently count waterfowl near the shoreline on 2-3 occasions in Sadie Cove does seem to be a reasonable low-cost means of getting some estimate of the number of ducks in that Cove. However, as we discussed, surveys of this sort typically suffer from unintended bias due to failure to detect all birds in the surveyed area (leading to a downward bias in the estimate) and/or an upward bias in the estimate due to birds flying in response to the approaching boat and consequently being counted multiple times. Data from these types of surveys are best viewed as an index of abundance (rather than a true estimate of abundance). Given that the presence and direction of bias in the counts is generally unknown (addressing these sources of bias requires far more complex and costly survey designs), data from these surveys is often only meaningful after the surveys have been repeated in the same



fashion for numerous years so that a trend in the index can be observed. Given that you will only be surveying one cove, and only the near-shore zone of that cove, very limited inference can be drawn from the data. It would absolutely be inappropriate to assume that numbers or trends observed in Sadie Cove are representative of sea duck abundance or trends throughout Kachemak Bay and therefore would have little to no direct value for informing waterfowl management in Kachemak Bay or at any larger scale.”

It was pretty clear that if Kachemak Bay residents were to get any data about the population of sea ducks that overwinter in the Kachemak Bay, it would have to be a Do It Yourself (DIY) project. So, we preceded to organize our first Kachemak Bay Winter Sea Duck Survey as a citizen science project. Typically, citizen science projects are to a large degree capitalized by volunteer effort rather than grant or revenue funding, which is what agencies usually depend on. An advantage of citizen science projects is that they often have more long-term reliability than agency projects. The reason is that avid citizen science volunteers are more likely to show up year after year than funding/staff for an agency project. For example, with the Kachemak Bay Shorebird Monitoring Project we now have 13 continuous years of shorebird monitoring following the same protocol and using many of the same dedicated volunteers at the same sites. Having reliable volunteers lessens the possibility that observer bias might creep into the data.

The Kachemak Bay Winter Sea Duck Survey design was based on my experience in organizing the Kachemak Bay Shorebird Monitoring Project since 2009. But first, it’s important to note a significant difference between shorebird monitoring and a sea duck survey. Kachemak Bay is a major spring stopover site for migrating shorebirds. That requires monitoring at least several times in order to capture data through most of the migration. On the other hand, sea ducks overwinter here and their populations after the duck hunting season (Dec. 16) are relatively stable. Consequently, fewer survey sessions are needed to provide meaningful data.

Protocol policies that apply to both the Kachemak Bay shorebird monitoring and sea duck surveys are described below.

1. Nearshore – For the Sea Duck Survey, we decided not to include the offshore parts of Kachemak Bay. The spatial distribution of sea ducks there would require surveying transects, which would be expensive, and we had no funding. Some of the sea ducks more popular with hunters (e.g., goldeneyes and harlequins) are usually found in the more accessible nearshore areas; the fiords and channels that make up much of the south side of the bay. In this nearshore area, transects wouldn’t work. Like shorebirds, the spatial distribution of sea ducks here mostly follows the shoreline. Laying a transect grid over that would likely have few instances where a transect is crossed by an aggregation of ducks. On the other hand, following the shoreline in boats follows the same pattern as the ducks - and the duck hunters. Because of this overlap, the probability of seeing and counting more ducks should be better.
2. Tidal Cycle - As we learned with shorebird monitoring, the number of birds you see and count can depend on what part of the tide cycle is being observed, especially in Kachemak Bay with its extreme tidal range. With shorebirds we determined that the optimal time to view them is when the outgoing tide approaches 15.0 feet (The mean high tide is 17.3 feet). Consequently, all our monitoring sessions start when the outgoing tide is at 15.0 feet. With sea ducks, we surmised that





low tide would probably be optimal. For one, it would concentrate the ducks more and secondly, it would reduce the opportunity for ducks to hide in shoreline vegetation.

3. Simultaneous – Our protocol, for ducks as well as shorebirds, is based on getting a snapshot survey. On March 19 of this year, we had an armada of 9 boats and 37 birders on the water for a couple of hours, giving us intense coverage of most of the prime overwintering habitat for waterfowl on the south side of Kachemak Bay. Having observers simultaneously see most of the birds also reduces error because of double-counts or movement by birds. This kind of coverage is something a citizen science project can do with a lot of volunteers, but ADF&G couldn't afford using staff. As a result, I think we got a good snapshot of the ducks on the south side of Kachemak Bay after the hunting season but before spring migration.

4. Observer Bias - To get a handle on whether observer bias is an issue, we replicated observations in Tutka Bay, Sadie Cove, and Hesketh, Yukon and Cohen Islands by having two boats in tandem cover the same route, but from opposite sides. One boat would go up one side, meet the boat from the other side, and then crossover and each return on the others side to the starting point. This means that each boat would be looking at the same route, but at a different time.

5. Teams – With shorebird monitoring, we assign teams to specific sites, each site having its own habitat. Having small teams of observers increases the chance of spotting birds as well as proper ID and count. With sea ducks, each open boat had 3-5 passengers, allowing us to cover both sides of the boat.

6. Photos – With both shorebirds as well as sea duck observing, we put an emphasis on each team having at least one good camera (cell phones won't do) to photograph questionable birds. On the Sea Duck Survey, I found that my photos with a 600 mm lens and cropped, gave me an image that was much better than I had with binoculars. Plus, the image didn't fly away. This helped clarify some uncertainties, like the color of the bill for those female goldeneyes.

7. eBird – With shorebirds and sea ducks, checklists are kept on eBird. The cell phone app for eBird provides a running tally, reducing counting errors due to arithmetic. Also, eBird checklists can be easily shared with others and provide time of travel, distance, and a GPS track.

Below, is most of the email that went out to those who participated in the Sea Duck Survey, going over the plan once more. This email should be useful for the next survey.

To: Sea Duck Survey volunteers  
From: George Matz  
Re: March 19

It looks like this year's Sea Duck Survey is going to be a success. We are maxed out on boats and birders. We have 9 boats and 36 birders/photographers. We will have coverage of the nearshore areas of the south side of Kachemak Bay from Glacier Spit to Jakolof Bay. As mentioned before, we are not surveying the open water areas of the bay. However, if someone not on the survey with a scope would take a look at ducks from the spit on Saturday morning,



that could be useful data. Attached is the current and (possibly) last roster. There have been a couple last minute changes.

The Underground Weather forecast looks good. Right now, they are forecasting that on Saturday at 10:00 am the skies should be partly cloudy, the temperature should be 31 degrees, and winds out of the NNE at 3 mph. By afternoon, the temperature will warm up to the upper 30's with skies and wind about the same.

Here is the plan.

1. Birders and boats meet at the Homer Boat harbor at the Ramp #2 about 8:30 am. Here we will match up boats and birders. We will meet up with [REDACTED]'s boat at Eldred Passage.
2. We should leave the harbor by 9:00 and arrive at the starting point for surveys. There will be a -1.7 low tide at 10:07. As mentioned before, a low tide should give us optimal exposure to waterfowl.
3. Routes and boat assignments. To optimize results, routes are aligned to match concentrations of ducks (diving as well as dabblers) in narrow waterways (fjords and channels). Route, captains, and boats are as follows.

#### **Sadie Cove**

1. [REDACTED] - [REDACTED]'s boat. Go up north shore.
2. [REDACTED] - Silver Wake. Go up south shore

Start at Eldred Passage and follow the shoreline. At the head of bay, cross-over and down the other side back to Eldred Passage. Start a new report for the other side so we can make comparisons. You may consider each boat having a report just for the head of the bay if there are a lot of ducks there.

#### **Tutka Bay**

1. [REDACTED] – Adelante. Go up north shore.
2. [REDACTED] – Orca. Go up south shore.

Start at Eldred Passage and follow the shoreline. At the head of bay, cross-over and down the other side back to Eldred Passage. Start a new report for the other side so we can make comparisons. You may consider each boat having a report just for the head of the bay if there are a lot of ducks there.

#### **Little Tutka Bay**

1. [REDACTED] – Skookum

Because Little Tutka Bay is not accessible by boat at negative tides, this team will walk the beach to survey ducks and then, about 2-3 pm, they will survey Little Tutka Bay again but by boat. This double survey will give us some information about movement of waterfowl with the tides.

#### **Jakolof and Kasitsna Bays**

1. [REDACTED] – Otter Woman.



Starting at Murphy Spit, follow the shoreline of Kasitsna Bay and then Jakolof Bay.

### Islands (Cohen, Yukon, and Hesketh)

1. [REDACTED] - Hesketh Isle
2. [REDACTED] - x .

Starting at Cohen Island, [REDACTED]'s boat cruises along the inner shore of the islands and [REDACTED]'s boat cruises the outer shore. Switch over at the south end of Hesketh Island and return to starting point.

### Glacier Spit to China Poot Bay entrance

1. [REDACTED] x .

Start at Glacier Spit at low tide (where ducks feed) and follow shoreline to Halibut Cove, but don't enter, and to the mouth of China Poot Bay.

4. Each boat has a team that includes the captain, at least one birder, and a photographer.

5. Observations. While the intent is to survey all waterfowl (diving and dabbling ducks) we should also take note of any other bird species we see.

6. Recording data. Decide at the start who will be the scribe who writes down the species seen and counts. My recommendation is to record data with a cell phone that has eBird and enough battery to be kept on the duration of the survey. Each of the routes has an existing eBird hotspot. The eBird app will not only list species most likely seen in the area but allows a running tally of the count by species. It will also give you a GPS track of where you have been that include time spent on the trip and distance. If there are ID questions, you can enter a photo on Merlin (a Cornell app). And it will either give the species or a short list. I used Merlin a lot on a recent birding trip to Costa Rica and was amazed at how accurate it was. If you record your data on eBird, please share your list with me. Use KachemakBay (capitals and no space) as my username, which is the name of the account I have for Kachemak Bay Birders data. You can also use my email address which is [REDACTED].

7. The photographer should try to get good ID shots of each species you see. Up to 10 MB of photos per species can be added to your eBird list. To do this you have to first submit the list and then reopen the list and hit the media button, which will give you your list and allow you to link to the file you want to add. Also, try to get shots of total flocks to verify your counting skills. Landscape photos would be useful to illustrate habitat and conditions, such as weather. A photo of the team and action shots of people birding would be useful, but no selfies. If we have some good photos, I intend to add them to the report that will be written up afterward.

Below is the list of participants.

### Sea Duck Survey - 2

Boat	Name	Email	Captain	Birder	Photos
1.	[REDACTED]	[REDACTED]	x		
Sadie Cove	[REDACTED]	[REDACTED]		x	



					X
2. Silver Wake			X		
Sadie Cove					X
				X	
				X	
3. Adelante			X		
Tutka Bay				X	X
				X	X
				X	
4. Orca			X		
Tutka Bay				X	X
				X	X
				X	
				X	
5. Skookum			X		
Little Tutka				X	
				X	
					X
6. Otter Woman			X		
Jakolof, Kasitsna					X
				X	
	Student				
	Student				
	Student				
7. Hesketh Isle			X		
Islands				X	
				X	
				X	
8.			X	X	
Islands				X	
					X
9.			X		
Halibut Cove				X	
				X	
				X	
					X

## Survey Data

Attached is the 2022 survey data on Excel spreadsheets. The spreadsheets have the data that was entered in eBird checklists by each of the nine teams (boats) that participated in the survey. This includes the bird species and count for each team as well as trip details (time, distance, and with some reports a GPS track of the route).

The spreadsheets show a good match for the three routes where we had two boats in tandem. For instance, [REDACTED]'s boat, which did Sadie Cove, saw 1,100 ducks and a total of 1,381 individual



birds of all species. [REDACTED]'s boat, which did the same route, counted 1,075 ducks and 1,161 individual birds. [REDACTED]'s count would have been even closer if she had included counting crows. There doesn't appear to be much of an observers bias or movement by the ducks in this survey data.

A summary spreadsheet gives the total number of waterfowl seen by each team. With the exception of the Glacier Spit to China Poot Bay route (which was not done last year) the total count for all waterfowl this year was 3,496. The total waterfowl count for last year was 3,623.5 (a half duck is due to using the average between two boats doing the same route). The total waterfowl count for the Glacier Spit to China Poot Bay route was 765, increasing the overall total for this year to 4,261.

This spreadsheet also has total count by species. Barrow's Goldeneye had the highest count this year which was 1,984.5 including the Glacier Spit to China Poot Bay route. The observers there counted only 6 Barrow's Goldeneye, but 453 Common/Barrow's Goldeneye. Excluding the Glacier Spit to China Poot Bay route, to allow direct comparison with last year, the Barrow's Goldeneye count for this year was 1,978.5. Last year the count was 1,419. Here again, the uncertainty between Barrow's and Common Goldeneye muddles thing a bit. If all the goldeneye are lumped into one count, the goldeneye count for this year would be 2,028 and the count for last year was 1,729. Although it seems most likely that there would be an increase in this year over last, because of reduced hunting pressure, given the uncertainty between Barrow's and Common counts, there doesn't appear to be any certain change.

The duck with the second highest count, both this year and last year was the Harlequin Duck. Last year the count was 424.5. This year, excluding the Glacier Spit to China Poot Bay count, it was 470. As with goldeneyes, an increase from past year would seem likely given the reduced hunting pressure this year.

With all species, it is obvious that more data will better the understanding of the status of sea ducks in Kachemak Bay. Based on the volunteer enthusiasm we experienced this year, continuing the Kachemak Bay Sea Duck Survey seems very likely. Furthermore, the snapshot survey data we have seems to be more relevant to Kachemak Bay than Pacific Flyway data and could prove to be more than an index. It might be useful for getting at least a rough approximation of what amounts to a sustainable harvest of sea ducks that includes recovery based on what sea duck population Kachemak Bay is capable of. How this approximation might lineup with bag limits etc. would necessitate having local harvest data, which doesn't currently. But that is a separate issue, though relevant, from organizing sea duck surveys.

While ADF&G has stated its skepticism "that a citizen science effort can produce rigorous data at a spatial scale that is meaningful for management", it might want to reconsider. For one, is there a difference between what ADF&G and local residents consider as a definition of meaningful spatial scale? Are we talking the same language? Also, as has been demonstrated, an organized citizen science blitz can attract enough volunteers to undertake a snapshot survey for a significant portion of Kachemak Bay nearshore areas that have high overwintering concentrations of sea ducks. Since ADF&G probably couldn't commit enough staff to do a snapshot survey of this size, maybe it should think about collaborating with those who can. This





Kachemak Bay 2022 Sea Duck Survey									
Sheet 11 total Count									
Sheet 25 summary									
Saturday 3/19/2022									
Tides: Low side of -1.7 ft. at 10:07 am.									
Weather based on NOAA Homer Airport reports ( <a href="http://w1.weather.gov/obhistory/PAHQ.html">http://w1.weather.gov/obhistory/PAHQ.html</a> )									
9:00 am: Clear, winds E at 3 mph, temp. at 25° F									
1:00 pm: Clear, winds E at 3 mph, temp. at 38° F									
For more details (such as GPS trackings, photos, etc.) see eBird checklists which are given at the bottom of each report.									
Sadie Cove									
Scott's Boat		Monica's Boat							
SW Side		NE Side		SW Side					
Time - start		9:40 11:25		9:29 12:13					
Time observing		1h. 10 m. 1h. 24 m.		2h. 7 m.					
Distance - miles		6.8 6.8		7.0 7.0					
# of Observers		4 4		3 3					
Species		Total		Total		Average			
Mallard		82 82		100 100		91.0			
Harlequin Duck		43 82 125		39 22 61		93.0			
Surf Scoter		52 7 59		13 57 70		64.5			
White-winged Scoter		5 5		-		2.5			
Bufflehead		3 3		-		1.5			
Barrow's Goldeneye		572 182 754		306 462 768		761.0			
Common Merganser		26 8 34		37 39 76		55.0			
Red-breasted Merganser		25 12 37		-		18.5			
Common/Red-breasted Merganser		1 1		-		0.5			
Subtotal		809 291 1,100		395 680 1,075		1,087.5			
Horned Grebe		2 4 6		-					
Common Murre		11 2 13		-					
Pigeon Guillemot		8 4 12		12 12					
Marbled Murrelet		3 1 4		-					
Black-legged Kittiwake		1 1 2		-					
Short-billed Gull		22 3 25		-					
Glaucous-winged Gull		13 9 22		33 33					
gull sp.				7 7					
Common Loon		17 17		3 5 8					
Pelagic Cormorant		13 13 26		9 11 20					
Bald Eagle		9 11 20		1 5 6					
Belted Kingfisher		1 1		-					
Black-billed Magpie		4 1 5		-					
American Crow		40 88 128		-					
Subtotal		144 137 281		20 66 86					
Total Birds		953 428 1,381		415 746 1,161					
eBird Checklists:		<a href="https://ebird.org/checklist/5105193060">https://ebird.org/checklist/5105193060</a> <a href="https://ebird.org/checklist/5105235994">https://ebird.org/checklist/5105235994</a>		<a href="https://ebird.org/checklist/5105406101">https://ebird.org/checklist/5105406101</a> <a href="https://ebird.org/checklist/5105388454">https://ebird.org/checklist/5105388454</a>					
Tutka Bay									
Dave's Boat		Curt's Boat							
NE Side		Head Bay		SW Side		Head Bay		NE Side	
Time - start		9:30 11:31		9:18 12:10		12:19			
Time observing		2 h. 55 m. 1 h. 38 m.		2 h. 48 m. 18 m.		1 h. 30 m.			
Distance - miles		8.7 1.9 8.5		9.7 0.3 9.4					
# of Observers		4 4 4		4 4 4					
Species		Total		Total		Average			
Harlequin Duck		78 83 161		34 31 65		113.0			
Surf Scoter		3 20 23		29 4 33		28.0			
White-winged Scoter				1 1		0.5			
Long-tailed Duck		1 1				0.5			
Bufflehead		1 1				0.5			
Common Goldeneye		48 48				24.0			
Barrow's Goldeneye		125 185 402 712		620 125 260 1005		858.5			
Common/Barrow's Goldeneye		13 13				6.5			
Common Merganser		38 4 13 55		12 4 16		35.5			
Red-breasted Merganser		4 2 1 7		20 4 24		15.5			
Common/Red-breasted Merganser		2 2				1.0			
Subtotal		298 205 520 1,023		715 125 304 1144		1,083.5			
Horned Grebe		2 2		6 5 11					
Red-necked Grebe		5 5							
Common Murre		1 1							
Pigeon Guillemot		4 4		13 7 20					
Marbled Murrelet		2 2 4		2 2 2					
Short-billed Gull		3 1 1		2 2 2					
Glaucous-winged Gull		3 6 9 9		5 5 5					
Common Loon		20 9 29		13 7 20					
Pelagic Cormorant		14 6 12 32		10 18 28					
Bald Eagle		7 6 13		14 10 24					
Belted Kingfisher		1 1							
Black-billed Magpie		2 7 9							
American Crow		84 75 159		26 95 121					
Subtotal		144 87 38 269		87 95 52 234					
Total Birds		442 292 558 1,292		802 220 356 1378					
eBird Checklists:		<a href="https://ebird.org/checklist/5105370437">https://ebird.org/checklist/5105370437</a> <a href="https://ebird.org/checklist/5105370441">https://ebird.org/checklist/5105370441</a> <a href="https://ebird.org/checklist/5105370443">https://ebird.org/checklist/5105370443</a>		<a href="https://ebird.org/checklist/5105430728">https://ebird.org/checklist/5105430728</a> <a href="https://ebird.org/checklist/5105430710">https://ebird.org/checklist/5105430710</a> <a href="https://ebird.org/checklist/5105430659">https://ebird.org/checklist/5105430659</a>					
Little Tutka Bay									
On Foot		Jim's Boat							
Time - start		9:36 1:54							
Time observing		2 h. 7 m. 1 h. 18 m.							
Distance - miles		0.6 3.1							
# of Observers		2 2							
Species		Average based on Jim's Boat							
Mallard		53 26							
Harlequin Duck		7 12							
Black Scoter		20 12							
Bufflehead		11 26							
Barrow's Goldeneye		3 17							
Common Merganser		53 134							
Subtotal		5 10							
Horned Grebe		4 1							
Great Blue Heron		4 1							
Glaucous-winged Gull		8 16							
Bald Eagle		61 150							
Total Birds									
eBird Checklists:		<a href="https://ebird.org/checklist/5105163471">https://ebird.org/checklist/5105163471</a>		<a href="https://ebird.org/checklist/5105179370">https://ebird.org/checklist/5105179370</a>					



<b>Jaklof, Kasitsna Bays</b>	<b>Debbie's Boat</b>						
Time - start	9:36						
Time observing	1 h, 29 m.						
Distance - miles	7.5						
# of Observers	6						
<b>Species</b>	<b>Total</b>						
American Wigeon	3						
Greater/Tuzson's Scaup	252						
Harlequin Duck	88						
Surf Scoter	12						
White-winged Scoter	81						
Black Scoter	120						
Bufflehead	39						
Common Goldeneye	29						
Barrow's Goldeneye	333						
Common Merganser	4						
Red-breasted Merganser	49						
<b>Subtotal</b>	<b>920</b>						
Other species not recorded							
eBird Checklist:	<a href="https://ebird.org/checklist/5105728805">https://ebird.org/checklist/5105728805</a>						
<b>Cohen, Yukon &amp; Hesketh islands</b>	<b>Penelope's Boat</b>	<b>Greg's Boat</b>					
Time - start	9:35	9:36					
Time observing	2 h, 50 m.	3 h, 32 m.					
Distance - miles	10.5	12.8					
# of Observers	3	4					
<b>Species</b>			<b>Average</b>				
Harlequin Duck	169	131	150.0				
Surf Scoter	29	55	42.0				
White-winged Scoter	40	8	24.0				
Black Scoter	70	11	40.5				
Common Merganser	10	1	5.5				
Red-breasted Merganser	2	11	6.5				
Common/Red-breasted Merganser		5	2.5				
<b>Subtotal</b>	<b>320</b>	<b>227</b>	<b>271.0</b>				
Horned Grebe	11	3					
Red-necked Grebe		1					
Common Murre		2					
Pigeon Guillemot	20	7					
Kittiwake Murrelet		1					
Mazda's Murrelet	3						
murrelet sp.		3					
Short-billed Gull		4					
Glaucous-winged Gull		5					
gull sp.	20						
Common Loon	18	15					
Pacific Loon		1					
Loon sp.		3					
Pelagic Cormorant	19	34					
Double-crested Cormorant	5	1					
cormorant sp.		6					
Bald Eagle	18	28					
Black-billed Magpie	1	1					
American Crow	35	27					
<b>Subtotal</b>	<b>150</b>	<b>142</b>					
<b>Total Birds</b>	<b>470</b>	<b>364</b>					
eBird Checklist:	<a href="https://ebird.org/checklist/5105334">https://ebird.org/checklist/5105334</a>	<a href="https://ebird.org/checklist/5105175236">https://ebird.org/checklist/5105175236</a>					
<b>Glacier Spit to China Poot Bay</b>	<b>Louie's Boat</b>						
Time - start	9:43						
Time observing	2 h, 53 m.						
Distance - miles	12.5						
# of Observers	4						
<b>Species</b>							
Mallard	31						
Harlequin Duck	83						
Surf Scoter	94						
scoter sp.	4						
Long-tailed Duck	5						
Bufflehead	53						
Common Goldeneye	19						
Barrow's Goldeneye	6						
Common/Barrow's Goldeneye	453						
Common Merganser	4						
Red-breasted Merganser	13						
<b>Subtotal</b>	<b>765</b>						
Red-necked Grebe	11						
Common Murre	1						
Pigeon Guillemot	12						
murrelet sp.	1						
Common Loon	9						
Pelagic Cormorant	6						
Bald Eagle	19						
Black-billed Magpie	1						
American Crow	7						
<b>Subtotal</b>	<b>67</b>						
<b>Total Birds</b>	<b>832</b>						
eBird Checklist:	<a href="https://ebird.org/checklist/510534584">https://ebird.org/checklist/510534584</a>						
<b>Kachemak Bay from Homer Spit</b>	<b>Lari Raymond</b>						
Time - start	1:00						
Time observing	2 h.						
Distance - miles	4						
# of Observers	1						
<b>Species</b>							
Mallard	4						
Greater Scaup	7						
Harlequin Duck	2						
Surf Scoter	54						
White-winged Scoter	7						
Black Scoter	18						
Long-tailed Duck	50						
Common Goldeneye	6						
Red-breasted Merganser	14						
Red-necked Grebe	5						
Rock Sandpiper	1,000						
Common Murre	12						
Black-legged Kittiwake	x						
Short-billed Gull	x						
Glaucous-winged Gull	x						
Common Loon	3						
Pelagic Cormorant	11						
Bald Eagle	5						
American Crow	x						
Song Sparrow	1						
eBird Checklist:	<a href="https://ebird.org/checklist/510518078">https://ebird.org/checklist/510518078</a>						



# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 201

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.



As a professional photographer who travels to this beautiful state 4 to 5 times a year to photograph (and the Cooper Landing / Seward area consistently), I was appalled to find out just how dangerous it was for me to be wandering a little off the trails and paths to capture the beauty of undisturbed snow, stars at night, and the eagles in their natural state. The ideas presented here are not cumbersome to the trappers; it is an acknowledgement that tourism and visitors to the area should take equal precedent and provide equal safety for them and their pets. Without these updates I might be reluctant to return as I cannot safely predict these unnecessary dangers and shouldn't have to in reasonable areas of higher foot traffic. Please take these proposals seriously as I would hate to see people not enjoy the benefit of this picturesque area because trappers were unreasonable to consider the safety of others sharing the same space.  
(feel free to add extra pages of comments)

Printed Name (First and last)\*: Kerry McAllister

Organization (if any) Professional Photographer

Signature\*: Kerry McAllister

Email\*: [REDACTED]

Street Address: [REDACTED]

City\*: Beaverton State\*: OR Zip code: 97006

\*Indicates it must be filled in to be accepted.



**Submitted by:** Ken McCormick

**Organization Name:**

**Community of Residence:** Rainbow Valley Homeowner

**Comment:**

Please do not allow hunting in Rainbow Valley. We have a private community with children and elders. We live with bears and have few problems. It is absurd to think hunters would descend on our community and possibly wound brown bears. Who would communicate to the homeowners if this tragedy occurs. Residents are at risk much more by this hunt, than by our ability to live with and respect brown bears. Please!!! NO HUNT IN RAINBOW VALLEY

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 98: Oppose



**Submitted by:** Margaret McGinnis

**Organization Name:**

**Community of Residence:** Hull, MA

**Comment:**

I am writing to support Proposal 145 to secure hunting and trapping setbacks from new wildlife crossings on the Sterling Highway Cooper Landing bypass.

This highway construction plans include multiple wildlife underpasses and Alaska's first wildlife overpass! Fencing will keep wildlife off the road and funnel them through these new crossings, but current regulations allow for hunting and trapping on these crossings.

This is beyond outrageous even by Alaska standards. These multi-million dollar crossings must be safe passages for wildlife.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support  
Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 156: Support Proposal 157: Support  
Proposal 158: Support Proposal 160: Support



**Submitted by:** Colin McGovern

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

Colin McGovern

39377 woodman lane north

Homer AK 99603

I am writing in support of the following setback proposals for trapping in unit 15C and others on the Kenai Peninsula:

Proposal 145

Proposal 146

Proposal 147

Proposal 148

Proposal 149

Proposal 150

Proposal 151

Proposal 152

Proposal 153

Proposal 154

My hope is that by implementing these 100 yard setbacks (which seems helpful in minimizing unintentional trapping of dogs) , trappers and non-trappers can find a happy medium to co-exist in these high public use areas.

Please consider the high volume of support for these setbacks by trappers and non-trappers alike.

Thank you,

Colin McGovern

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC205

**Submitted by:** Hope McGratty

**Organization Name:**

**Community of Residence:** Anchorage, AK

**Comment:**

I am writing to support Proposal #145 to secure hunting and trapping setbacks from new wildlife crossings on the Sterling Highway Cooper Landing bypass. I recreate year around on the Kenai with my family, friends and our dogs. I respect trapping and believe appropriate set backs can keep us all safer while allowing us to enjoy our great state. Please ensure the safety of all by implementing trapping setbacks from the new wildlife crossings on the Sterling Highway Cooper Landing bypass.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support Proposal 148:  
Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153:  
Support Proposal 154: Support

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PC206

**Submitted by:** Cody McLaughlin

**Organization Name:**

**Community of Residence:** Wasilla, Alaska

**Comment:**

As regards proposal 144 - 5 AAC 92.044

I am writing in support of this proposal. Words matter. And intentionally vague regulations that put the onus on the CITIZEN to read the mind of a future law enforcement official they've never met flies directly in the face of the original intent of the constitution where we are supposed to have a LIMITED GOVERNMENT.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 144: Support

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# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 207

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area. Please select the proposals that you are in support of (select all that apply).*

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
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- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## **Other areas setback proposals:**

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- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 207

As a born and raised Alaskan, whose father and husband trapped in past years, I understand the mindset of a trapper. I also support these proposals to help ensure safety for public trail users.

M.M.

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Maralee McMichael

Organization (if any) N/A

Signature\*: Maralee McMichael

Email\*: [REDACTED]

Street Address: [REDACTED]

City\*: Palmer State\*: AK Zip code: 99645

\*Indicates it must be filled in to be accepted.



Dear Board of Game,

I am a Homer resident of 14 years having moved here to embrace the Alaskan lifestyle and to live in relationship to the natural world. I harvest and consume local natural resources and also value animals and ecosystems for their own rights to flourish. In my mind, these two are dependent on each other. The depletion and over-extraction of resources threatens our ability to utilize them in the future, as we have seen time and time again in our human history. The Kenai Peninsula is no longer a frontier of boundless wealth. The limits of what the landscape can provide to our increasing population is apparent and will require careful management if we wish for these animals to continue to provide to us.

I am writing to voice my opinions for the following proposals to change hunting and trapping regulations:

I support proposal 160 that would allow only one beaver per lodge to be taken in a single year and I support proposal 156 which would close beaver trapping on the Anchor and Deep Creek Rivers for 6 years.

I support these measures because I would like to see the beaver population on the lower Kenai re-establish itself to historic levels. Beavers are highly beneficial members of the ecosystems and their presence on the landscape improves habitat for birds and fish, reduces wildfire, retains cold water and stores carbon. Many degraded watersheds in the lower 48 are being restored by the reintroduction of beavers. The watersheds on the lower Kenai are clearly over-trapped and I believe that measures ought to have been taken to sustain the beaver population prior to its collapse. This oversight is regretful. I know of many abandoned dams in my area that no longer retain ponds because the beavers aren't here any more (Diamond Creek headwaters and atop the Homer Bench in the Fritz Creek Drainage). The dams are overgrown and broken, indicating that beavers used to be present but are no longer here. Thankfully, beavers can reestablish themselves, we just need to give them the chance to breed and proliferate (I also advocate for re-location of beaver to these areas to accelerate the repopulation process).

In recent years I have been involved in a community project called the Homer Drawdown: Peatland Project. A group of over 100 volunteers have collected data on peat depth in the muskegs around the Homer area. Our motivation to "put peat on the map" is a proactive response to our warming and drying climate. These community members are recognizing the incredible value of peatland habitats to our human and natural communities as well as the global carbon cycle. Peatland stores cold water that recharges the aquifer and allows for the conditions necessary for salmon fry to survive during their time in the freshwater. Peatlands provide a buffer to fire, refill our residential and municipal water supply, remove sediment and purify runoff. During our time in the field, it is strikingly apparent that these fens are drying out and the spruce is moving in, as evidenced by spreading saplings and no wood in the peat profile that would indicate a history of trees in these areas. Soon, many of these fens will no longer serve us as they have in the past. They will become fire bridges rather than fire breaks. I am advocating for the proposals that will give us our best chance at slowing this process - allow





beavers to recover so that they can do the essential work of retaining cold, fresh water in these peatlands.

I have attached a photo of myself holding a 15" rainbow trout that I caught right next to a beaver lodge on Swan Lake. You can see the excitement on my face at the thought of cooking my prize on a campfire and enjoying this meal under the stars. The ecosystem engineering that the beavers provide allow for trout to grow to full size.

I support activities that connect us to our natural world and uphold traditions of hunting and trapping. I sew my own beaver fur mittens and hats that I wear on my long-distance winter excursions and I can attest that nothing compares to the warmth that they provide. I might even consider becoming a trapper myself someday if I felt like the population was robust enough to support it, but there is no way that I would feel ethical as a trapper of beaver on the lower Kenai today because the population is so sparse.



*Kim McNett holds a prize rainbow trout that she caught near a beaver lodge on Swan Lake.  
Photo by Bjorn Olson*

Additionally, I would like to voice support for proposals that safeguard sea duck populations in Kachemak Bay. My reasoning is similar to my above argument for beavers. If we over harvest a population we will not get to benefit from them in the future, whether for subsistence, hunting guide economy, eco-tourism, or the appreciation for biodiversity and intact coastal ecosystems. I



live right on the water and the sea ducks are a delight to observe during the winter as they utilize the sheltered waters of Kachemak Bay. I participate in the citizen science sea duck survey that has been going on in recent years. It seems very reasonable to me to have bag limits and accurate reporting of harvest so that we can use these resources responsibly and respond to any indications of population decline. An increase in human population will lead to increased use of resources and human impacts that put stresses on over-wintering birds, such as noise pollution and increased watercraft traffic. Baseline data and harvest reporting can help us keep a pulse on the population as it responds to environmental and climate related changes as well as our harvest impact.

I support proposals 164, 166 and 169 that would reduce the bag limit for goldeneye, bufflehead and harlequin ducks.

I support proposal 171 that would require accurate reporting of sea duck harvests.

I oppose proposals 162 and 163 and wish to maintain sea duck bag limits and the current shortened ptarmigan hunting season.

I also encourage proposals that would require trailside and roadside set-backs for hunting and trapping. This is both for the sake of the wildlife populations that will see an increase in pressure with increased human population and for safety reasons. During one of my winter camping trips (not on the Kenai) I was cutting some dead willow twigs on the side of the trail for a fire and I put my hand right on a trap. Thankfully the trap was tripped, but the experience really shook me up. I was 30 miles from the nearest village, traveling by human power, the sun was going down and I was preparing for a night of -35 F. A serious hand injury would have been life-threatening. It seems like common sense that hunters and trappers need to move away from human corridors in order to operate safely.

I support proposals 145, 146 and 147 for 100 yard set-backs from trails for traps and regulations that require hunters and trappers to go off of the road system ¼ mile.



**Submitted by:** Tom and Jane Meacham

**Organization Name:**

**Community of Residence:** Anchorage, Alaska

**Comment:**

My wife and I wholeheartedly support the comments on the various proposals affecting Anchorage and Chugach State Park that have been submitted by Rick Sinnott, retired Anchorage area biologist for ADF&G.

We also strongly support proposals 145-154 that would place setbacks and other requirements on recreational trapping on the Kenai Peninsula, in the paramount interest of public safety. We feel the Board of Game must recognize its responsibility to cooperate with other entities to promote public safety for all users of our public lands.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Oppose Proposal 85: Oppose Proposal 86: Oppose Proposal 88: Oppose Proposal 89: Support Proposal 90: Oppose Proposal 92: Oppose Proposal 93: Support with Amendment Proposal 94: Oppose Proposal 95: Oppose Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose Proposal 101: Oppose Proposal 102: Oppose Proposal 103: Oppose Proposal 104: Oppose Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 203: Oppose Proposal 208: Oppose

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**Submitted by:** Carla Meitler

**Organization Name:**

**Community of Residence:** Homer AK

**Comment:**

I would like to see some limitations to the distance that trappers can set snares and traps from trails and roadways, so that people or domestic animals would be less likely to get caught or possibly killed in a trap. I support all of the proposed setbacks, and feel that trappers would still have ample space to conduct their trapping. I would honestly like to see a setback rule from any roadway also, but this would be a great start. Thank you.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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**Submitted by:** Brad Melocik

**Organization Name:**

**Community of Residence:** Anchorage, AK

**Comment:**

While I support trapping, the conflicts between recreational users and trapping continues to increase. Traps found along trails and parking areas do nothing but create animosity toward trapping which is not fair to the trapping community or recreational users. Requiring a trapping license number or identifier on the trap to increase accountability for poor trapping practices is recommended. As a frequent user of the trails as well as a dog owner and bird hunter, reports of traps leads to anxiety. We have to find a way to keep both uses available.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Oppose Proposal 56: Support Proposal 57: Support Proposal 58: Oppose Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Oppose Proposal 62: Support Proposal 63: Support Proposal 64: Oppose Proposal 65: Support Proposal 66: Oppose Proposal 67: Oppose Proposal 68: Support Proposal 69: Support Proposal 70: Support Proposal 71: Support Proposal 72: Support Proposal 73: Oppose Proposal 74: Oppose Proposal 75: Oppose Proposal 76: Support Proposal 77: Oppose Proposal 78: Support Proposal 79: Support Proposal 80: Oppose Proposal 81: Support Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Support Proposal 85: Support Proposal 86: Support Proposal 87: Support Proposal 88: Oppose Proposal 89: Support Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Support Proposal 95: Support Proposal 96: Support Proposal 97: Support Proposal 98: Support Proposal 99: Support Proposal 100: Support Proposal 101: Support Proposal 102: Support Proposal 103: Oppose Proposal 104: Oppose Proposal 105: Support Proposal 106: Support Proposal 107: Support Proposal 108: Oppose Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 112: Support Proposal 113: Support Proposal 114: Oppose Proposal 115: Oppose Proposal 116: Support Proposal 117: Support Proposal 118: Oppose Proposal 119: Support Proposal 120: Oppose Proposal 121: Support Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Support Proposal 125: Support Proposal 126: Support Proposal 127: Oppose Proposal 128: Support Proposal 129: Support Proposal 130: Support Proposal 131: Support Proposal 132: Support Proposal 133: Support Proposal 134: Support Proposal 135: Support Proposal 136: Support Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 140: Support Proposal 141: Support Proposal 142: Support Proposal 143: Oppose Proposal 144: Support Proposal 145: Oppose Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Oppose Proposal 156: Oppose Proposal 157: Oppose Proposal 158: Support Proposal 159: Support Proposal 160: Support Proposal 161: Oppose Proposal 162: Support Proposal 163: Support Proposal 164: Oppose Proposal 165: Oppose Proposal 166: Support Proposal 167: Oppose Proposal 168: Support Proposal 169: Oppose Proposal 170: Oppose Proposal 171: Support Proposal 172: Oppose Proposal 173: Support Proposal 174: Support Proposal 175: Support Proposal 176: Support Proposal 177: Support Proposal 178: Support Proposal 179: Support Proposal 180: Support Proposal 181: Support Proposal 182: Support Proposal 183: Support Proposal 184: Support Proposal 185: Support Proposal 186: Support Proposal 187: Support Proposal 188: Support

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PC212

**Submitted by:** Elisabeth Mering

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

Good evening

I am writing in support of proposals 146 and 147 requiring trapping setbacks near popular trails in the Kachemak Bay Area. This area is used by lots of users and the risk of dogs being trapped directly off the trail is high. Simply having these set backs to allow both trappers to continue to operate and for hikers and snowshoers and skiers to also enjoy the trails with our dogs.

Thank you for your attention to this matter.

Liz.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support

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PC213

**Submitted by:** Dan Mico

**Organization Name:**

**Community of Residence:** Moose Pass, AK

**Comment:**

I oppose proposals 148, 149, 150, 151, 152, 153, and 154.

I do not wholesale oppose the idea of setbacks, especially for residential areas and administrative sites such as campgrounds and trailheads, but I do not support these proposals as written.

They do not account for submerged water sets using larger conibear traps. These can be placed virtually anywhere without the chance of conflict with other users. Also, unit 7 is characterized by steep mountains with narrow valleys where the roads and waterways are located. Singly, these proposals would each remove some areas for water trapping, but collectively they remove large swaths of streams that could easily and are presently trapped without conflict.

Specific to proposals 148-153, I do not see how imposing setbacks outside of residential and administrative areas will make a difference. Will people leash their pets beyond 100 yards or take greater responsibility for them? I doubt it. The other side of this issue is that many people have no control of their dogs and prefer to let them run amok wherever they choose. Enforcing leash laws for dogs not engaged in organized hunting (ex., trained bird dogs) would reduce conflicts significantly.

Specific to proposal 154, I try to not call attention the beginning of my lines in an effort to reduce conflict. While they are a minority, there are those in unit 7 who actively seek out trap lines to tamper with traps and call attention to the line on social media. Requiring signs would only make this unlawful activity easier.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose

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PC214

**Submitted by:** Zane Mileur

**Organization Name:** Mileur's Guide Service

**Community of Residence:** Palmer, AK

**Comment:**

Opposition to Prop 78:

I believe that if the non resident guided permits that are reserved via guide/client contract are included in the draw results it will eliminate the confusion we have right now. Each reserved permit done by guides/clients should be reflected in the draw results. This way the draw results wont show unutilized permits and it will show resident hunters that indeed all permits are being utilized.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 78: Oppose

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## Cooper Landing, AK Trap Setbacks



PC 215

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area. Please select the proposals that you are in support of (select all that apply).*

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

### Other areas setback proposals:

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 215

100 yards is not far away at all  
from a trail. I don't find 100 yards  
unreasonable or impracticable for a trapper  
to harvest their catch. 100 yards will increase  
safety for children and pets. As someone  
who frequently uses multiple trails I  
appreciate the signage to make me more  
aware of possible hidden dangers

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Margaret Mink

Organization (if any) \_\_\_\_\_

Signature\*: Margaret Mink

Email\*: \_\_\_\_\_

Street Address: \_\_\_\_\_

City\*: Seward State\*: NE Zip code: 68464

\*indicates it must be filled in to be accepted.





**Submitted by:** Jacob Mock

**Organization Name:**

**Community of Residence:** North Pole, Alaska

**Comment:**

Proposal 78 is beyond purview of the Board and should go before the legislature.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Oppose Proposal 56: Oppose Proposal 57: Support Proposal 58: Support Proposal 59: Support Proposal 60: Oppose Proposal 61: Support Proposal 62: Support Proposal 63: Oppose Proposal 64: Oppose Proposal 65: Support Proposal 66: Support Proposal 67: Support Proposal 68: Support Proposal 69: Support Proposal 70: Support Proposal 71: Support Proposal 72: Support Proposal 73: Support Proposal 74: Oppose Proposal 75: Oppose Proposal 76: Support Proposal 77: Support Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Support Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Support Proposal 85: Support with Amendment Proposal 86: Support Proposal 87: Support Proposal 88: Support Proposal 89: Support Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Oppose Proposal 95: Oppose Proposal 96: Support Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose Proposal 101: Support Proposal 102: Support Proposal 103: Oppose Proposal 104: Oppose Proposal 105: Oppose Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Support Proposal 109: Oppose Proposal 110: Support Proposal 111: Support Proposal 112: Support Proposal 113: Support Proposal 114: Support Proposal 115: Oppose Proposal 116: Support Proposal 117: Support Proposal 118: Oppose Proposal 119: Support Proposal 120: Oppose Proposal 121: Support Proposal 122: Support Proposal 123: Support with Amendment Proposal 124: Support Proposal 125: Support Proposal 126: Support Proposal 127: Support Proposal 128: Support Proposal 129: Support Proposal 130: Support Proposal 131: Support Proposal 132: Support Proposal 133: Support Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 140: Support Proposal 141: Oppose Proposal 142: Oppose Proposal 143: Oppose Proposal 144: Support with Amendment Proposal 145: Support Proposal 160: Oppose Proposal 180: Support Proposal 181: Support Proposal 182: Support Proposal 183: Support Proposal 186: Oppose Proposal 187: Oppose Proposal 188: Oppose Proposal 200: Oppose Proposal 203: Support w/Am Proposal 204: Support Proposal 205: Oppose Proposal 207: Support Proposal 208: Oppose

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PC217

**Submitted by:** Barrett Moe

**Organization Name:**

**Community of Residence:** Homer

**Comment:**

146 & 147

These proposals are for too large of an area. Trappers have the right to place a trap in the Anchor River, Deep creek drainage, wildlife refuge line. All areas that snomads trails go to. These are also hardly enforceable proposals. Just becomes another avenue for this group to hate another.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Oppose Proposal 147: Oppose

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PC218

**Submitted by:** Bill Mohrwinkel

**Organization Name:**

**Community of Residence:** Palmer, AK

**Comment:**

I support Proposal 145. Having a ¼ hunting and trapping buffer from the entrances of the new wildlife crossing and culverts. This Proposal seems like a no-brainer. First it goes against fair chase is you are hunting/trapping in an artificially made funnel for wildlife. Also it would deter wildlife from using these crossing and culverts, defeating the whole reason for spending millions to save lives by preventing wildlife/human collisions.

I support Proposals 147, 149, 150, 151, 152 and 153. These are all 100 yrd setbacks from high use trails, beaches, recreation areas, pull outs and campgrounds. I was a member of the working group to get set-backs on high use trails in the MatSu Valley and unfortunately the BOG voted against adopting this proposal. The main reason that was given was that this was a solution where there was no problem. A lack of data about trapping incidents on trails was brought up. There has historically been no clearinghouse to gather this data. ADF&G and the Troopers only keep track of these incidents if it was an illegally set trap. Most incidents with traps are with legal set traps set by an unethical, clueless or lazy trapper. Not only is this a problem, it's only getting worse. Do we really have to wait till there is a significant amount of dead or maimed dogs before you act? Or can we for once be preventative? The reality is that no one should be trapping anywhere near these area anyway, period.

I support Proposal 154. Requesting signage of active trapping in area. The opposition from the trapping community is that it will encourage people to steal or disturb traps. I feel quite the opposite would happen. If somebody knows there is trapping in an area, they will go somewhere else. I think traps are more apt to get stolen or disturbed because someone was unaware that there was trapping in an area and stumbled upon a trap and their dog got caught or almost caught. We make bear baiters sign their bait stations for safety, why not traps?

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support  
Proposal 152: Support Proposal 153: Support Proposal 154: Support

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I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area. Please select the proposals that you are in support of (select all that apply).*

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

#### **Other areas setback proposals:**

- ☐ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☐ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☐ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

Printed Name (First and last)\*: Brian Mandalbo

Signature\*: \_\_\_\_\_

Street Address: \_\_\_\_\_

City\*: Anchorage State\*: AK Zip code: 99515

2



**Submitted by:** Caitlin Montalbo

**Organization Name:**

**Community of Residence:** Anchorage, AK

**Comment:**

I support proposed setbacks in Proposals #146 - 153 as they seem reasonable and are already informally honored by many local trappers. This additional measure ensures that our children and pets are safe and can freely run around protected areas without threat of injury/death. In addition, I support Proposal 145 which would provide necessary buffers around the new wildlife crossings and ensure they could cross safely without threat of injury; I also support Proposal 154 for signage in areas of active trapping in order to make it clear to those who are recreating in the area so they may be vigilant about keeping their pets/children in the protected areas.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 221

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area. Please select the proposals that you are in support of (select all that apply).*

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

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- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## Other areas setback proposals:

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.



It is time for communities that  
overwhelming support an issue like  
trapping set backs on popular  
local trails be able to determine  
those regulations - not a small  
percentage of Alaskans that don't  
even live in the community.  
There is a lot of land in Alaska  
on which to trap. These few areas  
need the protection for winter  
recreational use.

(feel free to add extra pages of comments)

Printed Name (First and last)\*:

Sylvie Montalbo

Organization (if any):

Property owner in Cooper Landing

Signature\*

Sylvie Montalbo

Email\*:

Street Address:

City\*:

Anchorage

State\*:

AK

Zip code:

99515

\*Indicates it must be filled in to be accepted.





**Submitted by:** Dan Montgomery

**Organization Name:**

**Community of Residence:** Wasilla, Alaska

**Comment:**

Hello Chairman Burnett and fellow board members.

My name is Dan Montgomery. I have lived in Alaska for 41 years. 3 years in Juneau, 8 years in Kotzebue and the last 30 years in the Mat-Su valley. I started big game guiding in 1985. I have been hunting and guiding every year in the Chugach Mts. since 1991. I have served on the Mat Valley A/C for close to 15 years now and I'm vice-chair of Game.

Proposal 208: Support

I wrote this ACR proposal because when the Dept. implemented my Statewide proposal 149, that this board passed to make a separate draw for non-resident 2nd degree of kindred hunters in March of 2022, they made some drastic mistakes in permit allocations. There were 62 any weapon permits issued in the draw in 2023. Under 5 AAC 92.057 the Dept shall issue a maximum of 13% of these permits to non-residents. That would be a total of 8.06 permits. There was only 7 issued this year. My proposal was to convert DS236 to a 2ndDK permit. This area known as 14C, Southwest in the draw permit handy dandy. It has the most permits issued in it. It has the best access and by far has the most resident and non-resident hunters applying for permits in it. There is currently 8 resident permits (DS136) and 1 non-resident permit (SD236) issued in this unit for the first hunting period, AUG. 10 to Aug. 22nd. The 10 year average is 1009 applications for SD136 and 210 applications for DS236. I chose DS236 to convert to a 2DK permit because it has the most resident interest, the permit holder has to hunt with a resident relative.

The Department instead converted DS224 into a 2DK permit and it was the only non-resident permit issued in that unit(14C, Northeast). They also eliminated DS233(14C, Upper Eagle River) for no reason and it needs to be issued again.

Unit 14C went to separate sheep draws for non-residents in 2010. It was my proposal that the board passed in 2009 that limits non-residents to 13% of the permits. Guides were getting up to 100% of the permits in some areas back then and it was completely unfair for the resident hunters.

When the separate draws took place in 2010 there was to be at least 1 permit issued in each hunt area so non-residents would have access to every hunt area in 14C except for DS123 because there is only one permit issued for that hunt. That has been how the permits were issued for the last 14 years. The Dept. comments on this proposal states they will have to issue more than 13% of the permits to non-residents if permit numbers fall below 30. That simply isn't so and there has never been less than 53 any-weapon permits issued in any one year. If they ever do get that low they can just not issue a non-resident permit in some area, just like in DS123.

Please pass this proposal and instruct the Dept. to issue at least 1 non-resident guided only permit for each of the 4 hunt areas in 14C and if you pass proposal 83 include that area(DS239) also.

Proposal 82 Support.

Prop. 83 Support. More opportunity.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Oppose Proposal 56: Support Proposal 57: Oppose Proposal 58: Support Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Support Proposal 63: Support Proposal 65: Oppose Proposal 66: Oppose Proposal 67: Oppose

Proposal 68: Support Proposal 69: Oppose Proposal 70: Support with Amendment Proposal 71: Support Proposal 72: Support Proposal 73: Support Proposal 74: Oppose Proposal 75: Oppose Proposal 76: Support Proposal 77: Support Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Oppose Proposal 82: Support Proposal 83: Support Proposal 84: Oppose Proposal 85: Support Proposal 86: Support Proposal 87: Oppose Proposal 88: Oppose Proposal 89: Support Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Support Proposal 95: Support Proposal 96: Support Proposal 97: Support Proposal 98: Support Proposal 99: Support Proposal 100: Support Proposal 101: Oppose Proposal 102: Support Proposal 103: Oppose Proposal 104: Oppose Proposal 105: Support Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Oppose Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 112: Oppose Proposal 113: Oppose Proposal 114: Oppose Proposal 115: Support Proposal 116: Support Proposal 117: Support Proposal 118: Support Proposal 119: Oppose Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose Proposal 125: Oppose Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Oppose Proposal 129: Oppose Proposal 130: Support Proposal 131: Support Proposal 132: Support Proposal 133: Support Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Support Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 140: Oppose Proposal 141: Support Proposal 142: Support Proposal 143: Oppose Proposal 144: Support Proposal 145: Oppose Proposal 150: Oppose Proposal 151: Support Proposal 152: Support Proposal 154: Oppose Proposal 155: Oppose Proposal 156: Oppose Proposal 157: Support Proposal 158: Oppose Proposal 159: Support Proposal 160: Oppose Proposal 161: Oppose Proposal 186: Support Proposal 187: Support Proposal 188: Support Proposal 200: Oppose Proposal 203: Support Proposal 204: Support w/Am Proposal 205: Oppose Proposal 207: Oppose Proposal 208: Support

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PC223

**Submitted by:** Josh Morales

**Organization Name:**

**Community of Residence:** Eagle River, AK

**Comment:**

Support setbacks for trapping in the Cooper Landing area.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC224

**Submitted by:** Virginia Morgan

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

I am supportive of trapping, as long as it is not at the expense of safe recreational use in heavily used areas.

I support modest trapping setbacks and signage in high use areas.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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**Submitted by:** John Morton

**Organization Name:**

**Community of Residence:** Soldotna, AK

**Comment:**

Proposal 145:Support. Prohibiting hunting and trapping near wildlife overpasses and underpasses is a no-brainer to ensure our \$10.5 million public investment in helping wildlife move across the Sterling Highway is actualized. We don't want wildlife populations to become genetically segregated as moose have in Anchorage because of the Glenn Highway (Wilson et al. 2015).

Proposal 159:Oppose. ADFG expert [REDACTED] has written that Dall sheep in the Chugach-Kenai Mountains are declining because alpine tundra is being lost to rising tree- and shrub-line, and forage quality is reduced by hotter/drier conditions. Furthermore, *Mycoplasma ovipneumoniae* in sheep is clearly not well understood. What is certain is that wolverines rarely eat sheep. The wolverine population on the Kenai Peninsula is at a relatively low density (Golden et al. 2007) while harboring genetic haplotypes unique to populations elsewhere in northwestern North America (Tomasik and Cook 2005). In other words, we should be conserving wolverines on the Kenai Peninsula, not trying to liberalize their harvest.

Proposal 130:Oppose. GMU 15C has a low bull to cow ratio; consequently, 15C has had several years of antlerless hunts to reduce cows in the population. There's only one predator that disproportionately kills males over females, and that's humans (not bears or wolves). It's more likely a result of high unreported (illegal) take of bulls in Caribou Hills, an area with little law enforcement despite hundreds of cabins and enclaves like Nikolaevsk. Also, local ADFG biologists have expressed concern about snowmachines disturbing post-rut bulls at a time when they are already emaciated.

Proposals 146, 147, 148, 149, 150, 151, 152,153:Support. I want to see trapping continue as a recreational/subsistence pursuit, but it is irresponsible to not acknowledge that Alaska is urbanizing. Where public trails are maintained for other recreation, traps have no place. Kids and dogs should not be put at risk for a few trappers who are unwilling to walk 120 steps (100 yards) off trail.

Proposal 156:Support. Current management isn't working. ADF&G records indicate that historically the Anchor River drainage has supported a significant harvest of beavers. In 1976, almost half of 136 beavers taken in GMU15 came from the Anchor River. Except for 1 beaver in 2011, a beaver had not been harvested since 2006 despite active trappers in the area.

Proposal 160:Support. Trappers are still allowed the opportunity to harvest beaver, but this proposal ensures that beavers remain active on all drainages where they currently occur. Beaver dams are critical for recharging groundwater flow that maintains nonglacial salmon streams.

Proposal 109:Support. Dall sheep on the Kenai Peninsula have tanked. ADFG data shows the population declined 80% since 1968. Current management using full curl regs has not worked so why continue it? Our goal is SUSTAINABLE populations, not declining ones.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 104: Support    Proposal 109: Support    Proposal 130: Oppose    Proposal 145: Support    Proposal 146: Support  
Proposal 147: Support    Proposal 148: Support    Proposal 149: Support    Proposal 150: Support    Proposal 151: Support  
Proposal 152: Support    Proposal 153: Support    Proposal 154: Support    Proposal 156: Support    Proposal 159: Oppose  
Proposal 160: Support

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PC226

**Submitted by:** Katrina Moss

**Organization Name:**

**Community of Residence:** Anchorage, AK

**Comment:**

Please reduce conflicts between recreational users and trappers by establishing setbacks of 400 yards along both sides of trails and all sides of trailheads on the Kenai Peninsula and Chugach State Park.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC227

**Submitted by:** Nicholas Mumma

**Organization Name:**

**Community of Residence:** Homer, Ak

**Comment:**

I support proposals 146 and 147 regarding 100 yard setbacks for trapping from high use recreational trails in the Homer area.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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**Submitted by:** Jon Nichols

**Organization Name:**

**Community of Residence:** Cordova, AK

**Comment:**

As a lifelong Cordovan, the proposals for Unit 6 directly affect my way of life. Proposal 59 could only have been written by someone who lacks knowledge of our area and simply picked that spot because it “looked good” on a map... the proposal seeks to limit access to one of our goat hunting units by limiting who gets to hunt it even though only one of the seven goats have been harvested so far this season. Ironically I hunted there today in search of goats... and after finding one I realized that this was the easiest goat hunt I’ve ever been on and that it would be a perfect place to take my young daughter to kill her first goat just like sheridan unit rg231 was where I killed my first goat. There is so much opportunity to hunt goats in Unit 6, there is no reason to limit any users access, especially when our road access goat units still have 17 out of 26 available and the season is almost over.

**Proposal 60-**

seeks to limit access to users when there is no need. PWS is a huge place with so much hunting area that you might be the only human for miles. Why would we need to give exclusive access to archery hunters when 99% of the time anyone in the woods any given day already have exclusiveness.

**Proposal 61-**

makes claims that no one needs more than 3 deer per year. What right do they have to dictate how much meat I need to feed my family... the deer population is controlled almost entirely by our winters severity. They could close deer hunting entirely and it’s population growth could still be stifled by a bad winter.

**Proposal 63-**

Should be approved so people can shoot brown bears they encounter while deer hunting. Most people start deer hunting once any-deer opens October 1. More people in woods means more chance of encountering bears. The bears in October are more aggressive since salmon are tapering out and chance of conflict is higher. Being able to shoot the bears legally/ in season and not claim DLP and forfeit the hide is a step in the right direction.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Oppose Proposal 62: Oppose Proposal 63: Support Proposal 64: Support

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**Submitted by:** Nat Nichols

**Organization Name:**

**Community of Residence:** Kodiak, Alaska

**Comment:**

I'm a Kodiak resident and my position on select Unit 8 proposals are as follows:

Proposals 66 and 67 - I oppose these proposals. Ample archery goat hunting opportunity already exists. These proposals are counter to ADF&Gs objective of reducing or stabilizing the Kodiak goat population.

Proposal 68 - I support this proposal. If ADF&G needs better tools to conservatively manage the Kodiak caribou/reindeer herd, then I support giving them that authority.

Proposal 70 - I support this proposal. Very few cows are being harvested under the current draw hunt. Making this a registration hunt makes sense.

Proposal 73 – I support this proposal as amended by the Kodiak AC (reduce deer bag limit for nonresidents from 3 to 1).

Proposal 74 – I support this proposal as amended by the Kodiak AC (deer must remain bone-in, the AC amended it to make the language clearer based on input from AWT).

Proposal 81 – I support this proposal. There's no reason for bears, deer, and dogs to continue being injured or killed by snares when a simple solution exists.

Thank you for your public service and for your considerations of these important matters regarding the responsible management of our game resources.

Nat Nichols

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 66: Oppose Proposal 67: Oppose Proposal 68: Support Proposal 70: Support Proposal 71: Proposal 73: Support with Amendment Proposal 74: Support with Amendment Proposal 81: Support

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PC230

**Submitted by:** Natalya Nichols

**Organization Name:**

**Community of Residence:** Cooper landing

**Comment:**

As a resident of the area with multiple dogs that are well trained, I would appreciate signs. Signs would be an easy way of letting people know to bring your pets in closer or avoid the area

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC231

**Submitted by:** Clifford Norwood

**Organization Name:**

**Community of Residence:** homer and nikiski

**Comment:**

I support Proposal 146 and 147 homer area trapper setbacks in Homer area. I have lived in and have owned property in the Ohlson mountain area since 1982. At one time it was considered a remote area and it was not an issue where trappers set up trap lines. Well, it is not that way anymore and everyone needs to be respectful of the other users in the area. It doesn't seem to me that a 100 yard buffer is that big of a deal for trappers who more often then not are out to have an good experience. I am pretty sure the trappers are not trying to trap local dogs.

As authorized by Alaska Statute 16.05.260, which originally passed in 1959, the Joint Board of Fisheries and Game has established 84 advisory committees for the purpose of providing a local forum for the collection and expression of opinions and recommendations on matters related to the management of fish and wildlife resources. The regulations governing the advisory committee are 5 AAC Chapters 96 and 97.

The AC is to represent ALL users of Alaska fish and wdlife resources. Everyone out on those trails are users of fish and wildlife resources....it is not the sole domain of the trappers.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support Proposal 162: Support

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PC232

**Submitted by:** Holly Norwood

**Organization Name:**

**Community of Residence:** Nikiski and Homer, Alaska

**Comment:**

RE: Homer Area Proposals #146 and #147 regarding 100 yard trapping setback from trails.

The 100 yard setback for these public use trails is warranted to mitigate the ongoing trapping of unintended species, for example dogs. These crucial proposals are a valid compromise that optimize community safety and are supported by several member of the trapping community. All the trails in the Homer are permanent GPS located trails and DO NOT MOVE as some AC members have implied.

I would appreciate the Board of Game implementing the 100 yard trapping setback in these proposals.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support Proposal 162: Support

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PC233

**Submitted by:** Philip Nuechterlein

**Organization Name:**

**Community of Residence:** Eagle River, AK

**Comment:**

I support proposal 78. Non-resident hunter opportunity is given priority over resident hunter opportunity under the current regulations.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

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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.23025.LG

FEB 22 2023

Mr. Jerry Burnett, 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 Burnett:

The Office of Subsistence Management (OSM) appreciates the opportunity to comment on the Alaska Board of Game proposals during the March 17-22, 2023 Southcentral Region Meeting.

The Office of Subsistence Management, working with other Federal agencies, reviewed each of these proposals. The attached document includes comments from OSM regarding proposals that have the potential to impact federally qualified subsistence users or associated wildlife resources on or adjacent to Federal public lands in Alaska. During the meeting, we may wish to comment on other agenda items that might impact federally qualified subsistence users or wildlife resources.

Again, 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](mailto:george_pappas@fws.gov), with any questions you may have concerning this material.

Sincerely,

Scott Ayers  
Acting Assistant Regional Director  
Office of Subsistence Management

Enclosure

cc: Federal Subsistence Board  
Office of Subsistence Management



Interagency Staff Committee

Southcentral Alaska Regional Advisory Council

Kodiak/Aleutians Regional Advisory Council

Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game

Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game

Administrative Record



**RECOMMENDATIONS**

**ALASKA BOARD OF GAME PROPOSALS**

**Southcentral Region Meeting**

**March 17-22, 2023**

**Soldotna, Alaska**

**Office of Subsistence Management (OSM)**

**PROPOSAL 56 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.**

Prohibit taking of big game from boats in Units 6, 7, and 15.

**Current Federal Regulations:****§ 100.26 Subsistence taking of wildlife.**

*(b) Prohibited methods and means. Except for special provisions found at paragraphs (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:*

*(4) Taking wildlife from a motorized land or air vehicle when that vehicle is in motion, or from a motor-driven boat when the boat's progress from the motor's power has not ceased.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** There would be no expected impact on wildlife from adoption of this proposal. This proposal would not affect Federally qualified subsistence users harvesting under Federal regulations on Federal public lands as taking wildlife from a boat is currently allowed as long as the boat is not under propulsion from the engine. However, this may affect Federally qualified subsistence users' overall ability to harvest wildlife by methods they are historically accustomed to and would decrease their opportunity under State regulations. Federally qualified subsistence users routinely harvest in this manner, interchangeably where seasons overlap, under both Federal and State regulations as the season dictates (Meixell 2023, pers. comm.). Adopting this proposal would restrict that ability.

Adoption of this proposal would result in misalignment between Federal and State regulations, increasing enforcement and regulatory complexity and potentially contributing to 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 **oppose** Proposal 56.

**Rationale:** This proposal would affect Federally qualified subsistence users' ability to harvest wildlife resources, decreasing opportunity and potentially reducing their ability to meet their needs. It may also lead to enforcement confusion as to who is allowed to harvest game from a boat and where that may occur.

Literature Cited

Meixell, B.W. 2023. Wildlife Biologist. Personal communication: e-mail. US Forest Service. Cordova, AK.

**PROPOSAL 60 – 5 AAC 85.030. Hunting seasons and bag limits for deer.**

Create an archery only deer hunt in Unit 6 for resident and nonresident certified bowhunters only.

**Current Federal Regulations:****Unit 6 - Deer**

*Unit 6 – 5 deer; however, antlerless deer may be taken only from Aug. 1 – Jan. 31  
Oct. 1 – Dec. 31.*

*Only 1 of the 5 deer harvest limit may be taken between Jan. 1-31*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** This proposal would decrease opportunity for Federally qualified subsistence users to harvest deer under State regulations by replacing firearm seasons with archery-only seasons and requiring a less efficient means of harvest. However, Federally qualified subsistence users could still hunt deer using rifles on Federal public lands in Unit 6 under Federal regulations, which increases the Federal priority. Misalignment of hunting methods between State and Federal regulations also increases regulatory complexity and law enforcement concerns.

Conservation concerns for Unit 6 deer are minimal. Harvest limits are high, and pellet group surveys conducted by ADF&G in Unit 6, between RY16-RY20 indicate that the Unit 6 deer population was high four of the last five years (Westing 2022). Between RY10 and RY19, the average harvest for deer hunters in Unit 6 was 1.6 deer per year, indicating high success rates (OSM 2022). Therefore, little impact to the deer population is expected from this proposal.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** Proposal 60.

**Rationale:** This proposal would decrease opportunity for Federally qualified subsistence users to harvest deer under State regulations. Little impact to the deer population is expected.

**Literature Cited**

OSM. 2022. Staff analysis WP22-24. Pages 941-952 in Federal Subsistence Board Meeting Materials. April 12-15, 2022. Office of Subsistence Management, USFWS. Anchorage, AK. 1267pp.

Westing, C.L. 2022. Deer Management Report and Plan, Game Management Unit 6: Report Period 1 July 2016-30 June 2021, and Plan Period 1 July 2021-30 June 2026. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2022-21. Juneau, AK. 3pp.

**PROPOSAL 61 – 5 AAC 85.030. Hunting seasons and bag limit for deer.**

Lower the resident and nonresident general season bag limit for deer in Unit 6.

**Current Federal Regulations:****Unit 6 - Deer**

*Unit 6 – 5 deer; however, antlerless deer may be taken only from Aug. 1 – Jan. 31  
Oct. 1 – Dec. 31.*

*Only 1 of the 5 deer harvest limit may be taken between Jan. 1-31*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would decrease opportunities for federally qualified subsistence users hunting deer under State regulations. However, this proposal would provide a greater Federal subsistence priority on Federal public lands as federally qualified subsistence users could still harvest 5 deer under Federal regulations. It may also slightly reduce competition with non-Federally qualified users on Federal public lands as anyone hunting under State regulations would be limited to 3 deer, meeting their limit sooner, which could result in their spending less time hunting.

Little impact to the deer population is expected. Pellet group surveys conducted by ADF&G in Unit 6, between RY16-RY20 indicate that the deer population in Unit 6 was high four of the last five years (Westing 2022). Between RY10 and RY19, the average harvest for deer hunters in Unit 6 was 1.6 deer per year (OSM 2022), suggesting reducing the State harvest limits would not substantially affect the deer population.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on Proposal 61.

**Rationale:** This proposal would decrease opportunity for Federally qualified subsistence users hunting on State-managed lands but would increase the Federal subsistence priority for deer on Federal public lands. No impact to the deer population is expected.

**Literature Cited**

OSM. 2022. Staff analysis WP22-24. Pages 941-952 in Federal Subsistence Board Meeting Materials. April 12-15, 2022. Office of Subsistence Management, USFWS. Anchorage, AK. 1267pp.

Westing, C.L. 2022. Deer Management Report and Plan, Game Management Unit 6: Report Period 1 July 2016-30 June 2021, and Plan Period 1 July 2021-30 June 2026. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2022-21. Juneau, AK. 3pp.

**PROPOSAL 62 – 5 AAC 85.045(4). Hunting seasons and bag limits for moose.**

Re-establish an antlerless moose season in Unit 6C.

**Current Federal Regulations:****Unit 6C - Moose**

*Unit 6C – 1 antlerless moose by Federal drawing permit (FM0603) only. Sept. 1 – Oct. 31*  
*Permits for the portion of the antlerless moose quota not harvested in Sept.*  
*1 – Oct. 31 hunt may be available for redistribution for a Nov. 1 – Dec. 31*  
*hunt.*

*Unit 6C – 1 bull by Federal drawing permit (FM0601) only. Sept. 1 – Dec. 31*

*In Unit 6C, only one moose permit may be issued per household. A*  
*household receiving a State permit for Unit 6C moose may not receive a*  
*Federal permit. The 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. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

However, in April 2024 the Board will consider Wildlife Closure Review WCR24-41, which reviews the closure to moose hunting in Unit 6C on Federal public lands by non-Federally qualified users from Nov. 1 – Dec. 31.

**Impact to Federal subsistence users/wildlife:** The current management strategies in Unit 6C are a direct result of the cooperative moose management plan developed by the Prince William Sound/Copper River Delta Advisory Committee, ADF&G, and local residents. Part of the management system is allocating 75% of the bull harvest permits to Federally qualified subsistence users and the remaining 25% for people hunting under State regulations, while 100% of the antlerless moose permits are allocated to Federally qualified subsistence users (Westing 2018). The moose harvest allotment currently provides for a Federal subsistence priority.

Therefore, this proposal would have a minimal effect on Federally qualified subsistence users as they are allocated 100% of the antlerless moose permits. In its proposal, ADF&G notes that while antlerless moose hunts had been in State regulations prior to 2021, none had been held since 1999 due to the Federal allocation. However, OSM has concerns over the proposed registration hunt in November and December as Federal regulations currently state that, “Permits for the portion of the antlerless moose quota not harvested in Sept. 1 – Oct. 31 hunt may be available for redistribution for a Nov. 1 – Dec. 31 hunt.” Given





this, close coordination between the Federal in-season manager and ADF&G is imperative if this proposal passes.

No impact to the Unit 6C moose population is expected if this proposal is adopted due to the close management of harvest quotas and permits.

**Federal Position/Recommended Action:** The OSM recommendation is **support** Proposal 62 **with modification** to change the registration permit hunt to “may-be-announced”.

**Rationale:** Re-establishing State antlerless moose seasons in Unit 6C provides management flexibility, although they are unlikely to be held due to current management strategies and harvest allocations. As 100% of the antlerless moose quota is allocated to Federally qualified subsistence users and permits for the unmet quota may be redistributed in November and December under Federal regulations, a “may-be-announced” season is more appropriate for the proposed State registration permit hunt, Nov. 1-Dec. 31.

#### Literature Cited

Westing, C. 2018. Moose management report and plan, Game Management Unit 6: Report period 1 July 2010-30 June 2015, and plan period 1 July 2015-30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&RP-2018-15, Juneau, AK. 70 pp.

#### **PROPOSAL 64 – 5 AAC 92.095(4). Unlawful methods of taking furbearers; exceptions.**

Reduce the minimum jaw spread for trapping land otter in Unit 6 from 5 7/8 to 5 1/8.

#### **Current Federal Regulations:**

**§ 100.26(d)** *Trapping furbearing animals. The following methods and means of trapping furbearers for subsistence uses pursuant to the requirements of a trapping license are prohibited, in addition to the prohibitions listed at paragraph (b) of this section:*

**(4)** *Taking otter with a steel trap having a jaw spread of less than 5 7/8 inches during any closed mink and marten season in the same Unit.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would reduce the minimum jaw spread requirement for otters under State regulations in Unit 6, creating a misalignment of State and Federal regulations, increasing regulatory complexity, and potentially causing user confusion and law enforcement concerns.

The use of traps with smaller jaw spreads would increase the likelihood of unintended harvest of mink or martens out of season. Otters in Unit 6 are considered scarce and no otter harvest in Unit 6 was reported in 2021 (Bogle 2022). Adoption of this proposal would likely have little impact on the otter population but may increase incidental harvest of mink and marten.



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

**Rationale:** The minimum jaw spread of 5 7/8 is required for taking otter during any closed mink and marten season in the same unit to minimize out of season harvest of these species. Adopting this proposal increases the likelihood of accidental, illegal harvest and law enforcement concerns.

Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau AK.

**PROPOSAL 73 – 5 AAC 85.030. Hunting season and bag limits for deer.**

Reduce the bag limit for deer in Unit 8, remainder.

**Current Federal Regulations:**

**Unit 8, remainder - Deer**

*All lands within the Kodiak Archipelago within the Kodiak National Wildlife Refuge, including lands on Kodiak, Ban, Uganik, and Afognak Islands – 3 deer; however, antlerless deer may be taken only from Oct. 1 – Jan. 31.* Aug. 1 – Jan. 31

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would decrease opportunity for Federally qualified subsistence users hunting deer under State regulations, and would misalign State and Federal harvest limits, increasing regulatory complexity. While much of the land in Unit 8, remainder is Federal public lands, lands around communities are State-managed. Therefore, this proposal might burden local residents who would have to travel further to harvest a third deer.

However, this proposal would provide a Federal subsistence priority on Federal public lands as federally qualified subsistence users could still harvest 3 deer under Federal regulations. It may also slightly reduce competition with non-Federally qualified users on Federal public lands as anyone hunting under State regulations would be limited to 1-2 deer, meeting their limit sooner, which could result in their spending less time hunting.

Given the size and difficulty in accessing this hunt area, deer populations are primarily regulated by winter severity and are not influenced by hunter harvest (Pyle 2023, pers. comm.), suggesting minimal impacts to the deer population if this proposal is adopted. However, no deer population surveys occur in Unit 8 and harvest ticket reports provide limited information on harvest location. Information from harvest reports, hunters, guides, and transporters are the primary source for deer population information (Svoboda and Crye 2015). Deer harvest for all of Unit 8 over the last 10 years has ranged from 2,794 in



RY2012 to 8,137 in RY2016. More recently, Unit 8 deer harvest was 3,484 in RY2020 followed by 4,797 deer in RY2021 (ADF&G 2022). Using harvest as a rough index for population trend, the Unit 8 deer population does not appear to be declining. Additionally, Kodiak NWR surveys indicate that intensive use of key winter browse such as red elderberry has been sustained from 2017-2022, further suggesting that the deer population has not declined (Pyle 2023, pers. comm.).

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on Proposal 73.

**Rationale:** The status of the Unit 8, remainder deer population is uncertain, but does not appear to be declining. This proposal would decrease opportunity for Federally qualified subsistence users hunting on State-managed lands but would provide a Federal subsistence priority for deer on Federal public lands.

#### Literature Cited

ADF&G. 2022. Sitka Black-tailed Deer Hunting in Alaska.

<http://www.adfg.alaska.gov/index.cfm?adfg=deerhunting.deerharvest> Retrieved: January 24, 2023.

Pyle, B. 2023. Supervisory Wildlife Biologist. Kodiak National Wildlife Refuge. Personal communication: e-mail. U.S. Fish and Wildlife Service. Kodiak, AK.

Svoboda, N. J., and J. R. Crye. 2015. Unit 8 deer management report. Pages 9-1 through 9-16 in P. Harper and L. A. McCarthy, editors. Deer management report of survey and inventory activities 1 July 2012–30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-3, Juneau, AK.

#### **PROPOSAL 74 – 5 AAC 92.220. Salvage of game meat, furs, and hides.**

Require that meat must be left on the bone when hunting deer in Unit 8.

**Current Federal Regulations:** None

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would burden Federally qualified subsistence users hunting under State regulations by requiring them to pack out heavier loads from the field or make additional trips, and by reducing their options in how to process their harvests. This could also increase incidences of hunter-bear conflicts as bears might claim carcasses while hunters are packing out multiple loads. It would also increase regulatory complexity and law enforcement concerns as officers would need to know whether or not deer were harvested under State or Federal regulations. There would be no impact on the deer population in Unit 8.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** proposal 74.

**Rationale:** This proposal would require that edible meat remain naturally attached to the bone until the meat has been transported from the field or is processed for human consumption. This would be more



weight for users to carry out and potentially take longer by requiring multiple trips, burdening Federally qualified subsistence users.

**PROPOSAL 86 – 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, 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—I 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. 20 - Sep. 25*

**Unit 14—Moose**

*No Federal open season*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** These comments apply only to Unit 7. Adopting this proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose under State regulations. It is not expected to have a detrimental effect on the Twentymile/Portage/Placer moose population. The moose population in the Twentymile/Portage/Placer drainages is characterized by large population fluctuations associated with winter severity. As a result, the option to administer antlerless hunts is an important tool for managing population size within the appropriate range. Because the number of antlerless permits issued for the Twentymile/Portage/Placer hunt is adjusted annually, accounting for current population metrics, there are no conservation concerns.

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

**Rationale:** Reauthorizing the antlerless season provides additional harvest opportunities to Federally qualified subsistence users and management flexibility to sustainably manage this moose population.

**PROPOSAL 105 – 5 AAC 92.052. Discretionary permit hunt conditions and procedures.**

Limit hunters to one big game registration permit at a time in Units 7 and 15.

**Current Federal Regulations:** None

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** This proposal will greatly reduce Federally qualified subsistence users' hunting opportunities in Units 7 and 15 under State regulations. There are multiple State and Federal big game registration permits between the two units. If adopted, this proposal would eliminate the ability for subsistence hunters to utilize registration hunts with overlapping or adjacent hunt areas and/or seasons (e.g., brown bear and goat), which can reduce costs and improve hunting success by taking advantage of optimal weather windows. As Units 7 and 15 consist of a checkerboard of State and Federal managed lands, adopting this proposal may inhibit the ability of Federally qualified subsistence users to meet their needs. This proposal is not expected to have any substantial impacts on big game populations.

A possible modification of this proposal is to limit hunters to only one goat registration permit at a time in Units 7 and 15. If the number of goat registration permits in these units are limited, then limiting hunters to one permit at a time would result in more equitable permit distribution as well as permits being available to more people, including Federally qualified subsistence users.

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

**Rationale:** Limiting hunters to one big game registration permit at a time in both units would greatly reduce opportunity for Federally qualified subsistence users who hunt multiple species with registration permits in these units.

**PROPOSAL 108 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Make all sheep hunts in Units 7 and 15 registration hunts.

**Current Federal Regulations:**

**Unit 7 – Sheep**

*Sheep: 1 ram with full curl horn or larger by Federal drawing permit      Aug. 10–Sep. 20.*

**Unit 15 – Sheep**

*Sheep: 1 ram with 3/4 curl horn or larger by Federal drawing permit      Aug. 10–Sep. 20.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.



**Impact to Federal subsistence users/wildlife:** Federally qualified subsistence users currently have the opportunity to harvest a full curl ram in Unit 7 or a  $\frac{3}{4}$  curl ram in Unit 15 via Federal drawing permit on Federal public lands. Adopting this proposal would not affect that opportunity. However, Federally qualified subsistence users hunting under State regulations would need to obtain a State registration permit instead of a State drawing permit or harvest ticket.

Kenai sheep abundance and harvest has been declining since 2011 (Herreman 2021, pers. comm.). By converting the DS150 and DS156 drawing permits to registration permits, ADF&G's ability to manage sheep harvest in the affected units would be reduced, which may negatively impact these declining sheep populations. Modifying this proposal to only change the harvest ticket hunts to registration permits would provide ADF&G with better harvest report data and more management flexibility, which could help conserve these sheep populations and enhance long-term hunting opportunity.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 108 **with modification** to change only harvest ticket hunts in Units 7 and 15 to registration permit hunts.

**Rationale:** Improved harvest reporting data would provide a better understanding of harvest mortality, enhancing sheep management, while the increased management options provided by registration permit hunts (i.e., closing seasons early and limiting the number of permits issued) could help conserve sheep, ensuring long-term hunting opportunity on the Kenai Peninsula.

#### Literature Cited

Herreman, J.H. 2021. Wildlife Biologist. Personal communication: e-mail. Alaska Department of Fish and Game, Homer, AK.

### **PROPOSAL 109 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Close sheep hunting on the Kenai Peninsula, Unit 15.

#### **Current Federal Regulations:**

##### **Unit 15 – Sheep**

*Sheep: 1 ram with  $\frac{3}{4}$  curl horn or larger by Federal drawing permit      Aug. 10–Sep. 20.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** This proposal would also eliminate all opportunity for Federally qualified subsistence users hunting sheep under State regulations in Unit 15. Federally qualified subsistence users would still have the opportunity to harvest a  $\frac{3}{4}$  curl ram in Unit 15 via Federal drawing permit on Federal public lands. However, only one Federal permit has been issued each year since the hunt's inception in 2020, and the Federal in-season manager may close the season and set harvest quotas based on the status of the sheep population and in consultation with ADF&G and others.



Closing Unit 15 to the harvest of sheep under State regulations may allow for recovery of the sheep population in the unit, which has been declining since 2011 (Herreman 2021, pers. comm.). Based on long-term ADF&G minimum count data, the Kenai Peninsula sheep population trend has been declining since 1968. This population has declined by about 67% since the latest peak estimate of about 1500 individuals in 1996 to about 500 in 2016 (ADF&G 2019). If sheep hunting closed under State regulations in Unit 15 and the population were to increase, more opportunity for harvest could be provided to Federally qualified subsistence users in the future.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 109.

**Rationale:** Conservation concerns exist for the Unit 15 sheep population. While opportunity for Federally qualified subsistence users hunting sheep under State regulations in Unit 15 would be eliminated, potential increases in sheep abundance could provide more hunting opportunity in the future.

#### Literature Cited

Alaska Department of Fish and Game (ADF&G) 2019.Tab 5.1. Kenai Peninsula Overview. Presentation at the Alaska Board of Game, Southcentral Region: March 14-19, 2019.

Herreman, J.H. 2021. Wildlife Biologist. Personal communication: e-mail. Alaska Department of Fish and Game, Homer, AK.

#### **PROPOSAL 110 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Create an archery only registration hunt and youth hunt for sheep in Unit 7 Remainder.

**NOTE:** These comments only apply to the registration hunt portion of this proposal and do not apply to the youth hunt portion of this proposal.

#### **Current Federal Regulations:**

##### **Unit 7 – Dall Sheep**

*Unit 7 – 1 ram with full curl horn or larger by Federal drawing permit* *Aug. 10 – Sept. 20*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** This proposal would decrease opportunity for Federally qualified subsistence users to harvest Dall sheep (sheep) under State regulations by requiring a less efficient means of harvest. Federally qualified subsistence users with Federal drawing permits could still hunt sheep using rifles on Federal public lands in Unit 7, which may negate the safer, quieter hunting



experience the proponent is seeking. This misalignment of hunting methods between State and Federal regulations increases regulatory complexity and law enforcement concerns.

Conservation concerns exist for Kenai Peninsula sheep as their population as well as harvest have been declining over the long-term. Between Regulatory Year (RY) 2011 – 2016, in Units 7 and 15, the sheep population decreased from 644 in 2011 to 104 in 2020 (Herreman 2021, OSM 2022). Unit 7 sheep harvest averaged 6.9 sheep per year between RY00-RY09, but then dropped to 3.9 sheep per year between RY2010-2019 (OSM2022). A less efficient hunting method may decrease hunting pressure on and harvest of the Unit 7 sheep population, addressing some conservation concerns.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on Proposal 110.

**Rationale:** While this proposal decreases opportunity for Federally qualified subsistence users hunting under State regulations, OSM supports regulatory measures to help conserve the declining Unit 7 sheep population. A less efficient hunting method may address some conservation concerns, although other regulatory changes (i.e., limited registration or draw permit hunts, may-be-announced seasons, or harvest quotas) could also address conservation concerns.

#### Literature Cited

Herreman, J. 2021. Dall Sheep Management Report and Plan, Game Management Units 7 and 15: Report Period 1 July 2011 – 30 June 2016, and Plan Period 1 July 2016 – 20 June 2021. Alaska Departments of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2018-34. Juneau, AK.

OSM. 2022. Staff analysis WP22-25b/26b. Pages 958-973 in Federal Subsistence Board Meeting Materials. April 12-15, 2022. Office of Subsistence Management, USFWS. Anchorage, AK. 1267pp.

#### **PROPOSAL 114 – 5 AAC 85.040. Hunting seasons and bag limits for goats.**

Change the RG331 goat hunt in Unit 7 to archery only hunt.

#### **Current Federal Regulations:**

##### **Unit 7 – Goat**

*Goat: 1 goat by Federal Drawing permit. Nannies accompanied by kids Aug. 10-Nov 14.  
may not be taken*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Federally qualified subsistence users currently may harvest a goat in Unit 7 via Federal drawing permit on Federal public lands. Adopting this proposal and changing the RG331 permit to archery only would not affect that opportunity. However, Federally qualified subsistence users hunting under a State RG331 permit would experience a reduction of harvest





opportunity as harvesting any animal, especially a mountain goat, with archery equipment is more difficult and less efficient than with a modern firearm.

As the RG331 hunt has a may-be-announced season, changing this hunt to archery only could affect whether or not a season is opened. It would also increase regulatory complexity as firearms would remain a legal means for the other Unit 7 goat hunts. Federally qualified subsistence users with a Federal drawing permit would also still be able to use firearms within the RG331 permit hunt area under Federal regulations. As harvest opportunity in this permit area is limited and closely managed (e.g., only one DG331 permit available in 2022), no substantial impacts on the goat population are expected from this proposal.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** Proposal 114.

**Rationale:** Adoption of this proposal would decrease opportunity for Federally qualified subsistence users hunting under a State registration permit.

**PROPOSAL 118 – 5 AAC 85.045. Hunting seasons and bag limits for moose.**

Change the general season, resident bag limit for moose in Unit 15 to include bulls with fork antlers.

**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. 20-Sep. 25.</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&amp;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. 20-Sep. 25.</i>

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** According to the latest survey results published by ADF&G, the Unit 15A moose population is below management objectives, the Unit 15B population



estimates suggest a continued decline from peak numbers in the 1960s, while the Unit 15C moose population is currently within management objectives (Herreman 2022). Comparisons of harvest trends from the period of spike-fork harvest (prior to 2010) with the current restriction of spike only (2013–2019), shows higher rates of harvest during the spike-fork harvest limit than the spike only period (ADF&G 2019). With moose populations decreasing and/or below management objectives in two of three subunits in Unit 15, liberalizing the harvest limit would likely increase harvest and may cause conservation concerns for moose in Unit 15.

Federally qualified subsistence users can already harvest bulls with spike-fork antlers in Unit 15. While adoption of this proposal would provide more opportunity for users hunting under State regulations and would align Federal and State harvest limits, it would also decrease the Federal subsistence priority, potentially increasing competition between user groups.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** Proposal 118.

**Rationale:** This proposal may negatively impact the Unit 15 moose population. More recent population metrics should be analyzed prior to liberalizing harvest limits.

#### Literature Cited

Alaska Department of Fish and Game (ADF&G) 2019.Tab 5.1. Kenai Peninsula Overview. Presentation at the Alaska Board of Game, Southcentral Region: March 14-19, 2019.

Herreman, J. 2022. Moose management report and plan, Game Management Unit 15: Report period 1 July 2015-30 June 2020, and plan period 1 July 2020-30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2022-24, Juneau, AK.

#### **PROPOSAL 128 – 5 AAC 85.045(13). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 15C.

#### **Current Federal Regulations:**

##### **Unit 15 – Moose**

*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* Aug. 20-Sep. 25.

*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* Oct. 20-Nov. 10.



*consultation with ADF&G and the Chair of the Southcentral Alaska  
Subsistence Regional Advisory Council*

*Unit 15C - 1 cow by Federal registration permit only*

*Aug. 20-Sep. 25.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Federally qualified subsistence users can already harvest antlerless moose with a Federal subsistence drawing permit on Federal public lands during the fall in Unit 15C, although Federal public lands only comprise 28% of Unit 15C and habitat can be a limiting factor during winters with deep snow accumulations. Reauthorizing the antlerless moose season in this subunit would provide additional opportunity for Federally qualified subsistence users who can receive a State AM550 or DM549 permit to harvest an antlerless moose on State managed lands.

Antlerless moose harvest is limited by annual quotas and the number of permits available. According to ADF&G estimates, the moose population in Unit 15C is stable and within management objectives (Herreman 2022) and the moose population can withstand restricted cow harvest. Because there are such high densities of moose in the area, large snow events may concentrate moose on or near human habitats and roadways, creating negative interactions with humans. Having the flexibility to manage this moose population via drawing permit and targeted hunts allows ADF&G to maintain the moose population at sustainable levels.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 128.

**Rationale:** Federally qualified subsistence users benefit from the additional opportunity of State managed antlerless moose hunts. These hunts allow take of a limited number of cows in specific areas to keep the population within management objectives. Reauthorizing the State antlerless season will also maintain management flexibility within the unit, mitigating moose-vehicle collisions and other negative moose-human interactions.

Literature Cited

Herreman, J. 2022. Moose management report and plan, Game Management Unit 15: Report period 1 July 2015-30 June 2020, and plan period 1 July 2020-30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2022-24, Juneau, AK.

**PROPOSAL 133 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions.**

Prohibit the taking of black bear from boats in Unit 15C.

**Current Federal Regulations:****§ 100.26 Subsistence taking of wildlife.**

*(b) Prohibited methods and means. Except for special provisions found at paragraphs (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:*

*(4) Taking wildlife from a motorized land or air vehicle when that vehicle is in motion, or from a motor-driven boat when the boat's progress from the motor's power has not ceased.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** This change would not affect Federally qualified subsistence users hunting on Federal public lands, as harvesting black bear from a motor-driven boat is currently allowed under Federal regulations as long as the boat is not under propulsion from the engine. However, as no Federally managed land borders any of Kachemak Bay or Cook Inlet in Unit 15C, Federal users may only harvest in this manner in Tustumena Lake. Therefore, adopting this proposal would reduce Federally qualified subsistence users' ability to harvest bears when hunting under State regulations.

Adopting this proposal may reduce the number of black bears harvested in Unit 15C, although there are no conservation concerns for black bear in Unit 15C. OSM also recognizes land ownership in Unit 15C is varied, consisting of private, State, and Federal lands. Therefore, this proposal may reduce law enforcement concerns and trespass issues if bears on private lands are mistakenly shot from boats in Cook Inlet and Kachemak Bay.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** Proposal 133.

**Rationale:** This proposal would reduce Federally qualified subsistence users' opportunity to harvest black bears under State regulations, and no conservation concerns exist for Unit 15C black bears.

**PROPOSAL 141 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**

Lengthen the bear baiting season in Unit 7.

**NOTE:** These comments only apply to lengthening the baiting season for black bears as there is no Federal season or subsistence priority for brown bears in Unit 7.

**Current Federal Regulations:****§ 100.26(n)(7)(iii) Unit-specific regulations:**

*(A) You may use bait to hunt black bear between April 15-June 15; except in the drainages of Resurrection Creek and its tributaries.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal would provide Federally qualified subsistence users with increased opportunities to harvest black bears under State regulations. Adopting this proposal would also misalign State and Federal regulations, increasing regulatory complexity.

Black bear population estimates in Unit 7 are limited to tooth and skull morphometrics from harvested bears, which is not a sensitive metric for detecting population changes (Herreman 2022). While black bears in Unit 7 and 15 are resilient to current harvest pressure, only dramatic changes in the population could be seen in harvest data (Herreman 2022). However, three bear harvest limits and year-round seasons under State and Federal regulations indicate no conservation concerns for Unit 7 black bears. Additionally, the percentage of female bears in the total harvest declined between reporting periods, which may reflect an increase in the black bear population (Herreman 2022). Between Regulatory Years (RY) 2013-17, the number of black bears taken over bait in Unit 7 increased from 31 in RY13 to 47 in RY 17, and accounted for 40% of total harvest on average (Herreman 2022). As only 2% of black bear harvest occurred in April from RY13-RY17, this proposal is not expected to have any impact on the black bear population.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 141 (for black bears).

**Rationale:** This proposal provides additional hunting opportunity for Federally qualified subsistence users hunting under State regulations. While black bear population data and monitoring are very limited in Unit 7, liberal seasons and harvest limits indicate no conservation concerns.

However, there may be impacts to the brown bear population that OSM did not consider in its evaluation of this proposal.

Literature Cited

Herreman, J. 2022. Black bear Management Report and Plan, Game management Units 7 and 15: Report period 1 July 2013 – 30 July 2018, and plan period 1 July 2018 – 30 June 2023. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2022-22. Juneau, AK. 25pp.

**PROPOSAL 143 – 5 AAC 94.044. Permit for hunting bear with the use of bait or scent lures.**

Restrict bear bait stations within a half mile of certain structures in Unit 15.

**Current Federal Regulations:****§100.26(b) Prohibited methods and means:**

• • •

*(14) Using bait for taking ungulates, bear, wolf, or wolverine; except you may use bait to take wolves and wolverine with a trapping license, and you may use bait to take black bears and brown bears with a hunting license as authorized in Unit-specific regulations at paragraphs (n)(1) through (26) of this section. Baiting of black bears and brown bears is subject to the following restrictions:*

• • •

*(v) You may not use bait within one mile of a house or other permanent dwelling, or within one mile of a developed campground or developed recreational facility.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** While reducing the minimum distance between bait stations and certain structures would provide more area in which Federally qualified subsistence users could bait bears, it could also cause public safety concerns. No biological impacts to the bear population are expected from this proposal, although negative human-bear encounters may increase if bears become habituated to feeding at bait stations near areas of high human activity (e.g., developed campgrounds or schools). Adopting this proposal would also misalign State and Federal regulations, increasing regulatory complexity.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** Proposal 143.

**Rationale:** Reducing the distance between a bait station location and certain structures may results in public safety concerns.

**PROPOSAL 144 – 5 AAC 92.044. Permit for hunting bear with the use of bait and scent lures.**

Define “developed recreation facility” and “permanent dwelling” for bear baiting in Units 15 and 7.

**Current Federal Regulations:** None

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** The proposal would provide clarity for Federally qualified subsistence users baiting bears under State regulations, alleviating some law enforcement concerns. However, this proposal would misalign State and Federal regulations and ambiguity could still occur for law enforcement officers and users baiting bears under Federal regulations as these terms are not defined in Federal regulation. This proposal would not have any effect on bear populations.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 144 **with modification** to develop statewide definitions for these terms.

**Rationale:** OSM supports clarifying State regulations for Federally qualified subsistence users when bear baiting but notes similar definitions do not currently exist under Federal regulations. OSM also encourages the Board of Game to consider developing statewide definitions for these terms instead of only for Units 7 and 15.

**PROPOSAL 155 – 5 AAC 92.550 Areas closed to trapping.**

Close Unit 15C to beaver trapping.

**Current Federal Regulations:**

**Unit 15—Beaver**

*20 beaver per season*

*Nov. 10-Mar. 31.*

*Kenai NWR Regulations: Trapping on the Kenai NWR requires a refuge permit.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal would reduce Federally qualified subsistence users’ opportunities to harvest beavers under State regulation. According to trapper questionnaires, beavers are considered scarce across Region II and reported harvest in Unit 15C has only averaged 3 beavers/year from 2016-2021, although the total number of beavers sealed in Region II is much higher (Bogle 2022). Currently, no empirical data on the status of the Unit 15C beaver population is



available, although Unit 15C beaver harvest has declined to low levels (Eskelin 2023, pers. comm.). Therefore, the effects of this proposal on the Unit 15C beaver population are unknown.

One alternative to consider is to shorten the season to align with current Federal regulations rather than a complete closure. This alternative also reduces regulatory complexity. OSM supports conservation measures if beaver populations are declining, but considers a full closure as too sweeping at this time.

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

**Rationale:** Adoption of this proposal would eliminate Federally qualified subsistence users' opportunities to harvest beavers in Unit 15C under State regulations. While there may be conservation concerns for Unit 15C beavers, OSM supports shortening seasons or reducing harvest limits before instituting a complete closure, especially given the low harvest in Unit 15C.

#### Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau AK.

Eskelin, T. 2023. Wildlife Biologist. Personal communication: e-mail. Kenai National Wildlife Refuge, USFWS. Soldotna, AK.

#### **PROPOSAL 157 – 5 AAC 84.270. Furbearer trapping.**

Shorten the beaver trapping season in Unit 7.

#### **Current Federal Regulations:**

##### **Unit 7—Beaver**

*20 beaver per season*

*Nov. 10-Mar. 31.*

*Kenai NWR Regulations: Trapping on the Kenai NWR requires a refuge permit.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal would reduce Federally qualified subsistence users' opportunity to harvest beavers under State regulation. However, it would still provide more opportunity than the current Federal beaver trapping season. According to trapper questionnaires, beavers are considered scarce across Region II and reported harvest in Unit 7 has only averaged 9 beavers/year from 2016-2021, although the total number of beavers sealed in Region II is much higher (Bogle 2022). Adoption of this proposal may not impact the Unit 7 beaver population due to the relatively low harvest pressure indicated by trapper reports, although the actual number of beavers sealed from Unit 7 since 2016 as well as recent information on the population status of Unit 7 beavers are not readily available.





One alternative to consider is to shorten the season to align with current Federal regulations. This alternative also reduces regulatory complexity.

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

**Rationale:** Adoption of this proposal would reduce Federally qualified subsistence users' opportunities to harvest beavers under State regulation. OSM supports conservation measures if beaver populations are declining, although the impact of this proposal on the Unit 7 beaver population is unclear.

#### Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau AK.

### **PROPOSAL 158 – 5 AAC 84.270. Furbearer trapping.**

Shorten the coyote trapping season in Units 7 and 15.

#### **Current Federal Regulations:**

##### **Unit 7—coyote**

*No limit*

*Nov. 10-Mar. 31*

##### **Unit 15—coyote**

*No limit*

*Nov. 10-Mar. 31*

*Kenai NWR Regulations: Trapping on the Kenai NWR requires a refuge permit.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal would reduce Federally qualified subsistence users' opportunity to harvest coyote under State regulations. However, it would align Federal and State coyote trapping season opening dates, reducing regulatory complexity. According to trapper questionnaires, coyotes in Units 7 and 15 are considered scarce to common, and reported harvest averaged 19 coyotes from 2016-2021 (8 in Unit 7 and 11 in Unit 15), although reporting is voluntary and therefore likely an underestimation. There do not seem to be any conservation concerns for coyotes on the Kenai Peninsula, although adopting this proposal may alleviate some regulatory confusion, bycatch and user conflict issues as identified by the proponent.

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

**Rationale:** Adoption of this proposal would reduce Federally qualified subsistence users' opportunities to harvest coyotes under State regulations, although it would better align State and Federal regulations. No conservation concerns exist for coyotes on the Kenai Peninsula.

Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau AK.

**PROPOSAL 159 – 5 AAC 85.057. Hunting seasons and bag limits for wolverine.**

Lengthen the wolverine hunting season in Units 7 and 15.

**Current Federal Regulations:****Unit 7— Wolverine**

*1 wolverine*

*Sept. 1-Mar. 31*

**Unit 15— Wolverine**

*1 wolverine*

*Sept. 1-Mar. 31*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal would provide Federally qualified subsistence users with additional hunting opportunity to harvest wolverines under State regulations. However, it would misalign State and Federal regulations, increasing regulatory complexity.

According to trapper questionnaires, wolverines in Units 7 and 15 are considered scarce and reported harvest is low (Bogle 2022). Wolverines warrant conservative management strategies due to low reproductive rates, inherently low population densities from large home ranges, and susceptibility to harvest pressure (Krebs et al. 2004). However, adoption of this proposal would likely have little impact on the wolverine population as the trapping harvest limit is ‘no limit’, while hunters may only harvest one; reported harvest is minimal; and most wolverines are generally harvested via trapping versus hunting (Bogle 2022).

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

**Rationale:** Adopting this proposal would provide additional opportunity for Federally qualified subsistence users hunting under State regulations. Wolverine harvest and conservation concerns for both units appear minimal.

Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau AK.

Krebs, J. et al. 2004. Synthesis of survival rates and causes of mortality in North American wolverines. *Journal of Wildlife Management*. 68(3):493-502.

**PROPOSAL 160 – 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.**

Limit beaver trapping to one set per lodge for Units 7 and 15 and require visual markers.

**Current Federal Regulations:****Unit 7— beaver**

*20 beaver per season*

*Nov. 10-Mar. 31*

**Unit 15— beaver**

*20 beaver per season*

*Nov. 10-Mar. 31*

*Kenai NWR Regulations: Trapping on the Kenai NWR requires a refuge permit.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal would reduce Federally qualified subsistence users' opportunities to harvest beavers under State regulation, and burdens them with additional regulatory requirements. This proposal is consistent with the specific conditions in the special use permit required to trap beavers in Unit 15A on Kenai National Wildlife Refuge.

According to trapper questionnaires, beavers are considered scarce across Region II and reported harvest in Units 7 and 15 has only averaged 17 beavers/year from 2016-2021, although the total number of beavers sealed in Region II is much higher (Bogle 2022). Adoption of this proposal may not impact the Kenai Peninsula beaver population due to the relatively low harvest pressure indicated by trapper reports, although the actual number of beavers sealed from Units 7 and 15 since 2016 as well as recent information on the population status of Kenai Peninsula beavers are not readily available.

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

**Rationale:** OSM is neutral on this proposal because although it would reduce opportunity for Federally qualified subsistence users under State regulations and puts a burden on Federally qualified subsistence users, it may help conserve beavers and increase their population to provide more opportunity in the future. OSM supports conservation measures if beaver populations are declining, although the impact of this proposal on the Kenai Peninsula beaver population is unclear.

Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau AK.

**PROPOSAL 162 – 5 AAC 85.065. Hunting seasons and bag limits for small game.**

Extend the ptarmigan season in a portion of Unit 15C to March 31.

**Current Federal Regulations:****Unit 15C—Ptarmigan**

*Unit 15C - 20 per day, 40 in possession*

*Aug. 10-Dec. 31*

*Unit 15C - 5 per day, 10 in possession*

*Jan. 1-Mar. 31*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal would provide Federally qualified subsistence users with additional hunting opportunity to harvest ptarmigan under State regulations. It would also align State and Federal ptarmigan season dates in Unit 15C, reducing regulatory complexity. The additional three months would increase harvest pressure on the ptarmigan population but are not expected to negatively affect overall Unit 15C ptarmigan populations as ptarmigan species are anticipated to have abundant populations across the Kenai Peninsula (Merizon 2022).

However, localized reductions in ptarmigan populations in easily accessible areas such as along roadways and trails are possible. Merizon (2022) reports poor chick survival for willow ptarmigan in 2021 on the Kenai Peninsula. Before the State season was shortened in 2015, over 50% of the Unit 15 ptarmigan harvest occurred in February and March (ADF&G 2015). Therefore, extending the season back to March 31 would likely result in significant increases in harvest. The weather is more favorable, days are longer, and ptarmigan begin breeding behaviors, making them more susceptible to harvest (ADF&G 2015).

An alternative to consider is to extend the season in portions of Unit 15C that are harder to access, while maintaining the shorter season along roadways and trails.

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

**Rationale:** This proposal would provide additional opportunity for Federally qualified subsistence users hunting under State regulations. While conservation concerns for unit-wide ptarmigan populations are minimal due to abundant Unit 15C ptarmigan populations, caution may be warranted for ptarmigan occurring in easily accessible areas.

**Literature Cited**

ADF&G. 2015. Alaska Department of Fish and Game Staff Comments. Southcentral Region II Proposals. Alaska Board of Game Meeting. Anchorage, AK. March 13-17, 2015.

Merizon, R. A. and C.J. Carroll. 2022. Small Game Summary 2022. Alaska Department of Fish and Game, Juneau AK.

**PROPOSAL 173 – 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 13A.

**Current Federal Regulations:****Unit 13 – Moose**

*Unit 13E - 1 antlered bull moose by Federal registration permit only; Aug. 1-Sep. 20.  
only 1 permit will be issued per household*

*Unit 13, remainder - 1 antlered bull moose by Federal registration Aug. 1-Sep. 20.  
permit only*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users hunting under State regulations, although opportunity is limited as this is a drawing hunt with a limited, small number of permits. As stated by ADF&G in their proposal, the Unit 13A moose population was above State management objectives in 2021 and can sustain limited antlerless moose harvest. The hunt is closely managed through permit numbers, which, as ADF&G states in their proposal, ensures sustainable harvests at no more than 1% of the cow population.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 173.

**Rationale:** The Unit 13A moose population currently meets the State's objective for population size. Because the number of antlerless moose permits issued in Unit 13A is adjusted annually, accounting for current population metrics, reauthorizing the antlerless hunt poses little threat to the conservation status of this moose population, yet provides an important management tool to local managers. It also provides additional harvest opportunities to Federally qualified subsistence users.

**PROPOSAL 174 – 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 13C.

**Current Federal Regulations:****Unit 13 – Moose**

*Unit 13E - 1 antlered bull moose by Federal registration permit only; Aug. 1-Sep. 20.  
only 1 permit will be issued per household*



*Unit 13, remainder - 1 antlered bull moose by Federal registration permit only*

*Aug. 1-Sep. 20.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users hunting under State regulations, although opportunity is limited as this is a drawing hunt with a limited, small number of permits. As stated by ADF&G in their proposal, the Unit 13C moose population has reached abundance levels for which cow moose harvest is necessary to stabilize the population at a more productive level. The hunt is closely managed through permit numbers, which, as ADF&G states in their proposal, ensures sustainable harvests at no more than 1% of the cow population.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 174.

**Rationale:** The Unit 13C moose population currently exceeds the State's objective for population size. Because the number of antlerless moose permits issued in Unit 13C is adjusted annually, accounting for current population metrics, reauthorizing the antlerless hunt poses little threat to the conservation status of this moose population, yet provides an important management tool to local managers. It also provides additional harvest opportunities to Federally qualified subsistence users.

**PROPOSAL 175 – 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 13E.

**Current Federal Regulations:**

**Unit 13 – Moose**

*Unit 13E - 1 antlered bull moose by Federal registration permit only; only 1 permit will be issued per household*

*Aug. 1-Sep. 20.*

*Unit 13, remainder - 1 antlered bull moose by Federal registration permit only*

*Aug. 1-Sep. 20.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users hunting under State regulations, although opportunity is limited as this is a drawing hunt with a limited, small number of permits. As stated by ADF&G in their proposal, the Unit 13E moose population has reached abundance levels for which cow moose harvest is necessary to stabilize the population at a more productive level. The hunt is closely managed with a limited number of



permits available, which, as ADF&G mentions in their proposal, helps maintain a sustainable harvest of cows to keep the population and composition ratios within objectives.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 175.

**Rationale:** The Unit 13 moose population currently above the State's objective for population size. Because the number of antlerless moose permits issued in Unit 13 is adjusted annually, accounting for current population metrics, reauthorizing the antlerless hunt poses little threat to the conservation status of this moose population, yet provides an important management tool to local managers. It also provides additional harvest opportunities to Federally qualified subsistence users.

**PROPOSAL 177 – 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 17A.

**Current Federal Regulations:**

**Unit 17A - Moose**

*Unit 17A – 1 bull by State registration permit*

*Aug. 25 – Sept. 25*

*OR*

*1 antlerless moose by State registration permit*

*Aug. 25 - Sept. 25*

*OR*

*Unit 17A – up to 2 moose; 1 antlered bull by State registration permit, 1 antlerless moose by State registration permit.*

*Up to a 31-day season may be announced between Dec. 1 – last day of Feb.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adopting this proposal maintains harvest opportunity for Federally qualified subsistence users. No conservation concerns exist as the antlerless season is in-line with the Unit 17A Moose Management Plan (Barten 2018), and according to ADF&G in their proposal, the Unit 17A moose population is growing and can support additional harvest.

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

**Rationale:** No conservation concerns exist and harvest opportunity for Federally qualified subsistence users would be maintained.

Literature Cited

Barten, N. 2018. Moose Management Report and Plan, Game management Unit 17: Report Period 1 July 2010 – 30 June 2015, and Plan Period 1 July 2015 – 30 June 2020. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2018-49. Juneau, AK.

**PROPOSAL 178 – 5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons 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*      *Sep. 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 - 3 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. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose and has long-term benefits for the moose populations. In Unit 18 remainder, where the moose population is large and growing, antlerless hunts provide additional harvest opportunity for Federally qualified subsistence users as well as a mechanism to check the rapid growth of this population, which may be above carrying capacity. The antlerless season in the Goodnews River drainage provides additional opportunity for Federally qualified subsistence users, management flexibility by allowing local managers to respond to changing population and harvest dynamics, and is closely managed through harvest quotas.

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





**Rationale:** Antlerless moose hunts are an important aspect of moose management in much of Unit 18 and increase hunting opportunity for Federally qualified subsistence users.

**PROPOSAL 179 – 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.* Sept. 1 – Sept. 30

*Unit 19D, remainder of the Upper Kuskokwim Controlled Use Area – 1 bull* Sept. 1 – Sept. 30  
Dec. 1 – Feb. 28

*Unit 19D remainder – 1 antlered bull* Sept. 1 – Sept. 30  
Dec. 1 – Dec. 15

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Adopting this proposal maintains harvest opportunity for Federally qualified subsistence users. No conservation concerns exist as the antlerless season is consistent with the Unit 19D Moose Management Plan (Pierce 2018), and according to ADF&G in their proposal, the Unit 19D moose population is exhibiting signs of nutritional stress through decreased twinning rates and in need of stabilization.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 179.

**Rationale:** Cow harvest is warranted based on declining twinning rates, and harvest opportunity for Federally qualified subsistence users would be maintained.

Literature Cited

Pierce, J. 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. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2018-22. Juneau, AK.

**PROPOSAL 180 – 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**

*1 antlered bull*

*Sep. 1-20.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose under State regulations. According to ADF&G in their proposal, these antlerless moose hunts may have beneficial effects on the Unit 20A moose population, which is high density with concerns over nutritional stress if not stabilized. ADF&G closely manages and monitors these antlerless hunts. Because the number of antlerless permits issued for the Unit 20A hunt is adjusted annually, accounting for current population metrics, there is little threat to the conservation status of this moose population.

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

**Rationale:** Antlerless moose hunts are an important management tool in Unit 20A for maintaining moose populations at sustainable levels. Reauthorizing the Unit 20A antlerless moose season provides additional harvest opportunities to Federally qualified subsistence users with no conservation concerns.

**PROPOSAL 183 – 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 20E.

**Current Federal Regulations:****Unit 20E—Moose**

*Unit 20E, that portion within Yukon-Charley Rivers National Preserve - Aug. 20-Sep. 30*  
*1 bull*

*Unit 20E, that portion drained by the Middle Fork of the Fortymile Aug. 20-Sep. 30*  
*River upstream from and including the Joseph Creek drainage - 1 bull*

*Unit 20E, remainder - 1 bull by joint Federal/State registration permit Aug. 20-Sep. 30*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.



**Impact to Federal subsistence users/wildlife:** This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose under State regulation. According to ADF&G in their proposal, these antlerless moose hunts may have beneficial effects on the Unit 20E moose population, which is at risk of damaging habitat if growth of the female component of the population is not curtailed. ADF&G closely manages and monitors these antlerless hunts through limited drawing permits. Because the number of antlerless permits issued for the Unit 20E hunt is adjusted annually, accounting for current population metrics, there is little threat to the conservation status of this moose population.

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

**Rationale:** Antlerless moose hunts are an important management tool in Unit 20E for maintaining moose populations at sustainable levels. Reauthorizing the Unit 20E antlerless moose season provides additional harvest opportunities to Federally qualified subsistence users with no conservation concerns.

**PROPOSAL 184 – 5 AAC 85.045(a)(19)(B). Hunting seasons and bag limits for moose.**

Reauthorize a winter antlerless moose season during March in a portion of Unit 21D.

**Current Federal Regulations:**

**Unit 21 – Moose**

<i>Unit 21D, that portion south of the south bank of the Yukon River,</i>	<i>Aug. 22-31.</i>
<i>downstream of the up-river entrance of Kala Slough and west of Kala</i>	<i>Sep. 5-25.</i>
<i>Creek - 1 moose by State registration permit</i>	

<i>Antlerless moose may be taken only during Sep. 21-25 season if</i>	<i>Mar. 1-31 season</i>
<i>authorized jointly by the Koyukuk/Nowitna/Innoko NWR Manager and</i>	<i>may be</i>
<i>the BLM Central Yukon Field Office Manager. Antlerless moose may be</i>	<i>announced.</i>
<i>harvested during any of the winter seasons. Harvest of cow moose</i>	
<i>accompanied by calves is prohibited</i>	

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Reauthorizing this antlerless season would maintain opportunity for Federally qualified subsistence users and easier access to moose habitat closer to rural communities. Additionally, reauthorization would maintain alignment between State and Federal regulations, reducing regulatory complexity and law enforcement concerns, which is especially important in this hunt area given the checkerboard pattern of land ownership.

The Unit 21D moose population has been stable, within State management objectives and can sustain limited antlerless moose harvest (Bryant 2022). The USFWS conducted surveys in 2022, indicating stable



moose populations that are above the long-term average and recommended to maintain the harvest opportunity for Federally qualified subsistence users (Bryant 2022).

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 184.

**Rationale:** No conservation concerns exist as the moose population in Unit 21D is healthy enough to sustain antlerless moose harvest. Also, the additional opportunity to harvest moose closer to rural communities under State regulations benefits Federally qualified subsistence users.

#### Literature Cited

Bryant, Jenny. 2022. Moose Trend Survey Summary 2022. USFWS. Galena, AK. 34 pp.

#### **PROPOSAL 185 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.**

Reauthorize a winter antlerless moose season during part of February and March in Unit 21E.

#### **Current Federal Regulations:**

##### **Unit 21 – Moose**

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

*During the Feb. 15-Mar. 15 season, a Federal registration permit is      Feb. 15-Mar. 15.  
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  
Rivers during the winter season*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Reauthorizing this antlerless season would maintain opportunity for Federally qualified subsistence users and easier access to moose habitat closer to rural communities. According to ADF&G in their proposal, the Unit 21E moose population is starting to show signs of nutritional stress due to higher population levels. The latest population estimation from ADF&G is 9,777 moose, which is within population objectives, and declining twinning rates indicate that this moose population could benefit from antlerless harvest.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 185.



**Rationale:** No conservation concerns exist as the moose population in Unit 21E may benefit from some antlerless moose harvest. Also, the additional opportunity to harvest moose closer to rural communities under State regulations benefits Federally qualified subsistence users.

**PROPOSAL 186 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.**

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast.

**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. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**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 the tag fee exemption is particularly important in areas where there are few vendors.

**PROPOSAL 187 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.**

Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.

See comments for Proposal 186.

**PROPOSAL 188 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.**

Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23, and 26A.

See comments for Proposal 186.

**PROPOSAL 204 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Close resident and nonresident hunting for Dall sheep in Unit 19C, for five years.

**Current Federal Regulations:****Unit 19 – Sheep**

*Sheep: 1 ram with 7/8 curl horn or larger* *Aug. 10-Sep. 20.*

*Unit 19C, that portion within the Denali National Park and Preserve-residents of Nikolai only - no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system.* *Oct. 1-Mar. 30.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations in spring 2023.

**Impact to Federal subsistence users/wildlife:** Federally qualified subsistence users may currently harvest a 7/8 curl ram in Unit 19 under Federal regulations. Adopting this proposal would not affect that opportunity. A similar proposal could be submitted to the Federal Subsistence Board, although Federal public lands only comprise 17% of Unit 19C. Sheep hunting opportunity for Federally qualified subsistence users hunting under State regulations in Unit 19C would be eliminated for at least five years if this proposal were adopted. However, giving this sheep population time to recover and increase could provide more harvest opportunity to Federally qualified subsistence users in the future.

Closing Unit 19C to the harvest of sheep may allow for recovery of the sheep population in the unit by eliminating harvest pressure. Both hunted and nonhunted sheep populations in and around Unit 19C have decreased in concert with each other, by approximately 50% since around 2017. Sheep population estimates within Denali National Park and Preserve have decreased since 2019 (Borg 2023, pers. comm.) paralleling the declining population trend in adjacent Unit 19C.

ADF&G survey data indicates about a 60% decrease in abundance since 2017 when minimum count surveys reported over 500 individuals, compared to the latest minimum count from 2022, which only recorded about 200 individuals. Lamb production has also dropped off considerably since 2017, when about 120 lambs were counted, whereas just over 20 were counted in 2022. Harvest of sheep in Unit 19C has also followed this declining trend, decreasing by about 75% in recent years. Almost 120 rams were harvested in 2018, but only about 30 rams were reported in 2022. According to the ADF&G 2022 population composition survey, a small number of legal rams ( $\leq 10$ ) were identified, indicating few rams available for harvest in 2023 (ADF&G 2022).

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 204.



**Rationale:** Although opportunity for Federally qualified subsistence users hunting sheep under State regulations in Unit 19C would be eliminated, conservation concerns exist for Unit 19C sheep populations and potential increases in sheep abundance may provide more opportunity for the future. Since total sheep, legal ram, and harvest numbers have all severely decreased in the last five years, continuing to allow harvest from this population may exacerbate conservation concerns.

Literature Cited

Alaska Department of Fish and Game. 2022. Board of Game Sheep Informational Meeting. Presentation. ADF&G DWC. Juneau, AK. 56 pp.

Borg, B. 2023. Wildlife Biologist. Denali National Park and Preserve. Personal communication: e-mail. National Park Service, Healy, AK.



**Submitted by:** Bjorn Olson

**Organization Name:**

**Community of Residence:** Homer

**Comment:**

I support Proposal 160.

Although the warmth and comfort of a well-tanned beaver pelt cannot nor should not be diminished, live beavers, in their historic numbers, with the myriad ecological services they provide, must also not be overlooked.

As the western Kenai Peninsula continues to dry out, beavers help preserve water—water that now falls in more intense rain events. A robust population of beavers on the Kenai are an insurance policy, helping guard us from future droughts like we saw in the summer of 2019. Furthermore, the wetlands they create aid in forest fire mitigation.

When beaver populations are allowed to flourish, upland salmon and trout nurseries also flourish. Throughout the West, massive and expensive efforts are underway to re-wild incised streams and rivers using Beaver Dam Analogues and the re-introduction of live beavers. These costly efforts would not be necessary if the native beaver populations had been well-managed in the first place.

I would like to believe that it is possible to retain our customary practice of trapping while also working to improve ecological conditions here on the Kenai by encouraging robust beaver populations. Proposal 160 seems like a decent compromise toward these dual goals.

-Bjorn Olson

Homer, Alaska



**Submitted by:** Allison Ostrer

**Organization Name:**

**Community of Residence:** Seattle, WA

**Comment:**

I support Proposal #145 to secure hunting and trapping setbacks from new wildlife crossings on the Sterling Highway Cooper Landing bypass. The highway construction plans include multiple wildlife underpasses and Alaska's first wildlife overpass! Fencing will keep wildlife off the road and funnel them through these new crossings, but current regulations allow for hunting and trapping on these crossings. Please make these multi-million dollar crossings safe passages for wildlife.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 159: Support Proposal 160: Support



## Cooper Landing, AK Trap Setbacks



PC 237

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

***Please select the proposals that you are in support of (select all that apply).***

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

### **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

This image shows a single page of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There is no handwriting or other markings on the paper.

Printed Name (First and last)\*: WARREN PALMER

Organization (if any) \_\_\_\_\_

Signature\*: G. Michael Brown

Email\*:

Street Address:

City\*: Cougar Landing State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.



## Proposal 205

## Oppose

## Board of Game Members:

My name is Spencer Pape, I'm a resident of Wasilla and have been a big game guide/outfitter(#1302) for 19 years, with the past 12 years in and around the RM653 moose registration area of Farewell, Alaska. I am in strong opposition to proposal 205 as it is written. Through guiding big game hunters, outdoor recreating, and working for Brice Environmental on the remediation of the abandoned Farewell airbase, I spend roughly 70 days afield in 19C alone.

While I am concerned about the moose population around Farewell (RM653) and believe regulations and/or restrictions are in order, I am equally concerned about the blatant disregard shown by users of the Farewell airstrip, surrounding lands, resources, and wildlife in the area. The amount of trash, empty fuel drums, and ATVs left at the taxiway and hidden in the bushes that hunters leave behind is atrocious! I find it extremely embarrassing when I load and offload my clients on the opposite end of the airstrip. The length of the Farewell airstrip, the many ATV trails that spider out from Farewell and its relatively closeness to Anchorage, make it a moose hunting magnet for residents and nonresidents alike to fly out their ATVs and camping gear in large cargo planes for an easy moose hunt. My predecessor, John Latham, started hunting the Farewell area in 1968 and described the area as the best kept secret up until the mid-90s. Since the influx of hunters in the 90s, he has described the month of September as "the rat race", with four wheelers zipping all around and a mentality of "if it has horns, it's going down". Over the past three decades the moose seasons have been shortened and horn restrictions put in place to maintain a healthy moose herd within the area to try to combat this practice. The registration permit area RM653 was created to achieve a more accurate grasp on the number of hunters and moose harvested within the Farewell area. RM653 is 3 years old and is made up of roughly 325 square miles with the Farewell airstrip sitting near the center of the hunt area. The registration permit area also sits near the center of guide use area 19-09, which at this time has two licensed guide/outfitters, myself and one other, registered for the area according to the Big Game Commercial Services database. This past season, 2022, saw the highest number of permits issued to date at 201 with 106 legal bulls and eight sublegal bulls harvested. Historically, users are made up of 55% residents and 45% nonresidents with the moose harvest being about the same percentages of resident versus nonresidents. This past season saw 107 residents and 94 nonresidents, with 56 bulls harvested by residents and 50 by nonresidents, according to the Alaska Department of Fish and Game (ADF&G). My outfit guided 2 nonresident moose hunters into the RM653 hunt area and harvested one bull. According to ADF&G, the bull to cow ratio is 30 to 100 in the Farewell area currently. The bottom threshold for the area is 25 to 100. In more remote inaccessible areas, the bull to cow ratio is 60-80 to 100 according to the article "Recovery of Low Bull: Cow Ratios of Moose in Interior Alaska" by Young and Boertje (2008). According to ADF&G personnel, to get the bull ratio back up, a cap needs to be put on the number of bulls harvested within the registration area and that number is 60 bulls per year. Limiting nonresidents to 20 draw permits per this proposal will not solve the problem and ensure the goal of only harvesting 60 bulls. Hypothetically, if the area did go to a nonresident draw of 20 tags, twenty nonresidents plus 107 residents (2022 number) allows for 127 moose hunters. If the success rate stayed the same at 53%, that correlates to 67 bulls being harvested with another five sub legals taken based on historical percentages. However, I predict that the



harvest would be much higher with the area being relatively small, ease of transport by ATV, cutting the hunting pressure half and the number of resident hunters continuing to increase.

A secondary concern is the multiple large camps in the registration hunt area that bring in several hunters (friends, customers, employees, etc.) September 1<sup>st</sup> through 10<sup>th</sup>, with a change out halfway through the season and another set of hunters September 11<sup>th</sup> – 20<sup>th</sup>. These large camps resemble a guiding and outfitting operation, but without the regulations that would be part of an official outfit. As noted previously, there are only two state licensed outfitter/guides that are registered to conduct big game commercial services in the hunt area.

Another area of concern that I do not think this proposal will positively impact, is the number of sublegal bulls harvested per year. I was told by an ADF&G wildlife trooper some years ago that eight to ten sublegal bulls are taken in the registration area every season. To the novice moose hunter, a 45" to 55" moose is difficult to judge at a distance, especially if it doesn't have the required brow points to make it legal. I can only assume that, with the amount of hunting competition in the area, hunters can feel pressured, or even entitled, to harvest a moose, leading to shots taken when a questionable legal bull walks out. The hunter may pull the trigger to avoid watching the next hunter over take the shot.

To bring the bull to cow ratio and bull moose harvest into the parameters deemed optimal by ADF&G within the registration hunt area, I suggest establishing a moose draw permit for all user groups and mirror the nonresident draw permits to the Unit 21E moose hunt regulations. Unit 21E states that nonresident applicants may only apply for DM837 (nonguided only) or DM839 (guided only), but not both. Second, meat must remain on the bones of the front quarters, hindquarters, and ribs until removed from the field or it has been processed for human consumption. This is already a requirement in 19C. Third, nonresident moose hunters must complete the Nonresident Moose Hunter Orientation online at <http://hunt.alaska.gov> or must be accompanied in the field by an Alaska licensed guide. In accordance with the recommended harvest of 60 bulls and the historical user group history within the hunt area, the distribution of draw tags would be 40 tags to residents, 14 tags to nonguided nonresidents and 6 tags to guided nonresidents.

An event like what we are experiencing now occurred in the late 90s in Unit 24 and the northern section of 21D along the Koyukuk River and could serve as case precedent for the registration hunt area of RM653. Obviously, Unit 24 and 21D are on a much larger scale and include multiple villages, however, the percentages of moose hunters versus successful harvest, and the increase in hunting pressure over a 10-year period, is similar. In 1988 the moose harvest success rate was 60%. Eleven years later, with 731 moose hunters, the success rate had dropped to 50%. In addition to human harvest, a significant increase in the area's wolf population took place during this time that took a large toll on the overall moose herd. The Koyukuk River Moose Management Plan (KRMMP) was developed in conjunction with ADF&G Division of Wildlife Conservation and the Koyukuk River Moose Hunters' Working Group (KMWG or working group). The Alaska Board of Game (BOG) adopted regulatory proposals in the fall of 2000 that were spawned from the working group and in the 2001 spring meeting the BOG voted unanimously to support the process and endorse the KRMMP. The working group established a baseline maximum number of hunters based on moose biology concerns and what is considered a quality hunting experience. The general registration was changed to a drawing hunt with separate resident and nonresident drawing pools. The separate draws were established to retain opportunity for nonresidents and commercial guides based on user group history. The working group met after the close of the 2000



hunting season to review the regulation changes. Members of the working group all agreed that the season was greatly improved and that both local and nonlocal hunters enjoyed a higher quality hunt than in years past. A 2021 moose trend survey summary conducted by the Department of Interior Federal Subsistence Management Program through aerial survey shows a stable and healthy bull to cow moose population.

In closing, it is a supply and demand situation. The current demand on moose in the registration hunt area cannot be sustained with the current moose population and its downward trend. Proposing only to limit nonresidents to 20 draw tags is ignoring the other options that could work in conjunction with this limitation to provide demonstrable results. I would like to urge the BOG to use all options at their disposal to help sustain and maintain moose populations and the moose hunting opportunity for all user groups in the registration hunt area of RM653.

Thank you for your time and dedication to this Board.

Sincerely,

Spencer Pape



## Proposal 204

### Oppose

#### Board of Game Members:

My name is Spencer Pape, I'm a resident of Wasilla, and have been a big game guide/outfitter (#1302) for 19 years. I am strongly opposed to proposal 204 as it is written. Through guiding big game hunters, outdoor recreating, and working for Brice Environmental on the remediation of the abandoned Farewell airbase, I spend roughly 70 days afield in 19C alone. While I am concerned about the Dall sheep population in the area, as well as statewide, I'm also concerned with the loss of another hunting opportunity. My predecessor in 19C, John Latham, shared with me nearly 50 years of sheep population cycles, along with a vast knowledge of Western Alaska. He often described the bountiful numbers of sheep in the 70s and then the "lean years" of the late 90s and early 2000s.

Dall sheep populations have shown a cyclical pattern since record keeping began in the 1920s. Per the Alaska Department of Fish & Game (ADF&G) website, *"Sheep numbers typically fluctuate irregularly in response to a number of environmental factors. Sheep populations tend to increase during periods of mild weather. Then, sudden population declines may occur as a result of unusually deep snow, summer drought, or other severe weather events. Low birth rates, predation (primarily by wolves, coyotes, and golden eagles) and a difficult environment tend to keep Dall sheep population growth rates lower than many other big game species. However, their adaptation to the alpine environment seems to serve them well."*

Through my observations, three out of the last five winters have been detrimental to Dall sheep populations. Due to the inclement winter seasons, coupled with the rise in predator populations, the sheep haven't had it easy. Yes, the population is down, however I observed a huntable and harvestable population of rams on the mountain this past season. As for my outfit, this past Dall sheep season didn't end with every sheep tag being punched, but our observations did inspire optimism for the near future. For the second year in a row, we will again cut back the number of clients that we take into the field for Dall sheep to responsibly manage the area as best we can. Self-regulation, observation, conservation, and client success are what resonates with me. I am not as interested in tally marks on my gun stock or making as much money as possible. ADF&G records show that when a particular game population is low, less hunters will go to the field for that species. Since 2018, the number of Dall sheep hunters going to the field in 19C has decreased some 15-25% per year. This decrease could be due to either hunters staying home or hunting in a different area. A quick search on the ADF&G website indicates that other mountain ranges have seen an increase in sheep hunters since 2018. By closing 19C, other Game Management Units will see a significant rise in sheep hunters, putting more pressure on those Dall sheep populations, thus creating a snowball effect that will ultimately lead to more Dall sheep closure and/or limiting proposals. With the full curl regulation that is in place, I have no doubt that the numbers will come back in 15 to 20 years as shown in the Game Management Unit 20A population data that has been collected after the 1990s decline.

The full curl regulation has been proven to be the best management tool for 30 years now and is the most conservative approach according to ADF&G. Department studies have shown that once a ram surpasses 8 years old, its chances of survival greatly diminish within the wild with very few rams surpassing 12 years of age. Full curl, 8+ year old rams makeup less than 5 % of the overall sheep





population. The harvest of this age class of rams has no effect on the overall sheep population. Furthermore, harvesting these older rams gives the younger adults, which are in their prime, protection from injury during the rutting season.

The high take and sharp increase of sublegal harvest the past few seasons is alarming. Lack of education and entitlement are the two most prominent factors from my perspective. The creation of a mandatory online Dall sheep hunter orientation course, similar to the nonresident moose hunter orientation on the [www.hunt.alaska.gov](http://www.hunt.alaska.gov) website, for every resident, nonresident, and guide would positively impact this problem. A very informative Full-Curl Identification Guide already exists on the ADF&G website. Turning this material into an orientation course would help educate even the most seasoned sheep hunter. A meaningful penalty should be levied on the take of a sublegal ram and penalty should progress upon further offenses. For example, a monetary fine for the first offense, an increase in the fine and the loss of his/her sheep hunting rights for 1 year for the second offense, and a more significant fine and the loss of his/her sheep hunting rights for 5 years for the third offense, and so on. The online course, coupled with a mandatory penalty for the take of a sublegal ram, would help curb the illegal take and limit the entitlement mindset.

While I understand the purpose of the board, and its decisions, is to put the welfare of the state's game populations first, passionate sheep hunters would rather have the board act constructively to maintain Dall sheep hunting opportunities rather than destructively by completely closing the season. Consider other methods for Dall sheep regulations such as the harvest of one ram every four years for both residents and nonresidents, weapons restrictions for part of the general season, shortening of the general season, and intensive predator control management within the area. The creation of a Dall sheep working group to brainstorm such methods and means in order to come up with the best path forward to Dall sheep conservation would be extremely beneficial to the resource. Previous species-specific working groups, such as the Koyukuk River Moose Hunters' Working Group, have been instrumental in the rehabilitation and both the conservation of the resource and maintaining the hunting opportunity of a species.

I strongly urge the board to be mindful of the Dall sheep hunting opportunities that residents and nonresidents have left and the Dall sheep hunting opportunities that have been lost.

Good day and thank you for your time and dedication to this board.

Respectfully,

Spencer Pape



PC239

**Submitted by:** David Paperman

**Organization Name:**

**Community of Residence:** Seward, Alaska

**Comment:**

As an Alaskan I support the rights of others to trap for recreation. However, reasonable restrictions must be implemented for the common good. The vast majority of public lands should be open to recreational trapping. However, it is completely reasonable to restrict this activity on small corridors of land which receive high levels of use in our increasingly popular and growing rural communities like Seward, Cooper Landing and Moose Pass. Relatively narrow corridors along popular and demarcated trails is a reasonable way that all user-groups can share our public lands. Signage, education, and small corridors along popular trails can eliminate this conflict almost immediately.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC240

**Submitted by:** Alan Parks

**Organization Name:**

**Community of Residence:** Homer AK

**Comment:**

PROPOSAL 162 Oppose extending the ptarmigan season two months longer. They have just begun to grow back will mean managing ptarmigan at a depressed level

PROPOSAL 163 Oppose Rescinding bag limit restrictions for sea duck hunting in Unit 15C

Absolutely not. These birds are 90% declined from what they were in the 1980's this would not make sense to take them down further. We began seeing some recovery when these limits were lowered. The habitat is fine.

PROPOSAL 164 & 165 Support lowering goldeneye bags

What are the limited number of goldeneyes doing in the general bag with millions of mallards? Take it down to 2 would be more reasonable and fill in with mallards

PROPOSAL 166 & 167 Support lowering bufflehead bag limits

There are so few in Kachemak Bay it would be nice to have more around

PROPOSAL 168 & 169 Support lowering harlequin

Better to close this. These birds taste terrible but for trophy none needs to take more than one



## PROPOSAL 170 Support lowering long tail duck bag

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support  
Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support

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PC241

**Submitted by:** Sara Pate

**Organization Name:**

**Community of Residence:** Anchorage ak

**Comment:**

#145, support buffer at wildlife crossing. When we Concentrate wildlife at this area we should not be allowing traps also. Unfair to the animals

#149. Setbacks are good. Children and pets are likely to be roaming around camgrounds

#150. Setbacks from pullouts are good. People and animals are likely to step off the pullout to go to the bathroom and should be safe from traps

#151 setback from summit lake recreation area. People and pets are likely to be roaming around and should not have to worry about traps

#152 setback from high use cooper landing trails are good. People and pets are likely to be roaming around and should not have to worry about traps

#153 setbacks from beaches are very important. As a cabin owner, my family and I enjoy using the beaches and my children and pets should not have to worry about traps if they are building a fort in the woods

#154 trapping signage is important to warn recreations of hazards

#146, 147, 148, setbacks in all red areas are important. People and pets are likely to be roaming around and should not have to worry about traps

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC242

**Submitted by:** Scott Pate

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

I support Proposals #145 thru #154.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC243

**Submitted by:** Cora Patton

**Organization Name:**

**Community of Residence:** Homer, Ak

**Comment:**

in favor of proposal 132 getting rid of the sealing requirements.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 132: Support

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PC244

**Submitted by:** Laramy Paulson

**Organization Name:**

**Community of Residence:** Talkeetna, Alaska

**Comment:**

Proposal number 146-152 Cooper landing trap set backs.

I oppose these proposals because all it does is make it harder for the trapper. As a trapper myself the farther I trap from my trail the more lure and rotten bait I use to pull the critters in and as we all know 50-100 yards means nothing to a dog if it stinks they will go to it end of story. Not to mention there will be a perfect foot path from said trail to set which makes it easier for a pet too get to the set in the first place. These proposals will not save a pets life but they will make it harder and less productive for trappers

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose



PC245

**Submitted by:** Bryse Payment

**Organization Name:**

**Community of Residence:** Nikiski Alaska

**Comment:**

These are my thoughts

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 56: Oppose Proposal 57: Support Proposal 58: Support Proposal 59: Oppose Proposal 60: Oppose Proposal 62: Oppose Proposal 64: Support Proposal 65: Oppose Proposal 66: Oppose Proposal 67: Oppose Proposal 68: Oppose Proposal 69: Oppose Proposal 70: Support Proposal 71: Support Proposal 72: Support Proposal 73: Oppose Proposal 74: Oppose Proposal 75: Support Proposal 76: Support Proposal 77: Support Proposal 78: Oppose Proposal 79: Support Proposal 80: Support Proposal 81: Oppose Proposal 82: Support Proposal 84: Oppose Proposal 85: Oppose Proposal 86: Support Proposal 87: Oppose Proposal 88: Oppose Proposal 89: Oppose Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Support Proposal 95: Support Proposal 97: Support Proposal 98: Support Proposal 99: Support Proposal 100: Support Proposal 102: Support Proposal 103: Support Proposal 104: Oppose Proposal 105: Oppose Proposal 106: Support Proposal 108: Oppose Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 115: Oppose Proposal 116: Support Proposal 119: Oppose Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support Proposal 124: Support Proposal 125: Support

Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Support Proposal 129: Support Proposal 131: Support  
Proposal 132: Support Proposal 133: Oppose Proposal 134: Support Proposal 135: Support Proposal 136: Support  
Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 140: Oppose Proposal 141: Support  
Proposal 142: Support Proposal 143: Support Proposal 144: Support Proposal 145: Oppose Proposal 146: Oppose  
Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal  
152: Oppose Proposal 153: Oppose Proposal 154: Oppose Proposal 155: Oppose Proposal 156: Oppose Proposal 157:  
Oppose Proposal 158: Oppose Proposal 159: Support Proposal 160: Oppose Proposal 162: Support Proposal 173:  
Oppose Proposal 174: Oppose Proposal 175: Oppose Proposal 176: Oppose Proposal 177: Oppose Proposal 178: Support  
Proposal 183: Support Proposal 200: Oppose Proposal 203: Support

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PC246

**Submitted by:** Dolly Peach

**Organization Name:**

**Community of Residence:** Salt Lake City, Utah

**Comment:**

Hello. I am a landowner in Sadie Cove, Alaska with my family. We have owned our property there since 1978. We have seen changes in the ecosystem over time and a decline in the biodiversity of species. There does not seem to be a way to control the total amount of sea ducks being harvested and accurate methods of reporting. Therefore, we SUPPORT proposals reducing bag limits of Goldeneye, Bufflehead, Harlequin & Long-tailed Duck.

SUPPORT Proposal 164-170, 171, 172

OPPOSE Proposal 163

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support  
Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support

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PC247

**Submitted by:** Patricia Peach

**Organization Name:**

**Community of Residence:** Anchorage AK

**Comment:**

I support Proposals 164, 166 169, 171. I oppose Proposal 163.

Since 1978 we have had cabins in Sadie Cove. Though I am not a scientist I have decades of observing the ecosystem changes. The early years Sadie Cove had king crab at the head in late winter. We had crab shrimp clams and mussels for subsistence food. All are now unavailable. Sadie Cove is a fragile ecosystem. We enjoy the duck migration in March and

April. It is my strong belief that the proposals I support such as recording sea duck populations, harvesting and surveying data will assure our sea duck populations will survive.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 163: Oppose Proposal 164: Support Proposal

166: Support Proposal 169: Support Proposal 171: Support

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PC248

**Submitted by:** Alexis Peacock

**Organization Name:** Peacock Family

**Community of Residence:** Kodiak

**Comment:**

To Whom It May Concern,

I support Kodiak Area Unit 8 proposal 76 which seeks to extend the bear hunting season on the Kodiak road system.

Due to the increase in bear encounters, I would like to support the extension of the bear hunting system on the road system to help reduce the problems with bears we have had in our neighborhood.

This last fall there were multiple bears on many different occasions in which our dumpster and neighbors dumpsters were broken into. There were three different occasions when I had to call Peterson Elementary to notify them there were bears near the student pick up area.

Please consider extending the hunt for the safety of our neighborhood and children going to a from school.

Thank you,

Alexis Peacock

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 76: Oppose

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PC249

**Submitted by:** Erin Pearce

**Organization Name:**

**Community of Residence:** Seward, AK

**Comment:**

It is important to save our pets and children. Traps should not be near heavily trafficked area.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC250

**Submitted by:** Heather Pearson

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

I oppose proposals 149-153 because these proposals don't address the data-driven management of a wildlife resource. They don't address a public safety issue. These proposals attempt to address a social issue. For these reasons, these proposals are asking for something that falls outside of the purview of the mission of the Alaska Board of Game.

The proponents of this proposal package falsely attribute wide community support. However, the majority of recipients of their survey did not respond. Cooper Landing Safe Trails reports that they received 135 responses from 420 households that were sent a survey. So, about 68% of the households in the Cooper Landing community did not respond.

These proposals do not include any data regarding the polling of the community, including methods of the survey, how the data was collected, or what the results of the poll were. These proposals also do not include any specific data regarding the date, time, or location of any specific incidents.

I do support signage as requested by proposal 154, but with amendments. It is written poorly and perhaps the BOG can amend this proposal in a way that makes sense. It is important to educate the public to increase their awareness and understanding that traps may be present in an area and may pose a potential risk to loose (or "voice command") dogs, so that these folks may be informed enough to accept the risk and responsibility of keeping their dogs safe.

Thank you for your time and dedication to the management of Alaska's game.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal  
154: Support with Amendment

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**Submitted by:** Christopher Perry and Multiple Signers

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I support proposals 155, 156, and 160 regarding beaver management.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 155: Support Proposal 156: Support Proposal 160: Support

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Please support proposal numbers 148, 149, 150, 151, 152, 153 and 154. All these proposals concerning 100 yard setbacks and signage will help all users including trappers to understand their responsibility and usage of public trails, campgrounds, beaches etc. This will set a minimum standard for the “code of ethics” that has been the basic problem causing conflict between users. These are not anti-trapping proposals. Failure to address these issues and postponing these decisions will only cause more conflict and worse results down the road. I know of 11 dogs trapped in my area in two years. It is unacceptable for one trapper to trap four dogs in two years and refuse to post signage, or move traps further off trails and recognize that he may not be following the code of ethics as written by trapping regulations. Again these are not anti-trapping proposals every dog that is trapped is one more very negative and unnecessary story against trapping. Please support these proposals I thank you for your time and consideration.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support  
Proposal 153: Support Proposal 154: Support

---

I support proposals 146 and 147

See pdf below

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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My name is Chris Perry I have lived in the Homer area for 40 years. I oppose proposal 162 extending hunting season for Ptarmigan in unit 15 north of Kachemak Bay. The area where I live, we normally saw abundant flocks of Ptarmigan until around 30 years ago. We haven't seen any ptarmigan again until the last two winters but none this winter even with good early snow conditions.

ADFG shortened the hunting season for ptarmigan in around 2015 and it has taken six years to have any repopulation in our area. With none in the area this winter, it is clearly too early to extend the hunting season. The spring hatch surveys have shown no birds in our area for many years. The hatch surveys that do show some fresh recruits are in the most easterly portions of this unit and should not be used as a good representation of abundance for this area.

The changes in number, speed and efficiency of snow machines in the last 30 years has clearly affected the ease of harvesting ptarmigan. The lowered bag limits haven't helped the repopulation as often the daily harvest in this area may only be two or three birds. In areas with healthy populations it is quite easy to get daily and possession bag limits.

Please vote against this proposal and thank you for your consideration.

Christopher Perry

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Please support proposal number 145 concerning establishing 1/4 mile trapping buffer for the new highway wildlife crossing on the Cooper Landing bypass. Establishing a 1/4 mile buffer will allow unobstructed pathway between wilderness areas subdivided by the new highway construction. This method for safe passage has been proven to benefit the local populations of wildlife and allow them to prosper. Failure to protect passage may jeopardize the natural migration of these animals and negatively impact wildlife populations by the targeted trapping, hunting and Highway death after focusing the migration to this crossing. The buffers established in the Kenai national wildlife refuge and crossings across the country have been well proven to protect animals in the immediate area of crossings and allowing possibility of biodiversity within genetic pools. Thank you for your time and consideration. Please vote to support number 145.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 162: Oppose

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Please support proposals #146 and #147 trap setbacks in the Homer area.

There have been 8 dogs trapped within a couple miles of my home in the last two years and 3 on the McNeil area ski trails this winter. Four dogs were trapped by one trapper and 2 dogs by another in my neighborhood. One dog was trapped in a snare for three days before release approximately 100 yards from the owners property. Most of these traps were set within 50 feet of a summer road and public easement. My dog was trapped 30 feet off of this roadside. There have not been any posted signs of active trapping and when asked, the trapper has refused to post signage for fear of drawing attention to his activity.

Trappers are asked to abide by a "code of ethics". One of these trappers checks his traps only weekly. The trappers code of ethics asks to reduce possibility of catching non-target animals and trapping in ways to minimize conflict with other trail user groups. Avoid high recreational use areas, areas near homes, or trails used by hikers, skiers, hunters. This trapper has caught four dogs within 50 feet of high use recreational trails without posting signage of active trapping, and with refusal to move traps more than 50 feet off of the trail. He only checks his traps weekly and refuses to avoid conflict. I question his adherence to the code of ethics and clearly the definition is interpreted differently by each individual.

The 100 yard setback in the Homer area proposals is for a very small segment of mapped trails and was recommended by a trapper representative and other user groups. These proposals were unanimously approved by the local AC last spring, and at the last minute were opposed in January 2023 as being too broad. When the AC was asked to reconsider the January vote in February, with trapper and recreational users present to comment, they would not reconsider. An AC committee member falsely stated that this proposal would close trapping on trails from Homer all the way to Ninilchik.

These are NOT anti trapping proposals. They only clarify the ethical placement of traps in high multi-use areas, in an effort to minimize conflict between user groups. My dogs have always stayed on trail and out of deep snow, never harassing moose or other wildlife. It is impossible for a dog to resist the scented baits placed 50' off trails. The argument that all animals travel and are trapped on trails is wrong. If so, a snowmachine trail 100 yards or more off of the main trail may attract more animals and not dogs. I think it is unreasonable for one unethical trapper's use of a trail to close any portion of borough or state land for public use for a 3 month period. There are no leash laws and baiting dogs with scented baits is no excuse for implementation of leash laws.

The proposed mapped trails in the Homer area are permanent, GPS located and do not move as some AC members have implied.

These are very important proposals to consider and approve of to help the trapping industry and other users compromise for safe trails and to reduce conflicts. Continued and increased conflicts will not help the trappers cause and will only make things worse in time.

Thank your for your consideration.

## Trap Setback Proposals, Comments & Ballot

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee and other agencies to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (Cooper Landing area) and Game Unit 15 (Homer) I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing, Homer, and Seward area. **Select the proposals that you are in support of (select all that apply).***

*If there is more than one person in your household, please have each person submit their comments separately. Make copies of this form if needed or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) to request more.*

- ☐ # 145 Wildlife Crossings: ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ #149 Campgrounds: Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ # 150 Roads and pullouts: Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ #151 Summit Recreation: Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ #152 Trails: Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ #153 Beaches: Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ # 154 Signage: Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

### Other areas setback proposals:

- ☐ #146 Trails in Kachemak Bay State Park: Establish 100-yard trapping setback from the Diamond Creek Trail, Grewingk Glacier Lake Trail and the Grewingk Saddle Trail.
- ☐ #147 Ski Trails in Homer: Establish 100-yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ # 148 Seward Trails: Establish a 100-yard trapping setback from trails in Seward.



Please support proposal number 145 concerning establishing 1/4 mile trapping buffer for the new highway wildlife crossing on the Cooper Landing bypass. Establishing a 1/4 mile buffer will allow unobstructed pathway between wilderness areas subdivided by the new highway construction. This method for safe passage has been proven to benefit the local populations of wildlife and allow them to prosper. Failure to protect passage may jeopardize the natural migration of these animals and negatively impact wildlife populations by the targeted trapping, hunting and Highway death after focusing the migration to this crossing. The buffers established in the Kenai national wildlife refuge and crossings across the country have been well proven to protect animals in the immediate area of crossings and allowing possibility of biodiversity within genetic pools. Thank you for your time and consideration. Please vote to support number 145.

(Feel free to add extra pages of comments!)

Printed Name (First and last)\*: \_\_\_\_\_

Chris Perry

Organization (if any): \_\_\_\_\_

Signature\*: \_\_\_\_\_

Chris Perry

date

3/3/23

Email\*: \_\_\_\_\_

Street Address: \_\_\_\_\_

City\*: \_\_\_\_\_

Homer

State\*: \_\_\_\_\_

AK

Zip code: \_\_\_\_\_

99603

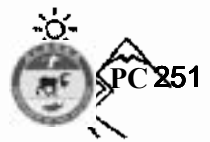
\*Indicates it must be filled in to be accepted.

Send to: ADF&G Boards of Support Section  
PO Box 115526  
Juneau, AK 99811

Comments via mail must be received (not postmarked) by the due date of March 3<sup>rd</sup>!  
Remember to have each household member submit separate comments individually.

*[Handwritten mark]*

Chris Perry  
Cooper Landing, Homer & Seward  
Trap Setback Proposals, Comments & Ballot



I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee and other agencies to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (Cooper Landing area) and Game Unit 15 (Homer) I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing, Homer, and Seward area. Select the proposals that you are in support of (select all that apply).*

*If there is more than one person in your household, please have each person submit their comments separately. Make copies of this form if needed or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) to request more.*

- ☐ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☐ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☐ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☐ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☐ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☐ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☐ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

**Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100-yard trapping setback from the Diamond Creek Trail, Grewingk Glacier Lake Trail and the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100-yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☐ **# 148 Seward Trails:** Establish a 100-yard trapping setback from trails in Seward.

Comments.



PC 251

See comment Page Attached  
comment Page 1 A

(Feel free to add extra pages of comments!)

Printed Name (First and last)\*:

Chris Perry

Organization (if any):

Signature\*:

Chris Perry

date

3/3/23

Email\*:

Street Address:

City:

Homer

State\*:

AK

Zip code:

99603

\*Indicates it must be filled in to be accepted.

Send to: ADF&G Boards of Support Section  
PO Box 115526  
Juneau, AK 99811

Comments via mail must be received (not postmarked) by the due date of March 3<sup>rd</sup>!  
Remember to have each household member submit separate comments individually.

Chris Perry

1A



PC 251

Please support proposals #146 and #147 trap setbacks in the Homer area.

There have been 8 dogs trapped within a couple miles of my home in the last two years and 3 on the McNeil area ski trails this winter. Four dogs were trapped by one trapper and 2 dogs by another in my neighborhood. One dog was trapped in a snare for three days before release approximately 100 yards from the owners property. Most of these traps were set within 50 feet of a summer road and public easement. My dog was trapped 30 feet off of this roadside. There have not been any posted signs of active trapping and when asked, the trapper has refused to post signage for fear of drawing attention to his activity.

Trappers are asked to abide by a "code of ethics". One of these trappers checks his traps only weekly. The trappers code of ethics asks to reduce possibility of catching non-target animals and trapping in ways to minimize conflict with other trail user groups. Avoid high recreational use areas, areas near homes, or trails used by hikers, skiers, hunters. This trapper has caught four dogs within 50 feet of high use recreational trails without posting signage of active trapping, and with refusal to move traps more than 50 feet off of the trail. He only checks his traps weekly and refuses to avoid conflict. I question his adherence to the code of ethics and clearly the definition is interpreted differently by each individual.

The 100 yard setback in the Homer area proposals is for a very small segment of mapped trails and was recommended by a trapper representative and other user groups. These proposals were unanimously approved by the local AC last spring, and at the last minute were opposed in January 2023 as being too broad. When the AC was asked to reconsider the January vote in February, with trapper and recreational users present to comment, they would not reconsider. An AC committee member falsely stated that this proposal would close trapping on trails from Homer all the way to Ninilchik.

These are NOT anti trapping proposals. They only clarify the ethical placement of traps in high multi-use areas, in an effort to minimize conflict between user groups. My dogs have always stayed on trail and out of deep snow, never harassing moose or other wildlife. It is impossible for a dog to resist the scented baits placed 50' off trails. The argument that all animals travel and are trapped on trails is wrong. If so, a snowmachine trail 100 yards or more off of the main trail may attract more animals and not dogs. I think it is unreasonable for one unethical trapper's use of a trail to close any portion of borough or state land for public use for a 3 month period. There are no leash laws and baiting dogs with scented baits is no excuse for implementation of leash laws.

The proposed mapped trails in the Homer area are permanent, GPS located and do not move as some AC members have implied.

These are very important proposals to consider and approve of to help the trapping industry and other users compromise for safe trails and to reduce conflicts. Continued and increased conflicts will not help the trappers cause and will only make things worse in time.

Thank your for your consideration.



# Cooper Landing, Homer & Seward Trap Setback Proposals Petition



PC 251

I support the following proposals submitted to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (Cooper Landing Area) and Game Unit 15 (Homer). I believe these proposals suggesting 100-yard setbacks are reasonable to maintain safe recreation for all public land users and their pets.

**# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass

**#149 Campgrounds in Cooper Landing:** Establish a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds.

**# 150 Roads and pullouts around Cooper Landing:** Establish a 100-yard trapping setback along both sides of roads and all sides of the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and pullouts from mile markers 37(Tern Lake) - 54.9(Russian River Ferry).

**#151 Summit Lake Recreation Area:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.

**#152 Trails in Cooper Landing Area:** Establish a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and first 400 yards of the trail.

**#153 Kenai Lake Beaches:** Establish a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake

**# 154 Signage for Cooper Landing Area:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## Homer & Seward setback proposals:

**#146 Trails in Kachemak Bay State Park:** Establish 100-yard trapping setback from the Diamond Creek Trail, Grewingk Glacier Lake Trail and the Grewingk Saddle Trail.

**#147 Ski Trails in Homer:** Establish 100-yard setback from the Mapped Trails south of Caribou Lake and the Kachemak Nordic Ski Club Trails

**# 148 Seward Trails:** Establish a 100-yard trapping setback from trails in Seward.

PAGE 1 of 5



I support BOG proposals #145 through #154 all considering trapping setbacks and buffers on multi-use trails.



PC 251

Name (print)	Signature
1. S.T. Roufa	
2. Nicholas [unclear]	
3. Holly Atkins	
4. Katie Weaver	
5. Brandon Thielke	
6. John [unclear]	
7.	
8.	
9.	
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I support B56 proposals #145 through #154, all consider setbacks and buffers on multi use trails.

**Supporters**

	<u>Name print</u>	<u>Signature</u>
	<u>Address</u>	
1.	Colin McGovern	Homer AK 99603
2.	Emily Garity	Homer AK 99603
3.	JULIA GARTY	AK 99743
4.		
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25.		

*[Handwritten signatures and notes]*  
Emily Garity  
Julia Garity

I support BOG proposals #145 through #154 all considering trapping setbacks and buffers on multi-use trails.



PC 251

Name (print)	Address	Signature
1. Devon Hiltz		
2. <del>Anna</del>		
3. NANCY WEBB		
4. Mallory Paine		
5. Abigail Clapp		
6. Tracey Tillion		
7. Tricia CARON		
8. Charlie GILSON		
9. Lynne Sinnhuber		
10. CRISTOBAL FIZUE		
11. Paula Cullumber		
12. Jessica Ford		
13. Kathleen Bass		
14.		
15. Katie Rutalana		
16. <del>Maria</del>		
17. Michael Pe		
18. Catherine H		
19. JANET HEGLEY		
20.		
21. Jenny Stroyeck		
22. Linda Franklin		
23.		
24.		
25.		

I support BOG proposals #145 through #154 all considering trapping setbacks and buffers on multi-use trails.



PC 251

Name (print)

Address

Signature

1. ~~#13~~ Janette Spunkle

AK Janette Spunkle

2. Jennifer Bando

AK 99603 Jf B

3. Lori Cray-Ramsdell

AK 99603 Lori Cray

4. Megan Tashash

Point 99556 Megan

5. Christelle R

AK 99603 Christelle

6. Kara Bauer

AK 99603 Kara Bauer

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**Submitted by:** Kristen Peters

**Organization Name:**

**Community of Residence:** Eagle River, AK/ Cooper Landing, AK

**Comment:**

In regards to the trapping set back proposals, specifically in unit 7 (148-154), it must be brought to light the disparity of these requests. Where trapping set backs are being requested in multi- use areas for the safety of children and unleashed dogs, there is zero enforcement of existing leash laws, which seems would solve this problem entirely.

I understand it is socially normal now to let your dog run, however it seems to be getting out of hand. As a mother to a 1 yo and 3 yo, we frequent multi-use trails in the winter and summer, and are nearly always met by dogs off leash. I often hear, "Oh my dog is nice", however as a parent it is my RESPONSIBILITY to ensure the safety of my kids so they do not get bitten. I like dogs! I have dogs. I recreate with them off leash when appropriate (not high trafficked areas). But I do not trust a dog I do not know. I never let a strange dog greet my child face to face, despite them running up to them constantly. AND, I make sure my dogs are close. Where is the responsibility to ensure a dog's safety and well being?

Furthermore, I have absolutely no fear of my kids being trapped, despite the argument frequently posed to justify setbacks. This would be extremely unlikely or better yet, a near impossible event.

Understandably, fearing your dog getting caught while recreating in the winter is upsetting. Leash laws are not enforced, so let there be specific trapping set backs for large traps, while still allowing dog safe trapping methods within these areas. Multi- use means multi-use, and let's eliminate the hypocrisy of these proposals.

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Duane (Andy) & Petrina Peterson

[REDACTED]

Kodiak, Alaska. 99615

Re: **Proposal 76 "Support as Amended"**

Lengthen the brown bear registration hunt seasons for RB230 and RB260 in Unit 8 as follows:

**RB230 Change dates to September 15 - November 30**

**RB 260 Change dates to March 1 - May 31**

We greatly appreciate any changes that would promote the safety of Kodiak residents and property from any bear encounters.

We have lived at Anton Larsen Bay year round since 2003 and have had more frequent bear encounters with each passing year. Also, we have experienced property damage numerous times from bears that are in our yard. We never used to see any bears go thru our yard and now we have to carry a gun/bear spray while doing chores around the yard during the spring, summer and fall months.

According to the Kodiak Bear Fact Sheet on the ADFG website, there are about 3500 bears; a density of about .7 bears per square mile. We would greatly appreciate you doing what you can to reduce bear issues in the areas where people reside.

Sincerely,

*Andy Peterson*  
*Petrina Peterson*



PC254

**Submitted by:** Candace Paige Petr

**Organization Name:**

**Community of Residence:** Anchorage, Alaska

**Comment:**

I support the proposals to increase setbacks because I walk, bike and ski Alaska's trails with children and dogs. A friend lost her dear dog in a bear trap set to trap wolverine in the winter. Thank you for your consideration.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC255

**Submitted by:** Joseph Piper

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I support the very reasonable 100yd setback on trails shared by both recreational users and trappers.

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC256

**Submitted by:** Tyler Polum**Organization Name:****Community of Residence:** Kodiak, AK**Comment:**

I am opposed to the portion of proposal 73 that reduces the deer bag limit for all of unit 8 for residents to two. It should remain 3 or even increase the limit to 4 or 5 and let ADFG manage specific areas by emergency order. While some parts of Kodiak seem to have had a significant reduction in deer populations, I would counter that not all of Kodiak saw the same declines. There are places on the Eastside of the Island that seem much less affected by deer populations crashing than on the Westside of the Island. In addition, deer harvest does not seem to be a limiting factor in their population growth as they are almost entirely influenced by winter severity. If the goal was to manage deer for antler size and keeping older bucks in the population for trophy hunting, that would be one thing, but they are a subsistence resource for Island residents primarily, where deer age and size is much less of a factor. For my family, reducing the bag limit would have a significant effect as this is our primary source of meat each year.

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Proposal 73: Oppose



PC257

**Submitted by:** Don Poole**Organization Name:****Community of Residence:** Soldotna, Alaska**Comment:**

OPPOSE PROPOSAL #82 Bowhunting is a very short range weapon. Because of that, a limited harvest is allowing for more quality hunting. As hunting is becoming more regulated, more quality hunting is needed.

SUPPORT PROPOSALS FOR NEW BOWHUNTS in #67, 71 & 72, 87, 91 - 93, 99 & 100, 110 -113, 119 - 126.

These new bowhunts allow for more quality hunting experiences as women and younger hunters step up to hunt in the quality experience of aging hunters.

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Proposal 67: Support Proposal 71: Support Proposal 72: Support Proposal 82: Oppose Proposal 87: Support  
 Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 99: Support Proposal 100: Support Proposal  
 101: Support Proposal 110: Support Proposal 111: Support Proposal 112: Support Proposal 113: Support Proposal  
 119: Support Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support Proposal 124:  
 Support Proposal 125: Support Proposal 126: Support



**Submitted by:** Susan Post

**Organization Name:**

**Community of Residence:** Homer

**Comment:**

Thank you for taking comments. As an active hiker and skier (and campground user) and as a dog owner who's dog was both trapped and snared on an existing trail close to our house, I feel 100 yards is the absolute minimum- I would like to see more. One of the traps that our dog was caught in was less than a foot off the trail we were on! I shudder if that had been a young child hiking or skiing with parents and fell right there and got a hand stuck in the trap. I am opposed to any trapping in state campgrounds or the Summit Lake Recreation Area. Many families are there, with young children, and again, 100 yards does not seem far enough away to ensure that children playing in the woods wouldn't be trapped. I guess if signs were required and parents knew there were traps, that might help, but who guarantees someone doesn't tear down a sign? I also wish there was more education as I feel the person who set the trap and snare our dog was caught in probably was a new trapper and had no clue what a horrible thing they did by setting the traps so close to a trail.

The proposals I am specifically commenting on here are #146, # 147, #149, #151, #152 and #154, however, I do think signs at any publicly used trails are important and necessary. As populations increase and tourism increases in Southcentral (and all of Alaska) I feel it is critical that safety and consideration of hikers and families with children and dogs need to be addressed. Trapping in this area no longer can be just off a trail or a parking lot.

Thank you,

Susan Post

Homer

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Proposal 145: Support Proposal 146: Oppose Proposal 147: Oppose Proposal 149: Oppose Proposal 150: Support  
Proposal 151: Oppose Proposal 152: Support Proposal 154: Support

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Proposal 204

Oppose

Members of the board,

I oppose proposal 204

I moved to Alaska in 1975 and have lived in south-central since then. I have been a full time outfitter and guide in 19C for nearly 40 years. I feel I am as intimate with the populations of sheep in my corner of the GMU 19C as anyone. As a pilot actually living and working in the area most of the year, I see the decline in numbers due to low lamb recruitment. I also see myself and the other stakeholders in the area voluntarily reducing impact on the sheep herd. I do not see a biological reason to close the season.

Dall sheep populations have shown a cyclical pattern ever since record keeping began in the 1920s. According to the Alaska Department of Fish & Game (ADF&G) website,

“Sheep numbers typically fluctuate irregularly in response to a number of environmental factors. Sheep populations tend to increase during periods of mild weather. Then, sudden population declines may occur as a result of unusually deep snow, summer drought, or other severe weather events. Low birth rates, predation (primarily by wolves, coyotes, and golden eagles) and a difficult environment tend to keep Dall sheep population growth rates lower than many other big game species. However, their adaptation to the alpine environment seems to serve them well.”

Since 2018 the number of Dall sheep hunters going to the field in 19C has decreased some 15-25% per year. Are those hunters staying home or are they hunting elsewhere? A search on the ADF&G website, other areas have seen an increase in sheep hunters since 2018. By closing 19C, other Game Management Units will see a potential rise in sheep hunters, putting more pressure on other populations.

We also need to look at the current decline in the Parklands surrounding 19C. These are areas with NO hunter influence and we are still seeing a decline. Is closing the season a viable option or a knee-jerk reaction to uneducated public sentiment? I believe Proposal 204 is not biologically founded in research. With the full curl regulation that's in place, I have no doubt that the numbers will come back provided we have mild to average winters.



The full curl regulation is the best management tool for more than 30 years. Studies have shown that once a ram surpasses 8 years old, survivability diminishes in wild populations with very few rams surpassing 12 years of age. Full curl, 8 plus year old rams constitute less than 5% of total sheep population. Harvest of 8 year old rams has no effect on the overall sheep population. Furthermore, harvesting these older rams removes foraging pressure, reduces potential injuries for younger ram in their breeding prime during the rut.

The increase of sub-legal harvest the past few seasons is unacceptable. We must implement education for sheep hunters. Lack of knowledge and misunderstanding how we impact sheep herds are a large part of our current management problem. Social Media influence and entitlement are terrible influences within our hunting community.

I see the best way to resolve this as education of all stakeholders. This requires funding. We are long overdue for an increase in license and tag fees for ALL sheep hunters. A mandatory online Dall sheep hunter orientation course, similar to the nonresident moose hunter orientation on the [hunt.alaska.gov](http://hunt.alaska.gov) website, for every resident, nonresident and guide would have a positive influence in solving this problem. I also feel there should be a field day requirement where the hunters can meet with the biologist and get hands on learning about not only judging, the entire life cycle, impact on sheep from hunting, and taking of sub-legal and young rams.

The Full-Curl Identification Guide already exists on the ADF&G website.

I believe education is paramount to protecting our resources as well as our heritage and opportunity to hunt. This said, fines may curtail some of the sub-legal harvest, however, I believe they also increase the percentage of sub-legal rams taken that are not reported. I suggest a “community service” penalty for first offenders 30-40 hours working with ADF&G. A second offense results in loss of license and a substantial fine, third offense or failing to self-report a sub legal ram loss of all hunting privileges for 5 years. Being caught hiding or altering a ram loss of hunting privileges permanently for all big game.

The welfare of the state’s game populations is first. Implementing proposals to positively maintain Dall sheep hunting opportunities rather completely closing the season should be the goal.



Consider Dall sheep regulations such as:

- The harvest of 1 ram every 4 years for both residents and nonresidents
- Shortening of the general season
- Placing a restriction on individuals that draw a sheep permit: if you draw a permit that is your sheep hunt for the year. You are not allowed to hunt in any other area during that regulatory year.
- Intensive predator control management.
- Creation of a Dall sheep working group in order to come up with the best path forward to Dall sheep conservation.
- Please be mindful of the consequences of this proposal. Historically once we lose an opportunity to hunt it is often permanently lost.

Thank you for your consideration and I hope we can move to implementing a positive change in education, knowledge and continued opportunity for all Sheep hunters.

Sincerely,

Jeff Pralle



## Proposal 205

### Oppose

#### Board of Game Members:

Equally concerned about the blatant disregard of the Farewell airstrip, surrounding lands, resources, and wildlife in general. The amount of trash, empty fuel drums and ATVs left at the taxiway and hidden in the bushes that hunters leave behind is atrocious! I find it embarrassing as an Alaskan and a hunter.

I have been hearing about this from our former Wildlife Trooper Gibbons from McGrath for years. I have flown over the area and can attest to the impact and mess left behind. I avoid the Farewell area during hunting season for these reasons.

The length of the Farewell air strip, the many ATV trails that spider out from Farewell and its relatively closeness to Anchorage make it a moose hunting magnet for residents and nonresidents alike to fly out their ATVs and camping gear in large cargo planes for an easy moose hunt. The registration permit area RM653 was created to get a more accurate grasp on the number of hunters and moose harvested within the Farewell area.

Historically, users are made up of 55% residents and 45% nonresidents with the moose harvest being about the same percentages of resident versus nonresidents. This past season saw 107 residents and 94 nonresidents, with 56 bulls harvested by residents and 50 by nonresidents, according to the Alaska Department of Fish and Game (ADF&G). According to ADF&G the bull to cow ratio is 30 to 100 in the Farewell area currently. The bottom threshold for the area is 25 to 100. The mid 90s saw this threshold breached and crash in the moose population occurred. In more remote inaccessible areas, the bull to cow ratios is 60-80: 100 from the article Recovery of low bull: cow ratios of moose in interior Alaska by Young and Boertje. To get the bull ratio to come back up, a cap needs to be put on the number of bulls harvested within the registration area. That number, I have been told by ADF&G personnel is 60 bulls per year. Limiting nonresidents to 20 draw permits per this proposal will not solve the problem.

A secondary concern is the several "large camps" in the registration hunt area that bring in several hunters (friends, customers, employees, etc.) September 1-10 and then have a change out halfway through the season and bring in another set of hunters September 11-20. These large camps resemble a guiding and outfitting operation. There are only 2 state licensed outfitter/guides that are registered to conduct big game commercial services in the hunt area.

Another area of concern, the number of sublegal bulls harvested per year. I was told by an ADF&G wildlife trooper some years ago that 8 to 10 sublegal bulls are taken in the registration area every season. This needs to be corrected.



I support Spencer [REDACTED]'s suggestion to:

"To bring the bull to cow ratio and bull moose harvest into the parameters deemed optimal by ADF&G within the registration hunt area, I suggest establishing a moose draw permit for all user groups and mirror the nonresident draw permits to the Unit 21E moose hunt regulations. Unit 21E states that nonresident applicants may only apply for DM837 (nonguided only) or DM839 (guided only), but not both. Second, meat must remain on the bones of the front quarters, hindquarters, and ribs until removed from the field or it has been processed for human consumption. This is already a requirement in 19C. Third, nonresident moose hunters must complete the Nonresident Moose Hunter Orientation online at <http://hunt.alaska.gov> or must be accompanied in the field by an Alaska licensed guide. In accordance with the recommended harvest of 60 bulls and the historical user group history of 55% residents and 45% nonresidents within the hunt area, 40 tags to residents, 14 tags to nonguided nonresidents and 6 tags to guided nonresidents."

Summarized:

We have a "Pinch point" access issue

Creating more pressure than is desired

Lack of education resulting in sub-legal harvest

Lack of enforcement officers and subsequent abuse of State Land Use Regulations and Hunting Statutes

Lack of funding to resolve the above issues

Thank you for your time and dedication to this Board.

Sincerely,

[REDACTED]



**Submitted by:** Myles Purington

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I am writing in support of proposals 154, 146, and 147. I am a skier and hiker in the Homer area and know several people who have had their dogs caught in leg traps within close proximity of well-used public easements, roads and ski trails. In our increasingly populated area, it seems a reasonable compromise for those engaged in trapping to keep their gear far enough off of public trails to keep dogs from casually encountering it. With regard to proposal 154, posted signage would help the public avoid unwanted interaction with traps.

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Proposal 146: Support Proposal 147: Support Proposal 154: Support

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**Submitted by:** Greta Pursley

**Organization Name:**

**Community of Residence:** Rainbow Valley, Indian, Alaska

**Comment:**

Proposal 98

I oppose Proposal 98. I live in Rainbow Valley with my husband who has been there for 52 years! Hunters even close to the Valley present high safety concerns for all of our families living in the Valley and for the high amount of families with children walking the trails on all sides of our valley. We have many small children who live and range throughout Rainbow Valley all year. We have our pets who range within our boundaries. Our private community takes up about 80 acres and extends a whole mile all the way up one hillside to all the way up the other hillside- there is no room for hunting. Although hunters are supposed to stay away from buildings, our buildings have been integrated into the natural looks of the valley, our houses are very difficult to see and covered in trees and bushes, and hunters won't be able to spot where families and children may be living. There are no lawns and such to mark where people live; we are integrated into the very nature of our Valley! Any hunt would have to take place all the way up at the top of the ridge to be far enough away from our properties and even there we have all the tourists hiking over ridges in all seasons. This is not a Valley where families can be kept safe and separated from hunting areas, because there is no area where children and families from both inside and outside the Valley are not in danger from a stray bullet or arrow!

Please do not allow this to happen! Our children are the future of Alaska; imagine what a terrible thing it would be to have them shot by fellow Alaskans by mistake! We all know the caliber and the range necessary for hunting would carry bullets or arrows past their targets and endanger humans in this area. We also all know that once you allow hunting in an area, you cannot protect us from the individual hunters who may or may not follow boundary rules. We don't even have the option of immediate assistance should an emergency occur, since last time we had an emergency there was a lag time

of 5 hours due to having only one or two policemen for the whole Seward Highway; and ambulances cannot easily negotiate our roads in the hunting seasons. There simply is NO place where hunters can be in Rainbow Valley or even close by that won't jeopardize public safety, because there are so many people and so many families and buildings. Even below the Valley private holding is an area that is frequented in every season by children and families who walk the McHugh to Johnson Trails. You absolutely cannot guarantee our safety if this proposal goes through. Please, I beg of you, do not let the thought of making more money from hunting groups allow you to endanger families and children of Alaska!

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Proposal 98: Oppose

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**Submitted by:** John Pursley

**Organization Name:**

**Community of Residence:** Indian, Ak

**Comment:**

I strongly oppose Proposal #98

I have been a resident in Rainbow Valley for 52 years. Of all the homes in our community, our home is the nearest to the Seward Hwy. Because of this location, we have seen more people trespassing wanting to hunt sheep, moose, and bear over the years than most of our neighbors. Our community's private property stretches one mile East to West from up one hill side to up the other. Our homes are located throughout this area.

Several homes have children.

No one from outside the community would know where our private property boundaries are. Hunters would likely trespass attempting to reach the upper elevations above our property and have no idea where the homes are.

PLEASE do not include our little valley in your plans to open any hunting, most importantly bear hunting because of the caliber and range of the guns used for bear!

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Proposal 98: Oppose

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I have been a resident in Rainbow Valley for 52 years. Of all the homes in our community, our home is the nearest to the Seward Hwy. Because of this location, we have seen more people trespassing wanting to hunt sheep, moose, and bear over the years than most of our neighbors. Our community's private property stretches one mile East to West from up one hill side to the other. Our homes are located throughout this area.

Several homes have children.

No one from outside the community would know where our private property boundaries are. Hunters would likely trespass attempting to reach the upper elevations above our property and have no idea where the homes are.

PLEASE do not include our little valley in your plans to open any hunting, most importantly bear hunting because of the caliber and range of the guns used for bear!

---





**Submitted by:** Kai Pyle

**Organization Name:**

**Community of Residence:** Kodiak, Alaska

**Comment:**

I oppose proposal 74. This proposal seeks primarily to stem potential waste by deer hunters that bone out deer meat before returning to a commercially operated vessels that afford commercial boat-based lodging and transport services specifically tailored to facilitate unguided deer hunting. Although the proposal targets potential waste by this group of hunters, if approved, it would affect all deer hunters in GMU 8. Requiring all deer hunters to pack deer meat out bone-in till they return from the field is unnecessary and discriminatory. Boning out meat in the field, when done properly, does not yield wasted meat. The requirement to pack out meat bone-in would unfairly discriminate against most deer hunters, residents, and non-residents alike, who hunt the backcountry. If solo hunters are required to leave meat bone-in then, in many cases, they would need multiple trips to pack the meat out of the field because they could not handle the heavy load of a big deer, up to 80-120 pounds, in one trip. Hunters who attempt to pack out a heavy load of bone-in meat would deal with increased safety hazard as they attempted to pack the heavy load out of the field from the kill site over often wet mountainous brushy terrain. On the other hand, hunters who decide to pack the bone-in deer in two trips would encounter a much higher risk of conflict potential with brown bear that homed in on the kill site while the hunter was away on the first pack trip. Not only would safety hazard for the hunter, but also for the bear. This is because, outside of towns, most of the Defense of Life and Property bear kills in the Kodiak area outside of towns, involve conflict with deer hunters after harvest action has occurred. Finally, approval of this proposal would be especially ironic and paradoxical in Kodiak where, by regulation, the state does not require recreational sport hunters of brown bear to pack any of the bear meat from the field. Wanton waste concern?

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Proposal 74: Oppose

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**Submitted by:** Cecelia Quinn

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I am writing in support of proposals 145-154.

I support the 1/4 mile hunting/trapping buffers from the new wildlife crossings on the upcoming Cooper Landing bypass. It's not ethical to funnel animals to a crossing, where they are then killed!!!

In Homer, proposals 146 asks for 100 yard setbacks for trapping on some trails in Kachemak Bay State Park. Proposal 147 asks for 100 yard setbacks on some ski trails in the Homer area. I support both of these, especially since my dog and 3 neighbor dogs have been caught in traps.

I also support proposals 148 through 153, requesting 100 yard setbacks in other Kenai Peninsula recreational areas and trails.

And I emphatically support proposal 154 which requests signage where active trapping is occurring. Honestly, that is a no brainer! A dog owner who doesn't know anything about traps, could call the trapper to ask how to release a caught pet. And it just seems like a basic safety issue to let people know loud and clear that there's trapping going on in the area.

Please, please vote to support these proposals to allow trappers and recreational users to exist on the same trails.

Thank you for your consideration.

Cecelia Quinn

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Support Proposal 156: Support Proposal 160: Support Proposal 162: Oppose

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I am writing in support of proposals 146 and 147, which address 100 yard setbacks for trapping on certain high use trails in the Homer area. I know of 11 dogs that have been trapped in the last 2 years close to nearby trails, including my own dog, and a friend's dog. Her dog was trapped within 100 yards of her property and was left in a snare trap for 3 days. Although these setbacks would not help me where I walk my dog, it is a start to addressing safety on multi use trails. I will never forget the harrowing screams my dog let out when she was trapped about 30 feet off the trail we were walking, and there is no leash law where we are walking. I live in an area that has low population density, which makes it perfect for dogs to be able to stretch there legs off leash.....except for the trapping danger.

Of the 11 dogs trapped, 4 were trapped by the same trapper, who has agreed that 100 yards setbacks are necessary due to more and more people using the trails for recreation.

Please vote to support these proposals to allow trappers and recreational users to exist on the same trails.

Thank you for your consideration.

Cecelia Quinn

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I oppose proposal 162. Forty years ago we often saw ptarmigan around our house in the winter. Then about 30 years ago we stopped seeing ANY in our area until a few years ago, like 2021-2022.

In 2015 ADF&G shortened the hunting season on ptarmigan, and it took 5 years before we saw them again. This year we haven't seen any ptarmigan. Pleased not approve this proposal to lengthen the hunting season again.

Thank you.

I support proposals 155,156, and 160 regarding beavers management.

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**Submitted by:** Paul & Laurie Radzinski

**Organization Name:**

**Community of Residence:** Cooper Landing, Alaska

**Comment:**

Regarding Proposals #145, #146, #147, #148, #149, #150, #151, #152, #153, #154

As Cooper Landing landowners since 1992 and full time residents since 2015 we strongly support the above identified proposals.

We reside towards the end of Bean Creek road in Cooper Landing which gives us direct access to Bean Creek Trail and Resurrection Trail. We regularly use most of the trails located in the Cooper Landing area including Russian River trail, Slaughter Ridge road, Snug Harbor road, Quartz Creek road and associated trails and most associated campsites and beaches. We use these trails and roads all year for hiking, biking, skiing, snowmachining, snowshoeing, hunting and fishing. We usually take our dog and often friends and family on these excursions. Our trails and recreation areas in Cooper Landing are heavily used all year around. Recreation in Cooper Landing drives our economy. I nearly always run into people on the trails even in the winter. All the people I recreate with and run into on the trail systems all unanimously agree with some type of setback for trapping on these heavily used systems.

Dogs have been caught in the past in traps and will continue to be caught. Many children recreate with their parents on these outings and it is only a matter of time before the unthinkable happens. For me, 100 feet is only about 40 steps. I do not understand why such a small effort can not be made by the trapping community in order to reduce the danger and pain that unethical trapping exposes to children and pets and to promote good community common ground.

A significant majority of the residents of Cooper Landing and those that recreate here are in agreement with some type of trapping setback. No one wants to ban trapping. The community only wants common sense rules that protect and serve all the people that use these resources.

Please support the above mentioned proposals.

Regards,

Paul and Laurie Radzinski

Cooper Landing, Alaska

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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To: ADF&G Boards Support Section  
Attn: Board of Game Comments

From: Jeremiah Drage, President, Rainbow Valley Homeowners Association (RVHA)

Re: 2022/2023 Board of Game Proposal #98 - Open a hunt for brown bear in Rainbow Creek Drainage/Unit 14C

Proposal 98 states that the Board of Game (BOG) considered a black bear hunt in Rainbow Creek Drainage at their last cycle of meetings. The Rainbow Valley Homeowners Association (RVHA), representing 160 acres of private property and households within the Rainbow Creek Drainage, was unaware of those considerations at that time.

Now that RVHA has had an opportunity to review Proposal 98, we are opposed to the 2022/2023 Board of Game Proposal 98 and urge that there not be a brown bear hunt in Rainbow Creek Drainage/ Unit 14C for the following reasons:

1. With our homes scattered over 160 wooded acres in the center of the Rainbow Creek Drainage, hunters would be unable to easily measure a half mile distance from our homes, even if they could find each home.
2. To attempt to find each home and begin measuring a half-mile distance, hunters would likely need to trespass on our private property, which would be a violation of our property rights, and could lead to confusion and unnecessary confrontations between homeowners and hunters.
3. We will not allow hunters to cross our property to scout game, pack meat, or to pursue a wounded bear.
4. A wounded bear would pose an unacceptable danger to our families.
5. If we knew there was a wounded bear, we would contact the appropriate department at Fish and Game to track the animal. Upon hearing gun shots, we would, of course, have no way of knowing if a wounded bear was running among our homes. Living with this level of uncertainty is unacceptable.
6. High caliber rifle bullets can travel considerably farther than a half mile; and would pose an unacceptable danger to our families. There would be little, if any, terrain in the valley far enough from our homes for us to be safe from stray bullets.

We also would like to call your attention to the management of Chugach State Park lands, adjacent to our community, which prohibits the discharge of firearms within the Rainbow Creek Drainage (11 AAC 12.190). This area is easily accessed and well used by the public year-round for recreation. In addition, we note that the park was established by the legislature in part to "provide areas for the public display of local wildlife" (AS 41.21.121).

Our community has peacefully co-existed with bears for many years. Some of us hunt and we all know that hunting is part of Alaska's history and culture. However, we are opposed to the 2022/2023 Board of Game Proposal 98 and urge that there not be a brown bear hunt in Rainbow Creek Drainage/ Unit 14C.

Respectfully,

Jeremiah Drage  
President- RVHA



**Submitted by:** Cindy Ranta

**Organization Name:**

**Community of Residence:** Seward, AK

**Comment:**

Attached

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support    Proposal 149: Support    Proposal 150: Support    Proposal 151: Support    Proposal 152: Support  
Proposal 153: Support    Proposal 154: Support

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## Comments for trapping setbacks, South Central AK

### **Proposal 145 – Support**

I strongly support this proposal to achieve intended results of the wildlife corridor. The under/over passes would be a complete waste of resources otherwise.

### **Proposal 149 – Support**

Agreed, large traps should have a setback of 100 yards from campgrounds, to ensure safety of *all users*.

### **Proposal 150 – Support**

Agreed, large traps should have a setback of 100 yards from listed roads and pullouts, to ensure safety of *all users*.

### **Proposal 151 – Support**

Agreed, large traps should have a setback of 100 yards from all listed pullouts, access points, and winter trails, to ensure safety of *all users*.

### **Proposal 152 – Support**

Agreed, large traps should have a setback of 100 yards on listed multi use trails, to ensure safety of *all users*.

### **Proposal 153 – Support**

Agreed, large traps should have a setback of 100 yards from the Kenai Lake Bench and Beaches, to ensure safety of *all users*.

### **Proposal 154 – Support**

I strongly support this proposal to have posted signage at all active trapping access points. This will make all users aware of the activity and will ensure safety of *all users*.



PC268

**Submitted by:** Kathryn Recken

**Organization Name:**

**Community of Residence:** Cooper Landing, AK

**Comment:**

I support proposals #145 through 156 that request trapping setbacks, signage and other regulations along trails and in areas with high recreation and public use in the Cooper Landing and Kenai Peninsula areas.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147:  
Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152:  
Support Proposal 153: Support Proposal 154: Support Proposal 155: Support Proposal 156: Support

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PC269

**Submitted by:** Donald Rees

**Organization Name:**

**Community of Residence:** Anchorage, Alaska

**Comment:**

I fully “support” Proposal 145 which will close areas to hunting and trapping within 1/4 mile of parts of the Sterling Highway in Units 7 and 15.

I support this proposal because:

- 1) the new wildlife crossings along with proposed fencing on the Sterling Highway Cooper Landing bypass will act as bottlenecks for wildlife moving across the highway corridor and funnel wildlife to these crossings resulting in potentially disproportionate harmful unintended consequences.
- 2) the Sterling Highway Cooper Landing bypass will construct approximately 15 miles of new road and open many acres to public access in an area that has many wildlife travel corridors and many acres of wildlife habitat. Putting restrictions on hunting and trapping in these newly opened areas where wildlife will potentially be concentrated only makes common sense.

Thank you for considering my input.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support

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## Cooper Landing, AK Trap Setbacks



PC 270

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

***Please select the proposals that you are in support of (select all that apply).***

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

### **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 270

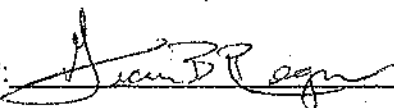
Thank you for considering this proposal. Grace

I feel there is a need to protect from harm our young children and our pets. Safety First!

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Grace Bluebird Reger

Organization (if any): N/A

Signature\*: 

Email\*: 

Street Address: 

City\*: Cooper Landing

State\*: AK

Zip code: 99572

\*indicates it must be filled in to be accepted.



**Submitted by:** Alison Rein

**Organization Name:**

**Community of Residence:** Seldovia

**Comment:**

Proposals 145-155: I support the creation of set-back from all access points, trails-and recreation areas mentioned in these 10 proposals, and posting signs where traps have been set so other users of the land are informed of the hazards present

Traps present significant hazards to recreationist and their pets and the presence of baited traps is not compatible with other public uses of the land. I would encourage the board of game to establish state-wide standards regarding trapping set-backs instead of this piecemeal approach to limiting places where traps can be set.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support  
Proposal 155: Support

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

February 28, 2023

**Comments to Alaska Board of Game  
Region II Southcentral Meeting  
March 17–22, 2023**

**Proposals we support: 58, 61 as amended, 71, 72, 77 as amended, 78, 79, 82, 90-102, 119-126 as amended, 204 as amended**

**Proposals we oppose: 73, 104, 134-142, 145-154**

**Proposal 61 – 5AAC 85.030 Hunting seasons and bag limits for deer**

**Lower the resident and nonresident general season bag limit for deer in Unit 6**

**SUPPORT AS AMENDED to lower nonresident bag limit only**

Recent federal proposals to curtail non-federally qualified deer hunting in Southeast Alaska have been a concern and the board recently lowered the bag limit for deer for all nonresidents in Units 1-4.

We agree with the proponent of this proposal that there should be a reduction in bag limit for all nonresident deer hunters, but we **oppose** any reductions in the resident bag limit.

**Unit 6 – Deer**

**Nonresidents – 2 Deer total**

**Bucks Aug 1 – Sept 30**

**Any deer Oct 1 – Dec 31**

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**Proposal 77 - 5AAC 92.061 Special provisions for brown bear drawing permit hunts**

**Eliminate brown bear permits the following season, when a female bear is taken in Kodiak bear management units 8-16 on Kodiak Island.**

**SUPPORT AS AMENDED**

Thank you to the Kodiak Advisory Committee for relating concerns for the brown bear population in the southwest portion of Kodiak Island.

As stated in the proposal, past RY94–RY06 regulations addressed these same conservation



concerns with penalties for the taking of any sow with a skull size under 9 inches wide and 15 inches long by nonresident guided hunters in these same southwest portions of Kodiak Island. Sows harvested that did not meet the minimum skull size requirements resulted in a loss of a permit the following regulatory year in the permit area where the sow was taken.

The Kodiak Archipelago Bear Conservation and Management Plan, in Appendix T, references survival of adult sows in the same southwest portion of the island with these comments (our emphasis: *"Survival of adult female brown bears on Kodiak Island is high even though they are a component of a hunted population. **This is a result of protection they are afforded when accompanied by offspring, by having minimum skull size restrictions in some permit areas, and by having generally lower trophy value (small size) compared to males.**"*

We are not sure why the past minimum sow skull size regulation for nonresident guided hunters in the southwestern portions of Unit 8 was rescinded, nor why it has taken so long to come forward again after management reports of declines in these areas.

The Department comments on this proposal state that, *"Although the effect and success of these female skull size restrictions is difficult to assess, it was widely believed this prior regulation (RY94-RY06) had a positive effect on the population."*

Again, the past regulation that had a minimum skull size for sows taken by **nonresident guided hunters only** in these areas was "widely believed" to have had a positive effect on the bear population. We see no reason to expand this minimum sow skull size requirement across the board for both residents, and nonresident guided hunters, when nonresident guided hunters currently receive such a high allocation of permits and when by all measures limiting it to nonresident guided hunters only had such a positive effect in the past.

We therefore support this proposal as amended to revert back to the same past skull size minimum requirements for sows taken by nonresident guided hunters in bear management units 8-16, but want to **stress that we oppose minimum sow skull size restrictions and penalties for resident hunters in these areas.**

#### **Unit 8 – Nonresidents and Nonresident Aliens Hunting with an Alaska-licensed Guide**

**One bear every four regulatory years, except that in the Deadman Bay, Dog Salmon River, South Olga Lakes, Red Lake, Frazer Lake, Karluk Lake, Halibut Bay, Sturgeon River, and North Karluk River permit hunt areas, for each female bear with a skull length (posterior sagittal crest to center of upper incisors) of less than 15 inches or with a skull width (zygomatic breadth) of less than nine inches harvested in a regulatory year by a guided nonresident hunter, one permit will be deducted from the next regulatory year's nonresident allocation for the area in which that bear was taken.**

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#### **Proposals 78 - 5AAC 92.061 Special provisions for brown bear drawing permit hunts**

**Require all hunters to apply for Unit 8 brown bear drawing permits, remove the loophole that allows nonresidents to skip the permit process**

**SUPPORT**

Resident Hunters of Alaska submitted a similar proposal at the 2022 Statewide meeting to address the issue of nonresident guided hunters not being required to go through the draw permit lottery process for hunts on USFWS Refuge lands as residents are required to do.

We were advised that this needs to be a regional proposal specifically for Unit 8 during a Region II meeting, so we have resubmitted it to pertain specifically to Unit 8.

The continuation by the board to allow nonresident hunters to completely skirt the draw permit process as outlined in our proposal is highly troubling. No state should ever allow nonresident hunters to have a preference over resident hunters, but that's exactly what this loophole in regulation does. The evidence is clear that:

- Nonresident guided hunters for Kodiak brown bear don't have to go through a draw permit lottery process, pay the required application fee, or are under the requirement that their names be made public
- Nonresident guided hunters can hunt every year if they make a deal with a guide to pay a certain amount of money
- DB 100 series of nonresident guided-only "draw" permits are actually allocated to the guide with the exclusive guiding rights within Kodiak National Wildlife Refuge for that permit area to do with as the guide wishes. This is corroborated by statements from Kodiak guides, such as: *"Sometimes we take permits off the table."* A guide can't "take permits off the table" if those permits aren't allocated to him or her.

All hunters should be required for all draw hunts to go through the lottery draw permit process. Money and influence should not allow one group to have a better chance (let alone a 100% chance) at drawing a permit.

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**Proposal 79 – 5AAC 92.061 Special provisions for brown bear drawing permit hunts****Transfer undersubscribed nonresident brown bear permits for Unit 8 to the resident allocation****SUPPORT**

At previous meetings, Kodiak guides have stated that for various reasons they will sometimes *"take permits off the table"* that are allocated to their specific guide concession area. Statements like that prove that these permits are actually allocated to the guide with the exclusive concession area for these permits. The Department allocates permits based on brown bear population information and the number of bears they believe can be sustainably harvested. For any nonresident permits not utilized, those permits for that area should be available to a resident hunter the following year.

---

**Proposals 90–96 - 5AAC 85.015 Hunting seasons and bag limits for black bear 5AAC 92.530 Management Areas**

**SUPPORT**

Proposals 90-96 all ask for new black bear hunts or to include archery as an allowed methods and means to current weapons-restricted black bear hunts. The Department supports all of these proposals to allow additional black bear hunting opportunities and has no conservation concerns for any additional harvest.

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**Proposals 97-100 - 5AAC 85.020 Hunting seasons and bag limits for brown bear**  
**5AAC 92.530 Management Areas****SUPPORT**

Proposals 97-100 all ask for new brown bear weapons-restricted or archery-only hunts. The Department supports all of these proposals to allow additional brown bear hunting opportunity in these areas and has no conservation concerns with any additional harvests.

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**Proposals 119-126 - 5AAC 85.045 Hunting seasons and bag limits for moose****Create new archery only moose hunts in Unit 15C****Support as amended for residents only**

We support the creation of new early season archery-only moose hunts for resident moose hunters when there are no conservation concerns with this additional moose hunting opportunity and when this additional opportunity will not lead to closures or loss of opportunity for general season moose hunts.

We **oppose** any additional nonresident moose hunting opportunity in Unit 15C.

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**Proposals 134-142 - 5AAC 85.020 Hunting seasons and bag limits for brown bear****OPPOSE****Extend brown bear seasons in Units 7 and/or 15**

We cannot support extending brown bear seasons in these units due to Department concerns that increased harvest in the spring will result in closures for the general fall season. If the board should pass any of these proposals, we request that they **apply to residents only**.

---

**Proposal 204 - 5AAC 85.055 Hunting seasons and bag limits for Dall sheep****Close resident and nonresident hunting for Dall sheep in Unit 19C for five years**

**SUPPORT AS AMENDED to close only nonresident Dall sheep hunting**

Resident Hunters of Alaska has been submitting proposals for several cycles, including out-of-cycle Agenda Change Requests (ACR), expressing conservation concerns for the 19C sheep population with continued allowance of unlimited nonresident sheep hunting opportunity.

We submitted an ACR (ACR #12) for the 2022 ACR meeting to limit nonresident sheep hunting in 19C to draw-only permits based on conservation concerns for the sheep population and fears that residents would lose general sheep hunting opportunities if nonresidents were not limited. ACR 12 would have been – if accepted at the 2022 ACR meeting – a proposal for this 2023 Southcentral meeting, but the board said it did not meet the criteria for conservation concerns and voted it down. Just after the board voted our ACR 12 down, **based on it not meeting the criteria for conservation concerns**, the board voted to accept a board-generated proposal to close all sheep hunting in 19C for five years **based on conservation concerns!**

**It is clear that the board did not follow its own policies as to ACR acceptance by voting down RHAK ACR 12, and purposely prevented another alternative to a complete sheep hunting closure in Unit 19C from being before the public.**

The board has known for some time that the sheep population in Unit 19C was declining, and every proposal RHAK submitted previously asked to limit nonresident sheep hunters in 19C to draw permits only with a limited allocation in order to conserve the sheep population and ensure that resident general sheep hunting opportunity would continue. But the board consistently refused to limit nonresident sheep hunters.

The board now wants to close all sheep hunting in Unit 19C for everyone after years of refusing to limit the nonresident component that has been taking the vast majority of a declining sheep population. This is exactly what resident hunters have long feared but were told consistently would not happen.

All nonresident sheep hunting in 19C should be closed until the sheep population rebounds, and if it rebounds and nonresident sheep hunting opportunity can be reinstated, it should be strictly limited to draw-only permits with a limited allocation. Under no circumstances should this proposal pass as written! If this proposal should pass, there needs to be stipulations that when sheep hunting opens again, all nonresident sheep hunters in 19C are put on draw-only permits with a very limited allocation.

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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](http://www.residenthuntersofalaska.org)



## Cooper Landing, AK Trap Setbacks



PC 273

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

***Please select the proposals that you are in support of (select all that apply).***

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

*1-mile!*

- ☒ **# 145 Wildlife Crossings:** ~~1/2~~ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☐ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☐ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☐ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☐ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☐ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☐ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

### **Other areas setback proposals:**

- ☐ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☐ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☐ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.



Road trapping is an insult to real wilderness trapping. Trapping from the road wipes out the few remaining fur bearers along the highways and trail systems. Plus, it is not an economical lifestyle. You may only end up with a stupid hat or so. Set backs ~~if~~ should be a minimum of 1-mile. Driving around in a pick-up truck and trapping  $\frac{1}{4}$  mile off the road doesn't make you a trapper.

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Chris Rhodes - 74 yr. resident

Organization (if any) none

Signature\*: Chris Rhodes

Email\*: [REDACTED]

Street Address: [REDACTED]

City\*: Cooper Landing State\*: AK Zip code: 99572

\*indicates it must be filled in to be accepted.



PC274

**Submitted by:** Janet Rhodes

**Organization Name:**

**Community of Residence:** Temecula, CA

**Comment:**

I support proposals 145-154. Thanks.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC275

**Submitted by:** Antonio Ricciardi

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

We need protections in place to keep our pets safe from heartless traps set in areas where people and pets frequent.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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PC276

**Submitted by:** Matt Rima

**Organization Name:**

**Community of Residence:** Cooper landing, ak

**Comment:**

Nobody wants to see a dog in a trap

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support      Proposal 154: Support

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PC277

**Submitted by:** Doug Robbins

**Organization Name:**

**Community of Residence:** Anchorage, AK

**Comment:**

I am writing in support of Southcentral Proposal #145, to establish a 1/4 mile hunting and trapping set-backing from the Sterling Highway in units 7 and 15.

The Sterling Highway is a busy major roadway providing the only vehicle access to the lower Kenai Peninsula. Travelers need to be able to safely take a break from driving, take a short walk and relieve themselves or their pets. With current regulations, it is a matter of time before a needless tragedy. Hunting and trapping within 1/4 mile of the highway is a public hazard and should be prohibited.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support

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PC278

**Submitted by:** Francie Roberts

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I support both Proposition 146 and 147. As the lower Kenai Peninsula has grown and become a destination for both winter and summer tourism, trails need to be a safe corridor for people and animals traveling through the back country. There is plenty of land available for trapping with these proposed corridors protected.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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PC279

**Submitted by:** Jeanne Roche

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

I support both Proposal #146 and Proposal #147. There are so many more people using Homer recreation trails during trapping season, and this is only expected to increase. Due to numerous incidents, it is now time to implement a 100 yard setback on all the trails indicated in both of the above Proposals to make the trails safer for all users.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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**Submitted by:** Carolyn Roemer

**Organization Name:**

**Community of Residence:** Seward, Alaska

**Comment:**

There should be a set back for trapping on all multiuse trails on the kenai peninsula to protect pets. No one should have to face the death of their beloved companion because a trapper is too lazy to step away from public trails.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Support Proposal 56: Support Proposal 57: Support Proposal 58: Support Proposal 59: Support Proposal 60: Support Proposal 61: Support Proposal 62: Support Proposal 63: Support Proposal 64: Support Proposal 65: Support Proposal 66: Support Proposal 67: Support Proposal 68: Support Proposal 69: Support Proposal 70: Support Proposal 71: Support Proposal 72: Support Proposal 73: Support Proposal 74: Support Proposal 75: Support Proposal 76: Support Proposal 77: Support Proposal 78: Support Proposal 79: Support Proposal 80: Support Proposal 81: Support Proposal 82: Support Proposal 83: Support Proposal 84: Support Proposal 85: Support Proposal 86: Support Proposal 87: Support Proposal 88: Support Proposal 89: Support Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Support Proposal 95: Support Proposal 96: Support Proposal 97: Support Proposal 98: Support Proposal 99: Support Proposal 100: Support Proposal 101: Support Proposal 102: Support Proposal 103: Support Proposal 104: Support Proposal 105: Support Proposal 106: Support Proposal 107: Support Proposal 108: Support Proposal 109: Support Proposal 110: Support Proposal 111: Support Proposal 112: Support Proposal 113: Support Proposal 114: Support Proposal 115: Support Proposal 116: Support Proposal 117: Support Proposal 118: Support Proposal 119: Support Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support Proposal 124: Support Proposal 125: Support Proposal 126: Support Proposal 127: Support Proposal 128: Support Proposal 129: Support Proposal 130: Support Proposal 132: Support Proposal 133: Support Proposal 134: Support Proposal 135: Support Proposal 136: Support Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 140: Support Proposal 141: Support Proposal 142: Support Proposal 143: Support Proposal 144: Support Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 159: Support Proposal 160: Support Proposal 161: Support Proposal 162: Support Proposal 163: Support Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support Proposal 173: Support Proposal 174: Support Proposal 175: Support Proposal 176: Support Proposal 177: Support Proposal 178: Support Proposal 179: Support Proposal 180: Support Proposal 181: Support Proposal 182: Support Proposal 183: Support Proposal 184: Support Proposal 185: Support Proposal 186: Support Proposal 187: Support Proposal 188: Support

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**Submitted by:** Tavis Rogers

**Organization Name:**

**Community of Residence:** Oak Creek, Colorado

**Comment:**

I am writing in opposition to Proposal 82 that would allow rifle hunting in an archery only area.

I am writing in support of Proposals 67, 71, 72, 87, 91, 92, 93, 99, 100, 101, 110, 111, 112, 113, 119, 120, 121, 122, 123, 124, 125, and 126.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 67: Support    Proposal 71: Support    Proposal 72: Support    Proposal 82: Oppose    Proposal 87: Support  
Proposal 91: Support    Proposal 92: Support    Proposal 93: Support    Proposal 99: Support    Proposal 100: Support    Proposal  
101: Support    Proposal 110: Support    Proposal 111: Support    Proposal 112: Support    Proposal 113: Support    Proposal  
119: Support    Proposal 120: Support    Proposal 121: Support    Proposal 122: Support    Proposal 123: Support    Proposal 124:  
Support    Proposal 125: Support    Proposal 126: Support

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# From the desk of

Sam Rohrer

Kodiak, AK 99615



PC 282

March 3, 2023

Kristy Tibbles  
Executive Director, AK BOG  
P.O. Box 115526  
Juneau, AK 99811-5526

RE: 2023 BOG Southcentral 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.

Kodiak's Brown Bear Management Strategy is regarded as one of the most successful wildlife conservation programs in the world. This program 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. I respectfully ask that you keep this long history of success in mind as you carefully consider all of the Kodiak Brown Bear proposals.

## **Proposal 77 – SUPPORT**

I ask that you pass proposal 77. This proposal was put forward by the Kodiak AC in response to bear population concerns in the Southwest portion of Kodiak (Unit 8). The Kodiak Brown Bear Management Plan specifies that when there is a decline in the Brown Bear population that female skull size minimums should be employed. This same strategy was in place in this region from 1994 – 2006, due to similar concerns over an apparent declining population. Once surveys demonstrated that the population had recovered, the Board removed the skull size minimums.

I encourage the Board to follow the Kodiak Brown Bear Management Plans recommendations and pass proposal 77.

## **Proposal – 78 OPPOSE**

I ask that you reject proposal 78. 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.(a)(4)(D).

5 AAC92.052.(23) is a statewide regulation, that gives the Department the discretionary authority to make undersubscribed permits available over the counter. There are many legitimate reasons why the department might choose to reissue undersubscribed permits. 5AAC92.061.(a)(4)(D) is a Unit 8 specific regulation that also authorizes the Department to make available undersubscribed permits. This regulation for Unit 8, 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 hunter's deposit. This is good for nonresident hunters, small businesses, and ADF&G.

Proposal 78 would prohibit the Department from issuing undersubscribed permits to nonresidents who do not go through the Application Drawing process, but what the proposal fails to mention is that 5AAC92.061(a)(1) only allows a guide to submit the same number of nonresident applications for a hunt as the number of permits available for that hunt. This means that on Federal lands, where only one guide is authorized to conduct guide activities, there would only ever be the same number of applicants as permits issued in each drawing. This would not allow for an alternate list, which would result in undersubscribed or canceled hunts leaving permits unusable.

Proposal 78 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 – 79 OPPOSE**

I ask that you reject proposal 79. This proposal would require that undersubscribed nonresident brown bear permits on Unit 8 be awarded to a resident applicant. There are several problems with this proposal. If undersubscribed permits were added to the resident pool in the following regulatory year, the result would be too many permits issued in that following year. There would be a strong potential for overharvest in that year, as well as hunter crowding in the field.

Additionally, this proposal, like proposal 78 before, would remove important consumer protections and economic safeguard for small businesses on Kodiak.

Lastly, this proposal would upend the longstanding allocation policy that has been in place on Kodiak for over 40 years. The BOG has a long-standing policy for evaluating allocative proposals, that includes considering the last 10 years of harvest history. This proposal seeks to make a change that would ultimately change the existing long-standing allocation. For these reasons, I ask that you unanimously reject this proposal.

#### **Proposal – 80 OPPOSE**

I ask that you reject proposal 80. This proposal would require that Kodiak brown bear draw permits cannot be allocated over the current average of 35% of the tags in an individual hunt going to a nonresident hunter. Currently regulations state that a maximum of 40 percent of the drawing permits go to nonresidents and a minimum of 60 percent go to residents. The current average consists of 65% of permits being issued to residents and 35% of permits issued to nonresidents. This average has been consistent for many years. This proposal is unnecessary and would tie the Departments hands when trying to make small permit changes to respond to specific hunt area concerns. For these reasons, I ask that you reject this proposal.

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:** Nicole Rojas

**Organization Name:**

**Community of Residence:** Chicago, Illinois.

**Comment:**

I support Proposal #145 to secure hunting and trapping setbacks from new wildlife crossings on the Sterling Highway Cooper Landing bypass.

I also. support Proposals 146 - 154 for trap setbacks from multiuse areas on the Kenai Peninsula.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

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I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway; AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

#### **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 284

Thankyou for keeping my son + fur babies  
safe

(feel free to add extra pages of comments)

Printed Name (First and last)\*: ~~Rachel Mundy~~ Cristina Rachel Rolfe

Organization (if any):

Signature\*: 

Email\*: 

Street Address: 

City\*: Capeer Landing State\*: Al Zip code: 99512

\*Indicates it must be filled in to be accepted.



Thomas C. Rothe  
[REDACTED]  
Eagle River, Alaska 99577  
Hm: [REDACTED] Cell: [REDACTED]  
E-mail [REDACTED]

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March 3, 2023

Alaska Board of Game  
c/o Boards Support Section  
Alaska Department of Fish & Game  
P.O. Box 115526  
Juneau, AK 99801

Advance Transmittal By Email

Members of the Board of Game:

This letter is to transmit comments on regulation proposals for Southcentral Alaska to be considered at your March meeting in Soldotna. I plan to attend the meeting and testify, and I welcome any questions you may have by email or telephone. Thank you for considering my comments and recommendations.

I have been an Alaska resident and hunter since 1977, and until 2009 I have been a professional waterfowl biologist and manager for both U.S. Fish and Wildlife Service and Alaska Department of Fish and Game—my latter career for 25 years as the Statewide Waterfowl Program Coordinator. My professional knowledge and experience support my extensive expertise in the biology and ecology of Alaska's waterfowl and wetlands, state and federal programs created to manage conservation of waterfowl populations and harvest across local and continental levels.

In a nutshell: I recommend DO NOT ADOPT for Proposals 164, 165, 166, 167, 168, 169 and 170; instead, ADOPT Proposal 163. Proposals 164-170 are not supported by evidence that the sea duck species addressed have declined or harvest has increased to warrant bag limit restrictions. These proposals are arbitrary attempts to reduce sea duck hunting opportunity without adequate scientific rationale. Proposal 163 would reset sea duck bag limits in Kachemak Bay to levels in 2009 before the Board adopted arbitrary species restrictions. The proposed regulations in 163 would simplify bag limits that are supported by sound information on the biological status of sea duck species and contemporary harvest data, as well as making Kachemak Bay regulations consistent with conservative regional and statewide regulations that have been in place for over 20 years.

DO NOT ADOPT Proposals 171 or 172. In effect, these proposals would unnecessarily establish a permit hunt to require sea duck harvest reporting by Kachemak Bay hunters, in addition to existing registration and report through the Federal Harvest Information Program. In practice,





such a requirement could not be statistically designed to interpret harvest data at the subregional scale for species that are highly mobile seasonally and geographically. The end result would be expensive and intrusive collection of data that would be insufficient to produce reliable trends in harvest of sea ducks, much less any species of interest. The overall effect of such a permit hunt would be to discourage and complicate legitimate, sustainable sea duck hunting in one of a few areas most accessible and productive for a large proportion of Alaska's duck hunters.

The purported merits of requirements in the state of Washington are irrelevant because the sea duck resources and harvest considerations of Kachemak Bay are markedly different than those in Puget Sound. Moreover, the Washington sea duck management plan and chosen harvest strategies are neither proven effective nor applicable to entirely different conditions in south coastal Alaska.

#### Perspectives for Evaluating Relevant Information

Proposals 164-170 are the latest in a 15-year-long history of proposed restrictions to hunting sea ducks in Kachemak Bay. Although these proposals differ annually and are submitted by a variety of constituencies, they seem to have a common goal—to reduce or eliminate hunting of sea ducks in Kachemak Bay. In addition, most of these proposals are poorly justified by a mixture of false or uninformed narratives about: (1) the status and biology of sea duck species, (2) anecdotal impressions of brief and historic waterfowl abundance; (3) misinformation about the structure and management scale of waterfowl populations, (4) the magnitude and impact of public hunting; (5) the role and behavior of hunting guides; and (6) engagement of diverse governmental and political authorities to appropriately and effectively address substantive concerns. Below are some relevant concepts to help put the issues of sea duck hunting regulations for Kachemak Bay into perspective:

#### Status and Trends of Sea Duck Populations

First, current sea duck status assessments by the competent authorities describe only a couple situations that warrant special protection and conservation: (1) Eastern (Atlantic) Harlequin Duck and (2) Eastern (Atlantic) Barrow's Goldeneye, both subject to hunting restrictions; (3) the component of Western Harlequin Duck that breeds in the Rock Mountains and winters on the coasts of WA, OR and BC (separate from Alaska birds); (4) Spectacled Eider listed globally as threatened in Alaska and Russian Far East; and (5) Steller's Eider with Alaska-nesting segment listed as threatened. Hunting is closed for both eider species.

No other populations of 15 sea duck species are listed as at risk or subject to significant harvest restrictions by:

- U.S. Fish and Wildlife Service: primary federal authority for the U.S. (Dept. of the Interior and Alaska Region)
- Pacific Flyway Council: state wildlife agencies for 11 western states
- Alaska Department of Fish & Game: primary authority for Alaska
- Sea Duck Joint Venture: U.S./Canada research and advisory body



Other than the 2 listed eider species in western Alaska, none of the authorities have issued management cautions about the status of sea duck populations that are open to hunting in Alaska.

Periodic and historical boat and airplane surveys provide ideas of sea duck abundance in Southeast Alaska, Prince William Sound, Kodiak, large areas of western and northern Alaska, AND multi-year surveys of Kachemak Bay by ADF&G.

#### Structure of Waterfowl Populations and Management Scales

Across North America, migratory waterfowl are managed based on demonstrated cohesive populations that generally occur across broad regions and migrate seasonally up and down flyways. Because of interannual shifts in distribution and extensive breeding grounds, population data for ducks are not precise but there is a consistent long-term dataset on trends. For nearly 70 years, data on breeding ducks over large areas have served as reliable bases for managing populations and adjusting hunting regulations.

Several aspects about sea duck populations have led to misinterpretations and poor assumptions. Sea ducks tend to seasonally gather during winter where pairs are formed and, more than dabbling ducks, sea duck females show substantial fidelity to previous nesting sites. However, this does not mean that local groups of sea ducks represent cohesive, persistent and absolutely fixed components of populations—there is and must be interchange between local areas and regions (e.g., among western Cook Inlet, Kachemak Bay and Prince William Sound). Harvest or other removal of sea ducks from coves, bays and other small areas does not constitute extirpation—replacement ducks will eventually repopulate vacancies. Consequently, it is only useful and meaningful to manage ducks over large areas, and it is not practical or effective to expend resources to document small ephemeral groups that may seem obvious to local observers.

#### Productivity and Mortality of Sea Duck Species

It is important to understand the differences in population dynamics between sea ducks and other taxa of waterfowl. In principle, sea ducks are less productive annually than other ducks, BUT they have substantially higher survival rates and sufficient long-term productivity to sustain populations. There are a few indicators of sea duck population changes that are monitored and, overall, harvest regulations for sea ducks are conservative across North America.

It is important to note that sea duck hunters and harvest across Alaska are small, relative to the total number of waterfowl hunters in the state and abundance of sea ducks that winter across the southern half of Alaska. For the past 20 years, Alaska as well as most other states, has relied on the improved Federal harvest survey to estimate various waterfowl harvests at the statewide level. In the 1970s and 1980s ADF&G conducted more detailed waterfowl harvest surveys, but they were largely not statistically reliable and provided an overview of harvest composition and distribution 30 years ago.



Attached are several relevant tables and graphs that illustrate numbers of sea duck hunters and harvests. Some important take-home points are worth noting:

- Over the past 20 years, the number of waterfowl hunters in Alaska has declined by about 15% after significant declines in the 1990s, and total duck harvest is down 40%. These declines track those in other states and the U.S. totals.
- In the past 10 years (2011-2021), the average number of active sea duck hunters has been 1,364 or about 27% of active Alaska duck hunters, and sea duck harvests have averaged 7,800 (about 15% of all ducks taken in Alaska). Since 2007, the trends in sea duck hunters and harvest have been quite stable. Historic studies showed that Kodiak (27%), Cook Inlet (26%) and Southeast accounted for most of the state sea duck harvest.
- The average active sea duck hunter annually spent less than 3 days in the field and harvested an average of 6 sea ducks per season.
- The current sea duck bag limits in Kachemak Bay, adopted in 2010 restricting resident daily limits to 1 eider (common/king), 2 harlequins and 2 long-tailed ducks amount to very significant arbitrary restrictions of harvest opportunity without any substantive biological evidence that sea ducks are declining or harvest has increased to warrant cutbacks.
- Additional bag limit restrictions proposed in Proposals 164-170 would arbitrarily compound the loss of opportunity by further reducing limits for harlequin and long-tailed ducks (1 each daily) and imposing more capricious and unsupported bag limit reductions for goldeneyes and buffleheads—collectively the most abundant and available sea duck species in Kachemak Bay.

#### Perspectives and Options for Addressing Apparent Conflicts

Based on available data on sea duck abundance and sea duck harvest, the Board has an opportunity to bring Kachemak Bay duck hunting regulations back onto a foundation of biological science and to reestablish a sound rationale for waterfowl hunting regulations consistent with long-standing and effective management principles.

The core of these long-running campaigns to reduce sea duck harvest opportunity, crimp the ability of hunters to conduct legal and proper hunts and to put a damper on waterfowl guiding services is to address perceived user conflicts between hunters and Kachemak Bay residents, both in Homer and remote south bay occupants. The travesty of most of these campaigns to reduce hunting has been wrapping specific real user conflicts in the guises of: (1) erroneous biological crises (claims of steep population declines, inherent impediments to productivity and survival, assertions that sea duck populations are structured such that each local group is a sacred and irreplaceable unit); (2) overstated and exaggerated depictions of sea duck harvest, unsubstantiated characterizations of values and behaviors of hunters and guides; and (3) disingenuous and hypocritical portrayals of impacts to specific constituencies (sport and subsistence hunters, guides and related businesses, wildlife viewers and local support businesses. The Board needs to carefully assess the true drivers of these regulation proposals, cut through the false and misleading arguments, and determine whether the Board has the appropriate tools and authorities to address the problems,





There are likely some aspects of these conflicts that can be addressed with appropriate authorities through open and transparent processes—that would seem to be the mutual goal of discussions. In this obfuscated set of arguments and proposals, after years of thought, I have concluded that the true heart of these conflicts is NOT related to sea duck population status, the magnitude of harvest or unseemly allegations by the participants—it is a zoning problem that concerns hunting activity (boats, gunfire and harvest of local animals) that offends some residents, especially those that occupy peaceful remote parcels, those that relate to seasonally accessible wildlife and those that are generally opposed to hunting/shooting.

In my view, these conflicts have nothing to do with the sustainability of duck populations and the Board of Game needs to be careful about its authority and ability to address the core issues—it is a slippery slope to voluntarily take on the social concerns of residents where hunting seasons are established or to mediate local disagreements just because a game animal is subject to harvest. In this case, I think the relevant authority is not the Board of Game, but the Kenai Peninsula Borough who can more properly address land and water uses, enact ordinances that mitigate disturbances and public safety risks, and apply meaningful standards of governance beyond the beaches of Kachemak Bay.

I am confident that an effective public process can be established to analyze and address mutually agreed problems in an appropriate collaboration of agencies and constituents (including ADF&G and the Board of Game).

I appreciate your attention to my comments and recommendations, and I am very willing to provide more information as needed.

Sincerely,

Thomas C. Rothe



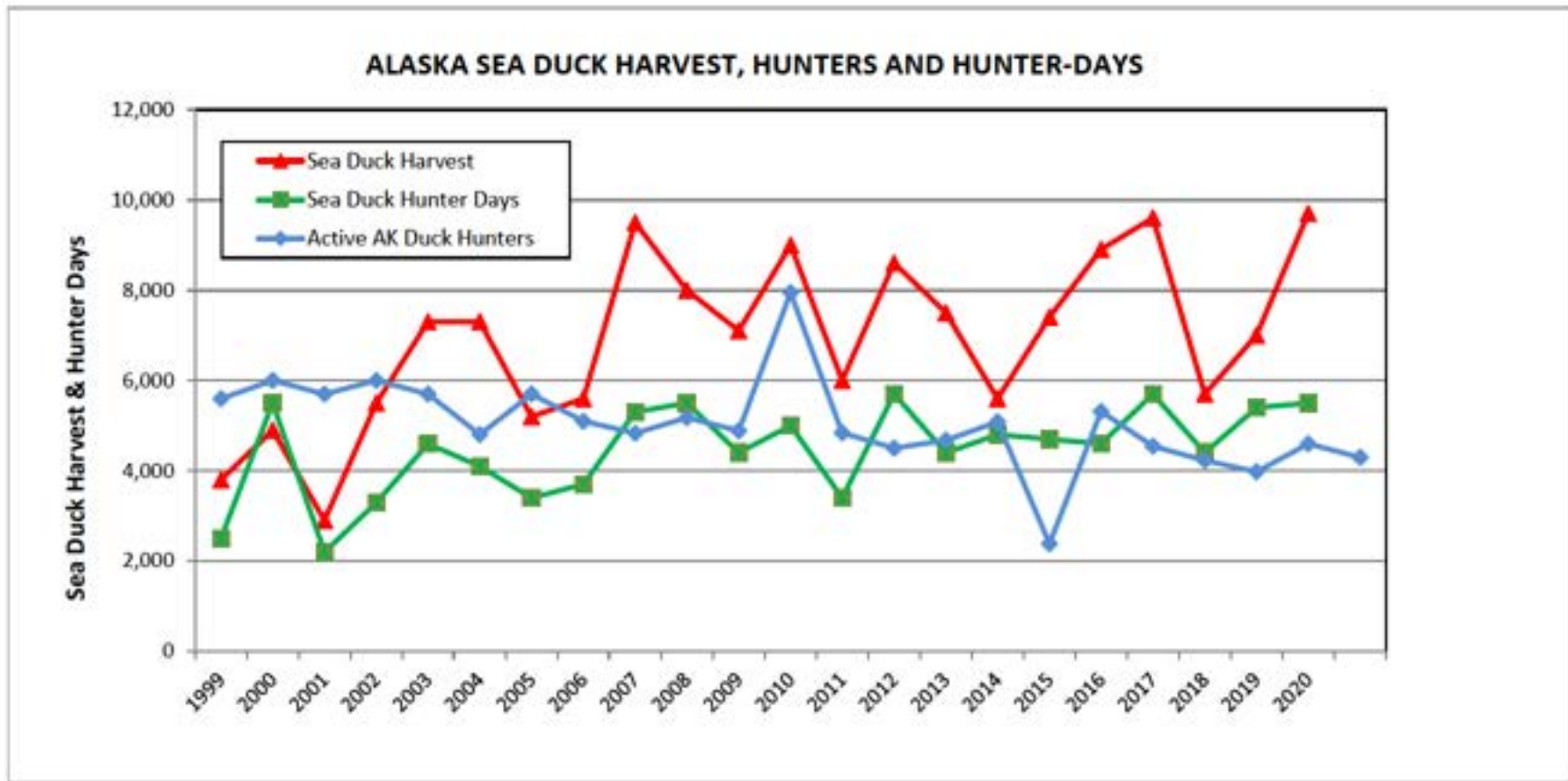
Attachments: Table and graphs depicting trends in Alaska waterfowl hunters and harvest.

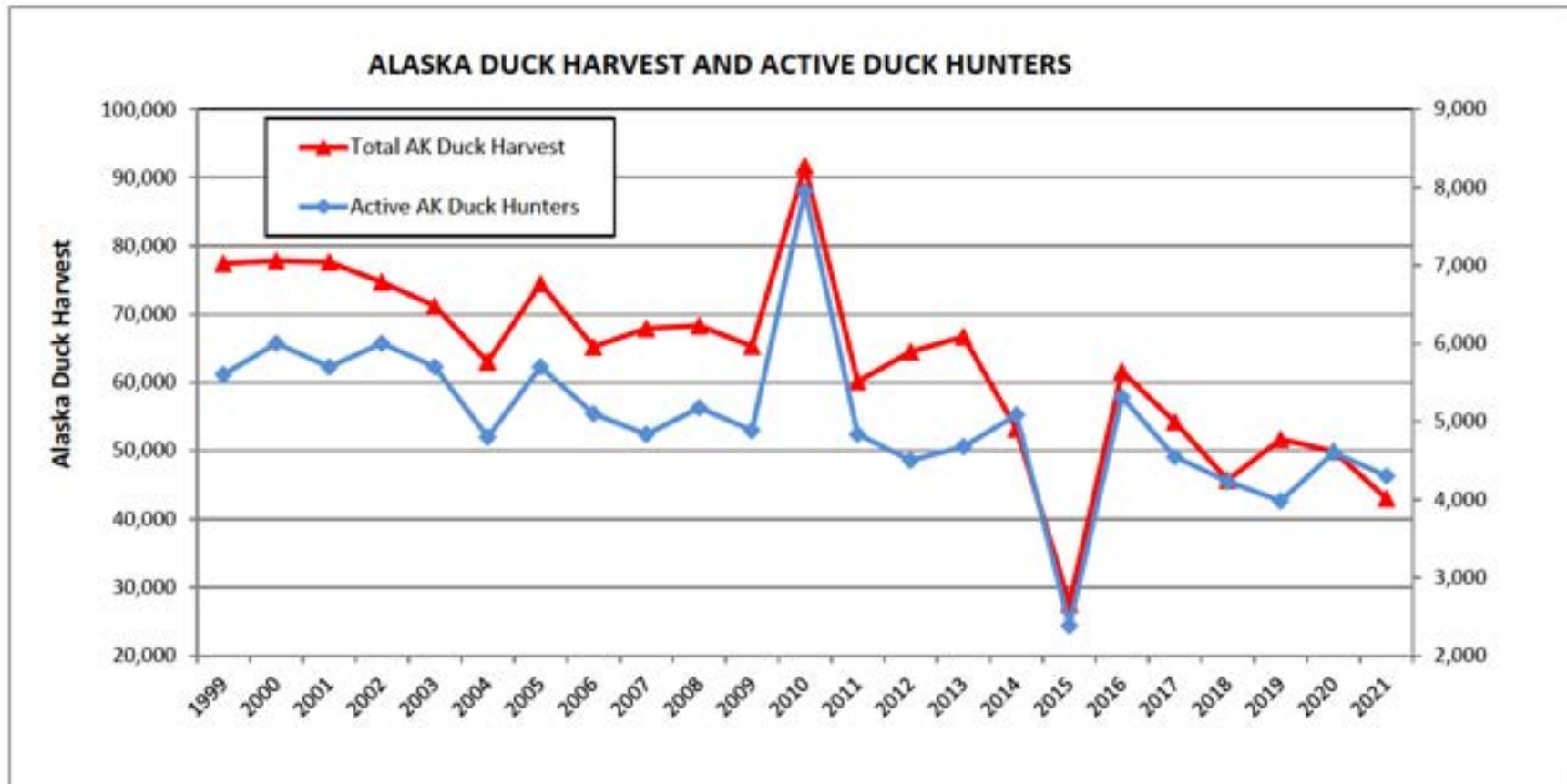
Cc: Ryan Scott, Deputy Director, Division of Wildlife Conservation  
Hugh Clark, President Alaska Waterfowl Association  
Dave Weber, Regional Director, Ducks Unlimited, Inc.



## Alaska Sea Duck Harvest and Hunter Activity from HIP 1999-2021

	Sea Duck Harvest		Active AK Sea Duck Hunters		Sea Duck Hunter Days		Sea Ducks/ AK Sea Duck Hunter	Sea Ducks/ Duck Hunter	% Sea Ducks In Harvest		Total AK Duck Harvest	Active AK Duck Hunters	Ducks/ AK Hunter
		±		±			±						
1999	3,800	30%	600	44%	2,500	54%	6.7	72%	0.7	4.9%	77,400	5,600	13.8
2000	4,900	52%	900	27%	5,500	44%	5.4	59%	0.8	6.3%	77,800	6,000	13.0
2001	2,900	54%	500	28%	2,200	44%	5.3	61%	0.5	3.7%	77,600	5,700	13.6
2002	5,500	40%	800	21%	3,300	27%	6.7	45%	0.9	7.4%	74,700	6,000	12.5
2003	7,300	24%	1,200	18%	4,600	21%	6.0	30%	1.3	10.3%	71,200	5,700	12.5
2004	7,300	24%	900	20%	4,100	22%	7.3	41%	1.5	11.6%	63,000	4,800	13.1
2005	5,200	38%	900	34%	3,400	38%	6.1	51%	0.9	7.0%	74,500	5,700	13.1
2006	5,600	73%	800	38%	3,700	54%	7.0	80%	1.1	8.6%	65,200	5,100	12.8
2007	9,500	32%	1,100	24%	5,300	34%	8.7	40%	2.0	14.0%	67,900	4,834	14.0
2008	8,000	26%	1,100	19%	5,500	58%	7.5	33%	1.5	11.7%	68,300	5,178	13.2
2009	7,100	32%	1,100	20%	4,400	25%	6.7	38%	1.5	10.9%	65,300	4,886	13.4
2010	9,000	32%	1,300	25%	5,000	35%	6.8	41%	1.1	9.8%	91,700	7,946	11.5
2011	6,000	47%	600	29%	3,400	50%	9.9	55%	1.2	10.0%	60,100	4,836	12.4
2012	8,600	28%	1,200	19%	5,700	22%	7.1	34%	1.9	13.3%	64,500	4,501	14.3
2013	7,500	33%	1,100	27%	4,400	34%	6.8	43%	1.6	11.2%	66,700	4,676	14.3
2014	5,600	36%	1,100	27%	4,800	43%	5.2	45%	1.1	10.5%	53,200	5,084	10.5
2015	7,400	66%	1,400	49%	4,700	56%	5.2	82%	3.1	26.8%	27,600	2,384	11.6
2016	8,900	36%	1,400	26%	4,600	31%	6.2	45%	1.7	14.4%	61,600	5,315	11.6
2017	9,600	38%	1,600	22%	5,700	32%	6.0	44%	2.1	17.7%	54,200	4,546	11.9
2018	5,700	47%	1,300	35%	4,400	41%	4.4	59%	1.3	12.5%	45,700	4,233	10.8
2019	7,000	35%	1,500	29%	5,400	43%	4.8	46%	1.8	13.5%	51,700	3,981	13.0
2020	9,700	30%	1,800	23%	5,500	25%	5.5	38%	2.1	19.4%	49,900	4,600	10.8
2021	10,100	33%	2,000	25%	5,900	16%	5.0	41%	2.3	23.5%	43,000	4,300	10.0
2022													
<b>Avg</b>	7,052	39%	1,139	27%	4,522	37%	6.4	49%	1.5	12%	63,165	5,039	12.5
<b>10-Yr</b>	7,827	39%	1,364	28%	4,955	36%	6.0	48%	1.9	16%	51,810	4,362	11.9







**Submitted by:** Sally Rothwell

**Organization Name:**

**Community of Residence:** Cooper Landing, Alaska

**Comment:**

I am a landowner in Cooper Landing and an avid hiker and biker. While I am not opposed to hunting and trapping in general, I am opposed to trapping anywhere near public access points; that is, near highways, wildlife structures, pullouts, campgrounds, trails and trailheads. It is just too potentially hazardous to people and pets and there are many other available places for trappers to go. Below are my comments to selected proposals.

145 - support

148 - support

149 - support

150 - support

152 - support

153 - support

154 - support

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I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

***Please select the proposals that you are in support of (select all that apply).***

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **#145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

#### **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **#148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 287

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Cory Route

Organization (if any): \_\_\_\_\_

Signature\*: Cory Route

Email\*: \_\_\_\_\_

Street Address: \_\_\_\_\_

City\*: Cooper Landing State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.



# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 288

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

***Please select the proposals that you are in support of (select all that apply).***

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.



Comments:



PC 288


(feel free to add extra pages of comments)

Printed Name (First and last)\*: Eric Rowe

Organization (if any) \_\_\_\_\_

Signature\*: 

Email\*: 

Street Address: 

City\*: Cooper Landing State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.



**Submitted by:** Amy Russell and Multiple Signers

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

The attachment here shows my support of BOG proposals 145-154, all considering trapping setbacks and buffers on multi-use trails, as well as the support of another 43 Homer area residents.

My personal experience is finding an unmarked trapline was on Easterday Road, last year where I could see his numerous traps from my ski trail. Easterday Road is 3 miles from a major road in Homer, Ohlson Mountain Road-a winter playland for the Homer area. I left him a kindly written note alerting him to the fact that that road has been a recreational area for many in this neighborhood. I returned the next day to find the note crumble up and returned to its place.

I called the wildlife trooper and he explained to me this man has the right to set a trapline here. I explained that clearly the law values the trapper's rights over our rights. Even if my dog didn't get caught in the traps (which other dogs did!), I should not be subject to happening upon a dead or dying animal in a trap. He is clearly a lazy trapper. He had a snowmachine and acres of backcountry at his access but he chose to drive to a road.

Previous to finding that trapline I have recreated on Easterday at least a dozen times a year. I have skied there since hearing dogs were trapped there.

I would appreciate if the Board recognized roads and common trails should not be used to trap animals, domestic or wild.

Thank you very much,

Amy Russell

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147:

Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152:

Support Proposal 153: Support Proposal 154: Support

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Name print

Signature

Address

1. KRISTIN TRUESELLE Kristin Truesdell
2. Kristy Stevenson Keller-Kristy Stevenson
3. Emily Lamb Emily Lamb
4. Beth Schott Beth Schott
5. Laura Peck Laura Peck
6. Rachel Allmendinger Rachel Allmendinger
7. Sarah Brewer Sarah Brewer
8. Brooke Varian Brooke Varian
9. Angela Harter Angela Harter
10. Elizabeth Love Elizabeth Love
11. Sharron Cotogna Sharron Cotogna
12. Eric Watson Banzett Eric Watson Banzett
13. Britney Christinson Britney Christinson
14. Jonaki Brost Jonaki Brost
15. Amy Russell Amy Russell
16. Samuel Crowl Samuel Crowl
17. Abigail Ross Abigail Ross
18. Cherry Peterson Cherry Peterson
19. Dara Ector Dara Ector
20. Madeline Winsor Madeline Winsor
21. Connor McCarron Connor McCarron
22. Julie McCarron Julie McCarron
23. Katy Coseglia Katy Coseglia
24. Zachariah Richards Zachariah Richards
25. ANTHONY PERELLI Anthony Perelli
26. Jackie DeLaCruz Jackie DeLaCruz

# I SUPPORT BPG Proposals 145-154

Setbacks and buffers on mu  VS 289

Printed Sign Address

- 27 Charidy Haerte Charidy Haerte
- 28 Marge Dunn Marge Dunn
- 29 RICHARD DUNN Richard Dunn
- 30 YOLANDA FIMON Yolanda Fimon
- 31 Stephanie Zauati Stephanie Zauati
- 32 Joni Wise Joni Wise
- 33 Reville Russell Reville Russell
- 34 Katie Byrnagle Katie Byrnagle
35. DEREK BYRNAGLE Derek Byrnagle
- 36 Henry Russell Henry Russell
- 37 Ashley Hansen Ashley Hansen
- 38 Taro Sasaki Taro Sasaki
- 39 Krista Parrett Krista Parrett
- 40 Carlin Rauch Carlin Rauch
- 41 Cindy Slisson Cindy Slisson
42. Susie Malone Susie Malone
43. Sarah Banks Sarah Banks
44. OMAR GUCER Omar Gucer



**Submitted by:** Revelle Russell

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I am writing in support of Proposals 146 and 147.

I feel a 100 yard setback on multi use trails is not an unreasonable. There is plenty space of room for everyone. What I do find unreasonable is when user group takes away the right of another user group to use a trail.

By trapping on a multi use trail you are effectively shutting that trail down to skiing with animals. There are only so many trails I can ski with my dog. Trapping on multi use trails reduces that number.

I respect the rights of people to trap but by I feel my rights are not respected when traps are set right on a trail. I feel a 100 yard set back on multiuse trail is a reasonable compromise. Thank you.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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**Submitted by:** Kathy Sarns Irwin

**Organization Name:**

**Community of Residence:** Homer Alaska

**Comment:**

See Attached

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support  
Proposal 153: Support Proposal 154: Support Proposal 156: Support Proposal 160: Support Proposal 162: Oppose  
Proposal 163: Oppose Proposal 164: Support Proposal 166: Support Proposal 169: Support Proposal 171: Support

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#### I Support Proposal 145

The highway construction plans include multiple wildlife underpasses and Alaska's first wildlife overpass. Fencing is meant to keep wildlife off the road and funnel them through crossings, but current regulations allow for hunting and trapping on these crossings. Make these multi-million dollar crossings safe passages for wildlife.

#### I Support Proposal 149

Establishing these reasonable trapping buffers for public safety around these campgrounds is a common sense proposal. Please support this to help prevent user conflicts in the future.

#### I Support Proposal 150

The proposed 100 and 50-yard trapping setbacks in this proposal are not large enough to significantly limit a trappers' opportunity to trap near a road or pullout. This proposal would only prevent conflicts and tragedies at the most used and popular pullouts and highways in Cooper Landing.

#### I Support Proposal 151

Please support these reasonable Trapping setbacks to establish safe zones for the increasing numbers of user groups accessing backcountry areas for: cross-country skiing, backcountry skiing, snowboarding, snowshoeing, ice fishing, bird hunting, cabin rentals.

#### I Support Proposal 152

As the number of winter trail users has increased so have the number of dangerous encounters between other user groups and traps set in recreational areas. These reasonable setbacks will help prevent conflicts in these recreational areas.

#### I Support Proposal 153

these proposed 100 and 50-yard trapping setbacks are not large enough to limit a trappers' opportunity to trap near beaches. These Proposed setbacks are only for the most popular and heavily used beaches to help prevent user conflicts.

#### I Support Proposal 154

Mandatory posted signs are in line with the Alaska Trappers Association Official Position Statement "Trapline Signs" that states:

"The Alaska Trappers Association encourages trappers in road-accessible regions of the State to post signs near major points of access to their personal trapline trails. These signs should explain that there are traps and/or snares on or near the trail. The signs could also include the trappers name and contact information. These signs are intended to alert other trail users of the purpose of the trail, so that they can avoid conflict with the trapper. This approach of posting signs should be beneficial for everyone involved."

#### I Support Proposal 156

The Anchor River beaver population needs some time to recover! Please support this proposal.

#### Support Proposal 160

This is a carefully crafted proposal to allow for beaver trapping to continue (as many members of the Board of Game want to see) but try to make sure that they do not continue to over-harvest. It has been tested in the Kenai National Wildlife Refuge with good results.

#### I Support Proposal 164

Please support this proposal to help reduce the decline in sea duck numbers in Kachemak Bay. Limiting harvest is one of the only ways to protect populations and support their recovery.

#### I Support Proposal 166

Please support this proposal to help reduce the decline in sea duck numbers in Kachemak Bay.



I OPPOSE the following 2 proposals:

I Oppose Proposal 163

This proposal not supported by the Homer Fish and Game Advisory Committee. It is not supported by local sea duck hunters or commercial guides, because it is not necessary to increase harvest on these populations.

I Oppose Proposal 162

The ptarmigan season was shortened for good reasons in 2014-2015 and there is not a good reason to revert back to a longer season.

Kathy Sarns Irwin  
Homer, Alaska



5 AAC 92.550. Areas closed to trapping.

Establish trapping setbacks along certain snow machine/multi-use trails and nordic ski trails in Unit 15C as follows:

We recommend no trapping within 100 yards from 4 public mapped snow-machine/multi-use trails south of Caribou Lake in Unit 15C : 1) McNeil Canyon Trail 2) Eagle Lake/Caribou Lake Trail 3) Mathews Hill Trail 4) Watermelon Trail.  
and 100 yards from public mapped Kachemak Nordic Ski Club Trails in Unit 15C.

5 AAC 92.550  
(4) Unit 15C

E. within 100 yards from 4 public mapped trails south of Caribou Lake: 1) McNeil Canyon Trail, 2) Eagle Lake/Caribou Lake Trail, 3) Mathews Hill Trail, 4) Watermelon Trail, all in 15(C);

F. within 100 yards from public mapped Kachemak Nordic Ski Club Trails in 15(C).

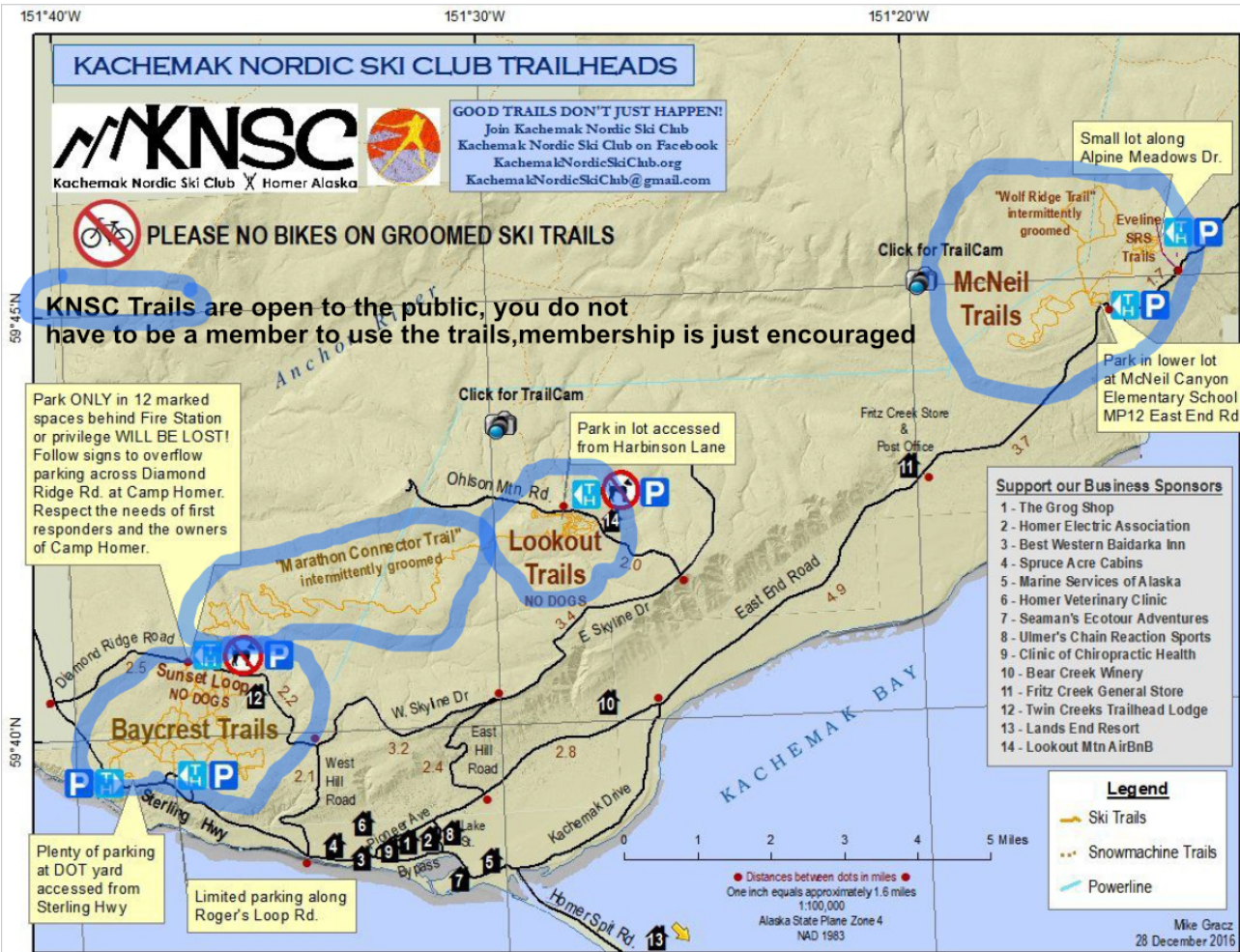
What is the issue you would like the board to address and why?  
With a growing population on the lower Kenai Peninsula and an increase in non-consumptive users on multi-use trails, conflict with traditional trapping areas and incidents of pet dogs being caught in traps is becoming more common in Unit 15C.

Local trappers, non-consumptive trail users, and the Homer AC working together propose that: traps set adjacent to public mapped trails in Unit 15C be at least 100 yards from the main trail.

If a 100-yard setback is not implemented, there will be more user conflicts on public trails, as the number of non-consumptive users increases on public trails in winter each year in Unit 15C.

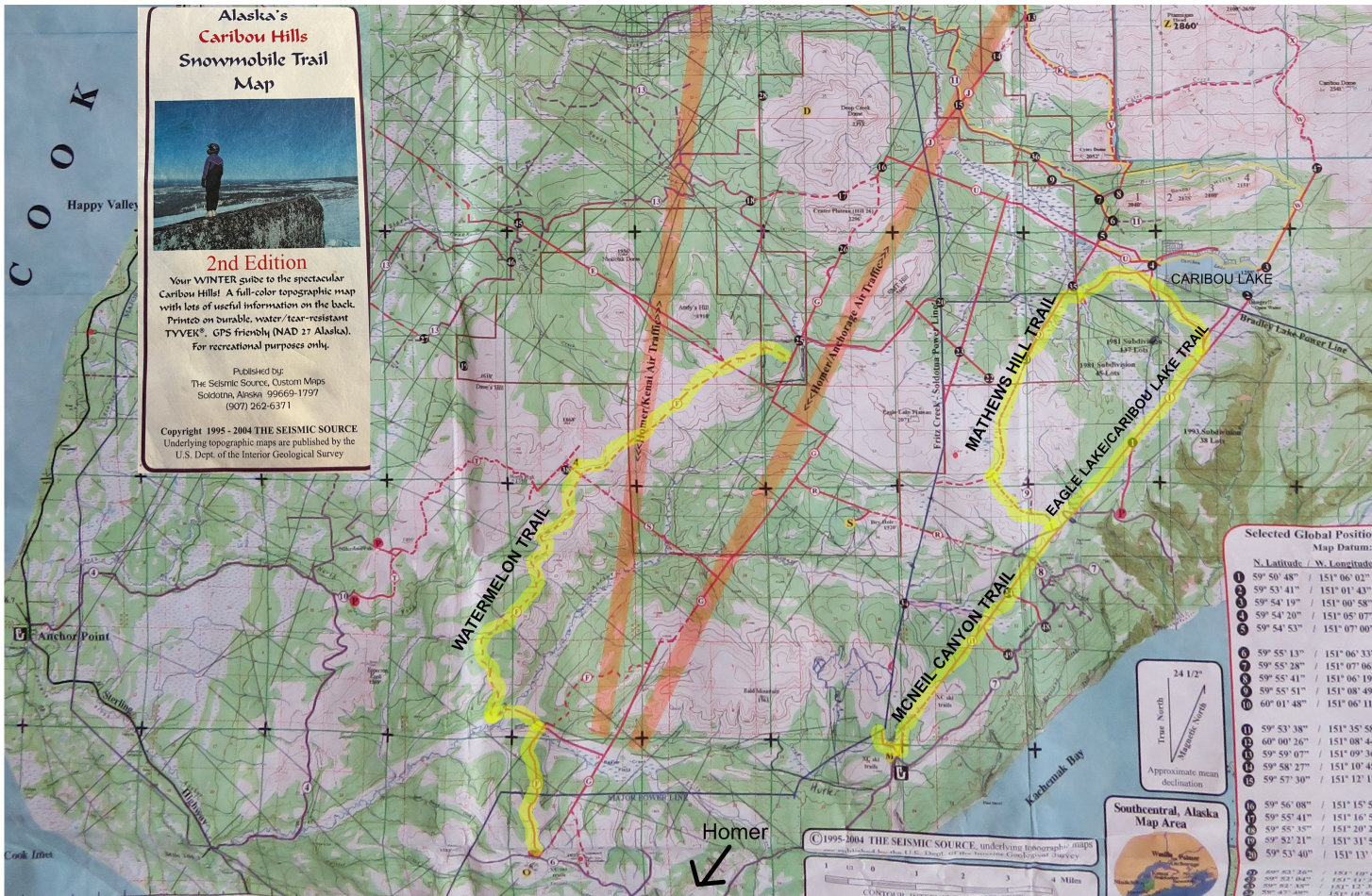
PROPOSED BY: Homer Fish and Game Advisory Committee, Sid Wolford and Kathy Sarns Irwin  
(EG-F22-048)

#147 AREA MAP1 OF KACHEMAK NORDIC MAPPED PUBLIC SKI TRAILS in UNIT 15C  
THEY ARE WELL MARKED AND GROOMED AND OBVIOUS PUBLIC TRAILS FOR SKIERS:  
More detailed maps of each area also attached below





#147 MAP2 OF public multi-use trails south of Caribou Lake: 1. McNeil Canyon Trail, 2. Eagle Lake Trail, 3. Mathews Hill Trail, 4. Watermelon Trail:



I support Proposition #147

If a 100-yard setback is not implemented on the popular public mapped trails in this proposal, there will be more and more user conflicts on these public trails near Homer, as the number of non-consumptive users (local & visiting snowshoers, skiers, snowbikers, hikers, runners, snowmachiners) increases on popular public mapped trails in winter each year in Unit 15C. The trails suggested for the 100 yd setback in prop #147 are mapped public trails and are available to the public online and to purchase: Kachemak Nordic Ski Trails Maps, and the 4 most used snowmobile/multi-use trails south of Caribou lake: McNeil Canyon Trail, Eagle Lake/Caribou Lake Trail, Mathews Hill Trail, Watermelon Trail. The 100 yard setback was proposed by trappers when we met last April 2022 to find a workable solution to the growing problem of pets getting caught in traps on popular trails near Homer. This is a reasonable guideline that allows the trappers to trap and at the same time allows the increased number of other trail users to pass without conflict along these popular public mapped trails. It gives a guideline for everyone, so both trappers and other users know what to expect on certain popular mapped trails in winter. I was with a group of skiers last spring and 2 different dogs were trapped along the Watermelon trail that day. It was a terrible experience for all involved. It would have been prevented if the traps were 100 yards away from this popular multi-use trail, since that is far enough away that a dog will most likely not smell the trap bait scent. These dogs were traveling along the trail with their owners and when they smelled the trap bait right alongside the trail, they veered off just a little to inspect the smell and were caught in the traps. If the traps had been 100 yd away from this popular multi-use trail this would not have happened. Recently at least 8 dogs have been caught in traps in the Homer outer area on these popular mapped trails including 3 dogs caught along the KNSC groomed ski trails that are marked as “dog friendly” ski trails. This proposal only includes the most popular mapped trails used by many Homer families and visitors. There are miles of other trails not listed on this proposal that trappers can use without a setback. Please support Proposal #147 to help prevent user conflicts with the increasing numbers of non-consumptive trail users on these most popular public mapped trails as indicated in proposal #147.

Kathy Sarns Irwin  
Homer Alaska



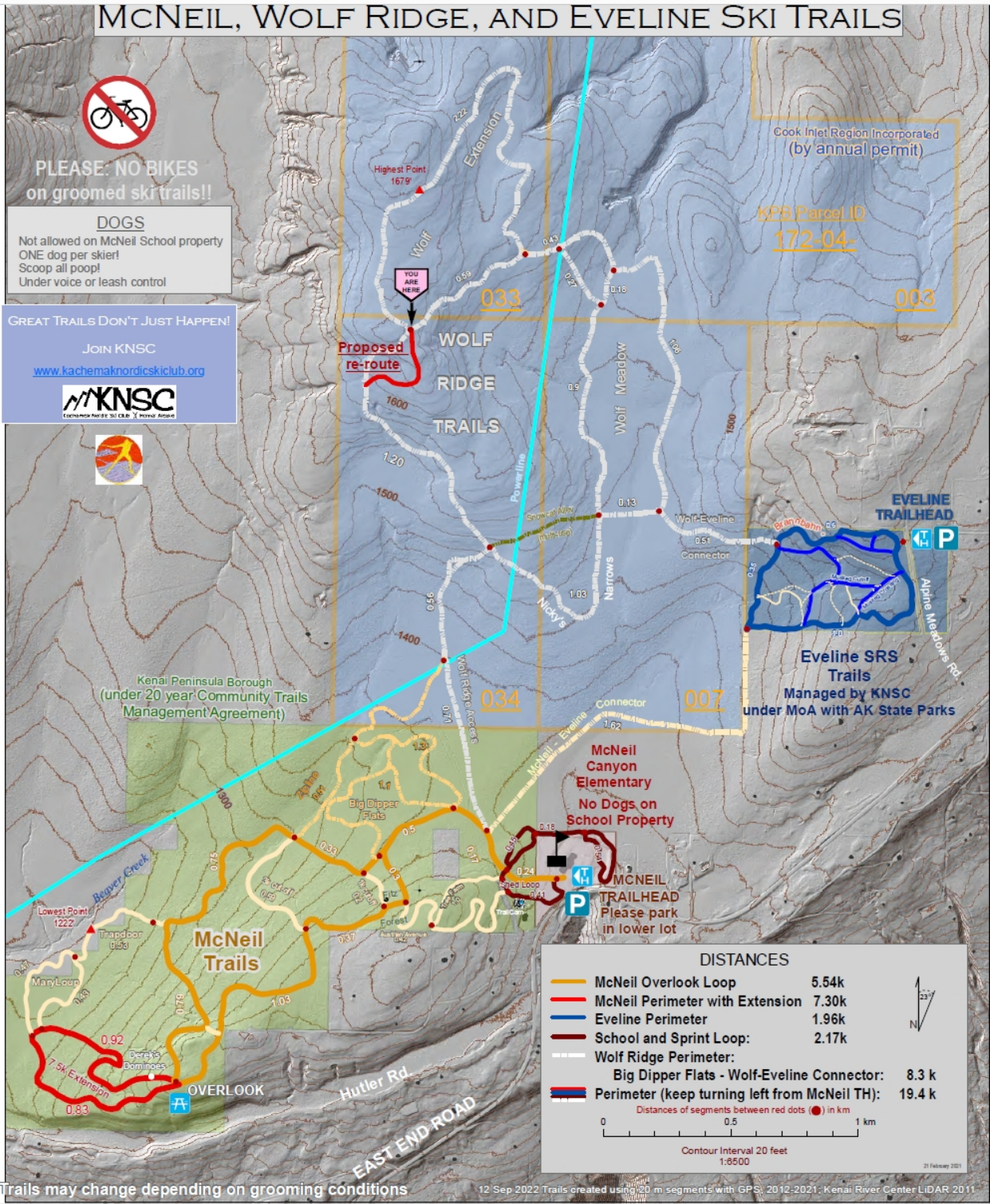
I support Propositions #146

Every winter 100s of families travel across Kachemak Bay by water taxi to ski on or to visit Grewingk Lake (in Kachemak Bay State Park). Families with pets hike on the Glacier Lake Trail and Saddle trail. Having a 100 yd setback along these 2 popular mapped trails would be a common sense regulation to prevent user conflicts and heartache for winter park visitors. The use of these 2 trails by hikers, skiers, snowshoers is growing every winter. There are many other miles of KBSP trails that are not in this proposal, so this 100 yd setback for only the most popular trails would not cause an inconvenience for trappers. Also The Diamond Ridge trails on Homer side of the Bay (in Kachemak Bay State park) are used by hundreds of local Homer and visiting cyclists, runners, snowshoers, & runners, with dogs by their side. Please support Proposal #146 for 100yd setbacks to prevent conflicts with the the growing number of multi-use trail users on these 3 most popular public mapped trails in Kachemak Bay State Park.

Kathy Sarns Irwin  
Homer Alaska



Prop #147 DETAILED MAPS of 4 areas from Kachemak Nordic Ski Trails area map:





**LOOKOUT TRAILS**

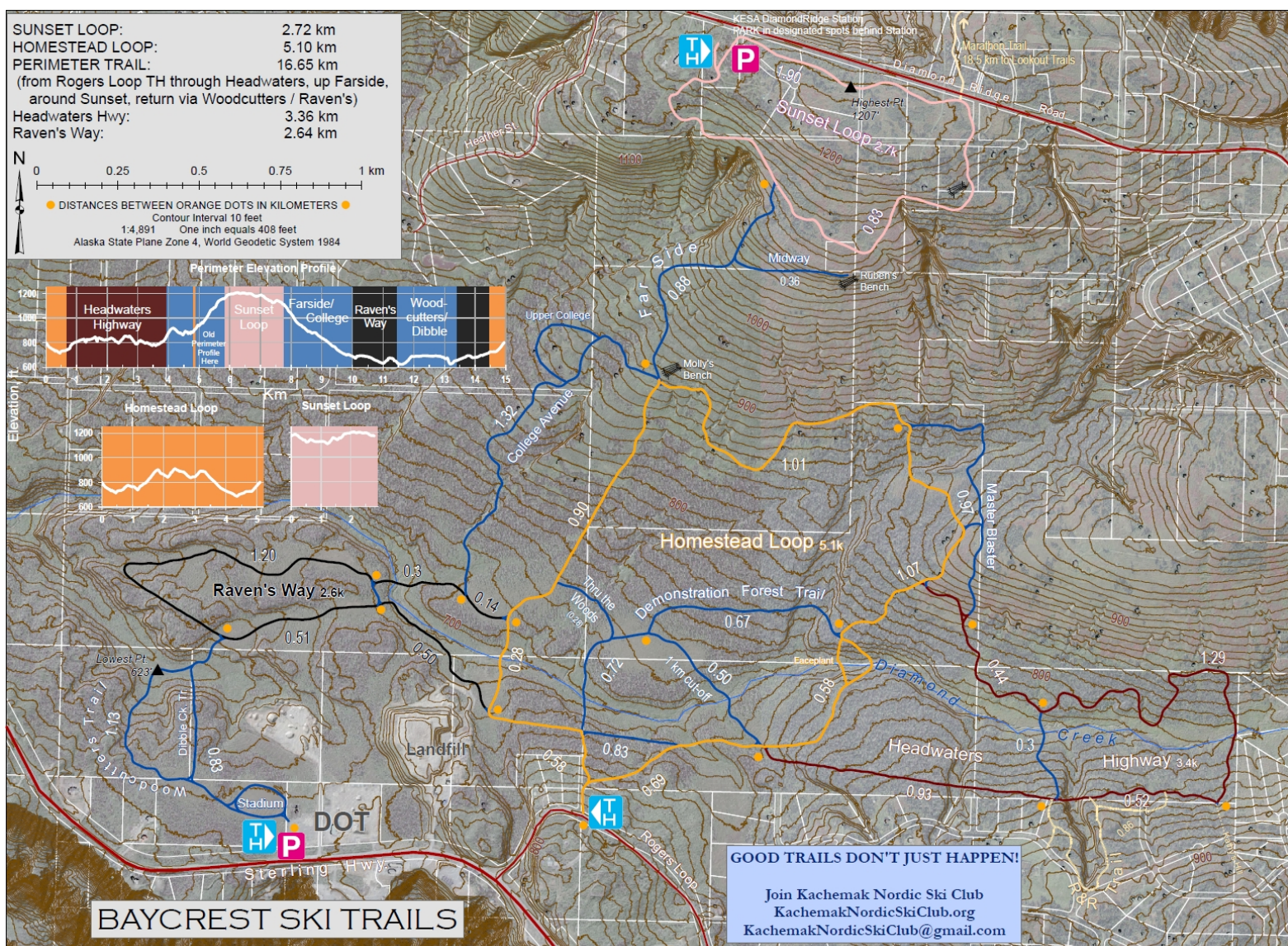
**Trail land ownership and management**

- Kenai Borough CTMA
- Private
- FAA Outgrant

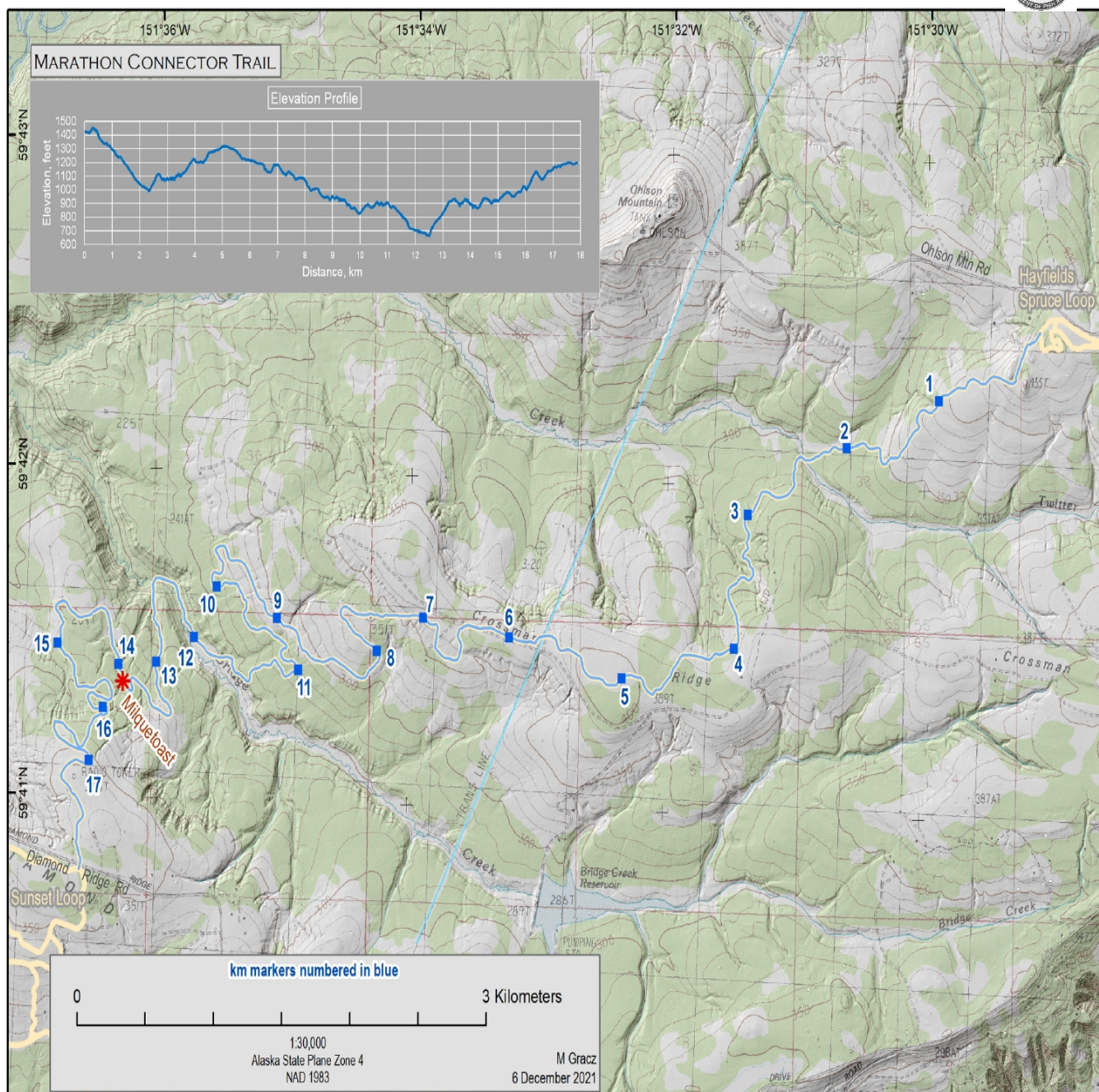
Hayfields: filed for DNR trail easement

**Scale:**  
 0 0.2 0.4 0.6 0.8 1 km  
 DISTANCES BETWEEN ORANGE DOTS IN METERS  
 Contour Interval 10 feet  
 1: 6,000 One inch equals 500 feet  
 Alaska State Plane Zone 4, World Geodetic System 1984

**Logos:**  
 Kachemak Nordic Ski Club X Homer Alaska  
[Kachemaknordicskiclub.org](http://Kachemaknordicskiclub.org)









**Submitted by:** Kathy Sarns Irwin

**Organization Name:**

**Community of Residence:** Homer Alaska

**Comment:**

Recommended Amendment for #147:

As one of the authors of #147, I conferred with the other individual author and propose the following recommended amendment to #147:

Please REMOVE the word “Snomad” from Proposal #147 and REPLACE “Snomad” with the names of 4 snowmobile/multi-use public mapped trails south of Caribou lake.

1. McNeil Canyon Trail
2. Eagle Lake/Caribou Lake Trail
3. Mathews Hill Trail
4. Watermelon Trail.

The suggested revised language for amended #147 is on attached PDF.

Reason for suggested amendment for #147: the Snomads Inc non profit club asked the authors of #147 to remove the word Snomad from proposal #147. When proposal #147 was endorsed by Homer AC vote 10-2 in April 2022, “Snomad trails” was chosen at the Homer AC meeting because the term “Snomad Trails” is commonly used by Homer residents in reference to the mapped snowmobile/multi-use public trails that are part of Alaska DNR Snowmobile/multi-use Trail Grant Program in South Caribou Hills. We now understand Snomads concern that the word “Snomad” in proposal #147 (inadvertently) implies that Snomads Inc non profit helped create proposal #147, even though they are not the authors of #147. Snomads Inc non profit only maintains these trails and pointed out that calling them Snomad trails is incorrect and instead suggested using the trails' proper names. In the spirit of cooperation and for better clarification, we request to remove the word Snomad from the language in #147 and replace it with the specific names of 4 popular mapped multi-use trails south of Caribou Lake: 1. McNeil Canyon Trail, 2. Eagle Lake/Caribou Lake Trail, 3. Mathews Hill Trail, 4. Watermelon Trail. (Maps are attached in PDF)

As the author of prop #147 we are also adding maps for #147 see attachment

SEE ATTACHED PDF CONTAINING:

1. Suggested updated language for amended Proposal #147 (removing word Snomad from prop #147 )
2. #147 MAP1 of Kachemak Nordic Ski Trails area mapped public Ski Trails (Homer residents and visitors and general public can easily find KNSC maps and download online.)
3. #147 MAP2 of public multi-use trails south of Caribou Lake: (produced by Seismic Source) showing the 4 trails highlighted in proposal #147,(this map is available for purchase by the public)
4. my support for Proposal #146
5. my support for Proposal #147
6. #147 four detailed maps of each of the 4 areas on the Kachemak Nordic Ski trails area map, that are groomed and are open to the public.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support with Amendment

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PC292

**Submitted by:** Mary Schallert

**Organization Name:**

**Community of Residence:** anchorage alaska

**Comment:**

I support all proposed trap set backs from trails, beaches, roads, campsites and recreational areas in Cooper Landing and Homer. I also totally support setbacks from the underpasses for wildlife on the new bypass. This is an issue that needs to be resolved for the safety and harmonious usage of these multi-use areas.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support

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PC293

**Submitted by:** Mark Schollenberger

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

Hello , I'm in full support of proposals 146 and 147. There should be a 100 yard setback from all trails and roads on the Kenai peninsula. Skiers, snowshoers bikers and hikers, who pursue these activities with their dogs, clearly outnumber trappers. It's not unreasonable to require traps to be set back 100 yards. It's a fair compromise.

Respectfully,

Mark Schollenberger

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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**Submitted by:** Thomas Schwantes

**Organization Name:**

**Community of Residence:** Kodiak, Alaska

**Comment:**

I strongly support passage of Proposal 76.

My desire is to reduce the number of human/bear conflicts, to reduce property damage for Kodiak area residents, and to avoid future injury and/or loss of life.

See my comments in the attached PDF.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 76: Support

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**March 3, 2023**

**Comments to the Alaska Board of Game**

**Submitted by: Thomas L. Schwantes**

**Re: Proposal 76, Unit 8, Kodiak Island  
Strongly support this proposal**

I live with my wife, Lila, in Bells Flats, Kodiak, Alaska, on a one-acre lot in a large residential area near the head of Woman's Bay. This is approximately 12.5 miles from the City of Kodiak and in close proximity to the U. S. Coast Guard Base.

We have lived in this home for 43 years and plan to live here the rest of our days.

For the first 20-25 years that we lived here we never saw a bear in the area, let alone had one on our property. During the past 10-15 years, however, the bear population has increased at an alarming rate, and now we see bear in this area on a near-daily basis. This occurs from early spring through hibernation time, which can be late on the Island depending on how mild of a winter we are having.

We have gardened here for 43 years and have had compost piles and compost bins near the garden every year. We have never had a bear get into our compost, yet we have been told by a local biologist that we are attracting the bears with our composting.

In March of 2016 a bear tore down our 2-car garage door and got into a chest freezer inside the garage. There was no garbage in the garage to attract the bear and we were told by a biologist from ADF&G that ours was the seventh home that bear had broken into. The other six homes were in Nemetz Park Coast Guard housing. Each home had a garage attached with a freezer inside. That bear broke into another home at the top of our hill the very next evening by pushing the front door in.

In 2020 I had to put down two aggressive bears to protect myself and my wife. We were repeatedly and aggressively approached by two bears while harvesting apples in our back yard. I was 71 and recovering from double knee replacement at the time, and not particularly mobile when these bears approached and continued advancing within 35 feet, disregarding our repeated yelling, use of a loud whistle and all the while showing no fear of us. During the subsequent investigation we were told by a biologist from the Alaska Department of Fish and Game that we were 'baiting the bears by growing apples.' We were also told that it was probably not safe to go in our back yard without bear spray.



This past summer we had numerous problems with bears coming into our yard, tearing down branches from our Mountain Ash trees to feed on the berries. We have worked hard over the past forty years to plant and care for these 17 trees, but it is only in the past three years that these trees have had any damage from bear (except for one incident ten years ago). This past year, 2022, every single tree was damaged by bear.

This past August my wife went to scatter some clover seed in the back yard. She came back in shortly, as white as a ghost and told me that there was a bear in the back yard below the garden. I decided to go have a look and try to chase it off. As I got to the back door, the thought came to me that I had better take a gun with me just in case. I got a shotgun and headed out to try to chase the bear away. But I did not see the bear where Lila said she had seen it, so I moved to a lower portion of the yard, much closer to the house, but still not seeing it. I did, however, see some tall grass and brush moving approximately thirty feet from where I was standing and believed that it might be a bear. In an attempt to scare it off I started to holler, but I had just opened my mouth when a large bear charged. I instinctively fired and the bear dropped six feet (literally) from where I stood. Instantly a second bear appeared and charged me. I fired and killed the second bear as well. The second bear dropped twenty four feet from where I stood. **There is no doubt in my mind if I hadn't taken the gun with me that morning I would have been mauled, and very possibly killed.**

Recently a small home in the Flats was broken into at night while [REDACTED] and his family were sleeping inside. Fortunately, Aaron had a firearm and was able to shoot the bear **inside the house** before he, his wife or children were attacked.

[REDACTED] just lost her golden lab to a bear attack in her Dark Lake residential neighborhood in February 2023.

[REDACTED] was mauled while hiking with his dog on a trail near Crescent Lake a few years back.

[REDACTED] was mauled while running on a popular trail two or three years ago. The sow mauled him and then left him only to return again. There is little doubt if he hadn't had bear spray with him to fend her off when she returned he may well have been killed.

These are events that have all been reported in the Kodiak Daily Mirror, and I know there have been others which I don't recall the details of probably because I didn't know the individual involved.

People in the community no longer feel safe letting their children play outside without close supervision. Some no longer feel safe going for their morning and evening walks



for fear of running into a sow with cubs or any bear for that matter. People don't feel safe in their own yards, nor do they feel safe allowing their children to walk to and from the school bus stops.

A friend of ours teaches at Petersen Elementary. She related one day that there was another teacher who wanted to take her students on a field trip, but when they were getting ready to leave, they saw three bears outside of the school. Consequently all outdoor activities were cancelled, and parents had to come to school to pick up their kids. Similar events have occurred on other occasions, she said.

Last summer I was working on a project in the yard and had four other guys helping clear brush when a sow with two cubs approached. All of us had to go quickly into the house, and I had to go out and fire warning shots so we could continue with our project.

Usually on any morning in the summer you can watch bears on the beach from the highway on Woman's Bay. Bear viewing has become a very popular pastime, and also a Trooper's headache because of traffic hazards; as pictures #3 and #4 indicate, clearly becoming a danger to bear viewers as they don't realize the harm they may be putting themselves in. The bears have become comfortable and unafraid being around people.

One morning last spring on KMXT Radio, the announcer was telling the public that there was a bear near East Elementary School, so parents and students could be aware. A few minutes later, they were announcing that a bear had been sighted swimming over to Near Island, and people were being warned, as the park on Near Island is a popular place for people to walk in the mornings.

This is just a handful of incidents I've shared. There are many, many stories of bears breaking into dumpsters, breaking into cars, charging vehicles, and even bears all over in the downtown areas. Last summer there was a sow with cubs in the parking lot of the US Post Office in the middle of town, in the middle of the day.

This is causing a huge drain on our police/ public safety agencies when they have plenty to do without dealing with these problems.

These bears are being managed for the guides, outfitters and the tourists, who all want to take or see more bears respectively. There is **LITTLE CONSIDERATION BEING GIVEN TO THE SAFETY OF THE RESIDENTS WHO LIVE HERE.**

Governor Dunleavy is encouraging Alaskans to grow more food to help us become more self-reliant and to help others obtain fresh, nutritious food. We all know how the shelves in our stores can be pretty low at times. We are told, however, by our local



biologist that when we try to grow fruit trees and berries, that we are attracting the bears.

For these and other reasons too numerous to mention, and in talking to people in our community, I find that many are having the same problems we are having and share the same feelings that I have.

**There are simply too many bears. I believe the bear population has increased so much that they are being pushed by competition out of the rivers into residential areas in search of food. Regardless of the reason, the population has gotten totally out of control, and it is only a matter of time before someone else gets mauled or even killed.**

Lila grew up in Kodiak and recalls as a youngster there were no bears in the areas surrounding the City of Kodiak, and there were no bear problems until about 10-15 years ago. 2022 was a record year for bear problems--no previous year even comes close.

**We strongly urge the passage of Proposal 76 to extend the road system bear season, with the goal of reducing human/bear conflict and property damage in the residential Kodiak areas. It may not solve all our bear problems, but we believe it will help.**

Thank you for your consideration.

Tom Schwantes  
Lieutenant, Alaska Wildlife Troopers (retired)



1) Our garage door destroyed by a bear on March 12, 2016.



2) Eleven bear on the beach at the head of Woman's Bay, Summer 2022



3) People watching bear near Russian River Bridge on the bank of Woman's Bay.



4) Tourists at the head of Woman's Bay watching a sow, not realizing the cubs were right behind them.





**Submitted by:** Matt Scott

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I am commenting in support of proposals 146 and 147. Asking for a setback is extremely reasonable. No one is asking for trapping to cease. Furthermore,

these very small areas being considered; hardly a comparison to the vastness of the Alaska backcountry still available to the trappers. Requiring minimal trapping setbacks in multi-use areas is not “anti-trapping” rather it is a “Safe Trails” issue. There’s plenty of room for both pursuits to exist.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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**Submitted by:** Evelyn Seguela

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

Hello, I would like to be on record as supporting both proposals 146 and 147 which ask for a 100 yard setback for traplines from multiuse public trails around our area. We live out East Road in Homer and use McNeil and Evaline ski /hike trails often and love to take our dog along so would be sad to have to deal with a dog in a leghold trap! Thanks so much! Evelyn

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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## Cooper Landing, AK Trap Setbacks



PC 297

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area. Please select the proposals that you are in support of (select all that apply).

If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) for extra forms.

☐ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass

☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.

☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.

☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.

☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.

☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.

☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

### Other areas setback proposals:

☐ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.

☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails

☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 297

Trapping is essential to the livelihood of many Alaskans. This is not an anti-trapping initiative.

These proposed changes only enhance the safety or perceived safety of multiple users.

These are good ideas!

(feel free to add extra pages of comments)

Printed Name (First and last)\*: BRUCE SERVICE

Organization (if any) N/A

Signature\*: 

Email\*

Street Address

City\*: Copper Landing State\*: AK Zip code: 99507

\*indicates it must be filled in to be accepted.

↑  
That's not a R.



**Submitted by:** Heather Shank

**Organization Name:**

**Community of Residence:** Seward, AK

**Comment:**

I am writing in support of proposals 145, 146, 147, 148, 149, 150, 151, 152, 153, and 154. I support the proposed 100-yard setbacks in these popular multi-use recreational areas. I feel that these proposals are reasonable and will go a long ways towards reducing user conflict.

This 100 yard setback would not pose an undue burden on trappers as they will be able to continue to trap on most public lands. Having to travel the additional length of a football field to their trapline is minor.

However, these 100 yard setbacks would go a long way to ensure that other users (non-trappers) are able to use and enjoy these popular trails and areas with peace of mind.

I also support mandatory signage for traplines. I would like to be aware of trapping and therefore be able to protect my pets and children by either deciding to recreate elsewhere or keep them on a leash (the pets, not kids :).

I have been a year-round resident of Alaska since 1995, essentially my entire adult life. Like many Alaskans, most of my recreation involves our great outdoors. While I don't trap and hunt I respect those who do, and believe that most are ethical. With that said, I strongly believe that the referenced proposals are necessary.

A year ago I had the unfortunate experience of watching a friend's dog die in a conibear trap as we frantically and unsuccessfully tried to free her. I would greatly appreciate being able to hike and ski on local trails without worrying about a repeat of that awful day.

Thank you for considering and hopefully supporting these proposals.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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**Submitted by:** Bob Shavelson

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

Please adopt proposals 145-154 regarding trapping near public access and use areas. Traps near these areas present unreasonable risks to kids and pets, and it's just common sense to provide some setbacks to promote public safety.

Thank you.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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## Cooper Landing, AK Trap Setbacks



PC 300

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

### **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.




We have a cabin on Snug Harbor Road in Cooper Landing. We also have always had dogs. We have had this cabin for 20 years. We are always concerned about our dogs getting caught in a trap anytime we hike, bike or snowshoe around the trails and lake. We approve all the measures and would even love to see even larger buffer areas!

Thank you - Mark + Andrea  
Silverman

(feel free to add extra pages of comments)

Printed Name (First and last)\*: Andrea Silverman

Organization (if any) \_\_\_\_\_

Signature\*: 

Email\*: 

Street Address: 

City\*: Anchorage

State\*: AK

Zip code: 99507

\*indicates it must be filled in to be accepted.





PC301

**Submitted by:** Mary Simondsen

**Organization Name:**

**Community of Residence:** Anchor point, ak

**Comment:**

I support proposals #146-147 to protect dogs that are recreating with their family. All traps could be set 100 yards off the trail system. Trails should be safe for all users and should be inclusive of people that wish to bring their companion animals.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support



PC302

**Submitted by:** Nancy Simpson

**Organization Name:**

**Community of Residence:** Juneau

**Comment:**

I support AWA's proposal 145. Thank you,

Nancy Simpson



PC303

**Submitted by:** Heidi Sinclair

**Organization Name:**

**Community of Residence:** seaward, AK

**Comment:**

I am an avid outdoor enthusiast and I have 2 dogs that go with me on many of these adventures. I feel having the 100 yard setback is more than enough space for me to feel safe to have my dogs off leash and also enjoy the freedom. I am in SUPPORT of proposals 145-154 and 146-148

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



Rick Sinnott  
Certified Wildlife Biologist  
Chugiak, Alaska

I am a certified wildlife biologist who worked for the Alaska Department of Fish and Game for 28 years. For 17 of those years I was the Anchorage area wildlife biologist.

Having read the proposals and department comments it strikes me that the department and the board's decision-making is seriously hampered by preventing the management biologists – who know the area, the wildlife and a cross-section of the local residents (not just the hunters, trappers and guide/outfitters) better than most – from commenting on potential user conflicts and public safety concerns. The department has apparently also been instructed to not comment on hunting methods and means, which means its management biologists are not allowed to advise the board, for instance, that baiting bears in or near the state's largest urban area or in Alaska's most heavily used state park is a terrible idea (refer to the department's "neutral" position on Proposal 103).

Board members are not familiar with the terrain, the wildlife, and the people in every region of the state. A board member from the Seward Peninsula is likely to be completely unfamiliar with conditions in Southeast Alaska and vice versa. It goes without saying that most rural board members will be unfamiliar with the conditions and issues in and adjacent to the state's largest city.

This blanket gag order often leaves the department with the lame response that a hunt would be biologically justifiable when other aspects of the hunt raise red flags. The board is clearly the decision-maker. Why not consider the advice of local management biologists?

Interestingly, comments by members of the public and representatives of non-governmental organizations are not restricted by the board. They can freely discuss their concerns regarding allocation, public safety, methods and means, and even the principles and goals of wildlife management – as they should.

Fortunately, I am not hamstrung by the department's inability to offer reasonable advice on local conditions and issues that the board needs to hear in order to make good decisions.

## **5 AAC 85.055. Hunting seasons and bag limits for Dall sheep**

### **PROPOSAL 82 – OPPOSE**

This proposal would add the East Fork of the Eklutna River sheep hunt area (currently an archery-only hunt) to adjacent sheep hunt areas where rifles are allowed.





Dall sheep populations in Unit 14C are lower than they were in previous decades. Although the populations appear to be rebounding, the record snow loads in the winter of 2022-23 will undoubtedly decrease sheep numbers again. Although the department supports this proposal, its recommendation notes that “there is not a sufficient number of full-curl rams to warrant opening any new drawing hunts.” I would argue that adding the existing archery-only hunt area to areas where rifles are allowed is in effect adding a new drawing hunt because rifle hunters are much more efficient at harvesting full-curl rams.

I do, however, support the department’s alternative recommendation to combine the archery-only hunt areas in the East Fork and West Fork of the Eklutna River into one archery-only hunt area to reduce hunter crowding in the West Fork and to increase opportunity for bowhunters who have limited areas in which to hunt Dall sheep in early fall without competition from rifle hunters. Of course, another way to reduce hunter crowding is to reduce the number of drawing permits.

### **PROPOSAL 83 – OPPOSE**

This proposal would reopen the late season rifle hunts for Dall sheep in Unit 14C and redistribute the existing permits.

These hunts were closed in 2011 after the department observed a significant and serious decline in sheep numbers. The department’s aerial counts between 2011 and 2022 show that sheep numbers have fluctuated somewhat but were not that different in 2022 compared to 2011. The winter of 2022-23 has had record snowfalls that will undoubtedly increase sheep mortality in Unit 14C. Now is not the time to be reopening hunt areas that were temporarily closed due to a declining sheep population and have yet to rebound.

### **PROPOSAL 84 – OPPOSE**

This proposal would create a new early-season, archery-only hunt for Dall sheep in the Eklutna River drainage and allow hunters to use aircraft to spot sheep because the new hunt would occur earlier than the prohibition is in effect.

The department does not support this proposal because the added hunting opportunity as well as the hunters’ ability to locate sheep from the air would likely increase harvest of all age and sex classes, which is unwarranted considering the relatively low numbers of sheep in the drainage.

Although the board requires the department to remain neutral on the issue of allocation, I can also assure you as the former management biologist for this subunit that extending the sheep hunting season will conflict with the high number of visitors using Eklutna Valley in the summer and early fall periods, including many hikers and mountain climbers in sheep habitat. Chugach State



Park requires a special park permit for the discharge of weapons, and the department and board should work closely with the park to both maximize hunting and viewing opportunities and minimize conflicts between park users.

### **PROPOSAL 208 – OPPOSE**

This proposal would modify the nonresident permit allocation for Dall sheep in Unit 14C.

This proposal purports to address an allocation issue that would bring guides more revenue at the expense of resident hunters and their relatives. However, as the department noted, the proposal has a conservation-related flaw in that it would force the department to issue at least one nonresident sheep permit in every hunt area in Unit 14C every year. This limits the ability of the department to close hunts temporarily to protect the sheep populations in these areas. In these small hunt areas, with a limited surplus of sheep in the best-case scenarios, harvesting one sheep can be one too many.

### **5 AAC 85.040. Hunting seasons and bag limits for goat**

### **PROPOSAL 85 – OPPOSE**

This proposal would create an archery-only hunt for mountain goats in the West Fork of the Eklutna River drainage.

Drawing goat hunts were expanded in several drainages of Chugach State Park decades ago, with the park managers' approval, because the small populations of goats in those drainages could support a very limited harvest. Thus, additional hunting opportunities were created with very little impact on other users. However, as the department noted in its recommendations, there does not appear to be sufficient numbers to open a new hunt in the drainage. Undoubtedly, some of the goats found in the West Fork of the Eklutna River during summer surveys are available for hunters in the East Fork of the Eklutna River. The two areas are separated by a ridgeline that presents no barrier at all to goat movements.

In addition, as noted in my comments regarding Proposal 84, the upper end of Eklutna Valley is heavily used by park visitors during September and early October, hikers may be encountered in and near goat habitat, and rounds discharged from most of the steep slopes surrounding the drainage are easily within range of the valley bottom where most visitors are concentrated. Chugach State Park requires a special park permit for discharge of weapons, and the department and board should work closely with the park to both maximize hunting and viewing opportunities and minimize conflicts between park users.

### **5 AAC 85.045(5). Hunting seasons and bag limits for moose**



## **PROPOSAL 86 – SUPPORT**

This proposal would reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C.

The department needs the flexibility provided by antlerless moose hunts to manage moose populations in these drainages.

On a related topic, the requirement to reauthorize antlerless moose hunts annually is a huge waste of time for the department and the board, not to mention a waste of paper. The board should consider amending this requirement so that antlerless hunts need to be reauthorized only when other proposals for the same region are considered. Moose populations are typically not so mercurial as to require the current level of oversight. If the department finds that antlerless permits should be reduced or eliminated to limit hunter harvest, it has the authority to do so. If, for some reason, the department decides that antlerless permits should not be reduced even when a moose population has suffered a significant decline, then the board cycle would allow the problem to be corrected in two or three years.

## **PROPOSAL 88 – OPPOSE**

This proposal is confusing. It asks to restrict the registration moose hunt in the Chugach State Park Management Area (i.e., what the proposal calls RM445) to archery only, but RM445 already is an archery-only hunt. RM445 is in the Eklutna Lake Management Area, which is not part of the Chugach State Park Management Area. Additional language in the proposal appears to ask for an archery-only moose hunt throughout the Chugach State Park Management Area (excluding Ship Creek drainage) for bulls with spike-fork or 50 inch antlers or bulls with at least 3 brow tines on at least one side.

Assuming that the proposal is asking to create an archery-only hunt throughout the Chugach State Park Management Area (excluding Ship Creek drainage), I agree with the department that this proposal would reduce overall moose hunting opportunity and harvest in Unit 14C. Bowhunters are currently allowed to hunt moose in the Chugach State Park Management Area and, unlike some areas in the state, competition from rifle hunters is not onerous. In addition, bowhunters already have several unique and very accessible opportunities to harvest moose without competition from rifle hunters in Unit 14C, including RM445, DM448, DM424, DM426, DM427, DM428, DM430, and DM444. These archery-only hunts produce a sizeable portion of the moose harvested in Unit 14C.

## **PROPOSAL 89 – SUPPORT**



This proposal would reauthorize the antlerless moose hunts on Joint Base Elmendorf-Richardson, Birchwood Management Area, Anchorage Management Area, Ship Creek drainage, and the Remainder of Unit 14C.

As stated previously regarding Proposal 86, the department needs the flexibility provided by antlerless moose hunts to manage moose populations in these areas and to provide additional hunting opportunity in areas with relatively high levels of human activity, in part to reduce the number of moose-vehicle collisions in the Anchorage bowl and surrounding communities.

Furthermore, the requirement to reauthorize antlerless moose hunts annually is a huge waste of time for the department and the board, not to mention a waste of paper. The board should consider amending this requirement so that antlerless hunts need to be reauthorized only when other proposals for the same region are considered. Moose populations are typically not so mercurial as to require the current level of oversight. If the department finds that antlerless permits should be reduced or eliminated to limit hunter harvest, it has the authority to do so. If, for some reason, the department decides that antlerless permits should not be reduced even when a moose population has suffered a significant decline, then the board cycle would allow the problem to be corrected in two or three years.

### **PROPOSAL 203 – OPPOSE**

This proposal would create an antlerless moose drawing hunt for shotguns or muzzleloaders in Kincaid Park for hunters who meet the 70% disability with mobility impairments.

I support hunts for impaired hunters, who have far fewer hunting opportunities than less physically challenged hunters and include a fair share of veterans. However, Kincaid Park is not an ideal, or even a somewhat acceptable, location for such a hunt.

The department has had the authority to issue permits for antlerless moose hunts in the Anchorage Management Area for nearly three decades. It has repeatedly refrained from exercising its permitting authority in Kincaid and other large city parks in the Anchorage bowl because they are heavily used in every season, and the trails systems are both extensive and interwoven to an extent that it would prove exceedingly difficult to discharge even a short-range firearm in the park without risking hitting a person using a nearby trail.

In the past the municipal division of parks and recreation has opposed even archery-only moose hunts in Kincaid Park. The only feasible and reasonably safe way to conduct the hunt would be to close the entire park or a large portion of it. A closure of this nature would be unpopular and unenforceable. People access the park's trails via a bewildering array of short, social trails from neighborhoods on the east side, and Kincaid Park is a major destination for



people hiking, biking, running and skiing the Tony Knowles Coastal Trail, which connects most of west Anchorage all the way to downtown.

**5 AAC 85.015. Hunting seasons and bag limits for black bear**

**5 AAC 92.530. Management areas**

**PROPOSAL 90 – OPPOSE**

This proposal asks to establish a new hunt area for black bears using “primitive” or any legal weapons in the West Fork of Eagle River, excluding that area within ½ mile of a developed facility. Later the proposal specifies the South Fork. To be clear, Eagle River has a North Fork and a South Fork; there is no West Fork.

The lower half of the South Fork drainage has many houses in the valley bottom and part way up the slopes. Because these houses are on private property, there is little or no public access to the slopes. Furthermore, if, as the proposal states, the hunt would exclude a buffer area of ½ mile from any developed facility, hunting in the lower valley would be largely restricted to the ridge tops.

Public access in the lower end of the valley leads primarily to a heavily forested strip of Chugach State Park land in the lower valley with a trail that leads a few hundred yards south to Barbara Falls, a popular hiking destination, and north a short distance to the confluence of the North Fork of Eagle River. For much of the summer black bears avoid this area because it is frequented by brown bears, being the only segment of the South Fork with spawning salmon.

At the upper end of the valley, public access is gained via a single, small parking lot that leads to one of the most popular hiking trails in the park. Hence, user conflicts will inevitably arise. Many of the people hiking the trail would like to see black bears in the park, albeit at a distance. The slopes of the valley for a considerable distance upstream from the access point are popular berry-picking sites; thus, hunting with firearms will be problematic from a safety perspective. Hunting with any weapon, but particularly bow and arrow, will inevitably wound bears, creating a potential safety issue with other, often unarmed visitors.

The South Fork drainage abuts the Ship Creek drainage and other portions of the Chugach State Park Management Area where black bear hunting with any legal weapon is allowed from September 1 through May 31. Black bears using the South Fork Valley also use Ship Creek Valley and other adjacent areas and can be hunted there without the user conflicts and public safety concerns of this proposed hunt.

**PROPOSAL 92 – OPPOSE**

This proposal would add bow and arrow to the legal means of taking black bears in DL457, the drawing hunt in McHugh Creek drainage.



Bowhunters have been asking for an opportunity to harvest bears in the Anchorage Management Area, including McHugh Creek drainage, for decades. Bowhunting has not been approved in the McHugh Creek drainage because the valley is heavily used by Chugach State Park visitors. It took many years and much discussion with park managers and the public to gain the opportunity to hunt in this drainage, and archery hunting was a non-starter due to user conflicts, the likelihood of wounding bears, and public safety concerns.

This is a difficult drainage in which to hunt black bears because much of it is heavily wooded or brushy and, for obvious safety reasons, baiting is not allowed. Without baiting, hunters using a bow and arrow are going to be even less successful than hunters using a firearm. If the objective is to harvest bears and perhaps instill a measure of wariness in the remaining bear population so that individual bears are less likely to become problems in nearby neighborhoods, then hunting should be restricted to muzzleloaders and shotguns with slugs.

### **PROPOSAL 93 – SUPPORT AS AMENDED**

This proposal would add bow and arrow to the legal means of taking black bears in DL455 and DL457, the drawing hunts on Joint Base Elmendorf-Richardson and in McHugh Creek drainage, respectively.

I oppose adding archery to DL457 for the reasons discussed under Proposal 92. However, adding archery to DL455 could be feasible if approved by JBER.

### **PROPOSAL 94 – OPPOSE**

This proposal would establish a weekday-only, archery-only drawing hunt for black bears in the McHugh Creek drainage.

The proposed hunt would allow bowhunters to hunt on the same days and throughout the same season (September 1 through May 31) as DL457 currently does for hunters using muzzleloaders and shotguns with slugs. In other words, it is unclear if the proposal is asking that bow and arrow be added to the existing hunt or that only archery be allowed in DL457. I oppose both interpretations for the reasons discussed under Proposal 92.

### **PROPOSAL 95 – OPPOSE**

This proposal would establish a limited registration, weekday-only, archery-only, resident-only, black bear hunt in the McHugh Creek drainage.

Like Proposal 94, it is unclear if the proposal is asking that bow and arrow be added to the existing hunt or that only archery be allowed in what is currently the DL457 hunt area. I oppose both interpretations for the reasons discussed under



Proposal 92. This hunt has always been managed as a drawing hunt because that is the best way to limit the number of hunters. A registration hunt would only exacerbate user conflicts and safety issues.

In addition, like other hunt areas in Chugach State Park, this hunt would require a special permit for discharging a weapon. With drawing hunts, a list of hunters can be shared with the park managers leaving plenty of time for them to issue each hunter a permit. How could the park's regulatory requirement to issue a special permit be fulfilled when a hunter might register the day before hunting?

**5 AAC 85.020. Hunting seasons and bag limits for brown bear**

**5 AAC 92.530. Management areas**

**PROPOSAL 97 – OPPOSE**

This proposal would establish a primitive weapons brown bear hunt in the South Fork of Eagle River drainage.

I oppose this hunt for many of the same reasons discussed under Proposal 90. Hunting in the lower valley would be limited by the ½ mile buffer, the lower South Fork trail system is short and abuts a residential neighborhood, and the upper valley trails are all heavily used by hikers and berry pickers. The department's recommendation to limit hunters by requiring a drawing permit would reduce some of the conflicts; however, public access is severely limited and accessible park areas are relatively congested with people, particularly during the fall berry-picking period. Public safety is a serious concern because a wounded brown bear could easily turn up in a residential neighborhood. Public surveys sponsored by the department have found that most park users like to see brown bears in the park and find the risk acceptable. As with other proposals, this hunt would require a special use permit from Chugach State Park for the discharge of weapons for each hunter.

**PROPOSAL 98 – OPPOSE**

This proposal would establish a brown bear hunt in the Rainbow Creek drainage, excluding those areas within ½ mile of the Seward Highway or any developed facility.

The proposal raises many of the same user conflict and public safety concerns as Proposal 97. Excluding the ½ mile buffer from the Seward Highway leaves a roughly square-shaped valley about 2 miles across. A road and a residential neighborhood occupies the center of the valley, leaving primarily the ridges and steep, rocky slopes for this hunt.

Allowing an unlimited number of brown bear hunters in this small valley would create problems. Residents of Rainbow Valley would not appreciate wounded



brown bears in their neighborhood. Outside of the private property much of the valley is in Chugach State Park. Public surveys sponsored by the department have found that most park users like to see brown bears in the park and find the risk acceptable. As with other proposals, this hunt would require a special use permit from Chugach State Park for the discharge of weapons for each hunter.

### **PROPOSAL 99 – OPPOSE**

This proposal would establish an archery-only drawing hunt for brown bears in the McHugh Creek drainage.

The proposal raises many of the same user conflict and public safety concerns as Proposals 97 and 98. The narrow valley is bisected by a popular hiking trail, and McHugh Creek trailhead is one of the most popular picnic areas in Anchorage. McHugh Creek is heavily wooded in some areas and has extensive subalpine alder and willow thickets. Without using a bait station, it will be difficult and unsafe to hunt brown bears in the valley with bows and arrows. The conditions lend themselves to deflected shots and lost bears. Residents of South Anchorage would not appreciate wounded brown bears in their neighborhood. It would be irresponsible to authorize a bow hunt for brown bears a little more than a mile from the residential neighborhoods in Potter Heights, Southpointe Ridge, Potter Valley and Bear Valley. As with other proposals, this hunt would require a special use permit from Chugach State Park for the discharge of weapons for each hunter.

### **PROPOSAL 100 – OPPOSE**

This proposal would establish an archery-only drawing hunt for brown bears on Joint Base Elmendorf-Richardson.

JBER is a military reservation that uses its wildlands intensively for training purposes. In addition, the base has large housing areas along its southern border. The base also allows recreational use, primarily hiking and running, by the residents of Anchorage in some areas by permit only. Much of JBER borders residential neighborhoods and popular city parks like Beach Lake Park and Far North Bicentennial Park in the Anchorage bowl, Eagle River and Chugiak. None of these current uses and activities will happily accommodate wounded brown bears. It would be irresponsible to authorize a bow hunt for brown bears on JBER.

### **PROPOSAL 101 – OPPOSE**

This proposal would extend the general season to allow an archery-only brown bear hunt in Unit 14C Remainder during the month of June.





The “remainder” of Unit 14C consists of mostly Chugach National Forest and other federal lands east of Chugach State Park. Most of the area, except for the southern portion around the communities of Girdwood and Portage, and a small neighborhood in the northwest corner of the hunt area, south of the Knik River, is remote and has few brown bears. The current hunting season for all legal weapons runs from September 1 through May 31.

In the most recent five-year period for which the department has records, an average of 3 brown bears have been harvested annually. Although the department has no idea how many brown bears inhabit the remainder of Unit 14C, because most of the area is far from salmon-spawning habitat I would hazard a guess that three bears per year (in addition to wounding loss) may be approaching the level of sustainability. Furthermore, many bear hunters believe that June bear hides have rubbed areas that detract from their trophy value.

### **PROPOSAL 102 – OPPOSE**

This proposal would extend the general season to hunt brown bears in Unit 14C Remainder.

The “remainder” of Unit 14C consists of mostly Chugach National Forest and other federal lands east of Chugach State Park. Most of the area, except for the southern portion around the communities of Girdwood and Portage, and a small neighborhood in the northwest corner of the hunt area, south of the Knik River, is remote and has few brown bears. The current hunting season for all legal weapons runs from September 1 through May 31.

In the most recent five-year period for which the department has records, an average of 3 brown bears have been harvested annually. Although the department has no idea how many brown bears inhabit the remainder of Unit 14C, because most of the area is far from salmon-spawning habitat I would hazard a guess that three bears per year (in addition to wounding loss) may be approaching the level of sustainability. Furthermore, many bear hunters believe that June bear hides have rubbed areas that detract from their trophy value.

**5 AAC 85.015. Hunting seasons and bag limits for black bear**

**5 AAC 85.020. Hunting seasons and bag limits for brown bear**

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

**5 AAC 92.530. Management areas**

### **PROPOSAL 103 – OPPOSE**

This proposal would establish a bait hunt for black and brown bears in the McHugh Creek drainage from May 1 through June 15.



This proposal trots out the common misperceptions that baiting bears will help keep bears from dangerous encounters with people: a “large number” of bears are present in the drainage, the bait station can be sited to “eliminate dangerous encounters with bears and recreational users of the park,” reducing overall numbers of bears is a “conservation” issue, bears “have taken the lives of people using the park for recreational purposes,” the bait station will “lure the bears away from heavily used trails,” if this proposal does not pass “more dangerous encounters and possible deaths may occur,” and without the hunt “the bear population will increase.”

What is a “large number”? The department admits it has no idea how many bears occupy the McHugh Creek drainage. And if there is a “large number” of bears what possible circumstances will allow the population to increase if the hunt is not authorized? There are no salmon in the drainage. Black bears are already hunted in the drainage, brown bears are hunted in nearby drainages, and the population of both species is likely at or below carrying capacity already.

This is a narrow valley, on average about a mile wide, with a popular recreational trail along its entire length. It would be impossible to site a bait station anywhere in the valley that is more than a 10-15 minute stroll to the trail. Another trail across the base of the valley, the Turnagain Arm Trail, is even more heavily used. The McHugh Creek trailhead is the most popular picnic area in the park. Hikers frequent Turnagain Arm trails earlier in spring than other Anchorage area trails because the trails become snow-free sooner on south-facing slopes. The trails are popular destinations in May and June.

There is no way that bears who are attracted to human-provided bait will not be attracted to hikers with food, tents, and the picnic area. Several Anchorage neighborhoods are little more than a mile from the McHugh Creek drainage. Food-conditioned bears will be encouraged by the bait stations to visit those neighborhoods and wounded bears could also find their way into nearby residential areas.

Both black and brown bears have killed and injured people in Chugach State Park. However, these are rare events and park managers are not asking for help in reducing bear populations. The incident mentioned in the proposal, where a young man was killed by a black bear, occurred in another valley several miles away. There was a tragic brown bear attack nearly 30 years ago that killed two runners on McHugh Creek Trail. The attack occurred because a sow and cubs were resting on a moose kill close to the trail. In other words, the attack was likely exacerbated by both the presence of the cubs and a coveted food source. A moose kill is not very different from a regularly restocked pile of bait, except it is a natural consequence of the wild nature of the park and not a place picked by some sport hunters to dump doughnut grease or dog food so they can each harvest one of the many bears that would be attracted to the site. The proposal doesn’t even consider the food conditioning of bears, especially sows with cubs



or small bears that are less likely to be harvested because hunters are waiting for a bigger, male bear. I submit that a bait station in McHugh Creek drainage would increase the number of dangerous bear encounters in the Anchorage area and increase the number of bears shot by the department and private citizens in defense of life or property, not decrease them as the proposal claims. Authorizing the use of bait stations in Chugach State Park or anywhere in the vicinity of Anchorage would be the height of irresponsibility.

This is not an isolated or protected population of bears. Collared and radio-tagged brown and black bears frequently move between Turnagain Arm drainages, the Anchorage bowl, Eagle River and Chugiak. There are opportunities to hunt bears in many parts of Chugach State Park.

**5 AAC 84.270. Furbearer trapping**

**5 AAC 85.060. Hunting seasons and bag limits for fur animals**

**PROPOSAL 104 – OPPOSE**

This proposal would close lynx hunting and trapping in Chugach State Park and the Glacier Creek drainage near the ski resort community of Girdwood.

It is interesting how the department's recommendation on this proposal splits hairs. The department supports lynx hunting and trapping in the park and the ski resort community, which is clearly stating a preference between two user groups. And yet the department subsequently claims to be neutral on the allocation between consumptive and non-consumptive users. A categorical statement in support of lynx hunting and trapping in Alaska's most visited state park, where people want to see lynx, and a ski resort with lots of people walking dogs off leash on woodland trails will not be considered a neutral stance by most people.

Nevertheless, I oppose this proposal because the opportunity to hunt and trap lynx has been carefully adjusted to accommodate at least some of the concerns of park visitors and dog walkers. For example, the park requires trappers to register and mark their traps to encourage responsible behavior. I just wish the board and the department would recognize the blatant hypocrisy inherent in supporting hunting and trapping almost everywhere in the state, including in parks and near urban and exurban areas, while often discounting the desires of nonconsumptive users, who the board and department are also required to serve.

Certainly adding one or more nonconsumptive users to the board itself would be a step in the right direction. The board should actively promote the idea of greater diversity – which can only lead to better decision-making in the service of all Alaskans – with the Governor and Legislature.



## Comments on Alaska Board of Game Proposals March 2023:

As a full time, year-round Moose Pass resident and federal subsistence user of Unit 7 public lands and trails - trapping, hunting, and recreating with my dogs - **I oppose all trapping setback proposals in Unit 7 (Proposals 148-153)** which would institute trap setback near many miles of trails, roads, and campgrounds. **I also oppose Proposal 154 requiring signs for trapping.** I hope my comments weigh into other trap setback proposals, as I am not as familiar with Unit 15 but these issues may apply and should be scrutinized before removing trapping opportunities from Alaskans.

First, these proposals would make State trapping regulations more restrictive than Federal subsistence trapping regulations. The Subsistence Board rejected similar trapping proposals in the past. This would create confusion by both trappers and dog owners if setbacks were required only by trappers under State regulations but not federal subsistence rules on federal land. Three different federal rural subsistence communities – including Cooper Landing – utilize the proposed area and would not be bound to setbacks. The Alaska constitution and ANILCA are clear that harvesting wildlife is a fundamental right and it is unfair to make it harder for families to snare hares, or trap beaver for food and warm clothing - just because some people do not want to control their dogs. We live within an area with abundant wildlife and a rich heritage of hunting and trapping that still exists. We don't loudly get on the radio or social media to gain attention because trapping for many of us is akin to getting groceries or buying pants – set our traps, hopefully catch meat and fur for personal use or income. But once again the legal harvest of wildlife under highly regulated methods in the backcountry is being unjustly vilified. The longest trapping season in the proposal area is six months - which provides six months without trapping for off leash dogs. Public land is managed for multiple uses, and this separation in time allows for both user groups to engage in their activities for half of the year. And contrary to the proposal, most trappers run their traplines via ski or snowshoe in this area because most of it is closed to snowmachines, so the impacts on trapping effort are more than being claimed.

Trappers aren't "holding others hostage" - the refusal by some dog owners keep their pet under control and within sight for 6 months is holding themselves hostage. The vast majority of dog owners recreating in the winter understand they are responsible for their pet if they are off leash and share the trails safely. It is no different than a skier learning about avalanche safety and being equipped with the knowledge and gear to recognize hazards and act accordingly when they ski the backcountry. Trapping is not fundamentally incompatible with any other user group. I have not heard of traps being placed right in the official tread of trails with official administrative signs. Biking, skiing, snowshoeing, or any other user will not encounter a trap "in the middle of the trail" if they are on an official trail with a trailhead around here – the only user group experiencing issues on these trails are dogs that are not with, and controlled by, their owner. Sometimes people accidentally recreate on a trapline, leaving from a pullout without a kiosk, thinking it is a real trail instead of recognizing the packed tracks are from repeated trap checks; in some cases, some do it on purpose to claim a trap is "right in the trail!" and create an uproar. Trappers may also think they are not on a trail, but unknown to them it is an unmarked, unofficial "local secret" trail and they just so happened to be first ones to travel it that winter.



These facts are being left out of the narrative of “traps are right in the trails!”. It would be interested to see an actual map of trap incidents as reported on Map the Trap, but I don’t think that information was ever shared publicly.

As a trapper, I am not opposed to some reasonable compromises in certain high use, easily located and identified (by all users, not just a subgroup of locals) trails or areas with clearly definable and officially recognized boundaries – such as the Campgrounds; or trails with permanent, official administrative trailheads, kiosks, and a set route that does not change. There is NO question by any user if you are on the Resurrection Pass trail, for example. But Safe Trail’s claim that they would simply like to make some “safe multi-use trails in Cooper Landing” is misleading. They want to restrict trapping in the backcountry far from towns; long stretches of highway without official trailheads; and bans on traps that pose zero risk to dogs. There is already a huge area closed to trapping entirely that is closer to Cooper Landing than many of these proposed areas - Skilak Lake Road loop of the Kenai NWR, which is 19 miles long and has at least 32,000 acres of trap free trails and backcountry, ~10 miles away from the center of Cooper Landing. This is much closer to Cooper Landing than some of the proposed areas. To put it in perspective: from town center, Tern Lake is 12 miles; Devil’s Pass trailhead is 14 miles; Summit Lake is 19 miles; Manitoba is 23 miles. Moose Pass center is slightly farther from these areas. It has been very misleading to the public that Cooper Landing Safe trails is trying to simply make Cooper Landing areas safe –. In fact, that section of the Seward highway could be considered the wheel hub of 3 federally recognized rural subsistence communities – Cooper Landing itself, Moose Pass, and Hope.

Another issue is that while trappers will read the regulations - as trapping is already highly regulated – what if dog owners don’t read them? Or they think “Summit area is safe of traps” and don’t seek out the exact mile markers and distance of setback? If they already read trapping rules, they would know when and where trapping season is open and know to keep their dog under control and/or scout out areas to see if traps are nearby. How accurate is the general public at recognizing 100 yards, uphill, in the snow (as would be the case near Summit Lake on the Seward Highway)? Will dog owners suddenly decide to leash their pet once they reach 100 yards? What if the mile markers on the highway are missing (as some are right now)? That’s a burden on not just trappers but also dog owners. What if somebody THINKS they are on one of the proposed trails that does not have a trailhead or administrative signage, but they accidentally follow a trapper’s off-trail tracks in the snow and follow their trapline? What is safer – assuming there are traps on public land and getting educated on trapping/controlling your dog to keep it safe, or putting an even bigger burden on dog owners to seek out, understand, and follow pages of regulations? It is guaranteed that if setbacks were instituted, a trapper with totally legal sets would still get demonized if a dog owner was ignorant of the rules - and further bans on trapping would be demanded.

There are further implications on allowing setbacks in areas that do not have legal, set boundaries or a fixed, hardened, known route, and do not have permanent administrative signage. The fact that they had to make their own maps to label areas with slang terms such as



“Japan Woods” and “Park and Poke” illustrates this point – they are only areas known by certain groups but known to the general public. It’s not on google; it’s not on the USGS quads. “Devil’s Pass Ski Loop” is not an officially designated recreation area; volunteers groom old skid trails in a moose habitat project. There isn’t an official boundary or recognized as federal recreation area, and I don’t believe the skid roads are even counted as permanent roads or trails as they are supposed to be restored - and the quickly growing habitat forage regeneration will certainly change the shape and accessibility of the area as trees grow back and cause confusion on what the boundary is. Setbacks from trail center of a known, hardened route – such as Resurrection Pass – is subject to less confusion and interpretation than “Manitoba Ski Area” in which skin trail/snow tracks by skiers or snowshoers within the vicinity could easily be mistaken as the “trap free” trail and can be too subjective. Another huge issue is that allowing setbacks on unofficial areas would set a dangerous precedent for traplines - if a trapper packs down, brushes and maintains a trapline, other users could hijack his trapline, give it a local slang name, and claim it is now “multi-use” and ask for setbacks. What would stop this from happening if this precedent is set?

For all setback proposals, setbacks are unnecessary for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes as there is zero risk to a dog being killed in this scenario. Lack of education, and/or the purposeful spread of misinformation about the risks posed by small elevated sets, should not lead to unnecessary burden on trappers. The same can be said for submerged water sets, under ice sets, or weasel sized sets.

Proposal 149: Regarding campgrounds, the Forest Service has a leash law for all the areas in the proposal. I have not heard of any dog incidents with traps in campgrounds on OR off leash. I am not opposed to keeping ground set 330s or other legitimately lethal traps out of campgrounds. However, I am opposed to setbacks extending outside of campgrounds for any sets (and campgrounds have definite boundaries, and dogs are required to be on leash anyway), and some sets do not pose any risk to dogs.

As noted before, setbacks are unnecessary for certain elevated marten/ermine sets as there is zero risk to a dog being killed in this scenario. If a setback were to be implemented as a compromise specifically and only in campgrounds, I would only suggest using the campground roads and loops/day use footprints to implement the 50’ setback for these traps – not the outer boundaries of the campground. Some campgrounds – such as Russian River – are not developed within the entire physical footprint and have large areas of undeveloped forest. Totally prohibiting these sets from being placed in peripheral woods away from the groomed roads is restrictive without just cause. Some campgrounds listed in the proposal are adjacent to rivers that beavers that have, at times, dammed up and may cause flooding. The ability to utilize trapping as a legal and effective management tool for trappers to harvest and utilize the fur and meat from areas where they can damage infrastructure should be maintained without having an unnecessary burden to request a special permit to remove nuisance animals because submerged beaver sets should be of no risk to a controlled dog under owner control.



For proposals 150 and 151: I disagree with setbacks along Seward and Sterling highways and pullouts because children and dogs should always be closely watched and never left to roam next to highways. From obvious dangers of high speed traffic, to disposed needles and abundant human waste unfortunately found at pullouts, to the chance a roadkill animal has drawn in predators close to the road are all very real dangers.

It is a misnomer for the organization to be called "Safe Trails", because the entire platform is based solely around restricting trapping, which would in turn encourage others to allow their dogs to run uncontrolled under the guise of safety. But not only are there endless other hazards for loose dogs in the backcountry – moose, porcupine, running away, predators, getting lost – uncontrolled dogs are literally a potential hazard to **all** other user groups. Children, adults, and other dogs can be bit or knocked over by an uncontrolled dog. Dogs can harass or kill wildlife, or spread or catch disease with wildlife, or interfere with people hunting. Popular outdoors publications have many articles about the conflicts between off leash dogs and other users – all state to keep your dog on a leash if it does not stay close and have perfect recall. Ironically, the reasons Safe Trails wants these setbacks – increasing recreation on multi use trails – is exactly why many public land managers – including Anchorage – are instituting new or stronger leash controls! The public outcry on negative dog interactions is abundant and conflicts with many other user groups. Dogs are mobile and have teeth. Traps just sit there. To ignore other user groups that may be negatively affected by increased dogs at large is a disservice to the very idea of multi-use and what a "Safe Trail" is. Even non-trappers are not happy with the rhetoric of user groups trying to force others out, and the discord being sown in our rural communities. Who will they try to exclude next?

One positive of this proposal cycle is that Safe Trails did prove just how effective education and outreach is to educate people on how to recreate safely during trapping season – WITHOUT trapping setbacks! I have not heard of any negative interactions in Unit 7 this winter! If they spend as much time and money promoting trap safety for pet owners in the future as they did pushing their proposal all over social media and in person, dog owners would be empowered with the awareness and skills that will benefit them far more than pages of regulations and a patchwork of setbacks.

Thank you for considering my comments.



**Submitted by:** Morgan Smith

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I would like to express my strong support proposals 146 and 147 to require setbacks for traps from popular trails in Kachemak Bay State Park and the Homer area. More than 8 dogs have been recently trapped on trails in the Homer area. Setback requirements are a powerful solution to prevent conflict and allow popular trails to be enjoyed by all. These proposals still provide trappers with access to public areas to continue trapping safely.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 156: Support Proposal 160: Support  
Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 166: Support Proposal 169: Support  
Proposal 171: Support



**Submitted by:** James Smith

**Organization Name:**

**Community of Residence:** Anchorage, Alaska

**Comment:**

Proposal 65- Strongly OPPOSE- I strongly oppose this proposal.

I have a resident buddy who's down in that area for an extended amount of time for the passed few years. He has record of the number of goats he sees on the hoof or sees harvested. Just alone in Kiavak Bay last year there were 80 goats. He says through out the other areas there is a large population of goats.

If there might be a decline of billy goats- maybe the solution should be is to limit the number of goats harvested per person- switch it from 2 to 1. I feel like limiting the season dates is only benefiting the user who submitted this proposal. If the season is shortened this will effect user access and opportunity for residents. As a resident myself changing the season dates will not allow me to hunt down there because of my current job. The season dates now will allow me to have a lengthy amount of time to chose when i decide to hunt this area.

Proposal 73- SUPPORT

Because of the low population of deer in areas- I agree with prop 73. I think if you limit non residents from 2 to 1, this will help the population in areas where there is a decline. I think most Non-residents harvest 1 deer anyways when they come up either on a guided deer hunt or a boat-based hunt.

Proposal 78- Strongly OPPOSE- I strongly oppose this proposal.

This Proposal is a direct anti-Guide Proposal. Like in the past this was not passed. The Kodiak National Wildlife Refuge has a excellent Brown bear management system that should not be changed. Majority of the guides submit non-residents for the draw and do not skip the draw. This is an obvious attack against guides.





[REDACTED]  
Kodiak, AK 99615

February 7, 2023  
[REDACTED]

To Whom it may Concern:

Please accept this letter of concern regarding proposal 76. First and foremost, let me start by stating that I am not anti-bear hunting. I find that extending the current road system bear hunting seasons in order to eliminate "problem" bears is an archaic and thinly veiled proposal on how to manage bears that live near our residential areas. This proposal does not address the underlying problem of people and garbage. With proper and enforced garbage management we could alleviate most of our bear issues.

This proposal also lacks substance on how a bear is deemed a "problem" bear. Who determines this? Where and when will this bear be eliminated. Hunting near our residential areas seems to invite a myriad of problems with potential for catastrophic results.

Finally, as a photographer and bear viewing guide, I feel that this proposal has potential to take out some of the local bears that many find wonderful to watch and photograph. We need to recognize that bear viewing, and photography also provides a substantial economic resource to our community. We tend to forget that Kodiak bears are and should be considered a shared resource.

Sincerely,

Jennifer Smith



PC309

**Submitted by:** Laura Sneddon

**Organization Name:**

**Community of Residence:** CA

**Comment:**

I support Proposal #145 to secure hunting and trapping setbacks from new wildlife crossings on the Sterling Highway Cooper Landing bypass. It is important that fencing keep wildlife off the road and funnel them through these new crossings, but at the same time regulations must restrict hunting and trapping on these crossings. Why would crossings be allowed only to subject the animals to the dangers of hunting and hunters?!

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 160: Support

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PC310

**Submitted by:** David Mastolier

**Organization Name:** Snomads, Inc.

**Community of Residence:** Homer, Alaska

**Comment:**

To whom it may concern,

It has been brought to our organization's (Snomads, Inc., a non-profit) attention that a Proposal involving southern Kenai Peninsula trails is in the works.

PROPOSAL 147 5 AAC 92.550. Areas closed to trapping.

Snomads, Inc. does not support our organization's name in this proposal, nor do we authorize any map we may produce. Snomads do not own any trails; we maintain public trails for multi-use. Labeling a trail as Snomads is incorrect. The trails we maintain can change yearly, making the proposed rules a moving target.

Snomads puts out a map for general use rather than for navigating or official use. These maps can be inaccurate and may include trails not meant to be in the proposal. Trails on our maps are public trails, open to the public, not Snomad trails. Using a Snomads-produced map for official use is firmly discouraged.

We can appreciate the attempt to simplify the writing of the proposal; however, our organization's name within the proposal needs to be removed, as well as any reference to any map we may produce. We suggest correctly identifying the trails proposed by their proper name and using a map source that is for official use.

To be clear, Snomads, Inc. will only allow our organization's name and maps to be used with proper written permission.



February 24, 2023

To whom it may concern,

It has been brought to our organization's (Snomads, Inc., a non-profit) attention that a Proposal involving southern Kenai Peninsula trails is in the works.

PROPOSAL 147 5 AAC 92.550. Areas closed to trapping.

Snomads, Inc. does not support our organization's name in this proposal, nor do we authorize any map we may produce. The Snomads do not own any trails; we maintain public trails for multi-use. Labeling a trail as Snomads is incorrect. The trails we maintain can change yearly, making the proposed rules a moving target.

Snomads puts out a map for general use of our members rather than for navigating or official use. These maps can be inaccurate and may include trails not meant to be in the proposal. Trails on our maps are public trails, open to the public, not Snomad trails. Using a Snomads-produced map for official use is firmly discouraged.

We can appreciate the attempt to simplify the writing of the proposal; however, our organization's name within the proposal needs to be removed, as well as any reference to any map we may produce. We suggest correctly identifying the trails proposed by their proper name and using a map source that is for official use.

To be clear, Snomads, Inc. will only allow our organization's name and maps to be used with proper written permission.

Snomads, Inc. maintains and preserves access to the backcountry. Attaching a restriction to the trails we maintain could have us losing support amongst our members. In addition, user groups could be afraid that any trail we maintain, there could be attached restrictions that were not meant to be.

We believe Proposal 147 should not pass, and the authors/supporters of this proposal rewrite it with no mention of Snomads.

Regards,  
David L. Mastolier, President

Snomads, Inc. maintains and preserves access to the backcountry. Attaching a restriction to the trails we maintain could have us losing support amongst our members. In addition, user groups could be afraid that any trail we maintain, there could be attached restrictions that were not meant to be.

We believe Proposal 147 should not pass, and the authors/supporters of this proposal rewrite it with no mention of Snomads.

Regards,

David L. Mastolier, President

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 147: Oppose

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PC311

**Submitted by:** Beverly Snyder

**Organization Name:**

**Community of Residence:** Anchor Point, AK

**Comment:**

Proposals # 146 and 147: I think a 50 foot setback is reasonable on all trails. This protects trappers setups and people/pets who may take a tumble off a trail. Dogs should be leashes at all times—in all public use spaces—do anything further off the trail should not be necessary to protect pets. Pet owners—of which I am one—cannot pick and choose the enforcement of leash laws to allow for THEIR greatest benefit. Laws should be to protect the majority's rights.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Oppose Proposal 147: Oppose

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**Submitted by:** Mike Soik

**Organization Name:**

**Community of Residence:** Anchorage, Alaska

**Comment:**

Proposal 104

I oppose this proposal as there is no biological reason to support it. The author wants to improve the "rare opportunities" to see lynx, yet "thousands of Alaskans" have seen lynx and videos of lynx "often appear on social media." It appears there is ample opportunity to see lynx with the current regulations.

Proposal 145

I oppose this proposal. I don't see the necessity for hunting/trapping closures because of highway construction.

Proposal 146

I oppose this proposal. I am opposed to trapping setbacks. You can trap many furbearers (squirrel, ermine, mink, marten, muskrat, under ice beaver) without catching domestic animals. This limits the opportunities for youth trappers who often begin trapping these animals. It states that park "rangers are already strapped with responsibilities and regulation enforcement is difficult at best" when it comes to leash laws. Why should there be new trapping regulations then? Are these trails well defined, marked, and mapped as far as measuring the 100 yards?

Proposal 148

I oppose this proposal. I am opposed to trapping setbacks. You can trap many furbearers (squirrel, ermine, mink, marten, muskrat, under ice beaver) without catching domestic animals. This limits the opportunities for youth trappers who often begin trapping these animals. Are trappers supposed to guess which "know multi-use trails" that this proposal would apply to? Are these trails well defined, marked, and mapped as far as measuring the 100 yards?

Proposals 149, 150, 151, 152, and 153

I oppose these proposals. I am opposed to trapping setbacks. You can trap many furbearers (squirrel, ermine, mink, marten, muskrat, under ice beaver) without catching domestic animals. This limits the opportunities for youth trappers who often begin trapping these animals. I don't know anyone who uses a #3 foothold trap for marten, so I don't understand that part of the proposal regarding the 50 yard setback. Are these campground perimeters, highway pullouts, backcountry access points, trails, trailheads, and beaches well defined, marked, and mapped as far as measuring the 100/50 yards?

Proposal 154

I oppose this proposal. I am opposed to mandatory trapline signage. The Alaska Trappers Association encourages trapline signs in certain areas, they do not recommend mandatory signs as this proposal states. What happens when a trapper's sign is removed/stolen by someone who doesn't approve of trapping? It will be easy for anti-trappers to create a violation for the trapper.

Proposal 156

I support this proposal as the beaver population is depleted and a trapping closure may help the population to recover.

Proposal 157

I support this proposal as the beaver population has been depleted by the extended season and a shortened season may help the population to recover.

## Proposal 159

I oppose this proposal. I don't believe there is an over abundance of wolverine in these units. I would think that pelt quality will be poor in August.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 104: Oppose Proposal 145: Oppose Proposal 146: Oppose Proposal 148: Oppose Proposal 149: Oppose  
Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose  
Proposal 156: Support Proposal 157: Support Proposal 159: Oppose

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PC313

**Submitted by:** Chad Sorenson

**Organization Name:**

**Community of Residence:** Soldotna, AK

**Comment:**

Reduce the harvest limit on Kodiak Island Sitka Black Tail deer to Two. With any buck w first kill and the second buck be at least 3X3.

With the continued growth in popularity of hunting from in state and out of state hunters, the population is seeing unprecedented pressure. Additionally, with the influx of the number of transporters working the Island, this is not helping with the deer population.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Support

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PC313

**Submitted by:** Chad Sorenson

**Organization Name:**

**Community of Residence:** Soldotna, AK

**Comment:**

Limit the number of transporters working the greater Kodiak Island deer hunting season.

In many areas on the Island, we are seeing a number of Transporters working on top of each other, thus causing the hunters in the field to be on top of each other, and an nonstainable deer population harvest rate.

Requesting to close down the ability to have new Transporters to begin working on or around Kodiak Island.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Support

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PC314

**Submitted by:** Mystie Spargo

**Organization Name:**

**Community of Residence:** Rainbow Valley, Alaska

**Comment:**

Hello Board of Game,

I'm writing to you about:

PROPOSAL 98

5 AAC 85.020. Hunting seasons and bag limits for brown bear. 5 AAC 92.530. Management areas.

Our family with two small children live in Rainbow valley and we are concerned about hunting so close to home.

Many hikers are unaware of property lines and often trespass. It is difficult to see where the park and where properties begin and end. I imagine it would be difficult to stay outside of the required ¼ mile from a developed facility. Hunters searching for boundary lines will probably lead to trespassing. Stray bullets traveling well beyond the ¼ mile boundary and pose a safety concern for families in the area. This would be a very stressful and dangerous burden on residents to maintain safety and potential increased conflicts with hunters.

Thank you for listening to my concerns,

Mystie Spargo

██████████

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 98: Oppose

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**Submitted by:** Ted Spraker

**Organization Name:**

**Community of Residence:** Soldotna, AK

**Comment:**

see attached.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 106: Oppose Proposal 107: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 112: Oppose  
Proposal 113: Oppose Proposal 119: Oppose Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose  
Proposal 123: Oppose Proposal 124: Oppose Proposal 125: Oppose Proposal 126: Oppose Proposal 129: Support  
Proposal 130: Support Proposal 132: Support with Amendment Proposal 134: Support Proposal 135: Support Proposal  
136: Support Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 145: Oppose Proposal 146:  
Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose  
Proposal 152: Oppose Proposal 153: Oppose Proposal 155: Support with Amendment Proposal 156: Support with  
Amendment Proposal 157: Support with Amendment Proposal 158: Support with Amendment

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Comments for March 2023 Southcentral Board of Game meeting.

Proposals **106 and 107**, seek to eliminate or change the Lower Kenai Controlled Use Area (CUA) in Subunit 15C. This CUA was approved by Board of Game (BOG) in 1985 to address the increasing harvest of moose during the September 1 - 20 “any bull” season. The proposal was submitted by department staff and approved by the BOG for the fall 1985 season. Although the public suggested several options other than motorized vehicle restrictions, data showed hunters using off road vehicles (ORVs) comprised 30% of the hunters but they harvested 50% of the moose taken in 15C. The original proposal requested the closure of ORVs during the first half of the season. The BOG amended the proposal and closed the last half instead. The goal of maintaining a harvest of less than 250 bulls was accomplished with this restriction. In the spring of 1987, another staff proposal was approved by BOG to implement the spike/fork-50 inch or three brow tine regulation (selective harvest strategy) for Units 7 and 15, and BOG kept the Lower Kenai Controlled Use Area restriction in place.

The selective harvest management strategy achieved the goal of maintaining an adequate bull to cow ratio, resulting in several proposals over the years to rescind the CUA. However, the ORV restriction was supported by many testifying at the BOG, stating hunting improved by the reduction in competition and noise. All thought about 70% of the hunters, at that time, did not use ORVs, they wanted to modify the CUA to allow for game retrieval. As a result of several changes in the season length and ORV restrictions, the current regulation only restricts ORV use for moose hunting from September 16 to 19 and September 22 to 25 in the September 1 to 25 seasons.

The benefits of maintaining this CUA far outweigh rescinding it, especially now that ORV traffic has increased greatly, especially large mud buggies. I suggest the Board **opposes** any changes to the CUA.

Proposals **110 to 113** request special archery seasons for sheep hunting in the remainder of Unit 7 and 15. I **oppose** all these special interest requests. With few exceptions, archery only areas are limited to areas where safety is a concern because the hunt area is close to residential areas or an “any weapons” hunt would result in over harvest. Restricting these areas to archery only would reduce hunter opportunity unnecessarily under the full-curl requirements. Additionally, allowing for archery only seasons before the general season will disturb sheep for the opening of the general season. The sheep population in the Kenai Mountains has undergone a major decline in the past couple of decades, and any additional harvest is not justified. At the current sheep population density in Units 7 and 15, we should be investigating methods to reduce harvest and enhance habitat, rather than increase hunter opportunity.



**Proposal 118**, increase the moose bag limit to allow harvest of forked antler bulls in Unit 15. The selective harvest program has been in place on the Kenai for 35 years and during that time several changes have been made. The first season length for the general hunt was 20 days, then changed to 32, then to the current season of 25. The bag limit has also been changed a couple times, starting with Spike/Fork-50" or 3 brow tines, then Spike-50" or 4 brow tines, and now Spike-50 or 3 brow tines. I believe these adjustments in season and bag limit have resulted in an optimum allowable harvest strategy. Additionally, the number of large bulls taken now is greater than under the S/F-50" or 3 brow tine regulations because by only allowing the harvest of spikes, larger antlered yearlings were allowed to survive. These larger yearlings have a higher over-winter survival rate, resulting in a higher bull to cow ratio. In the past, when forked yearlings were legal, the harvest was comprised of 60-70% spikes and forks. Now by saving these larger yearlings, the harvest has reversed so the large bulls make up 60-70% of the harvest. The yield of meat on a yearling is about 220-250 lbs. compared to about 450 or more, on a large bull.

We are also achieving our bull to cow ratio objective under the current regulations. If we change the bag limit now, we will be changing it back in a few years when the ratio declines. For these reasons, I **oppose** this request.

**Proposals 119 to 126**, establish an archery moose season in Units 7 and 15C. Similar requests have been made since archery seasons first opened in 15A and 15B, in 1993. The BOG has not supported any of these requests in the past, stating there are two areas on the Kenai for archery moose hunting currently (season August 22-29) and anyone can hunt using archery equipment during the general season. Additionally, there has been little to no support from ACs on the peninsula with the exception now of Homer submitting proposal 121, to open an archery season in 15C.

I oppose this request, however, if the Board adopts one of these proposals, the season should be the same as the season in 15A and 15B, i.e., August 22 to 29.

**Proposal 129**, expand the hunting area for DM549, the Homer cow hunt. This permit hunt has been in place for about 30 years, providing increased hunter opportunity and an inexpensive moose hunt. However, as the area has built up it has become difficult to find a place to hunt that is not on private land. This proposal has merit, and I **support it**. It will open a large area and potentially reduce conflicts with local property owners. The department currently issues 50 permits for this hunt and an average of 25-30 cows are taken annually. If hunting success increases with a larger area, the department will adjust the number of permits issued.

**Proposal 130**, intensive management plan for 15C. I **support** this plan to enhance habitat and conduct predator control.



**Proposal 132**, remove the sealing requirement for moose taken on Kalgin Island. I **support this request** by the department and suggest the Board amend it to include Units 7 and the remainder of 15 (Kalgin Island is in 15B). Over the past several years there has been an increasing number of moose confiscated from hunters during sealing that were thought to be sublegal, that were later determined to be legal. In most cases, the meat was given to a charity before the case was reversed so the hunter lost the meat or was offered to be placed on the road-kill list. It is unfortunate that the Board is being asked to remove this requirement that provides an opportunity to talk with hunters, explain the selective harvest program and collect biological data but if the department and Alaska Wildlife Troopers cannot adequately train and supervise field staff that seal antlers, the requirement must be removed. Additionally, Kenai is the only place in the state with mandatory antler sealing in a general moose hunt. This requirement is also an inconvenience to hunters to present their antlers for sealing during business hours, especially if they work normal 8 to 5 jobs.

I'm sure there will be concern about the number of illegal moose taken will increase if mandatory reporting is removed. The current (known) percentage of sublegal moose taken is 11%, down from 23% when the bag limit was 4 brow tines. These are primarily reported by hunters that have mistakenly killed a sublegal animal and turned themselves in to protection. People that knowingly kill sublegal moose do not turn themselves in.

**Proposals 134 to 139**, requests to extend the brown bear season in Units 7 and 15 to either June 15<sup>th</sup> or 30<sup>th</sup>. This proposal was before the Board several years ago and failed in a 3 to 4 vote. Those on the opposing side were concerned about rubbed hides and hunting brown bears under a longer season plus the quota system that had only been in place a couple seasons.

Under the current quota system used to manage brown bear harvest, it will be difficult to over harvest bears. The Department has only closed the season (September 1<sup>st</sup> to May 31<sup>st</sup>, opened in the fall of 2013) due to reaching the harvest limit on females one time, in the fall of 2022. The season was reopened on January 1<sup>st</sup>, 2023. The quota for units 7 and 15 is 50-60 bears from all known mortality or 8-12 adult females (five years old or older), based on a three-year running average.

I **support** this request to allow for more hunting opportunities. Since the black bear baiting season extends to June 30<sup>th</sup>, the Board may accept the longer season date to reduce confusion. Extending the season will not impact the management objective since a quota is in place.

**Proposals 145 to 154**, trapping closures.

**Proposal 145**. Seeks to close five 1/2-mile areas (1/4 mile each side) to hunting and trapping around the four underpasses and one overpass, on the Cooper Landing bypass highway. I investigated this concern in western states where wildlife passes are in place and none of the



states I contacted prohibited trapping or hunting near underpasses. Another point of needed clarification is the reference to wildlife use of the underpass at Watson Lake. The author failed to mention there are four miles of eight-foot-high fence funneling animals through this underpass. The author also stated this noted success is due to the trapping closure imposed by the Refuge. That is not true. Only the south side of the highway is closed, trapping is allowed on the north side. Their data also fails to show how many of each species and how often they used the underpass.

The reference to the benefit of these new wildlife crossings to reduce moose-vehicle accidents is gravely overstated. This portion of Units 7 and 15A has some of the lowest moose densities on the peninsula so I doubt the moose-vehicle incidents will even be significant, when compared to the remainder of the peninsula.

Since this highway project is not scheduled to be completed for several years, I **oppose this request** pending additional data on the benefits of closures.

**Proposals 146 to 153.** Authors of all these requests are basing their proposal on traps being set more than 100 yards will make trails safe for free ranging dogs. That is clearly not true. Lures used for trapping can easily attract the attention of a coyote or wolf (and dog) from a much greater distance. The only way to assure the safety of dogs on trails during the 5 months of trapping season is to require dogs be under control by voice commands or on a leash.

Alaska Trappers Association (ATA) has worked with these groups for years trying to establish a reasonable solution to their concerns. ATA produced a video, Shared Trails, to inform the non-trapping public about ways both users can enjoy these trails and avoid conflicts. Contrary to the statement that there is no money available for trail signs, money is available, and ATA has signs available to trappers.

**Proposals 155 to 157,** beaver trapping in 15C. Rather than closing trapping for beaver in these areas, I suggest the Board reduce the season to not allow open-water trapping. The season has traditionally been November 10 to March 31. When the season was increased to October 15 to April 30, trappers were able to trap beaver in open water rather than under the ice. I suggest the Board amend one of these proposals to change the season back to November 10 to March 31. Also, once beaver trapping is closed in an area, it is extremely difficult to have it reopened.

**Proposal 158,** reduce the season for coyote trapping. Early season snaring of wolves and coyotes was approved by the Board about 7- 8 years ago to address the high Dall lamb predation by coyotes and predation on moose and caribou by wolves. Harvest records show little effort was made during October to snare coyotes or wolves. This longer season failed to produce the results



hoped for, was confusing to users and increased the chances of catching a bear. I **support an amendment** to include wolf snaring and reduce the season to November 10<sup>th</sup> to March 31st.

**Proposal 199**, This request is for a “village” registration hunt for elk on Afognak Island. I suggest the Board amend the proposal to remove the word village to allow Board discussion. The current draw supplement shows 467 draw permits are issued to hunt elk on Afognak and Raspberry islands. There were 170 permits issued in the draw for Eastern Afognak and the remainder of Unit 8. **I support this request.** Several of the larger private Native lands are only open to their shareholders, however, lands owned by the Ouzinkie and Afognak Native Corporations are open to hunting for non-shareholders. If this proposal is amended to provide for open registration for all hunters, it is no different from the requirement to travel to Dillingham in July to register for an “any bull” moose permit.



PC316

**Submitted by:** Janelle Spurkland

**Organization Name:**

**Community of Residence:** Homer Alaska

**Comment:**

I support Proposal 146 and 147 - setbacks of traps around popular winter trails. As a local veterinarian, I have seen numerous pet dogs that have gotten trapped while hiking or skiing with their owners. 100yd setbacks will not decrease the efficacy of traps, but can help to decrease the likelihood of pets getting caught.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

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PC317

**Submitted by:** Samuel Starr

**Organization Name:**

**Community of Residence:** Kodiak, Alaska

**Comment:**

My name is Samuel Starr and I am strongly in favor of Proposal 76. As a home owner in the Bells Flats community I regularly see damage caused by bears on the property of my friends and neighbors in the area. While I take precautions with electric fencing an extended bear season would provide me with a legal avenue to harvest and use a bear threatening my property without having to do a defense of life and property killing.

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Proposal 76: Support

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PC318

**Submitted by:** Charlie Stewart

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

Hi Board of Game, Thank you for the time you put into our state. My name is Charlie Stewart and I live at 5660 Katie Jean Circle Homer AK. I'd like to comment on proposals # 145 and #146. I am in favor of both as I feel they are a fair compromise given our changing user groups and better reflects the actual numbers of users in these areas. I realize that this is something that previous meetings have been reluctant to vote in favor of; however its feels like just a matter of time before we have a serious encounter between some of these user groups. Thanks for your time. Charlie Stewart

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PC319

**Submitted by:** judith steyer

**Organization Name:**

**Community of Residence:** Fritz Creek, Alaska

**Comment:**

I have lived in Alaska for 25 years and have been a skier and dog owner for most of this time. I support proposal 146 and 147 because I feel it would allow access to multiuse trails for dog owners that are now too dangerous to access during trapping season. 100 foot trap setbacks would help to alleviate most of the risk to dogs that accompany recreational users of these trails during trapping season.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support

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**Submitted by:** David Story

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

I support BOG Proposal #145 creating a ¼ mile hunting and trapping buffer from highway wildlife crossings, especially those designed specifically to facilitate safe wildlife passage.

I support BOG Proposal #149 establishing trapping setbacks along the perimeter of campgrounds in Game Unit 7.

I support BOG Proposal #150 establishing trapping setbacks along listed roads and pullouts.

I support BOG Proposal #151 establishing trapping setbacks along listed highway pullouts, backcountry access points, and winter trails.

I support BOG Proposal #152 establishing trapping setbacks along listed trails and trailheads in Game Unit 7.

I support BOG Proposal #153 establishing trapping setbacks along described Kenai Lake beaches.

Multi-use winter recreation is important to Cooper Landing and the number of users of our area continues to grow. Proposals 149-153 acknowledge the changing pressures and create reasonable and intuitive locations that will minimize the potential for unintended conflict.

I support BOG Proposal #154 requiring signs at all access points to operating traplines as encouraged by the Alaska Trappers Association for trappers in road-accessible regions of the State.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support    Proposal 149: Support    Proposal 150: Support    Proposal 151: Support    Proposal 152: Support  
Proposal 153: Support    Proposal 154: Support

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**Submitted by:** Martha Story

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

I support BOG Proposal #145 creating a ¼ mile hunting and trapping buffer from highway wildlife crossings, especially those designed specifically to facilitate safe wildlife passage.

I support BOG Proposal #149 establishing trapping setbacks along the perimeter of campgrounds in Game Unit 7.

I support BOG Proposal #150 establishing trapping setbacks along listed roads and pullouts.

I support BOG Proposal #151 establishing trapping setbacks along listed highway pullouts, backcountry access points, and winter trails.

I support BOG Proposal #152 establishing trapping setbacks along listed trails and trailheads in Game Unit 7.

I support BOG Proposal #153 establishing trapping setbacks along described Kenai Lake beaches.

Multi-use winter recreation is important to Cooper Landing and the number of users of our area continues to grow. Proposals 149-153 acknowledge the changing pressures and create reasonable and intuitive locations that will minimize the potential for unintended conflict.

I support BOG Proposal #154 requiring signs at all access points to operating traplines as encouraged by the Alaska Trappers Association for trappers in road-accessible regions of the State.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support



PC322

**Submitted by:** Jennifer Stroyeck

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

Thank you for considering the following proposals: #146, #147, #149, #152, #153 which require setbacks for trapping along popular trails and recreational use areas. I have personally witnessed dogs caught in both traps and snares set within 20 feet of a well-used and groomed ski trail maintained by the Kachemak Nordic Ski Club. In addition to endangering dogs, the trappers tore up the ski trails in the process of setting and checking their traps. Doesn't seem very sportsmanlike, does it? There is plenty of unused land available in these areas for those who need to trap. Please allow a setback from trails and popular recreation sites for those of us who would like to recreate without worrying about the safety of our pets, and possibly, our children.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support Proposal 149: Support Proposal 152: Support Proposal 153: Support

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PC323

**Submitted by:** Michael Sturm

**Organization Name:**

**Community of Residence:** Anchor Point

**Comment:**

I am opposed to the following proposals:

145, 149, 150, 151, 152, 153, 154. Trapping is a heritage, our history and safe. If people keep animals on leashes setbacks and signage are not necessary.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose  
Proposal 153: Oppose Proposal 154: Oppose

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PC324

**Submitted by:** Tim Sturm

**Organization Name:**

**Community of Residence:** Soldotna, Alaska

**Comment:**

This is [REDACTED]

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 64: Oppose Proposal 81: Oppose Proposal 104: Oppose Proposal 145: Oppose Proposal 149: Oppose  
Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose

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**Submitted by:** Adam Sullivan

**Organization Name:**

**Community of Residence:** Moose Pass, AK

**Comment:**

I have been a resident of Moose Pass for 3 years. Prior to moving here I lived in Cooper Landing for close to 15 years. I am writing in opposition to proposals 149 -154 concerning trapping setbacks in unit 7 and 15. My family and I are frequent users of numerous popular and lesser used trails during all seasons throughout our communities and have never had issues or seen signs of trapping in these areas. Although the authors of these proposals would lead you to believe our communities are fraught with danger and traps around every corner.

Admittedly I'm not a trapper, but if one of my kids is interested in the activity in the future I could be. These proposals, while far reaching seem like no big deal, but this is how these issues always start. 50 yards here a 100 yards there no big deal. Until the next cycle when they go for a quarter, half, or full mile setback ultimately making it impossible for a person working 40 hours a week to actively run a trap line.

I think the most glaring issue I have with these proposals is the fact there is already a solution in place. A leash. I would be willing to bet of the 7 encounters between pets and traps none of those animals were being properly controlled by its owner. It would be a shame for the opportunities of one user group to be limited by the unwillingness of another to simply control their animals.

Additionally, for these proposals to insinuate a person or business can't market Cooper Landing and surrounding areas as a safe place to recreate is flat out ridiculous, and further just fear mongering. 7 encounters in all of south central is what is driving one user group to attempt to use a government board to limit the rights of another? Furthermore, I feel it is necessary to mention that the group suggesting these proposals has already placed regulatory looking signs in these areas essentially attempting to set land use regulations without any official capacity to do so.

On the surface these proposals seem reasonable. Unfortunately, like many other situations an inch turns into a mile. The group proposing these setbacks would have you believe everyone supports these proposals, and the scourge of this issue on the community is undeniable. This simply isn't true. I live and recreate in these communities and have for going on 20 years. It would be a shame to see an activity that literally built this state limited because one group can't simply control their animals with a leash while on public land.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose

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**Submitted by:** Wenona Suydam

**Organization Name:**

**Community of Residence:** Kodiak, Alaska

**Comment:**

Yes

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 73: Support Proposal 74: Support Proposal 75: Support Proposal 76: Oppose Proposal 77: Support Proposal 78: Support Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Support

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Wenona Suydam  
Kodiak, Ak 99615

February 7, 2023

To the Department of Alaska Fish & Game and Bear Management,

I am against and am addressing why Proposal 76 to extend the Kodiak Brown Bear Hunting Seasons RB230 and RB260 to almost double is not a good idea for this island.

RB260 original hunting days are: April 1<sup>st</sup> through May 15<sup>th</sup>. Proposal 76 would change hunting days to March 1<sup>st</sup> through May 15<sup>th</sup> adding 31 days to the already 45 days almost doubling the hunting of Kodiak Brown Bears for a total of 76 days.

RB 230 original hunting days are: October 25<sup>th</sup> through November 30<sup>th</sup>. Proposal 76 would change hunting days to October 25<sup>th</sup> through December 31<sup>st</sup> adding 36 days almost doubling the hunting of Kodiak Brown Bears for a total of 66 days

We are lucky here in Kodiak to have good Bear Management. Only Alaska, remote parts of Canada and Russia have a good healthy bear population left. If you have lived in Kodiak for two years and hike, you have probably walked right by a bear and did not even know it. Considering we live on an island with 3500 Brown Bears, one per mile you would think there would be many more incidences of unruly bears.

In the past there have been problems in the Winter due to excessive garbage left unattended leaving easy access to a bear with a good nose. Bears can smell up to 20 miles away. I have lived on Larch Street for 40 years and have seen a bear or two. Two years ago, the town of Kodiak received bear garbage containers. Now I know we all saw on social media a Sow opening up one of the bear containers. I also know that in the last two years I have not had a problem with bears roaming by my house. I am a believer in the bear garbage cans and keeping garbage contained so that bears will be good and go to bed.

Almost one million households-residents and visitors took at least one trip in 2011 to hunt or view wildlife in Alaska. Of those, more than 100,000 households, 86 percent of them Alaska residents, went hunting. Almost 900,000 households, 77 percent of them visitors, went wildlife viewing. Bear Wildlife viewing is important to Kodiak.

I am a Wildlife Photographer and Kodiak used to be a Photographers dream place to live. Now, we have a new group of people that arrive every June wanting to live the Alaskan Dream by shooting fox, ermine, beaver, river otter and of course the Kodiak Brown Bear. I have watched the wildlife on the road system in the past 10 years disappear. I feel that if the Kodiak Brown Bear Hunting Season was extended to almost double, we would cease to be able to enjoy watching and photographing a Kodiak Brown bear in their element, in the streams along the Kodiak Road system.



I feel like proposers of Proposal 76 are using the idea that there are many unruly bears when in fact there are very few if you think of the 3500 bears that live on this island. I believe Proposal 76 is being proposed for the sole purpose of making more money by extending the season rather than because of problematic bears. Please consider how much the Kodiak Bears contribute to this island and do not allow Proposal 76 to go through.

Thank you,  
Wenona Suydam



**Submitted by:** Adrienne Swan

**Organization Name:**

**Community of Residence:** Juneau, AK

**Comment:**

I strongly OPPOSE Proposal 82. Keep the archery only sheep hunt area!

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 67: Support    Proposal 71: Support    Proposal 72: Support    Proposal 82: Oppose    Proposal 87: Support  
Proposal 91: Support    Proposal 92: Support    Proposal 93: Support    Proposal 99: Support    Proposal 100: Support    Proposal  
101: Support    Proposal 110: Support    Proposal 111: Support    Proposal 112: Support    Proposal 113: Support    Proposal  
119: Support    Proposal 120: Support    Proposal 121: Support    Proposal 122: Support    Proposal 123: Support    Proposal 124:  
Support    Proposal 125: Support    Proposal 126: Support

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Missed some proposals

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 66: Support    Proposal 84: Support    Proposal 85: Support    Proposal 94: Support    Proposal 95:  
Support    Proposal 96: Support    Proposal 97: Support    Proposal 114: Support

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**Submitted by:** Carol Swartz

**Organization Name:**

**Community of Residence:** Homer' Ak

**Comment:**

Please please approve proposals 145, 146, 147 and 155 and with amendments 156, 160,161, 166, 171. Oppose 162 and 163.

I live in the Homer area....only 4 miles from town and in major residential area. I and my neighbors walk our dogs everyday. Last fall, one of us found a on 8' from side of road in the brush where ALL our pet dogs wander close by to us. What a scare that was! How could someone put a trap where a dog or worse could be maimed or killed? There are skiers, children, snowshoers, walkers, runners and bikers who use the sides of area roads for safety reasons. Winter and summer trails should not have such hazards close to the sides of trails that have seen increased use these past few years. The State of Alaska has been encouraging tourists to come to AK and spend money....hike trails, etc. I know a few that will not use trails if traps will be allowed to be out close to the trapping area. I know I will be wary of walking my dog , and frankly I should not have to be worried in this way when recreating.

A 100 yd. compromising set-back will not impact the goals of trappers who, by the way, represent only .4 of Alaskans. Unit 15C is particularly an issue as many are using ski trails

, hiking and snow machining. Thank you for voting for the 100 set- back proposals and others with amendments and including requiring trailers to get permits in Kachemak Bay State Park and added related informative trail and area signage.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support      Proposal 155: Support Proposal 156: Support  
with Amendment    Proposal 160: Support with Amendment    Proposal 162: Oppose Proposal 163: Oppose Proposal 164:  
Support with Amendment    Proposal 166: Support with Amendment    Proposal 169: Support with Amendment    Proposal  
171: Support with Amendment

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**Submitted by:** Eric Szymoniak

**Organization Name:**

**Community of Residence:** Moose pass property owner

**Comment:**

In regards to the trapping setback proposals I do not want 100 yard setbacks on trails. I am an active trapper in the area at this time on one of the trails included in the proposal. I understand the concern for animal safety but there are clearly posted signs at the trailheads of the certain trail I have active traps stating all animals must be on a leash. 100 yards is way too far to require trappers to be off trail.

I have trail cams on one of the trails included in the proposal and NOT ONE hiker, skier or person on foot had utilized the trail in the first two months of this winter. It is not a high traffic trail.

Don't group all trails into this proposal just because people say they use the trail when I know for a fact hikers and skiers aren't using all the trails they are trying to claim for themselves.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Oppose Proposal 146: Oppose Proposal 147:

Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose

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*a management and consulting firm specializing in natural resource industry support. We provide industrial, environmental, regional, and community assistance in understanding, developing, and maintaining conservation based initiatives that will help sustain long term stewardship for important social/cultural atmospheres, fish, wildlife, land/water habitats, and industry developments within them.*



PC 330

HC60 Box 299C Copper Center, Alaska USA 99573

Phone: 1.907.320.0228

Email: fithian@cvinternet.net

March 3, 2023

Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526

**Alaska Board of Game South-Central Region Meeting, Spring 2023  
Comments on Proposal 204**

Dear Alaska Board of Game Members,

Please find the following comments for your consideration regarding proposal 204 from Robert R. Fithian doing business as Alaskan Mountain Safaris and Taiga Resources Conservation. Please know that I am a tenured Alaskan conservationist, and professional guide who has conducted long term, conservation based, fair chase, multiple species hunts within GMU 19C for the past forty years.

**Proposal 204: Oppose**

**Summary Opposition:**

During my 40-year tenure within this region, I have seen and recorded our Dall's sheep population fluctuation in nearly identical numbers and occurrence as to where they are at today. During that time, (2003 – 2009) the sheep populations fell due to predation and winter conditions from an average annual sighting of 350 animals to 40-50 animals within the small region we traditionally hunt.

Note that:

a. Subsistence utilization/dependency at that time was much greater than it is now as the Minchumina, Nikolai and McGrath human populations were much higher then.

b. We had recently lost the previously established guide area system (1988 Owsichuk Decision) and the

guide industry was in a near free for all, especially on SOA lands.



b. We had lost our Guide Board (1989 legislative sunset) and were licensing over 100 new guides per year, (up from 6-10 per year) which nearly all had a focus on SOA lands of which GMU19C was a prime target.

c. The number of guides registered within the small GOUA which I operate within went from 3 to 14.

d. The only resident sheep hunter activity I have ever witnessed on the ground occurred within that same timeframe.

e. **Still, due primarily to the full curl law, the sheep numbers came back up without imposing restrictions on hunting.**

**We are in a better position now that we were then for several reasons:**

1. Development and implementation of the 19D East Predator Control Program in 2003. Wolves from GMU 19C follow the caribou out into the Kuskokwim Valley floor during the late fall and winter and become susceptible to harvest within the 19D East management program. This action more than any other has led to recruitment of sheep, moose and caribou within GMU 19C.

2. Establishment of the Big Game Commercial Services Board (2005) created new and higher standards of professional licensing. It also created a liaison position between the two board to address situations exactly like this.

3. The full curl law has held and maintained its performance ground for many years now. No matter how many older age class rams are harvested or die of natural causes, recruitment is still viable and sustainable through the less than full curl or eight-year-old rams. Harvest or die off of older aged rams has little or no effect on recruitment.

### **Recommendations:**

1. Consider acting on the basis of this proposal or upcoming proposals related to the Interior Region which would:

a. Create an IM finding for GMU 19C.

b. Establish an annual harvest goal/quota for wolves within GMU 19C. The goal/quota could be established by reviewing historic 19C wolf harvest data from when 19C was created to current and working with ADF&G McGrath to establish an average annual harvest goal. This action, more than any other, will help recruitment of our wild sheep and management for sustained yield, abundance, and



2. Utilize the BOG/BGCSB liaison position to deliver a joint board written letter to all professional guides licensed for GMU 19, that the Dall's sheep population is at a low density and request that bookings for sheep hunters be reduced or curtailed until improvement occurs.
3. Utilize ADF&G harvest report data to identify resident hunters who have hunted sheep within GMU 19C within the past ten years and send them a similar letter as what goes to the guides.
4. Encourage stiff fines and minimal leniency for harvest of sub-legal rams.
5. Continue to support the development ASAP of the Guide Concession Program and if the program is developed with a staggered regional implementation, request that GMU 19 is considered a priority. Also note and request that graded criteria for area selection should reference the applicants response to low density wildlife population occurrences.

**Additional Consideration:**

If the BOG deviates from full curl management by affirmative action to proposals that eliminate hunting opportunity for any user group other than our subsistence requirements, it will create a domino effect of proposals for the whole of the Dall's sheep ranges across Alaska, which, very probably, after all of the fight is said and done, will not help wild sheep conservation or recruitment.

Note that the age class of harvested rams is always variable between 8 and 12 years of age showing that legal rams are left after each hunting season. Stopping the hunting season for five years will not provide additional recruitment over just leaving the season alone. It will create a stampede of hunters for the year that it opens back up which will result in conflict situations.

During most of the forty years I have been guiding within this region, I have provided respectful detailed annual reports to ADF&G McGrath depicting:

- a. Wildlife populations including grouse, raptors, rodents, furbearers, and big game, with a focus on indicator species.
- b. Range conditions, impacts and change.
- c. Points of interest including weather, predators, hunting pressure etc.

These reports include substantial data including population densities, annual sightings of cow/calf, ewe/lamb ratios, yearling survival of ungulates and bears, eagle populations and much more. These reports have been submitted with respect to our wildlife and wildlife professional with the hope that they may provide an anecdotal "trend" relative to overall wildlife conservation concerns.

Once again, relative to this extensive past, I want to state that I can find no conservation basis benefit to

proposal 204.



PC 330

During the past several years including 2022, there have been plenty of 3/4 - 7/8 curl rams to facilitate recruitment. Ewe-lamb ratio continues to be high but yearling carryover is low. Overall sheep numbers are down. However, the sheep will come back over time, especially if IM can be established and wolf numbers can be lowered.

Submitted As Always,

Very Respectfully,

A handwritten signature in cursive script that reads "Robert R. Fithian".

Robert R. Fithian



**Submitted by:** Diane Taylor

**Organization Name:**

**Community of Residence:** Clam Gulch, Alaska

**Comment:**

I am writing in full support of Proposal 145, to secure hunting and trapping setbacks from new wildlife crossings on the Sterling Highway Cooper Landing bypass. This is a critical time to protect the all wildlife effected by the new bypass. As a 40+ year resident of the Kenai Peninsula, I encourage the board to be a visionary with this issue, and balance the impact of “progress” with Alaska’s spectacular wildlife. Thank you.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support

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[REDACTED]  
Anchorage, AK 99517

e-mail: [REDACTED]

February 27, 2023

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

Subject matter: Comments for consideration at the  
Southcentral Meeting March, 2023

Dear Members of the Board of Game:

Please consider my comments on the following proposals:

### **Region wide and Multiple Units**

Proposal 56. Support. Current State regulations prohibit taking big game from a boat (motorized or non-motorized) in Units 1-5, (Southeast Alaska). This proposal would add Units 6,7, and 15 (Kenai Peninsula east to Cordova) to the list. Hunters who don't own boats would benefit, as well as non-consumptive users, and tourists who enjoy seeing goats and bears on wildlife viewing tours. Wildlife viewing tours are offered by commercial businesses in communities such as Whittier, Seward, Homer, Valdez and Cordova and provide substantial employment and other economic benefits in these communities.

### **GMU 14 C**

Proposal 82. Oppose. This proposal would open the East Fork of the Eklutna River drainage to rifle sheep hunting. I have hiked and climbed in the East Fork drainage on at least a dozen occasions, perhaps more. In the period beginning in the early 1990's and continuing through 2010, or thereabout, I would usually see many





sheep, but in recent years, I have seen only goats. Table 82-1 in the Department Comments show that 2017 and in 2018 there were only 8 and 4 sheep in the entire East Fork drainage; but that in 2021 and 2022 the total observed were 18 and 42, indicating a sizeable recovery is underway. But there were virtually no full curl rams in the entire East Fork. Rather than expanding hunter opportunity, the recovery needs to be allowed to continue until sheep numbers in this beautiful area recover. These sheep are watch-able wildlife, easily accessible, and they should be allowed to fully recover.

Proposal 83. Oppose. This proposal would increase the take of sheep in Chugach State Park, and nearby areas. I have spent most of my life hiking and skiing and mountaineering in Chugach State Park, and nearby, and the numbers of sheep I have seen have declined substantially. I value seeing sheep in the mountains, and hope that the decline in their numbers can be reversed, and not made worse.

Proposal 84. Oppose. This proposal would create a new archery only Dall sheep hunt in the Eklutna Management Area, with a season starting August 5. Most significantly, it would begin early enough to allow hunters to use aircraft to spot sheep. I investigated the crash and death of pilot/hunter near the summit of Peeking Mountain in Chugach State Park, and know that even the best pilots die spotting wildlife. In doing so, they leave behind spouses and children, and also endanger mountain rescue volunteers. I frequently hike in Chugach State Park in August and September, and do not wish to be bothered by low flying planes. Aircraft hunting has no place in CSP, is dangerous to pilots and rescue personnel, and violates the Park's purposes. Finally, the Department's surveys and harvest records show that the numbers of rams is insufficient to warrant making more permits available.

Proposal 85. Oppose. This proposal would create an archery only hunt for mountain goats in the West Fork of the Eklutna Drainage. The Department's surveys and records show that goat numbers are low in the Eklutna drainage. While this proposal would apparently allow only one permit, and apply to the "west fork" of the upper Eklutna drainage, which I presume means the West Fork of the Eklutna Glaciers, and mountains above it, where I have climbed on several occasions, nevertheless, I would prefer that these watch-able wildlife not be hunted until the population fully recovers.

Proposal 92. Oppose. This proposal would authorize the taking of black bears by archery in the McHugh Creek drainage. This area sees large numbers of hikers throughout the year, and nearby: for instance on the Turnagain Arm trail and



at the McHugh Creek rest area. Archery bear hunts carry the risk of archers wounding but not killing bears. Wounded bears are dangerous, and adoption of this proposal would unreasonably increase the risk to hikers, and people who merely stop for a few minutes at the McHugh Creek rest area. If nuisance bears are reported in this area, ADF&G professionals and not amateurs should remove them, lethally or otherwise.

This proposal, and the other proposals (Proposals 94, 95, 97, 98, & 99) regarding archery and rifle hunts for bears near Anchorage's subdivisions and heavily used hiking trails close to Anchorage raise public safety issues. The Department's comments regarding this proposal (#92) (and proposals 94, 95, 97, 98, & 99) fail to address public safety, but instead refer only to biology and allocation between user groups. This avoidance of comment regarding public safety makes sense in light of the Department's apparent view that the Board of Game has no authority to enact regulations the purpose of which is to address public safety. But that point of view is mistaken, and contradicted by legal experts, including the attorneys representing the Alaska Trappers Association.

The Board of Game's authority to enact regulations aimed at public safety was addressed in the Alaska Supreme Court recently at Oral argument in *Alaska Trappers Association v. City of Valdez*, Supreme Court No. S-18189. There the attorney representing the Alaska Trappers Association argued that the Board of Game has the authority to enact regulations aimed at public safety.

If the leadership of the ADF&G genuinely believes the BOG has no authority to consider public safety concerns in fulfilling its mandate to enact regulations regarding the management and taking of game, then the Commissioner should ask the Legislature to give the Board of Game this authority, expressly. In the meantime, members of the Board of Game should consider public safety in their deliberations at their meeting in March 2023, and include their findings in the record. In other words, if the members of the Board of Game think that public safety will not be negatively impacted by authorizing black and brown bear archery only hunts in the McHugh creek drainage (as proposed in #92 and #99), then the record should show this, so that the archery-only hunts of these dangerous animals can be defended in court in the event of legal challenge aggrieved members of the public.

There is also the need for the ADF&G to be truthful. To put it bluntly, it is false for the Department to state that these archery-only bear hunts at McHugh Creek, Rainbow Valley, and the South Fork of Eagle River present only questions



Proposal 94. Oppose. This proposal is the similar to Proposal 92. It would authorize the taking of black bears by archery in the McHugh Creek drainage.

Proposal 95. Oppose. This proposal is similar to Proposal 92. It would authorize the taking of black bears by archery in the McHugh Creek drainage.

Proposal 97 Oppose. This proposal would open the South Fork Eagle river drainage to brown bear hunting. Wounded brown bears can be very dangerous, and there is a risk that some hunters, will injure but not kill a brown bear. The ½ mile set back contained in the proposal, if adopted, will not reduce that risk. The South Fork of Eagle River public lands are heavily used by hikers and skiers, and the risk to these non-consumptive users, as well as to children of local residents is too high.

Proposal 98. Oppose. This proposal would open the Rainbow Valley drainage to brown bear hunting. Wounded brown bears can be very dangerous, and there is a risk that some hunters will injure but not kill a brown bear. A ½ mile set back will not reduce that risk. The Rainbow Valley drainage and public lands nearby are heavily used by hikers and skiers, and children reside in some of the homes in Rainbow Valley. The risk of tragic human-bear encounters would be increased if this proposal is adopted. Let ADF&G professionals, not amateurs, control bears, lethally or otherwise, in areas like this.

Proposal 99. Oppose. This proposal would authorize an archery only brown bear hunt in the McHugh Creek drainage. Archery bear hunts, especially for brown bears, carry the risk of archers wounding but not killing bears. The comments made regarding Proposal 92 apply.

Proposal. 103. Oppose. This proposal would authorize a bear baiting station in the McHugh Creek drainage. This proposal if adopted would present a public safety issue, and the comments made opposing Proposal 92 apply. In addition to the public safety issues raised by this proposal, there are other reasons why authorizing a bear baiting station in the McHugh Creek drainage is a bad ideas.

First: Anchorage neighborhoods on the Hillside already have problems with bears habituated to human garbage left outdoors in unsecured containers. If this proposal is approved, the BOG will set a bad example negatively impacting public awareness campaigns in which residents are urged to avoid leaving garbage in



Second: More bears will be habituated to human food near subdivisions on the Hillside and in Rainbow Valley.

Proposal 104. Support. The undersigned Kneeland Taylor is the sponsor of this proposal. It would close lynx trapping in Chugach State Park, and the Glacier Creek Drainage to Lynx trapping. Lynx are treasured watchable wildlife for thousands of residents of Anchorage and Girdwood. The Department's comments indicate that the Department is opposed to the loss of lynx hunting and trapping opportunity, but that the Department is neutral as to the allocation between consumptive and non-consumptive users.

Table 104-1 in the Department's comments indicates that in the years 2017-2021, a total of 37 lynx were reported killed, or taken in Unit 14C, and that 6 of these were taken by hunters or trappers in Chugach State Park in 2020. The table does not provide specifics as to the take of lynx in the Glacier Creek drainage. (Girdwood area). Table 104-1 also makes it clear that many lynx are being killed every year, and that the total of lynx killed in Unit 14C is not strictly tied to the abundance of snowshoe hare. In other words, it is not true that almost all the lynx in a geographic area die off in years when snowshoe hare numbers crash. For instance, in 2017-2019 when lynx hunting and trapping was closed by emergency order, 10 lynx were killed in Unit 14C in D.L.P. incidents, by road kill and illegal take. The numbers are probably higher, especially in regard to illegal take. Adding to those numbers is number of lynx harvested legally when emergency orders closing the season are not issued. That number could be eliminated if the proposal were to be adopted, which it should.

The statutes authorizing and creating Chugach State Park provide for the purposes of the park, and include "the display of wildlife". Trapping is not mentioned as one of the purposes. This proposal would increase lynx numbers in Chugach State Park and the Girdwood area, and increase opportunities for watchable wildlife in that part of Alaska where half of all Alaskan live, and that a million tourists visit every year. These magnificent cats are worth so much more residents and tourists than as pelts for a few lucky hunters and trappers.

The undersigned notes that the BOG's Anchorage Advisory Committee did not allow any public testimony on this subject or any other subject at the meeting of its "Game subcommittee", notwithstanding the attendance, and efforts of the



undersigned and others to testify, and notwithstanding the agenda for the subcommittee's meeting. This proposal and many others were not addressed by the full Anchorage Advisory Committee, which proceeded in accordance with a procedure providing that if all three of the participating subcommittee members unanimously approved or opposed a proposal, the subcommittee's position was automatically adopted by the full Advisory Committee. The point is that the position of the Anchorage Advisory Committee on this proposal and many others was reached without public input and without any discussion by the full Advisory Committee.

Proposal 200. Oppose. This proposal would provide for a moose hunt for seniors over the age of 65 throughout the Southcentral Region. It would appear to apply anywhere, including closed areas such as the Anchorage Management Area, and others where special controls apply. It is objectionable for that reason.

Proposal 203. Oppose. This proposal would authorize a moose hunt in Kincaid Municipal Park for hunters that meet the 70% disability standard and require a mobility device; for instance a wheel chair, prosthetic limbs, or a motorized vehicle of some type. This proposal if adopted would deprive thousands of people of the pleasure of viewing moose, and would benefit only a handful of hunters. The use of motor vehicles anywhere in Kincaid Park (with the exception of the roads and parking lots within the Park) is prohibited by Municipal ordinances and regulations. In addition, hunting in Kincaid Park is prohibited by Municipal ordinance.

The proposal provides that the time for the Kincaid Park hunt would be in September through November. Those three months are when the Park is busy with cross country runners of all ages, competing and training. It is also prime season for single track biking. The Department's comments fail to mention cross country running, suggesting insufficient investigation of the impact if this proposal were to be adopted. The Department's comments also make it clear that mountain bikers only rarely have injury causing encounters with moose on the trails.

Viscera from harvested moose might be required to be removed, according to ADF&G regulation, but total removal and enforcement is highly unlikely: increasing the danger to the thousands of people walking, running or biking within the Park. The Department's neutral position reflects its failure to take seriously the interests and preferences of the thousands of Anchorage residents and visitors who treasure recreation in this beautiful Park.



Proposal 81. Support. This proposal by the Humane Society of Kodiak Board of Directors would require all snares set on the Kodiak road system to include breakaway mechanisms. If adopted it would reduce the number of non-target species maimed or killed in snares set by trappers along the road system. The Department reports that breakaway devices are required in other states, and that the Department receives a significant number of complaints of domestic pets (dogs) getting caught in snares in popular, high traffic areas, and that quite a few bears and deer have been killed or maimed in snares in the last several years. This proposal should be amended to include all snares set in Unit 8, and not only those set along the road system.

### **KENAI PENINSULA GMUs 7 & 15**

Proposal 109. Support. This proposal, as intended by the proponent, would close all Dall Sheep hunting on the Kenai Peninsula. The Department's surveys and records (as indicated in Figure 109-1, and the Department's comments) make it clear that the population of Dall Sheep on the Kenai Peninsula has crashed from more than 2000 animals in 1968 to less than 500 today; an 80% decline according to the Department. The Department's comments and chart also indicate that the five year harvest, including the federal subsistence harvest, is six sheep per year. Dall Sheep on the Kenai Peninsula should be conserved for future generations to enjoy, and not reduced to unsustainable levels by over harvest. The Department opposes this proposal (and is neutral as to other proposals which provide for additional sheep hunting) stating the following:

"Sheep are managed under full curl regulation, currently negating concerns of harvest affecting the trajectory of sheep populations."

I attended the six day conference on Dall Sheep sponsored by the Safari Club and the Department held several years ago. Several members of the Board of Game attended on all six day. I raised the issue of whether reliance on the full curl regulation might be causing negative impacts on Dall Sheep populations in Alaska. Some information provided in response to my focus indicated that there are negative impacts.

In the last 13 years, the population of Dall Sheep on the Kenai Peninsula has

fallen 50%. See Figure 109-1 which shows a population of approximately 600 Dall Sheep on the Kenai Peninsula suggests that the Department's reliance on "full curl regulation" as a panacea is mistaken.



Wildlife conservation should be the Department's priority, not hunting. Here, the preservation of a sustainable population of Dall Sheep on the Kenai Peninsula is at risk. Hunting should be closed until there is evidence of recovery. Reliance on full curl regulation clearly is not working.

Proposal 130. Oppose. This proposal would authorize Intensive Game Management in the Unit 15 C Predation Control Area which consists of all lands within 15C north of Kachemak Bay including the Fox River Flats and State and private lands consisting of approximately 2027 square miles. The stated purpose of Proposal 130 is to continue the habitat enhancement and predator control plan first adopted in 2012, but with minor amendments.

This proposal if adopted would violate AS 16.05.255(e). The relevant applicable statutory language is as follows:

"The Board of Game shall adopt regulations to provide for intensive game management to **restore the abundance** or productivity of identified big game populations as necessary..."

[Emphasis added.]

The Department makes it clear in Proposal 130 that moose population and harvest goals are being currently met. In other words, there is no evidence of a need to "restore" the abundance of moose, and there is no evidence that it is "necessary" to authorize intensive game management in Unit 15C.

The Department's proposal authorizes extreme measures to take wolves. Those extreme measures include the following:

- A. hunting and trapping of wolves by the public using motorized vehicles [i.e. chasing wolves using snow machines]
- B. public aerial shooting permits issued by the Commissioner under AS 16.05.783



AS 16.05.783 provides for authorization of these extreme measures as part of a predator control program in **only two circumstances**, described in AS 16.05.783 (a) as follows:

- (1) in regard to an identified big game prey population under AS 16.05.255(g) that **objectives set by the board for the population have not** been achieved and that predation is an important cause for the failure to achieve the objectives set by the board, and that a reduction of predation can reasonably be expected to aid in the achievement of the objectives; or
- (2) that a disease or parasite of a predator population (A) is threatening the normal biological condition of the predator population; or (B) if left untreated would spread to other populations.

[Emphasis added.]

The Department's explanation for its proposal is stated in relevant part as follows:

**"The department would like to have the plan [adopted in 2012] reauthorized with predator control and habitat enhancement options. While Unit 15 C moose population and harvest objectives are currently being met the department sees a benefit to reauthorizing and updating the plan.** Updates to the plan include adding habitat enhancement, which was not the focus in the initial IM plan development. The department's intent is to utilize habitat work to maintain moose populations within objectives." [Emphasis added.]

The statutes authorizing intensive game management and extreme measures for controlling wolves do not allow intensive game management, and the use of extreme measures in these circumstances. The mere fact that the Department "sees a benefit" in reauthorization is insufficient grounds for approving an intensive game management plan, with extreme measures for controlling predators. For this reason, the proposal should be rejected by the Board of Game in its entirety. It's illegal and that fact can easily be demonstrated to a court having jurisdiction.





Proposal 133. Support. This proposal by the Homer Advisory Committee would prohibit taking black bear from boats in Unit 15 C. By Homer Adv. Committee. Support. See comments regarding Proposal 56, which would cover not only Unit 15C but also the rest of Unit 15, and all of Units 6 & 7.

Proposal 145. Support. This proposal if adopted would close areas close to the Sterling Highway where there are underpasses and overpasses for wildlife. The purpose of these planned underpasses and overpasses is to reduce motor vehicle collisions with moose and other animals. If hunting and trapping is permitted at these underpasses and overpasses, moose and other animals will not become habituated to using them. The number of moose killed in motor vehicle collisions on the Sterling Highway is similar to the take by predators, and similar to the take by human harvest. Reduction of the number of moose killed by motor vehicles will increase the number of moose available for human harvest, and should be a significant goal of moose management on the Kenai Peninsula.

Proposals 146-147 and 149-153. Support. These proposals all address the same issue, namely traps on or near trails, trail heads, and other locations where large numbers of people hike, ski, and walk, some of whom take their dogs. I support all these proposals.

I have been involved with this issue, as an advocate for buffers, for 23 years. I wish to add some comments on **procedure** if the Department and the Board of Game wish to deal with this issue responsibly.

**First**, the Board of Game should direct the Department to include in the handbook of current trapping regulations specifics regarding municipal ordinances providing for trapping buffers, and safe no-trapping zones. The Department doesn't do that at the current time. It is worth noting that at least 12 municipalities in the State have enacted ordinances banning traps and snares within certain areas within their jurisdictions. The purpose of these ordinances is to address the same problem as the people who have submitted Proposals 146-154; namely traps on trails and in other locations where traps pose a threat to dogs, and small children. The issue of the validity of these ordinances is currently before the Alaska Supreme Court, and a decision should be issued soon. When the validity of these ordinances is affirmed, the Board of Game should make it clear that the specifics of these ordinances are included in the handbook of trapping regulations, or that links to these ordinances are included in the handbook.



**Second,** the Anchorage ordinance and some of the other municipal ordinances should be used as models of how to deal with the issue responsibly. The elected representatives of Anchorage and other municipalities are smart, experienced representatives of the Alaskan public.

**Third,** the Cooper Landing Safe Trails Committee and the other people and organizations submitting Proposals 145-147 and 148-153 have sufficiently identified, and described the trails and other locations that deserve protection, and these proposals should be approved. But government employees should assist in the technical process of identifying and describing trails, trail heads, and other locations requiring protection in other areas of the state. Relying on volunteers such as the Cooper Landing Safe Trails to come forward with proposals often results in proposals that are not perfect in terms of descriptions, maps, and supporting data. If not perfect, trappers routinely nitpick the details and waste everyone's time. Regulations providing for sanctions for trapping in closed areas need to be specific, and well defined if they are to be enforceable. It is time to enlist the professionals employed of the Department and other agencies in developing lists and reliable information on where common sense instructs us that traps should not be set. Relying on volunteer non-professionals is not a realistic way to address the issue. It was the City of Anchorage's planning department that identified and developed lists and maps of all the trail heads, campgrounds, and developed areas where traps are prohibited by the substantive provisions of the Anchorage ordinance. A similar process should be used statewide.

**Fourth,** if meetings are to be held the purpose of which is to reach compromise regarding the proposals currently before the BOG, individuals and organizations participating should come to meetings prepared. That means familiar with the trails and other locations to be addressed. No one should be given absolute veto power at these meetings.

Proposal 154. Support, but with amendment. This proposal would require trappers to post signs indicating that trapping is being conducted. This proposal should be adopted with amendment providing for signs within 100 yards of traps, and not at trail heads. Public lands belong to the public, and signs at trail heads warning of traps unfortunately convey the implied message that public lands are the exclusive preserve of trappers, and that responsible pet owners should keep out.

Proposal 155, 156, & 160. Support. These three proposals would address the low numbers of beavers in various locations on the Kenai Peninsula. The people and



organizations who have made these proposals have noticed that beaver numbers have declined in recent years, and the Department's comments confirm this. The failure of beavers to re-colonize the Anchor River drainage after many years of heavy beaver trapping should stand as a warning to the Department and the BOG. Conservation of this important species and not continued harvest should be the priority.

Proposals 164--172. Support. These proposals would reduce the take of sea ducks in and near Kachemak Bay, and provide for accurate reporting of harvest. Most are made by the Homer Advisory Committee, which reports "a drastic decline in sea duck numbers in Kachemak Bay in recent years." Ms. Penelope Haas, who is a sponsor of some of these proposals, goes into detail regarding "community sea duck surveys in Kachemak Bay" conducted by more than 30 concerned individuals, which show that sea duck populations in Kachemak Bay are limited and do not bounce back after harvest. I have attended the Kachemak Bay Shorebird Festival for more than ten years. People travel from all over America to attend the Festival each year, and birding is big business in Homer both during the Festival, and throughout the summer. There are many expert birders who reside in Homer; and at least one of them is a member of the Homer Advisory Committee. Their expertise, and the expertise of volunteers doing community surveys, should be relied upon. They are asking that the harvest of sea ducks be reduced so that these sea duck species may recover in Kachemak Bay. Additional information should be gathered through detailed harvest data, as proposed. Conservation and recovery should be the priority, not hunting. The Board of Game should adopt all of these proposals.

I thank you in advance for considering my comments.

Sincerely,

Kneeland Taylor



PC333

**Submitted by:** Christina Teafor

**Organization Name:**

**Community of Residence:** Seward, Alaska

**Comment:**

For everyone's safety please approve trapping setbacks.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC334

**Submitted by:** Matt Teafor

**Organization Name:**

**Community of Residence:** Seward, AK

**Comment:**

Only .4% of Alaskans have a trapping permit, that means 99.6% DON'T engage in trapping. It is time to manage public lands in accordance with usage. Please, at the very least, require trappers to move away from trails.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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**Submitted by:** Lorraine Temple

**Organization Name:**

**Community of Residence:** Cooper Landing

**Comment:**

I strongly support proposal numbers 145-154.

Please See Attached for comment.

Lorraine Temple

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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Dear Board of Game,

I strongly support proposals 145, 146, 147, 148, 149, 150, 151, 152, 153 and 154 regarding trap setbacks and signage. My name is Lorraine Temple and I'm the head of the Cooper Landing Safe Trails Committee as well as a 40-year resident of the Kenai Peninsula having homes in both Cooper Landing and Homer. I am an avid outdoor enthusiast and spent 20 years on the trail by dog team with my business as a tour guide. Today, I am the owner of a vacation rental business and bike rental business. My interest in the conflict between recreationalists and trappers was piqued years ago when several local dogs were left maimed or dead from traps on multi-use areas. I have owned hundreds of dogs as a musher, but only a few as pets. These pet dogs are no less important to me than a human child is to a mother. The thought of one of my pets getting stuck in a trap is intolerable. It is also disturbing not to be able to take them on the trails we have enjoyed the rest of the year and let them run and play freely as dogs should be able to do. I am also concerned about the impact to our winter vacation rental business; I've already had repercussions. Professional wildlife photographers came here, but were reluctant to go too far off the trail to explore and indicated they would probably go somewhere else next time. Lost income. Young families are trying to grow year-round businesses here to thrive and be able to stay local, but this growing conflict has the potential of stumping economic growth.

My efforts began in the fall of 2020 by creating a local committee interested in establishing safer trails and areas to winter recreate in the Cooper Landing and Summit Lake Recreation Area. Soon, we submitted proposals to the Federal Subsistence Management Board for trap setbacks which we knew were futile under ANILCA and that federal regulations cannot supersede State Regulations. Nevertheless, I thought it was important to bring the conflict to the public's attention and to let our community know that this issue needs addressing. This is not a new issue for Cooper Landing; in 2012, an online survey was conducted to get a feel for the residents' attitude regarding trapping and setbacks. The Conclusion of the 2012 survey echoed our 2020 Cooper Landing Safe Trails Committee survey. We mailed surveys to every PO Box in Cooper Landing to gauge their concern for traps near recreational areas and suggestions for setbacks. Our survey found that 90% of the Cooper Landing community supports setbacks. Our polling resulted in a 35% return, and some were from households with many having 2 or more people living there, so it can be assumed the percentage of support was even higher.

This is not the first time the community has rallied to support trap setbacks. Around 2013, community members created the Committee for Safe Public Lands and Trails which submitted proposals to the BOG after a failed effort to work with local trappers, and their proposals were opposed by the BOG. Since then, encounters between unethically set traps and dog owners continue, and irritation from our growing community of younger families and winter visitors is increasing. This issue has been on a slow boil, but I truly believe there is hope for resolve.

ADF&G estimates there are 3,000 active trappers out of the over 23,000 permits issued annually. This estimate comes from sealing records, the annual Trappers Questionnaire sent out, and harvest reports. Permits are sold often in a bundle and the extra money spent is utilized for education and research so the investment is worthy. I have some friends who buy a trapping license for this purpose only. With a state population of around 730,000 and a Kenai Peninsula Borough population of around 60,000, it breaks down to about .4% of the Alaskan population traps, if you apply the percentage of trappers to Cooper Landing, that is 1.2 people in our community who trap! The current land use regs, or lack thereof, are unfairly in favor of this very small number of trappers. 99.6% of Alaskans cannot use the public lands safely or without fear of traps close to trails, beaches, campground, roads and pull outs due to the violent nature of



this activity. These are supposed to be “multi-use” areas, but they clearly are not comfortably “multi-use” in the winter. It’s time for change.

The argument has been made that encounters have decreased since the ATA put up informational signs at various places in the Cooper Landing area. The truth is, people are too scared to take their dogs to their favorite places because of the fear of traps so they leave them home or just don’t go. That is a shame. How do you quantify emotions? These are very real facts for our community. Our ability to enjoy our ‘backyard’ here in rural Alaska has been taken away. Yes, the Wildlife Refuge has trap setbacks and is a safe place to go, but that is inconvenient, time consuming and not a good alternative to being able to walk out your door or a 5-minute drive to a beach. As a resident of the State of Alaska, I hope our Board of Game, tasked with representing all Alaskans, can provide setbacks on state-managed lands - a request the public has repeatedly made of this board for over a decade. One longtime resident who actively hikes and skis in the winter says she “feels held hostage” when the traps come out. Another lifelong local Alaskan who traps and hunts with her family shared concerns about her young kids being curious and exploring off the trails a bit, and the dangers of active traps.

My desire is to create a safe buffer between the traps and multiple other non-lethal user groups, such as hikers, skiers, snowshoers, Nordic ice skaters, search and rescue teams. This is not an anti-trapping campaign. I respect and honor the long-standing tradition and lifestyle of trapping in our state. I spent 24 years as a motivational speaker in the lower 48 and extolled the virtues of fur, and how my beaver hat was a game changer for this Santa Barbara transplant back in the early 80’s when I was out on the trail with my dog team. I will acknowledge though, that the necessity of fur, and the low prices a pelt commands, makes trapping rather obsolete, but, like keeping a traditional language alive, there is a place for it. I have friends and neighbors taking their children out to teach them ethical trapping and then how to tan the hides. There is an art and value to that. We wrote these proposals with the intent that they will not meaningfully impact subsistence users and ethical trappers who are already setting away from multi-use areas. Knowing that the subsistence users are local, our neighbors and friends, makes it more likely they will be respectful of trap placement and the possible conflicts with dogs. It’s the weekend, hobby, problem trappers that our proposals target for accountability. Further, local trappers are Federally Qualified subsistence users, so they would not be impacted by these proposals.

The 100-yard setback was established as an appropriate distance to be as preventative as possible for conflict. In our survey, we got many responses that suggested up to a mile setback; Juneau has ¼ mile setbacks. A trapper from Homer is actually the one who suggested the distance and I’ve heard it supported by at least 4 other trappers that this is “acceptable” and very easy to work with. 100 yards is literally 120 steps and should take a person about 2 minutes to walk; even less if they use a snowmachine. As one of our AC members who is supportive of setbacks stated, “trappers need to get off the main trails and get out there in the wilderness, cut their own traplines and stay away from busy areas. The trapping isn’t that good there anyway”. He continued with “come on guys, we need to address this and make some changes. It’s not going away”. I couldn’t agree more. Sure, the scent of a trap will catch the attention of any dog and most likely cause the dog to check it out, but at least with some distance, the possibility is less. And I agree, dogs should be in voice command or electric collar control. There are no tethered leash laws in place for the areas we seek protections.

Without regulations put in place today, the possibility exists that trapping may be even more regulated or even banned in the future which would be tragic for those who enjoy it so much. It would be much



better all-around to work together now to create a more harmonious, equitable allocation of our public lands.

There are two special areas the Committee submitted proposals for, and that is the Summit Lake Recreational Area and the Stetson Creek Parking Area and 100 yards of the trail. The reason these are special is that the Summit Lake Recreation Area is high avalanche danger and search-and-rescue dogs are used there. The last thing a rescuer needs to deal with is their trained dog getting caught in a trap while on a mission. The Stetson Creek parking and bit of trail area is used for search-and -rescue training by local people. It's important to have a space where this training can take place safely.

One of the ADF&G staff comments that showed up in reference to our proposals was that "the department is generally opposed to a reduction in opportunity where a harvestable surplus exists, and instead encourages trappers to be cognizant of potential conflicts and to follow the trapper's Code of Ethics." I question if there have been studies done on how much "harvestable surplus exists" within the 100-yard corridor we have proposed? Is the trapping productivity so abundant around those busy areas that it will truly reduce the 'opportunity' to the trapper? What is the effect to the recreationalist who is clearly in the majority? The Forest Service's Our Values Statement includes the intention of managing for "Safety. In every way; physical, psychological, and social". Land use management and allocation is not safe physically, psychologically, or socially today - ask the 90% of the Cooper Landing residents who support trap setbacks. I wish we could rest on the assumption that trappers would all recognize potential conflicts and follow the trappers Code of Ethics which states in part:

3.) Promote trapping methods that will reduce the possibility of catching non-target animals.

9.) Concentrate trapping in areas where animals are over-abundant for the supporting habitat.

Trapping close to highly used areas increases the potential of catching non-target animals, and utilizing the 100 yard corridor between the areas referred to in the proposals for trapping is not concentrating on where animals are over-abundant for the supporting habitat. Abiding by the conservative requests in the proposals, asking for 100-yard setbacks would be right in line with the trappers Code of Ethics so shouldn't be hard to agree to.

I feel that this loose, 'self-regulating' means of regulating trappers is an ideology that might have worked in the past, but these are new times with unfamiliar, ambitious out-of-town trappers that are creating a nightmare for local residents and recreationalists.

Should trapping of a species within this setback be proven biologically necessary, I would recommend a temporary permit system that identifies active traps in specific cases and make sure the public has full awareness. We had an issue here in Cooper Landing with a trapper trying to eradicate problem beaver close to a prominent rafting business and private home who had their dogs loose on their property, which added to existing tension and conflict. More communication could have avoided this.

There is a safety issue at the center of all this, but also, just as important, a 'community rights' issue. I hear all the time about 'trappers rights' but I have not heard anything about the rights of the 99.6% of Alaskans who want to recreate without fearing the wilderness instead of enjoying it. When are their 'rights' considered? This is another 'fact' that is hard to get scientific data for however, it is equally, if not more important.

"It's time to address this evolving need and make some changes"; I agree with this sentiment that was voiced by a former Board of Game chairman recently at 'Trap Release Seminar' the Cooper Landing Safe





Trails Committee organized in Moose Pass. I encourage education for all user groups on how to identify a trapping area, how to release your dog from a trap, different types of traps used, what ethical trapping means and most importantly, how to respect each other's value on outdoor recreating. I plan on organizing more seminars next fall as a combined effort with the Soldotna/Kenai ATA to continue public awareness and hopefully prevent that unfortunate outcome of a lost pet.

There is a disturbing aspect to this process that needs to be addressed which is the recommendations and makeup of our local Advisory Committee. The discussions leading up to the AC's decision to oppose or support the proposals regarding Cooper Landing were manipulative, inadequate, glossed over and left myself and community members feeling our voices really didn't matter. I am an alternate on the AC by default. I nominated myself to fill a vacancy in the last election. After our spring meeting where I presented the Safe Trails trap setback proposals to the AC, I received 3 phone calls from community members who had attended the meeting and the word I heard describing what happened during that time was "disgusting". My understanding is that the AC is created to provide a forum for individuals, agencies and interested organizations to discuss, understand, and add their opinion to the process. I was also under the understanding that the AC is supposed to represent the community as a whole. The current AC is composed of a group, many of whom have been on the committee for 10-22 years as they re-elect each other year after year. They all have common interests and how they vote reflects personal interests rather than the broader scope. Recently, in discussing these current proposals, 19 community members commented about the setbacks; 17 supported them and only 2 opposed them. Even with all the information from the community survey, desires and the comments during the meeting, the AC opposed any setbacks, clearly not representing the community as a whole. The AC votes were fueled by personal agendas and not reflective of the community they represent. ADF&G states: "The Value of Working Together Advisory committees serve as a forum to bring individuals, agencies, and interested organizations together to review important fish and game resource matters. These forums not only provide an opportunity for collaboration and communication, keystones to forging regulatory change with the boards, but serve to strengthen relationships among each of these parties in their work to improve Alaska's fish and game resource."

I hope in the future the input from our community can be respected, honored, heard with more sincerity and our AC can become a "strengthening" force as it should. We have a few community members who are both consumptive and non-consumptive users, who would like to be part of the AC, so I see a more equitable committee in the future.

If the proposals before the Board of Game need more attention and discussion, I would encourage the Board to create a committee to discuss the appropriate trails and areas for setbacks. This committee should be a group that can logically, cohesively, comfortably, respectfully discuss the issues and have equal representation from both user groups. Please consider all these qualities when choosing the constituents if it comes to pass.

More importantly, I again, urge the Board of Game to consider the evolving nature of our population and the importance of having the ability to thoroughly enjoy where we call 'home' safely, freely, respectfully and support the 100-yard setbacks outlined in proposals #145-#154.

Thank you,

Lorraine Temple



## THE BLUE HERON INN

John & Fran Latham  
P.O. Box 254  
Yakutat, Alaska 99689  
907/784-3287  
FAX 907/784-3603



PC 336

February 23, 2023

ADFG BOARD SUPPORT SECTION

P.O. BOX 115526

JUNEAU, ALASKA 99801

RE: PROPOSAL 204 - SHEEP CLOSURE UNIT 19C

I AM IN OPPOSITION TO THIS PROPOSAL OF TOTAL CLOSURE. AS A REGISTERED GUIDE HAVING GUIDED IN UNIT 19C FOR OVER 40 YEARS WE EXPERIENCED THE UPS AND DOWNS OF SHEEP CYCLES BUT WERE ALWAYS ABLE TO HARVEST TROPHY RAMS FOR OUR CLIENTS WITH A HIGH RATE OF SUCCESS.

THE ECONOMIC EFFECTS OF A COMPLETE CLOSURE WOULD BE LARGE TO MANY SMALL BUSINESSES STILL RECOVERING FROM COVID YEARS. A FULL CLOSURE MIGHT EVEN PUT SOME FOLKS OUT OF BUSINESS.

SOME SUGGESTIONS IN LIEU OF A COMPLETE CLOSURE:

① REDUCE THE SHEEP SEASON TO ALL HUNTERS.

② HISTORICAL EXISTING CURRENT GUIDES HAVE SHEEP HUNTS REDUCED BY A PERCENTAGE EQUALLY.

③ HAVE RESIDENT HUNTERS REQUIRE PURCHASING A SHEEP TAG MONIES TO BE DIRECTED FOR SHEEP RESEARCH/STUDIES TO F&G.



As a guides reputation is based on hunters success for the most part, I think they for the most part regulate the harvest in the areas they operate in to insure future success.

THANK YOU,

SINCERELY,

John H. Latham



PC337

**Submitted by:** Sydney Thielke

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

I am writing in support of proposal 146 and 147. Trapping is no doubt part of many Alaskans heritage and in some cases livelihood. With population growth and increased accessibility to winter recreation via groomed trails, sensible management is needed to protect public safety. A 100 yard setback from mapped trails is a reasonable approach to keep everyone safe and still allow for trapping to occur in southcentral Alaska.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 146: Support Proposal 147: Support



PC338

**Submitted by:** John Thomas

**Organization Name:**

**Community of Residence:** Cooper Landing, AK

**Comment:**

#145 Support. These wildlife crossings are to protect, should not be used to funnel wildlife into traps.

#149 Support. Families with children and pets use these campgrounds, should not have to worry about traps.

#150 Support. Again, used by families, trap where it doesn't endanger people and pets.

#151 Support. Same reasons.

#152 Support. If you have hiked these trails as I have, you know traps need to be far away, or skied them in winter.

#153 Support. Folks like to run their dogs along the lake, often with their children.

#154 Support. This just seems common sense, if trappers are concerned about steeling, that's a small price to pay for protecting those who are using these facilities.

#146, #147, #148 Support. Same reasons as expressed above.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 339

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact cooperlandingsafetrails@gmail.com for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area. Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## Other areas setback proposals:

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 339

feel free to add extra pages of comments)

Printed Name (First and last)\* Kay Thomas

Organization (if any) Cooper Landing Community Library

Signature\* Kay Thomas

Email\*: [REDACTED]

Street Address: [REDACTED]

City\* Cooper Landing State\* AK Zip code 99572

\*Indicates it must be filled in to be accepted.



PC340

**Submitted by:** Elena Tillman

**Organization Name:**

**Community of Residence:** San Diego, CA (current)

**Comment:**

I SUPPORT Proposal #145 to secure hunting and trapping setbacks from new wildlife crossings on the Sterling Highway Cooper Landing bypass. The highway construction plans include multiple wildlife underpasses and Alaska's first wildlife overpass! Fencing will keep wildlife off the road and funnel them through these new crossings, but current regulations allow for hunting and trapping on these crossings, which defeats the purpose, and is not in line with the spirit of ethical hunting. Please make these crossings safe passages for wildlife.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support

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PC341

**Submitted by:** Bruce Turkington

**Organization Name:**

**Community of Residence:** HOMER, ALASKA

**Comment:**

I support proposal 132 for not requiring sealing moose horns in areas of the Kenai Peninsula.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 132: Support

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**Submitted by:** Ryan Turkington

**Organization Name:**

**Community of Residence:** Homer Alaska

**Comment:**

Hi I am in support of proposal 132, eliminating the sealing requirements for moose in unit 15. There has been major inconsistencies between different biologists on what's legal antlers. They have taken several peoples meat and antlers when by definition the antlers are legal. As a hunter you only have definition to figure out what's legal. What kind of training have the biologists actually had on what is legal and what is not? I feel by getting them sealed really isn't accomplishing anything and honest people are having their meat taken away when in fact they felt by the definitions that are given to hunters there antlers are legal. I strongly hope you consider removing the sealing requirements.

Ryan Turkington

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 132: Support

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**File Code:** 1500; 2630

**Date:** March 3, 2023

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

Dear Alaska Board of Game,

The United States Forest Service-Chugach National Forest would like to submit the following comments in support of Proposals 149, 150, 151, 152, 153, and 154 submitted by the Cooper Landing Safe Trails Committee to establish trapping setbacks from heavily used recreation areas and to require signs be posted at all active trapping access points in Unit 7:

Year-round outdoor recreation is an important and growing segment of the Cooper Landing area's economy. As the amount of winter recreation has increased over the past 20 years, so has the number of encounters between user groups and traps set in recreational areas. Many of these areas occur on Forest Service lands.

The proposals include 100-yard setbacks from the most popular and heavily used multi-use trails, campgrounds, roads, pullouts, and beaches that are in the Cooper Landing area as well as areas of the Summit Lake Recreation Area. Trapping setbacks would establish safe zones for user groups accessing these areas for: cross-country skiing, backcountry skiing, snowboarding, snowshoeing, ice fishing, hiking, fat tire biking, dog mushing, snow machining, bird hunting, cabin rentals, and more.

The Forest Service strives to fairly manage the land for all uses balancing commercial, recreational, personal, and subsistence uses across our public lands. Our National Forest is multi-use and balancing those uses at times becomes difficult with opposing views and this issue is one of those that all parties have the right to continue using the Forest for their needs. The goal of these proposals is to establish safe corridors for recreation users with their families and pets, while still allowing trapping beyond a modest buffer.

For the reasons mentioned above, Chugach NF supports establishing effective regulatory measures including trapping setbacks and signs posted at all access points of active trapping along high use trails and recreation areas in Unit 7.





Thank you for the opportunity to share the Chugach NF comments on this proposal. If there are questions, please contact me at 907-288-7730 or by e-mail at [ruth.damico@usda.gov](mailto:ruth.damico@usda.gov).

Sincerely,

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RUTH L. D'AMICO  
District Ranger



**File Code:** 1500; 2630  
**Date:** March 1, 2023

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

Dear Alaska Board of Game:

The United States Forest Service-Chugach National Forest (Chugach NF) would like to submit the following comments in support of Proposal 145 submitted by the Alaska Wildlife Alliance to close areas to hunting and trapping within ¼ mile of five wildlife crossing structures related to the Sterling Highway MP 45-60 Project in Units 7 and 15:

- The construction of the new 10-mile segment of the Sterling Highway MP 45-60 Project north of Cooper Landing, and associated recreational development planned for the area, substantially impairs crucial north-south wildlife movement. The new 3-lane highway segment bisects the Juneau Creek drainage which is the primary wildlife movement corridor connecting nearly 1 million acres of habitat north of the highway with 1.4 million acres on the south side. Combined with the existing 2-lane highway, residential, commercial, and recreational development of Cooper Landing and the Russian River Area, and the natural barriers of Kenai and Skilak lakes, this new highway segment represents a substantial new impediment to effective north-south wildlife movement on the Kenai Peninsula.

A study completed in 2010 in anticipation of future development along the Sterling Highway found **“almost 80% of the area historically available for north-south movement by wildlife on the Kenai Peninsula has been lost”** (Morton et al., 2010). This study considered the 65-mile linear distance from the mouth of the Kenai River to the Seward Highway along the eastern most edge of Kenai Lake. Within this stretch Kenai Lake and Skilak Lake act as natural barriers, leaving the remaining 38.5 miles for wildlife movement. Expanding urbanization in the Kenai-Soldotna-Sterling area and in Cooper Landing has further bottlenecked these corridors. In addition to the new Sterling Hwy MP 45-60 Project, the Kenai Peninsula Borough has selected approximately 1,000 acres of land for community development. Cumulatively, these projects leave only two potential landscape-scale corridors across the Sterling Highway without additional, significant human interference: a 3.5-mile-wide segment immediately west of the outlet of Skilak Lake, and the area between the Skilak Lake inlet and Cooper Landing. (Figure 1).

In 2019, the Alaska Department of Transportation & Public Facilities (DOT&PF) completed the Sterling Highway MP 58-79 Project, which is immediately west of the new Sterling Highway MP 45-60 project. The project included widening shoulders, alignment improvements, and adding passing lanes over a 22-mile section that bisects the 2-million-acre U.S. Fish and Wildlife Service (USFWS) Kenai National Wildlife Refuge on the Kenai Peninsula. Seeking to maintain wildlife movement and migration across this portion of the highway, and also focusing on safety and reducing moose-vehicle collisions, the Refuge and DOT&PF worked together, spending \$10.5 million to construct six wildlife underpasses and 2.3 miles of 9-ft-high fence with 22 jump-outs every 1/8 mile. Because this section of the highway is on Refuge land, the six underpasses are protected by current Refuge regulations including no trapping within one mile of public roads and no discharging of a firearm within a ¼ mile of the Sterling Highway.

- Project mitigation measures for the Sterling Highway MP 45-60 Project include 5 dedicated wildlife





crossing structures intended to help maintain wildlife movement patterns and minimize wildlife/vehicle collisions on the highway (Figure 2 & 3). To identify the best locations for mitigation measures that would help to retain wildlife movement patterns, DOT&PF sponsored a wildlife mitigation study in collaboration with wildlife management agencies. The scope of the study was developed in consultation with an interagency wildlife team (USFWS, Forest Service, and ADF&G). The results of the study, initiated in 2014, have been used to refine the location of wildlife crossing structures to accommodate wildlife movement.

- To function effectively and sustain habitat connectivity, wildlife use of these crossing structures must not be inhibited or impaired by human activities occurring on, within, or in proximity to these structures. The objective is to ensure that human activities occurring on or near the dedicated wildlife crossing structures do not function as a population mortality sink due to hunting or trapping.
- Long-term effectiveness of this substantial, multi-million-dollar investment in dedicated wildlife crossing structures requires a cooperative interagency approach to effectively manage and control human activities in the vicinity of these structures.
- To maintain long-term public safety in the Sterling Highway MP 45-60 project area, and to successfully achieve the project's wildlife mitigation objectives, management actions are necessary to prevent human activities such as trapping and hunting in and near the dedicated wildlife structures from impairing the effectiveness of dedicated wildlife crossing structures.

For the reasons mentioned above, Chugach NF supports establishing effective regulatory measures restricting hunting and trapping closures within  $\frac{1}{4}$  mile of the five dedicated wildlife crossing structures, including two underpasses and one overpass in Unit 7 and two underpasses in Unit 15A.

Thank you for the opportunity to share the Chugach NF comments on this proposal. If there are questions, please contact me at 907-288-7730 or by e-mail at [ruth.damico@usda.gov](mailto:ruth.damico@usda.gov).

Sincerely,

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RUTH L. D'AMICO  
District Ranger

Enclosed: 3 Figures and 2 References



Figure 1. Potential landscape-scale movement corridors for wildlife remaining on the Kenai Peninsula east of the Seward Highway. (Morton and Benoit, *Delineation of Landscape Linkages in the Cooper Landing Planning Area*, Sept 2010)



Figure 2. Overview of Sterling Highway MP 45-60 Project (<http://sterlinghighway.net/>)





Figure 3. Photo of existing underpass on Kenai Wildlife Refuge.  
Sterling Highway MP 45-60 Project wildlife underpasses are expected to be similar.

References:

Morton, J., Magness, D., Benoit, M. (2010). *Delineation of Landscape Linkages in the Cooper Landing Planning Area* [White paper]. U.S. Fish & Wildlife Service, Kenai National Wildlife Refuge & U.S. Forest Service, Chugach National Forest.

[Cooper\\_Landing\\_connectivity\\_revised\\_compressed\\_2.pdf \(kpb.us\)](#)



My name is Larry Van Daele and I am a retired Kodiak area wildlife biologist and former Board of Game member. I am submitting this comment to OPPOSE Proposal 76 (lengthening the brown bear season for RB230/260) and to SUPPORT Proposal 81 (require breakaway devices for snares on Kodiak road system).

### **Proposal 76 - OPPOSE**

The proposal as written will not accomplish its stated goal of reducing DLPs or “problem” bears on the Kodiak road system, but it will greatly increase the opportunity for illegal harvest of bears from other parts of the archipelago.

Bears living in the vicinity of Kodiak City primarily occupy 3 drainages, all of which are largely closed to bear hunting. The Monashka and Pillar drainages are part of the City watershed and are completely closed above the main road. The Buskin drainage is almost exclusively US Coast Guard property and the vast majority of it is also closed to bear hunting due to security and safety concerns. Coastal areas between these drainages include the Kodiak Island Borough landfill, the vicinity of which is closed to bear hunting by State regulation, and urban areas of Kodiak city and surrounding subdivisions most of which are either illegal or impractical to hunt due to private lands and safety concerns. What this land use pattern does is essentially create a bear sanctuary surrounding the areas that experience the greatest degree of bear problems, and expansion of the seasons by a couple months will have little impact on DLP kills.

The portion of the registration hunts south and east of Kodiak city is mostly either owned by private individuals or by the Lesnoi or Ouzinkie Native Corporations. Lesnoi charges a \$800 land use fee for resident bear hunters and \$1,500 for non-residents. Afognak charges \$1,000 and \$1,700. There are some state lands on the south end of the road system. Regardless of land ownership or land use fees, any bears harvested in these areas will have little or no impact on the problem bears in and around Kodiak city.

Other compounding factors to the potential successful impact of this proposal are the behavior and reproductive status of the bears that cause problems within the area. The most effective “garbage bears”, including those that get into domestic livestock, cars and buildings, are almost exclusively nocturnal. Extension of the season still would not allow hunting with artificial light, so these bears would still be protected. The remaining bears that are seen during the day are typically sows with cubs, which are also protected, regardless of extension of the seasons. Finally, the season when bears are most likely to be attracted to human food/garbage is during August and September, a period known as hyperphagia, when they dramatically increase their food consumption in preparation for hibernation. The proposed season extensions would not allow hunting during this period.

While the proposal is expected to have little or no positive impact on the number of DLPs, it has a very likely chance of increasing illegal bear harvest from areas outside of the registration hunt area. Kodiak bears are a highly sought after trophy, and like most other parts of the state, the number of State Troopers and ADF&G personnel on Kodiak are woefully and chronically underfunded and understaffed. Having the registration and drawing permit hunt dates synchronized greatly reduces the likelihood of a person successfully “bootlegging” a bear that is shot in one area (for instance the closed drawing hunt area) and claiming it was taken in another area (such as the newly opened registration hunt area). Any alteration of this long-standing tradition will adversely impact the effectiveness of law enforcement and ultimately hurt the bear population.



In summary, the proposed regulation change will cause more harm than good. Time and again it has been proven that the most effective way of reducing bear problems is not by shooting more bears or by translocating bears. The only effective measure is to drastically reduce or eliminate bears' access to human food/garbage and aggressively educate both bears (averse conditioning) and people (outreach and enforcement) that bears and people can co-exist but only with consistent behavior by both species. Proposals such as this one have come up periodically over the past 4 decades I have been associated with bear management on Kodiak and each time the Board has voted it down. I urge you to do the same with this proposal.

### **Proposal 81 – SUPPORT**

Kodiak road system has an ill-fated combination of healthy bear, deer, beaver, otter and fox populations; a community that loves to go onto the limited trails in the area with their dogs; and, US Coast Guard personnel and others moving to the island providing a constant stream of young, enthusiastic, and oftentimes naive outdoors people new to Alaska who want to try their hand at trapping. When these factors come together the unfortunately end result is a bear, deer or dog caught in a snare along a popular trail. Aside from the intense trauma inflicted on the animal and the humans associated with it, these incidents paint trappers in a very bad light. While Kodiak residents are generally accepting of trapping, that sentiment has eroded significantly in recent years. This was exacerbated by a similar proposal that was passed during the last Board cycle, only to be reconsidered later in the meeting during which time it was defeated with a promise that Alaska Trappers Association would come to Kodiak annually to give clinics on how to safely set snares and traps to avoid "by-catch". Those clinics never happened and non-target species continue to be caught, even by snares remaining in the field after season closure.

While Boards have consistently avoided passing any proposals that attempt to minimize trap/dog encounters by regulation and opt for voluntary compliance and/or education instead, this case in Kodiak needs to be addressed by regulation. It is beyond the capabilities of the ATA to provide enough consistent education and peer pressure on all trappers to eliminate the problem. The proposal has strong public support and would codify an accepted "best practice" that most seasoned trappers use already. I urge the Board to support this proposal to enhance public safety, public acceptance of trapping, reduce harvest of non-target species, and to improve the quality of trappers in the area.





**Submitted by:** Craig Vanarsdale

**Organization Name:**

**Community of Residence:** Soldotna, Alaska

**Comment:**

Oppose Proposal 82 but support the departments comments on adding the area in question the current archery hunt areas for DS141/241 to spread out hunters.

Support Proposal 87. It creates a great opportunity for Bowhunters to get some time afield outside of general seasons while likely not making a large affect on harvest.

Oppose proposal 109. As stated by the department, there is no biological reason to close sheep hunting under the full curl management structure.

Oppose proposal 204. As stated by the department, there is no biological reason to close sheep hunting under the full curl management structure. if there is to be reduction in harvest it should be a reduction to the allowed allocation of non-resident sheep hunters.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Oppose Proposal 56: Support Proposal 57: Oppose Proposal 58: Support Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Oppose Proposal 62: Support Proposal 63: Oppose Proposal 64: Oppose Proposal 65: Oppose Proposal 66: Oppose Proposal 67: Support Proposal 68: Support Proposal 69: Oppose Proposal 70: Support Proposal 71: Support Proposal 72: Support Proposal 73: Oppose Proposal 74: Oppose Proposal 75: Oppose Proposal 76: Oppose Proposal 77: Oppose Proposal 78: Support Proposal 79: Support Proposal 80: Support Proposal 81: Oppose Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Oppose Proposal 85: Oppose Proposal 86: Support Proposal 87: Support Proposal 88: Support Proposal 89: Support Proposal 90: Support Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 94: Support Proposal 95: Support Proposal 96: Oppose Proposal 97: Support Proposal 98: Support Proposal 99: Support Proposal 100: Support Proposal 101: Support Proposal 102: Oppose Proposal 103: Support Proposal 104: Oppose Proposal 105: Support Proposal 106: Oppose Proposal 107: Support Proposal 108: Oppose Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 112: Oppose Proposal 113: Oppose Proposal 114: Oppose Proposal 115: Oppose Proposal 116: Support Proposal 117: Support Proposal 118: Oppose Proposal 119: Support Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support Proposal 124: Support Proposal 125: Support Proposal 126: Support Proposal 127: Support Proposal 128: Support Proposal 129: Support Proposal 130: Support Proposal 131: Support Proposal 132: Support Proposal 133: Support Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Support Proposal 137: Support Proposal 138: Support Proposal 139: Support Proposal 140: Support Proposal 141: Support Proposal 142: Oppose Proposal 143: Oppose Proposal 144: Support Proposal 145: Oppose Proposal 146: Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose Proposal 155: Oppose Proposal 156: Oppose Proposal 157: Oppose Proposal 158: Oppose Proposal 159: Support Proposal 160: Oppose Proposal 161: Oppose Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Oppose Proposal 165: Oppose Proposal 166: Oppose Proposal 167: Oppose Proposal 168: Oppose Proposal 169: Oppose Proposal 170: Oppose Proposal 171: Oppose Proposal 172: Oppose Proposal 173: Support Proposal 174: Support Proposal 175: Support Proposal 176: Support Proposal 177: Support Proposal 178: Support Proposal 179: Support Proposal 180: Support Proposal 181: Support Proposal 182: Support Proposal 183: Support Proposal 184: Support Proposal 185: Support Proposal 186: Support Proposal 187: Support Proposal 188: Support Proposal 200: Oppose Proposal 203: Oppose Proposal 204: Oppose Proposal 205: Support Proposal 207: Oppose Proposal 208: Support

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PC346

**Submitted by:** Ryan Vanzo

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

I strongly support 146 and 147. Trail setbacks are common sense and a win-win for all stakeholders.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 156: Support Proposal 160: Support  
Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 166: Support Proposal 169: Support  
Proposal 171: Support

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PC347

**Submitted by:** Von Veeh

**Organization Name:**

**Community of Residence:** Cooper Landing, AK

**Comment:**

As a homeowner in Cooper Landing on Kenai Lake, I oppose trapping near roads, trails, beaches, campgrounds, private property and any other areas frequently used by recreators and their pets.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support  
Proposal 153: Support Proposal 154: Support

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PC348

**Submitted by:** Robert Vernon

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

Like many Alaskans I came to Alaska to see the wildlife, not to kill it.

I do not understand how one species can get pleasure out of killing another species.

I hope I am in a crowd you will cater to too.

Less than 5% of Americans were issued hunting licenses last year.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 155: Support Proposal 160: Support  
Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 166: Support Proposal 169: Support  
Proposal 171: Support

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PC349

**Submitted by:** Kevin Walker

**Organization Name:**

**Community of Residence:** Kachemak City, Alaska

**Comment:**

Proposal 147. I totally support no trapping within 100 yards from Snomad mapped trails in Unit 15C and 100 yards from Kachemak Nordic Ski Club Trails in Unit 15C. 8 family pets / domestic dogs have been trapped on these trails in the past few weeks. Trapping should be "in the woods", not next to existing trails with children and dogs.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 147: Support with Amendment

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**Submitted by:** Bill Watkins

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

See Attached:

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Support Proposal 56: Support Proposal 57: Oppose Proposal 58: Support Proposal 59: Support Proposal 60: Oppose Proposal 61: Support Proposal 62: Oppose Proposal 63: Oppose Proposal 64: Oppose Proposal 65: Oppose Proposal 66: Oppose Proposal 67: Support Proposal 68: Support Proposal 69: Oppose Proposal 70: Oppose Proposal 71: Oppose Proposal 72: Oppose Proposal 73: Support Proposal 75: Support Proposal 76: Oppose Proposal 77: Support Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Support Proposal 82: Oppose Proposal 83: Support Proposal 84: Oppose Proposal 85: Oppose Proposal 86: Oppose Proposal 87: Oppose Proposal 88: Support Proposal 89: Oppose Proposal 90: Oppose Proposal 91: Oppose Proposal 92: Oppose Proposal 93: Oppose Proposal 94: Oppose Proposal 95: Oppose Proposal 96: Oppose Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose Proposal 101: Oppose Proposal 102: Oppose Proposal 103: Oppose Proposal 104: Support Proposal 105: Support Proposal 106: Oppose Proposal 107: Oppose Proposal 109: Support Proposal 110: Oppose Proposal 111: Oppose Proposal 112: Oppose Proposal 113: Oppose Proposal 114: Support Proposal 115: Oppose Proposal 116: Support Proposal 117: Support Proposal 118: Oppose Proposal 119: Oppose Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose Proposal 125: Oppose Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Oppose Proposal 129: Oppose Proposal 130: Oppose Proposal 131: Oppose Proposal 132: Oppose Proposal 133: Support Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 140: Oppose Proposal 141: Oppose Proposal 142: Oppose Proposal 143: Support Proposal 144: Oppose Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Support Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 159: Oppose Proposal 160: Support Proposal 161: Oppose Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support Proposal 173: Oppose Proposal 174: Oppose Proposal 175: Oppose Proposal 176: Oppose Proposal 177: Oppose Proposal 178: Oppose Proposal 179: Oppose Proposal 180: Oppose Proposal 181: Oppose Proposal 182: Oppose Proposal 183: Oppose Proposal 184: Oppose Proposal 185: Oppose Proposal 186: Oppose Proposal 187: Oppose Proposal 188: Oppose Proposal 200: Oppose Proposal 203: Oppose Proposal 204: Support Proposal 205: Support Proposal 207: Oppose Proposal 208: Oppose

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Dear Sirs,

I wish to express my support for the following trapping setback Proposals:

145 - ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass

- These wildlife overpasses/tunnels are being created specifically for the safety of both motorists and to provide safe crossings for wildlife. They are not being created as unethical, taxpayer funded, welfare queen benefits for trappers.

149 - 100yd. Setbacks from Cooper Landing area campgrounds.

- Common sense proposal to reduce potential conflicts between recreation users and their dogs and trappers.

150 - 100yd. Setbacks from highway pull outs in Cooper Landing.

- Common sense proposal to reduce potential conflicts between recreation users/ motorists and their dogs and trappers.

151 - 100yd. Setbacks from recreational areas in the Summit Lake Recreational Area.

- Common sense proposal to reduce potential conflicts between recreation users and their dogs and trappers.

152 - 100yd. Setbacks from some high-use Cooper Landing trails.

- Common sense proposal to reduce potential conflicts between recreation users and their dogs and trappers.

153 - 100yd. Setbacks from some Kenai Lake Beaches.

- Common sense proposal to reduce potential conflicts between recreation users and their dogs and trappers.

154 - Request for signage where active trapping is occurring.

- Common sense proposal to warn the public of nearby traplines so they can take measures to protect their dogs.



Additionally, I support trapping setback Proposals: 146 (Kachemak Bay State Park), 147 (Homer Ski Trails) and 148 (Seward trails).

- Common sense proposal to reduce potential conflicts between recreation users and their dogs and trappers.

All of these are common sense, practical proposals that are meant to avoid conflicts with other recreational users and their dogs. And further, to prevent the socialized targeting and trapping of wildlife that is attempting to safely cross the Sterling Hwy using wildlife overpasses or tunnels.

No dog owner should be so paranoid about the safety of their dog while taking it out on a walk, snowshoe, ski, dog mushing or skijoring trip where they may encounter traps or snares on or close to multiple use trails, parking lots, pull outs, campgrounds residential areas and schools. Nor, should they have to deal with the trauma of trying to save the life of their dog while recreating on such a trail.

For many people, they consider their dogs to be family members and feel they should be able to safely recreate with their dogs without fear of their dogs being injured or killed by traps and snares.

For every dog that is injured or killed by trappers, it creates anger and opposition to trapping. I highly doubt that dog owners who have had their dogs injured, strangled or killed by trappers are going to care about maintaining any type of "trapping tradition".

In my own case, I wish to get a future german shepherd and be able to hike, camp, x-c ski, and mountain bike with her without being paranoid about her being injured or killed in a trap or snare. And this would apply whether I am in Denali, Homer or anywhere else in the state.

This is further enraging when trappers are not required to sign their traplines, identify with contact information their traps, or are required to check them in a timely manner and are allowed to monopolize multiuser trails to the exclusion of all other recreational users.

No other form of recreation in Alaska enjoys such an extreme monopoly for roughly only 3,000+ Alaskans versus over 730,000 residents.

Please explain to me how this builds in any way shape or form public support for maintaining a "Culture of Death" tradition that excludes and takes priority over all other uses?

It has further come to my attention, that the BOG has not once authorized trapping setbacks for multiple use trails anywhere in Alaska.



Such attitudes and policy decisions feed an ever growing wave of opposition to trapping and eventually an opposition that will not be content with strict and needed regulations but one that wishes to see trapping banned throughout the state.

If it comes to a choice between maintaining a "Culture of Death" tradition for a tiny minority or protecting one's dogs for the majority, it is an easy choice in putting the protection of communities and dogs first.

If the BOG denies these common sense and ethical proposals then I do feel that the public should return to the BOG and the trapping community the same level of consideration that has been repeatedly shown them.

Wanton killing of man's (and women's) best friend should never be tolerated and only creates opposition and momentum to creating and working towards a "Trap Free Alaska".

I ask you to consider and approve each of these proposals for the benefit of each of these communities and to return common sense ethics and regulations to trapping.

Sincerely,

Bill Watkins



**Submitted by:** Brian Watkins

**Organization Name:**

**Community of Residence:** Eagle River, AK

**Comment:**

I put these proposals in as primitive weapons. Its come to my attention that Alaska doesnt define primitive weapons. I would like for an any weapon hunt, but If it helps the proposal pass, bow or shotgun can be submitted (proposal 90, 97,98)

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 90: Support      Proposal 97: Support Proposal 98: Support Proposal 204: Oppose

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I am the proposer of this proposal. I wanted to make it clear that my intention was not to add any tags. DS141 already has 24 tags. I would like to separate those tags into (2) 12 tag allocations. This will alleviate over-pressure of sheep during the hunt, as well as allow for a hunt that is prior to the neighboring Hunter creek rifle draw. This will allow for a more hunter-friendly experience. A lot of hunter creek tag hunters access the area through DS141 and it pressures the sheep prior to the opener of a bow only tag

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 84: Support

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I am opposing Proposal 82. The area of the east fork of the ekultna drainage is one of very few areas that is bow only for sheep. DS141 is already extremely heavy on hunters at tags of 24. DS124 is also prior to the DS141 season, which would push sheep out of the area. I have personally hunted DS141 4 times and each time it is difficult to hunt such a small area with the amount of tags. To put a rifle tag prior to that hunt would take away from DS141 and create pressure and safety issues.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 82: Oppose

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PC352

**Submitted by:** Gary Weaver

**Organization Name:**

**Community of Residence:** Anchorage, AK

**Comment:**

Proposal 82 - opposed

Proposal 67, 71, 72, 87, 91, 92, 93, 99, 100, 101, 110, 111, 112, 113, 119, 120, 121, 122, 123, 124, 125, 126 - all support

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 67: Support Proposal 71: Support Proposal 72: Support Proposal 82: Oppose Proposal 87: Support  
Proposal 91: Support Proposal 92: Support Proposal 93: Support Proposal 99: Support Proposal 100: Support Proposal  
101: Support Proposal 110: Support Proposal 111: Support Proposal 112: Support Proposal 113: Support Proposal  
119: Support Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal 123: Support Proposal 124:  
Support Proposal 125: Support Proposal 126: Support

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PC353

**Submitted by:** Jared Webber

**Organization Name:**

**Community of Residence:** Alaska, Alaska

**Comment:**

Yes

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Oppose Proposal 146: Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal  
150: Oppose Proposal 151: Oppose Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose

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I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

*There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.*

**Please select the proposals that you are in support of (select all that apply).**

*If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) for extra forms.*

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

#### **Other areas setback proposals:**

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.

Comments:



PC 354

MY PROPERTY BORDERS A MAJOR  
TRAIL IN COOPER LANDING. I ALWAYS  
HAVE CONCERNS WHEN MY PETS ARE AROUND  
THAT BORDER. I SHOULD NOT HAVE TO  
FEAR FOR MY OWN PETS.

(feel free to add extra pages of comments)

Printed Name (First and last)\*: HARVEY P. WEBER II

Organization (if any) SELF

Signature\*: Harvey P. Weber II

Email\*: [REDACTED]

Street Address [REDACTED]

City\*: COOPER LANDING State\*: AK Zip code: 99572

\*Indicates it must be filled in to be accepted.

# Cooper Landing Trap Setback Proposals, Comments & Ballot



PC 355

I support the following proposal(s) that have been submitted by the Cooper Landing Safe Trails Committee to the Alaska Board of Game to reduce conflicts with trappers and increase safety among the rising number of multi-use groups in Game Unit 7 (the Cooper Landing area). I believe the proposed are reasonable setbacks to maintain safe recreation for trail users and their pets.

There are multiple proposals for trap setbacks or trap signage in the Cooper Landing area.

**Please select the proposals that you are in support of (select all that apply).**

If there is more than one person in your household, please have each person submit their comments separately. You can copy this, or contact [cooperlandingsafetrails@gmail.com](mailto:cooperlandingsafetrails@gmail.com) for extra forms.

From: Linn & Mary Weeda, 3529 [REDACTED] Anchorage, AK  
99517

- ☒ **# 145 Wildlife Crossings:** ¼ mile hunting and trapping buffers from mouths of new highway wildlife crossings on the upcoming Cooper Landing bypass
- ☒ **#149 Campgrounds:** Establish 1) a 100-yard trapping setback along the perimeter of the Quartz Creek, Crescent Creek, Russian River, and Cooper Creek (North and South) campgrounds, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 150 Roads and pullouts:** Establish 1) a 100-yard trapping setback along both sides of roads and all sides of the the pullouts listed: Quartz Creek Road, East Quartz Creek and Williams Road, Old Sterling Highway, Snug Harbor Road, Bean Creek Road, Russian Gap Road, and all pullouts along the Sterling Highway. AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☐ **#151 Summit Recreation:** Establish trapping setbacks along the perimeter of all highway pullouts, backcountry access points, and winter trails in the Japan Woods area, Tenderfoot Campground ski area, Park-N-Poke area, and Manitoba Mountain.
- ☒ **#152 Trails:** Establish 1) a 100-yard trapping setback along both sides of the trails and all sides of the following trailheads: Crescent Creek Trail, Lower Russian Lake Trail, Bean Creek Trail, Russian Gap Trail/Historic Quartz Creek Trail, Resurrection Trail (South End), West Juneau Bench Trail, Devil's Pass Ski Loops, and Stetson Creek Parking area and Trail, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **#153 Beaches:** Establish 1) a 100-yard trapping setback from the mean high-water mark along the north and south side beaches of Kenai Lake, AND 2) a 50-yard trapping setback for traps with an inside spread of 5 inches or less, that are set at least 4 feet above the ground or snow level, and size 3 leghold marten traps set in boxes.
- ☒ **# 154 Signage:** Establishing mandatory signs posted at all access points of active trapping in the Game Unit 7 area to reduce conflicts with trappers and increase safety among the rising number of multi-use groups.

## Other areas setback proposals:

- ☒ **#146 Trails in Kachemak Bay State Park:** Establish 100 yard trapping setback from the Diamond Creek Trail, the Grewingk Saddle Trail.
- ☒ **#147 Ski Trails in Homer:** Establish 100 yard setback from the Snowmad Trails and the Kachemak Nordic Ski Club Trails
- ☒ **# 148 Seward Trails:** Establish a 100 yard trapping setback from trails in Seward.





Comments to Board of Game Southcentral Region Proposals, Spring 2023

Comments submitted by: Brian West

[REDACTED]  
Anchorage, Alaska 99515

Proposal 55. OPPOSE. This makes no sense. Why should the State reduce the number of resident permits just to add non-resident permits?

Proposal 58. OPPOSE. Serves no purpose. The proposer indicates that he is concerned that novice hunters will take too many female goats. However, the taking of females, without kids, is allowed in all units open to goat hunting.

Proposal 59. OPPOSE. Nothing prohibits the use of archery equipment during the existing hunt. This proposal would discriminate against one group of hunters for the benefit of another.

Proposal 60. OPPOSE. This proposal seeks to eliminate the use of rifles in this hunt for the benefit of those who use archery equipment. The proposer is able to hunt with bow and arrow during the general season.

Proposal 61. OPPOSE. If the deer population can sustain the harvest I see no reason to reduce the bag limit because someone does not believe another does not need 5 deer. How could he possibly know the needs of other people?

Proposal 63. SUPPORT

Proposal 66. OPPOSE. Nothing restricts the use of archery equipment during the hunt. Contrary to the proposer's statement this proposal would decrease the opportunity of all those who do not use bow and arrow. This is a self-serving proposal to allow archery only hunting in the areas most popular with other hunters and with easier access.

Proposal 67. OPPOSE. Why should one group of hunters lose opportunity for the benefit of another? This person should put in for the earlier hunt and hunt with a bow if he so chooses.

Proposal 69. SUPPORT.

Proposal 71. OPPOSE. There is no restriction on using archery equipment during the regular hunt. A special hunt is not required. If as stated, this will allow bow hunters to be in the field without the expectation of taking an animal maybe they should consider camping. Additionally, if they have no expectation of killing an animal why should the State go through the added expense of administering this special hunt?

Proposal 72. OPPOSE.

Proposal 73. OPPOSE. Instead of reducing the bag limit for residents eliminate the non-resident hunt.

Proposal 75. OPPOSE. This would be virtually impossible to enforce.

Proposal 77. SUPPORT

Proposal 78. SUPPORT

Proposal 79. SUPPORT. There should never be non-resident opportunity when resident opportunity is restricted to a permit. The State is not responsible for providing a client base to guides.

Proposal 84, 85. OPPOSE. There is no reason for a special bow only hunt. Few permits are given and the proposers should apply for these permits and hunt with a bow if successful. What they are really looking for is a way of increasing their odds of getting a permit.

Proposal 87. OPPOSE. There is no restriction on using a bow during the general season. This is a lightly hunted area with little competition. Why should a special season be created just because it is harder for bow hunters to take game. This seems to be the only reason given for establishing this hunt.

Proposal 88. OPPOSE. This proposer states that this change would eliminate hunting opportunity for others. However, that is exactly what it does. It eliminates rifle hunting and replaces it with bow only. Also, how does the proposer make the leap from remoteness to ethical hunting? As stated before nothing in the regulations prohibits the use of archery equipment during the existing hunt.

Proposal 90. SUPPORT with conditions. I would support this if it was an any weapon hunt.

Proposal 91. OPPOSE. Too high of a risk of wounded bears with bow only in a populated area.

Proposal 92. OPPOSE. Too high of a risk of a wounded bear in a popular recreation area. One wounded bear causing problems would shut down hunts in this area no matter the weapon. One only has to remember the problems associated with the archery only hunt for moose on the Anchorage hillside years ago to see how this is a bad idea.

Proposal 93, 94, 95, 96. OPPOSE.

Proposal 97. SUPPORT

Proposal 101. OPPOSE. Why should the State expend time and money for a hunt that has almost no chance of success, as stated by the proposer?

Proposal 102. SUPPORT

Proposal 106. OPPOSE. This hunt is open to ATV during the majority of the season which lasts from Sep 1 through Sept 25. Only two four day periods are closed to ATV, this gives those without ATV an opportunity to hunt without being harassed by them. If someone wants to hunt with unrestricted ATV use there are literally millions of acres in the State open to them.

Proposal 107. OPPOSE. Being disabled, veteran or not, does not entitle a person to special exemptions to the detriment of others. This area is open to ATV use for the majority of the season so his access is not eliminated. This is merely a veiled attempt to increase the success of one group at the expense of others. If this person wants to hunt in areas without ATV restrictions there are millions of acres in the State open to him.

Proposal 110, 111, 112, 113. OPPOSE. With so few hunters there should be no conflict with others if people were to hunt with a bow during the general season.

Proposal 114. OPPOSE. The existing hunt is open to all hunters, why should one group be eliminated for the benefit of another?

Proposal 119, 120. OPPOSE. Likely to be unsuccessful but would impact the success rate of the general hunt by spooking the animals.

Proposal 121, 122, 123, 124, 125, 126. OPPOSE

Proposal 127. OPPOSE. Proposer states that poor weather is the reason for implementing this change. However, the proposed season in early Nov. is the stormiest month in that region. If harvest numbers are decreasing as stated extending the season into the rut would not be a good for the health of the moose population.

Proposal 133. OPPOSE. I fail to see how they can be confused with the regulations in Unit 6 and 15 being different. The wording is quite clear. You can not even make the argument that they are adjacent Units as they are separated by Unit 7.



**Submitted by:** Stephen Stringham

**Organization Name:** WildWatch Consulting

**Community of Residence:** Soldotna, AK

**Comment:**

BOG Should Heed ADF&G Biologists

Unlike human rules, Natural laws can't be broken. They can't even be bent. But they can be used to our advantage – once we learn them, which is best done through science. Yet all too often, as illustrated by the recent Covid crisis, scientists who dare contradict politically correct dogma are all too often muzzled.

This also happens in wildlife management. Intensive Management assumes that the number of moose and caribou that can be harvested each year on a sustained yield basis is maximized by keeping their populations near carrying capacity – which isn't true.

The capability of a moose to survive harsh winters, parasites, diseases, and predators can depend on its health and nutritional status. Nutritional status depends on per capita food supply. When moose are scarce, most moose tend to be well fed. As the number of moose increases, malnutrition can occur, increasing vulnerability to harsh winters, parasites, diseases, and predators. Beyond carrying capacity, moose deaths exceed the number of calves being born. A population near carrying capacity is highly vulnerable to any drop in that capacity due to bad weather or competition from other herbivores, which increases vulnerability to weather, parasitism, disease, or predators.

In a population at carrying capacity, moose are a lot more less productive than at an intermediate density – the so-called optimal density. Even if Alaska's Intensive Management legislation can't be revised to replace "carrying capacity" with "optimum density", the BOG should be wise enough to interpret the regulations that way, if the goal really is to maximize harvest. Identifying optimal density takes the skills of professional scientists.

Despit Alaska's bad habit of muzzling State biologists (and ignoring other scientists) who recommend managing according to the best available science, Alaska has an extraordinarily good record of hiring first class scientists – far more so than many other states. On the Kenai Peninsula, we are fortunate to have [REDACTED], who participated in wolf-moose studies in the Lower 48 before coming to Alaska. After serving for decades as Area Manager, he became Regional Coordinator. Replacing him as Area Manager is [REDACTED], an expert on interactions among predator species. We also have Wildlife Physiologist [REDACTED], and Wildlife Biologists [REDACTED] and [REDACTED]. Where additional expertise is needed, they can turn to Biologist [REDACTED] on Kodiak Island, and to those in Anchorage. Our team of local ADF&G scientists is highly skilled as field biologists as well as thoroughly trained in book knowledge, computing, and other technologies.

Let's hope that when the BOG meets here in mid-March that they refrain from dictating to these biologists and take their expert advice on how best to maximize moose and caribou harvests on the Kenai Peninsula.

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**Submitted by:** Danielle Williams

**Organization Name:**

**Community of Residence:** Anchorage, Alaska

**Comment:**

Alaska Board of Game Members:

I write today to strongly support Proposals 145 - 154.

Thank you in advance for considering my comments below.

-Danielle Williams

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I am a 30-year Alaska resident who spends a lot of time on the Kenai - especially in and around Cooper Landing, Seward, Homer and Kachemak Bay - supporting the local economies. My husband and I hike, backpack, camp, fish, canoe, ski and stay at local cabins, etc. - and always with our dogs. We have introduced many a visitor to the Kenai to do the same.

We always go with the hopes of seeing bears, lynx, moose, etc. in the wild – an opportunity so exceedingly rare in our world today and what makes Alaska and the Kenai (for its accessibility) so special. If we are lucky enough to see wildlife, it is assuredly a highlight of the trip.

But we have also gone naively - until recently - without realizing how lacking the setback, signage and other trapping regulations are currently, including on many of the common trails we use regularly. Sadly, we have two different friends whose dogs were caught in traps in the past year on multi-use trails in Southcentral Alaska. One friend's beloved dog died in a conibear trap on a trail in Seward – it's been a heart-wrenching loss for so many and eye-opening to the risks for sure.

After reviewing Proposals #145 through and including #154, I support all of them, for the general reasons discussed above and the specific reasons outlined below:

- Regarding Proposal 145: I do not believe it is ethical or humane to allow wildlife to be hunted or trapped on and at the entrances and exits of the new wildlife underpasses and overpass on the Sterling Highway. Establishing a ¼-mile buffer zone sounds at least reasonable.
- Regarding Proposals 146 - 153: Trail-users with dogs are a large stakeholder group for Kenai area trails and the Kenai is growing rapidly. There are still many unwary people, like we were, using these trails, campgrounds, roads and pullouts. The consequences are too great to not establish the trap setbacks and other common-sense measures proposed. These would give trail-users, with and without dogs, greater confidence that they will be reasonably safe from traps in high-use areas. Meanwhile trappers would also benefit from the additional clarity. I understand that the setback distances proposed have strong community support and are considered a reasonable compromise between user groups including several local trappers consulted.
- Regarding Proposal 154: Alerting user groups and emergency responders to trapping in the area by way of simple signs posted at active trapping access points is another reasonable compromise for heavily used areas and provides an opportunity for folks who decide to (or who must) use the trails, to take additional safety precautions.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC359

**Submitted by:** Steve Williams

**Organization Name:**

**Community of Residence:** Anchorage, Alaska

**Comment:**

Thank you for the opportunity to provide comment. I have lived in Alaska for over 30 years and actively enjoy the outdoors with my wife and our dogs. We enjoy, as do our family and friends, the opportunities in Cooper Landing, Seward, Homer, and along the Sterling Highway to view wildlife. I support proposals 145 - 154, they are reasonable and balance the needs of multiple user groups. I encourage the Board of Game to give these proposals serious consideration and ultimately approve them. Thank you.

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC360

**Submitted by:** Emily Wilson

**Organization Name:**

**Community of Residence:** Moose Pass, Alaska

**Comment:**

Commenting in support of proposals 145-154. Cooper Landing public areas need to be safe for dogs and children. It is absolutely unnecessary for trapping to happen anywhere near publicly used beaches, hiking trails, and highway pullouts. It is shocking to me that this is even an issue.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC361

**Submitted by:** Roy Wilson

**Organization Name:**

**Community of Residence:** Homer, Ak

**Comment:**

Proposal 149 should be approved as written.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support  
Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC362

**Submitted by:** Lindsay Wolter

**Organization Name:**

**Community of Residence:** Homer, Alaska

**Comment:**

I am writing in support of Proposal 146 and Proposal 147, which relate to establishing a set back for traps in areas in which I frequently travel with my dog. I personally know three dogs who have been caught in traps - one was my own, and another didn't survive. So this issue is near and dear to me. I have no problem with trapping; I do have a problem with trapping close to areas where people recreate with their pets. Both of these proposals seem like a no brainer - everyone wins if trappers continue to trap, and people can recreate in areas with less chance of their pets being trapped.

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Proposal 146: Support Proposal 147: Support

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PC363

**Submitted by:** Andra Woodard

**Organization Name:**

**Community of Residence:** Seward, AK

**Comment:**

I support proposals 145-154. It will keep our children and pets safer as we utilize the trails in and around our communities.

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Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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PC364

**Submitted by:** April Woods

**Organization Name:**

**Community of Residence:** Anchorage, Ak

**Comment:**

I support AWA's Proposal #145. What happen to the concept of fair chase hunting? How are hunters and trappers lined up where wildlife are forced to travel through fair? It is an assembly line of death & bag. It is the opposite of what decent hunters & citizens would allow, it is 100% wrong and evil. Protection is the opposite of extinction. Make wildlife protection, not a death trap.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 55: Oppose Proposal 56: Oppose Proposal 57: Oppose Proposal 58: Oppose Proposal 59: Oppose Proposal 60: Oppose Proposal 61: Oppose Proposal 62: Oppose Proposal 63: Oppose Proposal 64: Oppose Proposal 65: Oppose Proposal 66: Oppose Proposal 67: Oppose Proposal 68: Oppose Proposal 69: Oppose Proposal 70: Oppose Proposal 71: Oppose Proposal 72: Oppose Proposal 73: Oppose Proposal 74: Oppose Proposal 75: Oppose Proposal 76: Oppose Proposal 77: Oppose Proposal 78: Oppose Proposal 79: Oppose Proposal 80: Oppose Proposal 81: Oppose Proposal 82: Oppose Proposal 83: Oppose Proposal 84: Oppose Proposal 85: Oppose Proposal 86: Oppose Proposal 87: Oppose Proposal 88: Oppose Proposal 89: Oppose Proposal 90: Oppose Proposal 91: Oppose Proposal 92: Oppose Proposal 93: Oppose Proposal 94: Oppose Proposal 95: Oppose Proposal 96: Oppose Proposal 97: Oppose Proposal 98: Oppose Proposal 99: Oppose Proposal 100: Oppose Proposal 101: Oppose Proposal 102: Oppose Proposal 103: Oppose Proposal 104: Oppose Proposal 105: Oppose Proposal 106: Oppose Proposal 107: Oppose Proposal 108: Oppose Proposal 109: Oppose Proposal 110: Oppose Proposal 111: Oppose Proposal 112: Oppose Proposal 113: Oppose Proposal 114: Oppose Proposal 115: Oppose Proposal 116: Oppose Proposal 117: Oppose Proposal 118: Oppose Proposal 119: Oppose Proposal 120: Oppose Proposal 121: Oppose Proposal 122: Oppose Proposal 123: Oppose Proposal 124: Oppose Proposal 125:

Oppose Proposal 126: Oppose Proposal 127: Oppose Proposal 128: Oppose Proposal 129: Oppose Proposal 130: Oppose Proposal 131: Oppose Proposal 132: Oppose Proposal 133: Oppose Proposal 134: Oppose Proposal 135: Oppose Proposal 136: Oppose Proposal 137: Oppose Proposal 138: Oppose Proposal 139: Oppose Proposal 140: Oppose Proposal 141: Oppose Proposal 142: Oppose Proposal 143: Oppose Proposal 144: Oppose Proposal 145: Support Proposal 146: Support Proposal 147: Support Proposal 148: Oppose Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support Proposal 155: Oppose Proposal 156: Support Proposal 157: Support Proposal 158: Support Proposal 159: Oppose Proposal 160: Support Proposal 161: Oppose Proposal 162: Oppose Proposal 163: Oppose Proposal 164: Oppose Proposal 165: Oppose Proposal 166: Oppose Proposal 167: Oppose Proposal 168: Oppose Proposal 169: Oppose Proposal 170: Oppose Proposal 171: Oppose Proposal 172: Oppose Proposal 173: Oppose Proposal 174: Oppose Proposal 175: Oppose Proposal 176: Oppose Proposal 177: Oppose Proposal 178: Oppose Proposal 179: Oppose Proposal 180: Oppose Proposal 181: Oppose Proposal 182: Oppose Proposal 183: Oppose Proposal 184: Oppose Proposal 185: Oppose Proposal 186: Oppose Proposal 187: Oppose Proposal 188: Oppose Proposal 200: Oppose Proposal 203: Oppose Proposal 204: Oppose Proposal 205: Oppose Proposal 207: Oppose Proposal 208: Oppose

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PC365

**Submitted by:** Stephanie Wright

**Organization Name:**

**Community of Residence:** Seward, AK

**Comment:**

To whom it may concern: I am in support of the proposals numbered 145 and 149 through 154. They are requesting setbacks of traps along trails in public use areas. I often ski, walk, and hike with dogs and although they are generally on a leash I believe that traps should not be close to these hiking and skiing areas. I have known at least three people who have had their dogs caught in traps. One of the dogs died. In some of these instances, the setbacks would probably have resulted in dog not getting ensnared. Please sign these proposals into law so that we can keep our pets and even our children safe. Thank you.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 145: Support Proposal 149: Support Proposal 150: Support Proposal 151: Support Proposal 152: Support Proposal 153: Support Proposal 154: Support

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**Submitted by:** Stig Yngve

**Organization Name:**

**Community of Residence:** Kodiak

**Comment:**

see attached

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

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**PROPOSAL 73**

**As the proposer I am in favor of Proposal 73.**

Kodiak Island deer populations are very low and depressed after two consecutive hard winters in 2020 and 2021. There are not enough deer for people, especially Kodiak Island and Kodiak Native Village residents to obtain enough deer meat for subsistence. I suggest that the bag limit for Sitka black-tailed deer in Unit 8 be reduced to two deer a year for Alaska residents and one deer a year for nonresidents.

**PROPOSAL 74**

**As the Proposer I am in favor of Proposal 74**

This is mainly an issue with Transporter deer hunts, but to some degree with float plane and wheel plane, and non-transported boat based hunts too. By law all meat of the ribs, neck, brisket, front and hind quarters, back strap and tenderloins have to be harvested. A mature Sitka black tail buck yields 50-85 pounds of boned out meat and a mature doe yields 25-60 pounds of boned out meat. This proposal simply curbs any chance of in the field wanton waste.

**PROPOSAL 75**

**As the Proposer I am in favor of Proposal 75**

Amend to Count brown bear wounded by hunters in Unit 8 against the bag limit of one bear every four **REGULATORY** years as follows: If you wound a bear in Unit 8, you cannot hunt for bear again in Unit 8 for four regulatory years.

The main goal here is to treat a wounded bear the same as harvested bear and reflect the same rate of harvest. I would like to address the issue of wounded bears in Unit 8. Because a calendar year of hunting is different than a regulatory management year, a person can legally wound a bear in a spring hunt on Kodiak Island and hunt again legally in the fall because the Fish and Game regulatory year ended in July of the same year. I would like to see this changed such that a wounded bear in Unit 8 counts against your tag, just like a harvested bear. It is an issue of hunting morality and ethics that needs to be addressed.

**PROPOSAL 76**

I am vehemently opposed to this proposal for many reasons.

**1. Bears are not a problem on the Kodiak Road System. PEOPLE and their waste disposal is the problem.** This proposed very generous and lax hunting season would promote more killing of sows and especially, **KILLING THE WRONG BEAR.** Not necessarily killing of problem bears. Many times late in the year **SOWS WITH CUBS** are out still





catching late Silver salmon. These bears are out in the open all day, around people, and to increase the chance past November 30<sup>th</sup> that one of these bears could be inadvertently shot, it's not good at all. It would overall make for a lower Bear population, with less sows and cubs which is not desirable. Kodiak Island and its Bears and people are supposed to be a shining example of symbiosis and coexisting for the whole world to see. This proposed solution undermines that in the worst way.

2. **Other user groups like nature photographers and enthusiasts** shoot these bears...WITH CAMERAS year 'round. Some come from all over the world to do it. It is a beautiful and unique resource, a photogenic and accessible bear population that you don't have to go in a bush plane or boat to see. These bears live in close proximity to humans on the Kodiak Road System their whole lives and to destroy or compromise that is just ludicrous in the worst way.

3. **Ranching** has been going on in Kodiak for over 200 years and A LOT OF BEARS HAVE BEEN SHOT as a result. They continue to be shot. Tough. Tough for cattle. Tougher for bears. When you live in bear country, that is the cost of doing business. KODIAK ISLAND IS NOT CATTLE COUNTRY. Defense of life and property is also a matter of living in Bear Country, that is the cost of doing business.

4. **My personal experience as a Bear Guide and BORN AND RAISED ALASKAN AND KODIAK ISLAND LIFETIME RESIDENT FOR 37 YEARS.** I am a Bear Guide that makes a part of my living every year hunting and killing bears on the Kodiak Road System. I have bear hunted for 13 years. I have lived around bears my whole life working and living on Kodiak Island as a commercial fisherman, Bush Resident, ADFG weir boss, personal recreator in the wild.

I have personally hunted and killed my own Kodiak Road System Bear ~~for myself~~. ~~It was~~ a **problem bear**. I killed it legally and quickly during hunting season in Late November of 2012 less than a mile from my house in Monashka

Bay. He was a known menace, breaking into chicken coops and freezers, and garage doors. He even tried to break into the Salvation Army Food Bank. I talked to ALASKA STATE TROOPER [REDACTED] in advance, as well as ADF&G biologists [REDACTED] Van Daele. After a thorough briefing on legality of pursuing a bear like this, I got my bear tag. I caught up with that bear 1 day later and killed him. I have a really nice rug now.

Waste Management(Our local garbage and waste service Provider) had come in 30 minutes after I left ADF&G with my bear tag in hand, asking if they could DLP (Defense of life and Property) kill that specific bear. [REDACTED] said, "NO, you can't kill that bear. You haven't caught him red-handed yet. But don't worry, the best man for the job just walked out the door with his bear tag."

That bear had been acting like this since early October and No one had managed to hunt and kill him for almost 2 months....until I showed up.





The point is that there is ample opportunity already to harvest a road system bear, problem bear or not, 45 days in the spring and 37 days in the fall, a Guaranteed Over the counter registration bear tag, no quota for harvested bears on the road system, and if a hunter is motivated, like myself, they can harvest a bear with relative ease.

An increased hunting season will have no positive effects, short term or long term whatsoever.

This proposal would effectively increase the opportunity to hunt on the Kodiak Road System, guided or unguided. I have a vested interest here as a hunting guide. I could effectively hunt longer and kill more bears and make more money.

**THAT IS THE LAST THING I WANT TO DO.** We kill enough bears we are actually targeting during spring and fall hunting seasons already. There is no monetary compensation worth killing more.

Rather, my thinking comes from a conservation standpoint. Kodiak Brown Bears *URSUS ARCTOS MIDDENDORFFI* is its own unique subspecies of bears of the world, unlike any other. They are Beautiful and Fierce even Dangerous at times. As an individual it is one of the most fascinating creatures on the planet. As a quarry to pursue in fair chase hunting, it is arguably the pinnacle of hunting. There are always going to be problem bears and dead cows and horses and other livestock, broken into freezers and raided chicken coops etc. We are always going to learn and relearn how to coexist with Bears on Kodiak Island.

An increased hunting season would accomplish nothing positive whatsoever on any level.

#### SOLUTION

I suggest forming a Kodiak Road System Bear task force, composed of a member of the ALASKA DEPT. OF FISH AND GAME WILDLIFE DIVISION., ALASKA STATE TROOPERS, KODIAK CITY POLICE, and REGISTERED HUNTING GUIDES, and 1 concerned citizen not on the ALASKA DEPARTMENT OF FISH AND GAME ADVISORY COMMITTEE. I nominate Nate Szoboda or Bill Dunker for ADF&G. Either one will do.

1 member of the Alaska State Troopers. I nominate [REDACTED]

1 Member of the Kodiak City Police. I nominate [REDACTED]

Also a short running list of Registered Bear Guides that live on the Kodiak Road System to aid in our goal of a cohesive existence with our Bears. We are crucial for this cause because we observe and study bears, live in bear country in tents for the better part of 2 months a year, and kill bears for a living. And no one is better qualified than ourselves for something of this nature.



I nominate myself Stig Yngve. I also Nominate [REDACTED]  
[REDACTED] and [REDACTED] Anyone else who believes they are qualified for this position  
should also volunteer themselves.

For a concerned citizen I nominate [REDACTED]

The goal is to find a unified and unanimous diplomatic as possible solution to keep  
problem bears alive and well on the Kodiak Road System.

If lethal force and the need to kill a bear is called for then, that is where Registered  
Guides like ourselves would be most instrumental for the cause.

THE LAST THING I WANT TO DO IS KILL KODIAK ROAD SYSTEM BEARS...unless I am  
hunting them on a guided hunt as form of my livelihood, or for the safety of the Kodiak  
Road system and its human and Bear residents.

#### PROPOSAL 191

**As the proposer I am in favor of Proposal 191.**

There are too many transporter boats on Kodiak Island during the fall deer hunting  
season. The biggest concerns are **safety for other hunters and land and sea resource  
users of Kodiak Island, quality experience for transported deer hunt clients, and  
proper use of a resource (Deer) as a form of subsistence.** I would like there to be a set  
and finite amount of transporters allowed to operate on Kodiak Island, with preference  
going to those with those with the best safety record and longest standing in operation,  
with preference going to land based transport operations in Kodiak Island Villages.  
There was a huge increase in deer hunting transported hunts following the 2016 hunting  
season when Kodiak Island had upwards of 100,000 deer on the island. Subsequent  
harsh winters in 2017, 2018, 2020 and 2021 have reduced the deer population by half or  
a lot more in certain geographic areas like Afognak Island, Northeast Kodiak Island, the  
East side of Kodiak Island all the Way to Sitkalidak Island and the whole West side of the  
Island from Viekoda Bay to Sturgeon River. Each year since 2016, there are more of  
these boats because of a boom year in '16. Some are fully accountable for their actions  
and run good ethical operations, especially land based ones of long repute on Kodiak  
Island, many others boat-based, from elsewhere have not spent a great deal of time on  
Kodiak Island, but simply show up as opportunistic vultures, johnnycomelatels if you  
will. They are reckless in landing clients on beaches to hunt, have ZERO accountability  
for wanton waste of deer on their vessels, zero regard for sport crab and rockfish stocks,  
not logging that data at all like a normal sport fishing charter is required to do with a  
mandatory logbook. They run amok completely unaccounted for. They are generally  
quite rude and territorial as well, regarding hunting areas that they operate in, claiming  
it as "theirs" when subsistence hunters like myself from Kodiak Island are out trying to





fill our freezers for the year. There can at times be upwards of 20 armed to the teeth transported deer hunters in a bay at one time competing with local resident hunters for deer. It is dangerous. Sooner or later someone will get shot inadvertently because there are too many people in the field in one area at a time. Many of these boats homestead in the same general areas, making as if they have a predetermined destination in mind, which, unless specified by paying clients, could be considered illegal guiding. There is a lot of borderline gray stuff going on, and I want 100 % accountability by transporters. LIMITING THEM to a single transporter season in Either KODIAK, UNIT 8, <sup>or</sup> elsewhere will make for a safer, better all-round experience for everyone as a whole.

### PROPOSAL 192

**As the proposer, I am in favor of Proposal 192.** My sentiments are echoed as above in PROPOSAL 191. The best time for transporter deer hunts is during the rut in November. By having a specific transporter season for the peak of colder fall weather for optimum hunting conditions, Late October- November, coinciding with the rut, and bear hunting (October 25<sup>th</sup> –November 30<sup>th</sup> and April 1<sup>st</sup> to May 15<sup>th</sup>,, hunters will have the best hunting experience, and give resident and non-transported hunters a chance to hunt before and after the rut without the added pressure and inconveniences that come with ever increasing pressure from transporter hunts. Transporters will still have full opportunity to transport bear hunters and Goat hunters from October 25<sup>th</sup> onward to reflect the Bear season and Extended Registration 480 goat season.

### PROPOSAL 193

**As the proposer, I am in favor of Proposal 193**

Again, same sentiments as echoed in proposals \_\_\_73, 74, 191, 192. The bottom line here is accountability for actions of a boat and its crew and its clientele. **WANTON WASTE** is a major theme. I have been witness to dumped bags of deer meat in dumpsters at Kodiak and Native Village boat harbors because transported deer hunters didn't want the meat and didn't care about meat or ethics or the law. Owners and captains of transporter vessels are choosing to look the other way at clients and their dead deer. When you come back to a boat with only the back strap and the head, a boat Captain should be turning in the hunter /client for wanton waste to Alaska State



Troopers. I have also been witness to rockfish overharvest, mass exploitation of subsistence crab stocks, King crab poaching, rampant trespassing...the list goes on and on.

**Regarding safety**, many vessels have a mate and a captain and only the Captain has a 6pack license for transporting clients, yet the mate is most often transporting clients to and from shore while the Captain keeps an eye on the main vessel. They are all implicated. This is magnified when a single owner of multiple vessels has rentaskippers, boat captains for hire, running their boat(s), and they don't know what is really happening and **THEY DON'T CARE** because they are not actually present, they are just collecting money with no consequence for the actions of **THEIR** boat and crew and clients. Having a single transporting vessel per owner and business would demand that the accountability be attached to one entity, thus theoretically reducing by half or more, any and all illegal and questionable activities regarding transport hunting.



PC367

**Submitted by:** Dennis Zwiefelhofer

**Organization Name:**

**Community of Residence:** Kodiak, AK

**Comment:**

I would like to voice support for Proposals 164-170, regarding reduction of bag limits for Goldeneye, Bufflehead, Harlequin & Long-tailed Duck. Hunter take is an additive mortality to these diminishing waterfowl species and should be lowered. Current bag limits are biologically unsupported given these species natural history and reproductive success.

I would also like to voice my support for Proposal 171. Harvest data is valuable management tool for many species and given the additive nature of hunter harvest to sea duck mortality rates should be utilized to aid in conserving diminishing sea duck populations.

I would also voice support for Proposal 172 for the same reasons listed above. Common sense dictates the need to know the scope of harvest mortality to maintain sea duck populations at viable levels.

Lastly, I vehemently oppose Proposal 163 for all the reasons I support Proposal 164-172. The increase in current harvest levels resulting from this proposal can only further damage the already decreased sea duck populations.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 163: Oppose Proposal 164: Support Proposal 165: Support Proposal 166: Support Proposal 167: Support  
Proposal 168: Support Proposal 169: Support Proposal 170: Support Proposal 171: Support Proposal 172: Support

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PC368

**Submitted by:** Geoffrey Davies

**Organization Name:**

**Community of Residence:** Wasilla, Alaska

**Comment:**

I agree with Caleb Martin to clarify the definitions. Each officer shouldnt be left to determine for Him/Herself what constitutes these areas on an individual basis.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

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PC369

**Submitted by:** Molly Fierro

**Organization Name:**

**Community of Residence:** Anchorage AK

**Comment:**

Trapping along recreational trails needs to be controlled. I strongly support at least a 100 yard setback.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

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PC370

**Submitted by:** Tina Seaton

**Organization Name:**

**Community of Residence:** Homer, AK

**Comment:**

Please pass the proposal to require 100 yd setbacks for traps from recreational trails and ski trails. Alaskans are outdoor people and dog people. They should be able to use our hiking and ski trails without fear of being injured in traps set on or near the trails.

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

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PC371

**Submitted by:** Daniel Wood

**Organization Name:**

**Community of Residence:** 34581 N Fork Rd

**Comment:**

I oppose the proposals selected

*Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:*

Proposal 120: Support Proposal 121: Support Proposal 122: Support Proposal  
123: Support Proposal 124: Support Proposal 125: Support Proposal 126: Support Proposal 129: Support Proposal 133:  
Oppose Proposal 134: Support Proposal 135: Support Proposal 136: Support Proposal 145: Oppose Proposal 146:  
Oppose Proposal 147: Oppose Proposal 148: Oppose Proposal 149: Oppose Proposal 150: Oppose Proposal 151: Oppose  
Proposal 152: Oppose Proposal 153: Oppose Proposal 154: Oppose Proposal 155: Oppose Proposal 156: Oppose Proposal  
157: Oppose Proposal 158: Oppose Proposal 159: Oppose Proposal 160: Oppose Proposal 161: Oppose Proposal 162:  
Oppose Proposal 163: Oppose Proposal 164: Oppose Proposal 165: Oppose Proposal 166: Oppose Proposal 167: Oppose  
Proposal 168: Oppose Proposal 169: Oppose Proposal 170: Oppose Proposal 171: Oppose Proposal 172: Oppose

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