



**Submitted by:** Alaska Outdoor Council (AOC)

**Community of Residence:** Palmer, Alaska

**Comment:**

Alaska Outdoor Council (AOC) comments on Alaska Board of Game (BOG) proposals for SE Region

January 2023

The Alaska Outdoor Council (AOC) is a statewide federation of 47 Clubs and thousands of individual Alaskans who hunt, trap, fish, and recreate on public lands/waters in Alaska. AOC supports sustained yield manage of game to provide the opportunity for Alaskans to harvest a wildfood sources for themselves, family, and friends.

Proposals #10 and #11. AOC recommendation Do Not Adopt.

The Alaska Department of Fish & Game (Department) has determined from the best data available that the Sitka deer population in GMU 4 is currently high for the available habitat.

Making deer available for humans to harvest whenever the harvestable surplus will support high harvests fulfills the constitutional mandate found in Article 8, Natural Resources of the Alaska State Constitution.

Proposal #36 and #37. AOC recommendation Do Not Adopt.

AOC appreciates that the individual who submitted these proposals understands and respects the importance of making easily accessible small game hunting opportunities available to new hunters. AOC prefers that education of local hunters to accommodate new, young and experienced hunters by hunting grouse and ptarmigan further afield is advantageous to the continuing of our hunter heritage.

Burdening the BOG with regulating who can hunt on public lands only infringes on the Common Use clause Article 8, Section 3 enshrined in Alaska's State Constitution. AOC would not like to see a proliferation of these types of proposals across the state.

Proposal #41. AOC recommendation Adopt.

AOC supports predator/prey management systems that allows hunters to harvest game under the Sustained Yield principal Article 8, Section 4 of the Alaska State Construction. Managing for one prey species is inconsistent with predator/prey management. Repealing the Douglas Island Management Area will allow for game management consistent with current statutes.

Proposals #48 through #54. AOC recommendation Do Not Adopt

AOC supports the current wolf population and harvest data estimates based on the best science available to the Department for GMU 2. The Department has a long standing record of providing adequate population and harvest data to the BOG for decades. No unrecoverable decline in wolf populations have occurred statewide under the Alaska Department of Fish & Game.

Adoption of proposals #48 through #54 by the BOG would only benefit anti-predator/prey advocates working to stop regulated wolf hunting and trapping in Alaska.

AOC thanks the board members for their time familiarizing themselves with current proposals up for deliberations in January 2023.

Rod Arno

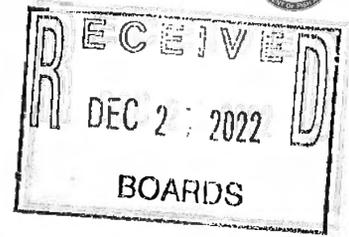
Public Policy Director

Alaska Outdoor Council

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



ATTN: BOG COMMENTS

December 22, 2022

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

Dear Chairman and members of the Board:

On behalf of over 1100 members of the Alaska Trapper's Association, we wish to share our opinions on several proposals you will be considering at your January Southeast Region meeting in Ketchikan.

**PROPOSAL #6**

ATA supports the standardization of seasons between adjacent units and the expansion of harvest opportunity but, for the sake of primeness, defers to the expertise of the Department and the discretion of the Board regarding the dates.

**PROPOSAL #7**

Again, ATA supports the standardization of seasons between adjacent units and the expansion of harvest opportunity but, for the sake of primeness, defers to the expertise of the Department and the discretion of the Board regarding the dates.

**PROPOSAL #8**

Since the resource will support the additional harvest opportunity and, since primeness would not be an issue, ATA supports this proposal.

**PRPOSAL #9**

ATA supports the standardization of seasons between adjacent units as well as the expanded harvest opportunity.



**PROPOSAL #27**

The ATA opposes this type of regulation. It would unnecessarily eliminate a lot of legitimate opportunity and would be difficult to enforce. It is normally a small number of people in a small number of locations that cause a problem. Rather than imposing an onerous, excessive closure, educational and signage efforts should be implemented to avert problems in public use areas.

**PROPOSAL #41**

Since the Douglas Island Management Area is neither unique nor isolated, and requires no special protection, ATA supports this proposal to eliminate it.

**PROPOSAL #46**

ATA sees no reason why the wolf hunting season in Unit 2 cannot be extended as long as trapping continues to be the primary method of harvest.

**PROPOSALS #45 and #s 47 – 54**

All of these proposals are for the simple purpose of further restricting the harvest of wolves in Unit 2. They would over-complicate wolf management and would set up a system that could forever be challenged with litigation. Wolf management in Unit 2 is really no different than game management statewide. ADF&G and the Board of Game should manage Unit 2 wolves in a manner which is consistent with other management around the state.

ATA appreciates the opportunity to participate in the regulatory process.

Sincerely,

A handwritten signature in cursive script that reads "Randy Zarnke".

Randy Zarnke, president



**Submitted by:** Alaska Wildlife Alliance

**Community of Residence:** Anchorage, AK

**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 portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 3:** Oppose

**Proposal 4:** Oppose

**Proposal 23:** Oppose

**Proposal 27:** Support

**Proposal 33:** Oppose

**Proposal 41:** Oppose

**Proposal 45:** Support

**Proposal 47:** Support

**Proposal 48:** Support

**Proposal 49:** Support

**Proposal 50:** Support

**Proposal 51:** Support

**Proposal 52:** Support

**Proposal 53:** Support

**Proposal 54:** Support

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*See attachment on the following page.*

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## Alaska Wildlife Alliance comment on Proposal 3



**PC3**

AWA is **OPPOSED** to this proposal. The data collected during sealing (skull measurements, teeth age, and sex) are the primary means for assessing whether harvest is excessive (skull measurements and teeth aging).

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## Alaska Wildlife Alliance comment Proposal 4



**PC3**

AWA is OPPOSED to this proposal.

Changing brown bear harvest from 1-in-4 to 1- in-2 is one of the ways that bear harvest has been increasingly “liberalized” in Alaska since 2012 without the safeguard protocols that Alaska Department of Fish and Game (Department) requires of formal Intensive Management (feasibility assessments, statement of objectives, and monitoring of outcomes) (Sterling Miller et al. 2017 - Trends in brown bear reduction efforts in Alaska, 1980-2017). Furthermore, brown bears are NOT increasing in Unit 1, at least in 1D. Quite the opposite in fact. According to the Department “The level of human-caused brown bear mortality in 2020 exceeded sustainable yield, and without conservation measures would result in a long-term decline in sustainable harvest opportunity. Population modeling indicates that recovering the bear population and future hunter harvest opportunity requires limiting mortality, particularly for adult female bears, for about 5 years [2021–2025]” ([2022 Brown Bear Management Plan For Game Management Unit 1D](#)).

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## Alaska Wildlife Alliance comment Proposal 23



PC3

Alaska Wildlife Alliance is OPPOSED to this proposal.

The Board previously tried to get rid of the two non-motorized hunt areas off the Denali Highway (Unit 13). There was a lot of public pushback and that effort was dropped. This proposal to introduce e-bikes is yet another way to undermine non-motorized hunting opportunities in Alaska. The whole point of designating non-motorized hunt areas is to provide hunters the opportunity of a human-powered hunt. Electric motors (at any wattage) are still motors, and make it much easier to access the backcountry for hunting than human-powered means.

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## Alaska Wildlife Alliance comment Proposal 27



PC3

Alaska Wildlife Alliance SUPPORTS this proposal.

- A setback does not shut down trapping, and we do not believe it is the intent of the author to stop trapping in this region. This proposal simply aims to provide safe recreational corridors on prominent public routes (maintained roads and established hiking trails).
- Trappers can still use these areas as an access point for trapping.
- Trappers will still have the opportunity to trap where harvestable surplus exists.
- We believe the trapper code of ethics is compatible with reasonable setbacks. For example, Code of Ethics, number 3: “Promote trapping methods that will reduce the possibility of catching non-target animals.” Presumably this means ethical trappers are *already* voluntarily trapping away from highly used areas where non-target animals (dogs) could be caught. Since this is already part of the code of ethics, a regulated setback would not burden ethical trappers who are already enacting voluntary setbacks. This regulation would only limit trappers who are not following the code of ethics and trap on/near high-use areas.

**AWA recommends the following amendment:**

Provide an opportunity for the proposal author to clarify which roads and trails they seek setbacks.

## Alaska Wildlife Alliance general comments on Proposals 45 and 47-54



**PC3**

Alaska Wildlife Alliance SUPPORTS these proposals

On behalf of our Alaska-based membership, Alaska Wildlife Alliance (AWA) submits the following comments in support of Proposal 45 and Proposals 47 through 54. The AWA proposals have been submitted to improve upon the 2019 (proposal 43) Board of Game (Board) wolf management framework implemented in Game Management Unit 2 (GMU 2). The 2019 management framework (Framework) for wolves in GMU 2, which relies exclusively on season length to control harvest, is inconsistent with sound wildlife management practices when trying to sustain a genetically distinct, vulnerable and isolated population of wolves. The implementation of the Framework resulted in an immediate unsustainable wolf harvest, a petition for listing the species as threatened or endangered, and a lawsuit by AWA to ensure the population is managed sustainably relative to the Alaska State Constitution. Furthermore, the Framework has now morphed into an ill-defined public process that frustrates trappers and hunters and continues to put the GMU 2 wolf population at risk for listing as an endangered or threatened species.

To understand the importance of why these proposals were submitted, it is essential to review recent events that demonstrate how far the Alaska Department of Fish and Game (Department) has veered from the 2019 management framework. The fall population estimate and season length scale that was outlined in the Framework has been abandoned. Subsequently, this has led to an unpredictable, convoluted and non-transparent public process to set seasons and control harvest. The current ad hoc method of setting varied season lengths to control harvest is now decided by the Department without clear disclosure to the public and without identifying what harvest levels are acceptable pre-season. This is a risky management framework to impose on such a vulnerable population. Providing transparency, by actually setting a harvest quota as done prior to 2019 (AWA Proposals 51/52/53) and establishing tighter reporting requirements (AWA Proposal 47) are minimum steps to ensuring sustainable management of this population. AWA Proposals 45, 49 and 50 provide precautionary approaches to identifying and setting appropriate population objectives until research is completed to determine a viable population objective (AWA Proposal 48). Finally, AWA Proposal 54 offers an alternative management concept the Department could explore that is based on establishing protected areas.

In October of 2022, AWA representatives attended a deer summit meeting on Prince of Wales Island (POW). The goal of the meeting was to foster an understanding and dialog among a diverse array of experts regarding the challenges of deer management on POW. Fundamentally acknowledged during the 3-day workshop was that habitat loss was the primary limiting factor for sustaining a healthy deer population. Other important factors influencing deer populations included overharvest of deer, overharvest of doe deer, climate change, wolf and bear predation, and disease. It was an amazing 3-day meeting that brought together the most knowledgeable people to candidly and respectfully discuss the diverse and challenging issues facing wildlife management on POW. It was acknowledged

that predators (wolf and bear) influence the deer populations on POW but they should not be considered the most important factor to control when trying to manage POW deer populations. Restoration of habitat, reducing future old growth timber harvest, and control of deer harvest were higher priorities.



**PC3**

In closing, the goal in submitting nine proposals is to provide the Board with a range of options to improve the wolf management program in Unit 2 and ultimately ensure the population is not listed but remains sustainable and genetically viable into the future. Another goal is to request the Board adopt more transparent methods that can provide predictability on how seasons will be set and what factors are being used by the Department to establish seasons and trigger emergency closures when warranted. We acknowledge the difficulty in estimating this wolf population and we commend the Department, partners, trappers and hunters for their continued efforts to gather data that are critical to formulating the best possible population estimates. We sincerely hope the Board adopts many of these proposals as a means to provide a transparent management framework that works effectively to sustain the unique wolves of POW and is clearly understood by the public.

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# Alaska Wildlife Alliance comment Proposal 45



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal.

## **Proposal Goal**

- Manage for a unit wide wolf population that is sustainable into the future and reduces the possibility it will be listed as threatened or endangered.
- Raise the population objective from 150-200 wolves to 250-350 wolves and raise the threshold for closing the season from 100 to 200 wolves.

## **What is the Problem**

- The current minimum population threshold of 100 wolves is very low, along with the current population objectives of 150-200 wolves.
- The Board should not have been tasked with identifying the minimum population threshold needed to maintain a genetically distinct and vulnerable population of wolves. That is the job of professional biologists that can analyze and model historic and current data.
- When the Board decided to set 100 wolves as the minimum viable population they did not include consideration of a multitude of factors like: the genetic diversity needed to sustain this isolated, genetically distinct population; genetic bottlenecking; susceptibility to rabies and disease; changes in habitat conditions due to logging/climate change, etc.
- The Department conducted no population viability analysis to support the Board's decision to set 100 wolves as the minimum acceptable level.
- At a public hearing in Prince of Wales on November 9th, 2021, the Department representative stated, that "new genetic data raises questions about genetic diversity to prevent inbreeding" in Unit 2 and that the agency was keeping the trapping season short (one month) because, "the population objective might not be genetically sustainable."
- A small residual population of 100 wolves could be feasibly extirpated or seriously compromised genetically due to inbreeding.

## **Why is the proposal important**

- Until a biological viability analysis has been completed as proposed in AWA's Proposal 48, the Board and Department should take a precautionary approach to managing the Unit 2 wolves to ensure they remain off the Threatened and Endangered species list.
- Raising the Unit 2 population objectives and minimum population objective would be a good and simple precautionary step to ensuring that the genetic diversity of the population is



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protected until more rigorous data analysis has been completed to establish these parameters.



**PC3**

- History indicates this wolf population has likely hovered around 250 -300 wolves while maintaining a harvest of 30%. Raising the population threshold and objectives is a step towards sustainable management.

# Alaska Wildlife Alliance comment Proposal 47



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

## Proposal Goal

Ensure that the risk of overharvesting Unit 2 wolves is minimized.

## What is the Problem

A shorter reporting period is needed to ensure overharvest does not occur. With a seven-day reporting period there is a much greater risk of overharvesting wolves in Unit 2.

## Potential Management Example

**7 Day Reporting Requirement:** Season opens Nov. 15 and Closes Dec 15 and trappers can record their harvest 7 days after harvest. There are 3 trappers. Department quota for the year is **20 wolves**. We understand that the State is not officially managing this population with a quota, but we assume the State has an internal harvest goal that is used to determine when the season is closed or shortened by emergency order.

Season Day	Trapper 1	Trapper 2	Trapper 3	Wolves Trapped/day	Cumulative Wolf harvest
Day 1 Nov 15	2	1	3	6	6
Day 2 Nov16	0	4	2	6	12
Day 3 Nov17	2	1	1	4	16
Day 4 Nov18	4	0	2	6	22
Day 5 Nov 19	2	2	0	4	26
Day 6 Nov20	0	0	2	2	28
Day 7 Nov 21	1	1	2	4	32
<b>Total Day 7</b>				<b>32</b>	
Harvest that could happen from Nov 22- 25	4	6	4	14 (for a 4 day period)	<b>46</b>
<b>What does the State Know based on 7 day reporting requirement</b>					
On Day 8 (Nov 22) The total reported to State as per regulation.				6 wolves reported on Day 8 (Nov 22) as only those harvested on day 1(Nov 15) need to be reported.	
On Day 9 (Nov 23) Total reported to State as per regulation.				12 total wolves now reported to State	
On Day 10 (Nov 24) Total reported to State as per regulation.				16 wolves reported total	
Day 11 (Nov 25) STATE STOPS HUNT as they know 22 wolves have been harvested Between Nov 15-18.				22 wolves reported total	

In this scenario by Day 11 (Nov 25) of the season, 22 wolves have been reported harvested and the State shuts down the season. However, in reality the Department will need to add 24 more wolves

that were harvested between Day 5 (Nov 19) – Day 11 (Nov 25) of the season that had yet to be reported. Thus the Department will realize that 46 wolves were actually harvested when they shut the season down on Day 11 (*26 wolves/230% over their quota*).



**PC3**

**2 Day (48 hr) reporting requirement:** Same harvest as above scenario

Season Day	Trapper 1	Trapper 2	Trapper 3	Wolves Trapped/day	Cumulative Total
Day 1 Nov 15	2	1	3	6	6
Day 2 Nov 16	0	4	2	6	12
Day 3 Nov 17	2	1	1	4	16
Day 4 Nov 18	4	0	2	6	22
Day 5 Nov19	2	2	0	4	26
Day 6 Nov 20	0	0	2	2	28
Day 7 Nov 21	1	1	2	4	32
Total Day 7				26	
On Day 3 (Nov 17) Total reported to State as per regulation.				6 total wolves reported on Day 3 (Nov 17) as only those harvested on day 1 (Nov 15) need to be reported.	
On Day 4 (Nov 18) Total reported to State as per regulation.				12 (add in 6 from day 2 harvest) etc.	
On Day 5 (Nov 19) Total reported to State as per regulation.				16	
On Day 6 (Nov 20) Total reported to State as per regulation.				22 – State STOPS HARVEST	

In this scenario the Department knows by Day 6 (Nov 20) of the season they have harvested 22 wolves and stop the Season. However, the Department would realize an additional 6 wolves were harvested from Nov 19-20 (Days 5-6). Thus, they would stop the harvest season with 28 wolves harvest (*8 wolves/125% over the quota*).

**Why is the proposal important**

- As indicated by the examples above, the Department can be much more effective at monitoring harvest and meeting a potential harvest quota by implementing a shorter reporting requirement. The example clearly shows that a 7-day reporting requirement allows for a much greater risk to overharvest (over harvest of 28 wolves from their objective of 20) than a 2 day reporting requirement (over harvest of 8 wolves from their objective quota of 20).
- Unit 1D has a 48 hour reporting requirement for wolves indicating this is feasible and the Department has a system in place that can work



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- The number of individuals required to follow this simple reporting requirement is small
  - We suggest a cell phone call to a recorded Department line within 48 hours of recovery – a minimal burden.



**PC3**

# Alaska Wildlife Alliance comment Proposal 48



PC3

Alaska Wildlife Alliance SUPPORTS this proposal

## **Proposal Goal**

Establish a Scientifically based minimum population objective for Unit 2 wolves

## **What is the Problem**

- The Board's calculation and adoption of a spring population objective between 135-180 wolves, and setting 100 wolves as the lowest acceptable limit of wolves for Unit 2, is not based on a scientific analysis.
- The Board is not the appropriate group to develop the minimum viable population objectives for this vulnerable population. The Department has access to the technical experts that should formulate the population objectives and identify the minimum viable population objective.
- These population objectives pose a credible threat to the sustainability of this vulnerable and genetically unique population that is under review to determine if it should be listed as a threatened or endangered species.

## **Potential Management Example**

- The Board of Game's main role is to conserve and develop Alaska's wildlife resources. This population of wolves has been petitioned for ESA listing multiple times. It is also an island population, which is more vulnerable to overharvest and inbreeding. We respect the Board's role in determining allocative issues, but the minimum viable population of these wolves is not an allocative question, or one that should be made on feelings or public opinion. It is one that must be determined by scientific and TEK review. If the agency is unwilling to provide a recommendation, we encourage the Board to ask questions, like "what is the minimum number of wolves that could ensure enough genetic diversity for a healthy population?" ; "what percentage of wolves could be taken from this population each year to maintain that genetic diversity?" ; "What other factors, aside from human harvest, contribute to wolf mortality?" to determine a biologically responsible minimum population objective.
- The Board has a depth of knowledge about a diversity of wildlife populations and issues but they are not biometricians capable of synthesizing and modeling years of Unit 2 wolf population data to determine the minimum viable population and appropriate population objectives for Unit 2 wolves.

## **Why is the proposal important**

- In conjunction with AWA Proposal 45, which requests a change to the wolf population objectives for Unit 2, this proposal would allow the Department to initiate the steps to set up a

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research project to determine the appropriate minimum viable population goal.



**PC3**

- At a public hearing in Prince of Wales on November 9th, 2021, the Department indicated “new genetic data raises questions about genetic diversity to prevent inbreeding” in Unit 2 and that the agency was keeping the trapping season short (one month) because, “the population objective might not be genetically sustainable.”
- Time is of the essence to take immediate steps to ensure a viable and sustainable wolf population is protected in Unit 2. The consequences are high given the species could be listed as threatened and endangered.

# Alaska Wildlife Alliance comment Proposal 49



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

## **Proposal Goal**

To develop a conservative and precautionary population estimate to ensure a sustainable wolf population is maintained in Unit 2.

## **What is the Problem**

Current population estimates have been extremely variable and their accuracy questionable.

## **Real Examples of how this would adjust population estimates**

- In 2020 the pre-season population estimate was 386 with 95% confidence limits of (321-472). If this proposal was adopted, the pre-season population estimate the Department would have adopted to set their season length would have been 321, which is 56 fewer than the point estimate of 386.
- In 2021 the pre-season population estimate was 286 with 95% confidence limits of (216-332). If this proposal was adopted, the pre-season population estimate the Department would have adopted to set their season length would have been 216, which is 52 fewer than the point estimate of 268.

## **Why is the proposal important**

- This population is very vulnerable and currently being evaluated by the U. S. Fish and Wildlife Service to determine if it will be listed as a threatened or endangered species. This is the third time this population has been submitted for listing. Hence, it is appropriate to take a very precautionary and conservative approach when identifying the initial population size that will form the bases for establishing harvest seasons.
- The Department is still refining their population estimation models and techniques. There have been noticeable swings in population estimates and the confidence intervals surrounding the estimates over the past 4 years. As the Department, their partners, and harvesters continue to gather important population data, the stability of estimates will hopefully improve.
- Until the Department refines their models, sample collection standards, etc. it is appropriate to be precautionary on identifying the baseline population number from which annual management will be based.

# Alaska Wildlife Alliance comment Proposal 50



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

## **Proposal Goal**

To establish the best pre-season wolf population estimate so an accurate wolf harvest quota can be established annually

## **What is the problem**

- The current pre-season population estimate calculated by the Department overestimates the wolf population because it assumes that all habitat in Unit 2 has equal ability to support wolves.
- Most outer islands in Unit 2 likely have no wolves as they are not accessible by wolves or have no food to support wolves. They likely cannot support the same density of wolves as those found on Prince of Wales Island.
- Extrapolating wolf density estimates from the most productive wolf habitat (POW = 60% of Unit 2) to the remaining 40% of the Unit, that are primarily islands, is problematic and results in an inflated population estimate for Unit 2. Estimates of the wolf population for Unit 2 are based on samples almost exclusively from POW (99% of samples come from POW). There is little sample data (<1%) from islands to know if they are occupied and at what density.

## **Example Scenario for Unit 2**

- Assuming all lands in Unit 2 can support wolves equally:
  - The State estimates there is 1 wolf per 1,000 acres in Unit 2 based on their research.
  - Entire Unit 2 lands = 500,000 acres
  - Pre-season population estimate for GMU 2 is 500 wolves (500,000 acres/1,000 acres per wolf = 500 wolves).
- Assuming all lands in Unit 2 cannot support wolves equally and only POW lands are suitable wolf habitat.
  - The state estimates there is 1 wolf per 1,000 acres in Unit 2.
  - Only POW (300,000 acres) is suitable wolf habitat
  - Pre-season population estimate for GMU 2 is 300 wolves (300,000 acres/ 1,000 acres per wolf = 300 wolves).
- Assuming that all the islands in Unit 2 can support wolves automatically results in a situation that overestimates the pre-season population (in this example by 200 wolves) and thus creates the immediate potential for an overharvest of the number of wolves available for harvest.

- Given the vulnerable state of the Unit 2 wolves it makes sense to take a more conservative approach to estimating the pre-season population.
- For another example, we would not extrapolate the average population density in Anchorage to Glennallen to determine Glennallen's population.



**PC3**

### **Why this Proposal is Important**

- This proposal corrects the potential to overestimate the pre-season wolf population by limiting the pre-season population estimate to only lands that can actually support wolves.
- Not all lands in Unit 2 support wolves equally, and creating a population estimate that assumes otherwise is inappropriate and puts the Unit 2 wolves of overharvest.
- The Department has very limited data from harvest records to justify outer islands are occupied by wolves in the same density at Prince of Wales. They have no data within GMU 2 that justifies their assumption that wolf densities on the outer islands are similar to that on Prince of Wales.

# Alaska Wildlife Alliance comment Proposal 51



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

## **Proposal Goal**

Provide a transparent wolf harvest framework in GMU 2 that will ensure a sustainable wolf population and provide harvesters with a predictable harvest quota and reasonable reporting requirements.

## **What is the problem**

- The current management framework adopted by the Board of Game (Board) in 2019 cannot adequately and predictably control wolf harvest as it relies only on controlling season length to control the number of wolves harvested. Because of this, the Alaska Department of Fish and Game (Department) has modified its approach to setting the wolf season length since 2019 to shorten seasons based on internal discussions and facts that are announced in the fall when they establish the final season length. The Department is concerned with potential overharvest and subsequently is not following the 2019 Framework passed by the Board.
- Under the current 2019 Framework there is no harvest quota/limit established for the pre-season and thus hunters/trappers have no idea how many wolves they can harvest in the season. Hunters and trappers are provided a set season length that is announced early fall, based on the recent preseason population estimate and internal Department discussions.
- The Department has virtually no idea how many wolves might be trapped per season regardless of the season length they set. The number harvested in a season will depend on weather, number of trappers and number of hunters pursuing wolves. The State does not require wolf trappers or hunters to pre-register so they have no idea of the effort that may occur during that season.
- There is no Quota (limit) “publicly announced” on numbers of wolves that trappers can take although they are required to call in a wolf harvest within 7 days and seal the animal within 15 days. Hunters can take 5 wolves per season with similar call in and sealing reporting requirements as trappers.
- The Department is not following the 2019 framework that is supposed to set a season length based on the pre-season population. Why? The Department knows the current framework does not work to maintain a sustainable wolf population and thus have adopted an internal management scheme that is based on an unknown framework. The AWA is thankful to see the more conservative seasons, but greater transparency is needed for both trappers and non-trappers.

## **Example Scenario for Unit 2**

- In 2019 the Board adopted a new Management scheme (Proposal 43) for wolves in Unit 2 and established a fall Unit 2 wolf population objective of 150–200 wolves.

- The new framework relies on season length based on pre-season population estimates to determine the length of the season.
  - If the population is 100 or below = no season
  - Population of 100-149 = up to 6 week season;
  - Population 150- 200 = up to 8 week season,
  - Population >200 = up to 4 months.
- The framework does not use in-season harvest data nor does it set a harvest quota like the old framework.
- 2019 Season: The pre-season population estimate was 187 wolves (2018 fall estimate). When the population estimate is above 150 the 2019 framework allows for up to an 8 week season and thus an 8 week season was allowed. An unsustainable harvest of 165 wolves happened in 2019.
- Season 2020: The pre-season population estimate was 316 (fall 2019 estimate). The trap season was set conservatively from Nov. 15- Dec 5 due to the 2019 season unsustainable harvest. Hunting was allowed Dec 1-5. Technically the 2019 management framework would have allowed for up to a 4 month season. 68 wolves were harvested in 2020.
- Season 2021: The pre-season population estimate was 386 (fall 2020 estimate). Technically this would allow for up to a 4 month season based on the original 2019 framework. However the State wanted to take a more conservative approach based on the uncertainty of former population estimates and set the season from Nov 15- Dec 15. 66 Wolves were harvested.
- Season 2022. The pre-season population estimate was 268 (fall 2021 estimate). Based on the original framework this would have permitted up to a 4 month season. However, the State announced a one month trapping season from Nov 15-Dec 15. The number of wolves harvested has not been announced.



### **Why this Proposal is Important**

- The current management framework adopted by the Board in 2019 is not being followed because it does not work. The Department has discretion to set a season “up to” the maximum amount, but the factors going into their determination are a complete mystery.
- There is not a transparent process for the trappers, hunters or public to follow- the Department is managing based on internal discussions and data.
- AWA Proposal 51 speaks to the management framework only, and adopts the same method that was used to manage wolves in Unit 2 from 1997 through 2018. Returning to that method, with the benefit of annual population estimates, a population objective, more convenient in-season reporting requirements, and a transparent public process represents a significant improvement over the current system.
- This proposal provides a path forward to a more transparent method of informing how wolf management can be improved by setting quotas based on the best available population estimates. It also ensures data is reported in a timely manner in-season so the quota may not



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be exceeded, or exceeded to a minimal extent. This provides conservative but transparent forward framework to manage a very vulnerable species with hopes of keeping it off the endangered species lists.



**PC3**

## Alaska Wildlife Alliance comment Proposal 52



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal.

### **Proposal Goal**

A harvest quota between 20% - 35% of the estimated population of wolves in Unit 2 is established by the Board of Game (Board) based on conservation concerns.

### **What is the problem**

- The Board and Alaska Department of Fish and Game (Department) have not established what percentage of the annual Unit 2 wolf population can be harvested each year so that the population remains sustainable into the future.
- Without developing a standard sustainable harvest level, the population may be overharvested leading to a population that is no longer sustainable and vulnerable to becoming threatened or endangered.
- The State has the data that has established the potential percentage of mortality that the wolf population can sustain which is 30- 35%. We recommend 20-35% until population models and harvest management is stabilized.

### **Example Scenario for Unit 2**

- If, for example, the Department determines the pre-season population estimate is 350 wolves in Unit 2 and hypothetically the Department population objective is to maintain a minimum 200 wolves to ensure a sustainable population. Thus in total no more than 150 animals should be removed (harvest (legal/illegal and natural mortality) from the population.
- If there is a standard range of harvest mortality established like 20-35% this would equate to human harvest allowed of between 70-122 wolves. Leaving a sustainable estimated population of 228 (350-122) to 280 (350- 70) animals. Given there is illegal harvest and natural mortality that will occur during the year the population post season and into the spring breeding period is likely lower but still within an acceptable limit of likely 200 animals entering the next harvest season.

### **Why this Proposal is Important**

- This Proposal provides flexibility for the Department in setting harvest quotas and predictability for the trappers and hunters on how quotas will be set each year. Transparency in the process is increased for all interested parties while ensuring a sustainable future population of wolves continues to reside in Unit 2.
- When the preseason population estimate is large enough to allow for a harvest of wolves providing a harvest quota range of 20-35% of the population allows the Department to be



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conservative (use a 20% quota) if the pre-season estimate is near the population objective or to be a bit more liberal (35%) if there appears to be a healthier population.

- This proposal links with Proposal 53 that requests that mortality factors beyond harvest are factored into the equation to create an overall more transparent, conservative, and predictable management framework to wolf management in Unit 2.



# Alaska Wildlife Alliance comment Proposal 53



**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

## **Proposal Goal**

An estimated unreported mortality rate of 35-50% shall be utilized in establishing an annual harvest quota of wolves in Unit 2 to ensure there is a continued sustainable wolf population in Unit 2.

## **What is the Problem**

- The current methodology ignores mortality resulting from natural and illegal harvest despite research indicating such mortality is happening.
- Ignoring that other mortality is happening beyond legal harvest results in less accurate population estimates and ultimately more instability when trying to maintain a sustainable wolf population objective.
- The legal take of wolves in Unit 2 underestimates the total mortality in the wolf population, and thus leaves the Department vulnerable to overharvesting a genetically distinct, isolated wolf population. Wolves die from any number of causes, including legal harvest by trapping and hunting, wounding loss, illegal harvest (wolves killed but not reported or sealed per regulations), and natural mortality.

## **Management Example**

Preseason population estimate is 285 wolves. The Board's sustainable post- harvest season Population Objective is 200 wolves.

- Current method, if the Department sets an actual harvest quota as recommended by AWA and the Department only accounts for harvest mortality:
  - Department allows for 35% (harvest quota) of 285 animals to be harvested  $.35 \times 285 = 100$  animal harvest allowed. At the end of the season, the harvest quota of 100 animals is met and there are now 185 animals ( $285-100=185$ ). This is below the objective sustainable population the Department wanted of 200 and they have yet to account for any other mortality that may happen in winter and next year. Thus, the population is starting below the sustainable population objective of 200 going into the winter and breeding season just based on legal harvest. IF additional mortality (illegal and natural) of 35% happens, another 65 animals are lost ( $.35 \times 185=65$ ;  $185-65= 120$ ). There are now only 120 + animals that may be available preseason the following year. New pups will be born but may not allow the population to rebound to the population objective of 200 animals.
- A better approach:
  - The Department gets a preseason fall estimate of 285 wolves. They account before setting the legal harvest quota that there may be a 35 % mortality that may occur due to illegal harvest and natural mortality going into the next year = 100 animals. Subsequently the next year's population may already be as low as 185 ( $285-100$ ) animals just based on non-legal harvest and natural mortality. They know there will likely be some new pups born but accounting for the non-harvest mortality up

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front they may opt to not have a season or they may opt to have a very low harvest quota to ensure they keep the population at their 200 objective level.



**PC3**

### **Why is the proposal important**

- The Department argues that the preseason population estimate they provide each year accounts for all mortality. This assumption is flawed in the sense that we know how many animals there are in the preseason (at one point in time), but when you set your fall harvest quota you do not account for other mortality that will also influence the breeding population and ultimately your next preseason population estimate.
- The Department knows there are both new pups and other mortality happening in a population. Why would the Department not account for other mortality to create a better management framework and overall model? The research has been done and there are estimates of non-harvest mortality that could be used to improve the management of this population.
- This proposal echoes a recommendation made by the Interagency Wolf Technical Committee that recommends that harvest quotas continue to be adjusted annually for unreported kill.

## Alaska Wildlife Alliance comment Proposal 54



PC3

Alaska Wildlife Alliance SUPPORTS this proposal

### **Proposal Goal**

- Provide a potential alternative spatial methodology for managing wolves by using area closures
- Task the Department and the U.S. Forest Service with identifying 2/3rds of Unit 2 land area for protected status for wolves. Work to ensure the protected areas are large enough to be buffered from trapping pressure and have suitable habitat resources to maintain wolf packs.

### **What is the Problem**

The Board and the Department have wrestled with creating a sustainable wolf management scheme in this Unit for years, so we offer a different approach for consideration. This system may sustainably manage wolves in GMU 2 and maintain the genetic diversity

### **Example Scenario**

If the wolf population can sustain ~30% annual mortality, then open ~ 1/3rd of the unit to wolf trapping each year and close the remainder. The areas subject to closure, and those that are open, could be established permanently by the Board of Game, or rotated on a long-term schedule.

### **Why is the proposal important**

- This proposal simply provides another mechanism for the Department to evaluate for the management of unit 2 wolves.
- The proposal relies on spatial closure to control potential harvest and increase the ability to maximize genetic diversity in the population that is currently showing signs of stress.
- Partial closures of game units have proved effective in protecting wildlife populations in AK and elsewhere.



**Submitted by:** Alaskan Bowhunters Association

**Community of Residence:** Anchorage, 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 portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 16:** Support

**Proposal 24:** Support

**Proposal 30:** Support

**Proposal 19:** Oppose

**Proposal 29:** Support

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*See attachment on the following page.*



# **The Alaskan Bowhunters Association**

## **Comments to the Alaska Board of Game**

### **Southeast Region**

**Ketchikan, AK. January 20-24, 2023**

Submitted January 6, 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 16 - *SUPPORT***

Proposal 16 asks to lengthen an already existing archery only hunt within the Petersburg Management Area with the season opening August 1<sup>st</sup> instead of the existing opener of October 1<sup>st</sup>. This earlier season opening mirrors several other deer seasons in the state. The bag limit for this hunt is currently 2 bucks and this proposal would not change that. Allowing for an earlier season opening in this area would allow more bowhunting opportunity for pursuing early season deer in the alpine of the management area. This proposal would benefit all bowhunters who choose to utilize this hunt but would be of most benefit to local residents of Petersburg who choose to enjoy chasing velvet bucks with a bow. This area is already limited to bow and arrow only with a bag limit of two buck deer and the only change this proposal would bring is added days of season to hunt. This hunt is already of extremely low impact to the deer population, and we do not believe that the proposed lengthening of the season would change that. For these reasons, we ask that you vote **To Adopt** proposal 16.

### **Proposal 19 - *OPPOSE***

Proposal 19 calls for cutting the Etolin Island archery elk season (DE318) from one month to two weeks while also creating an any weapon drawing permit hunt in the two weeks taken away from the archery season. This proposal also would advocate for cutting 35 drawing permit hunts from October which brings less revenue to The Alaska Department of Fish and Game (ADFG) and allows for less opportunity to apply and draw an Etolin Island elk permit. If adopted, this proposal would cause the number of drawing permits for the month of September to go from 25 to 50 with half of that number being available to firearm hunters during the peak of the rut.



There are already two existing any weapon drawing permit elk hunts on Etolin during the month of October (DE321 & DE323) and a registration hunt (RE325) in November. Harvest Data shows that currently, the any weapon hunts yield over 50% more harvest than the additional archery hunt. The beauty of the current regulation is that it allows a longer season with more hunting opportunity in September due to the low impact of archery equipment. This proposal would take away from that opportunity while also potentially having a negative effect on the elk herd of the Island. The Ketchikan Advisory Committee cites under utilization of the archery hunt as a reason for this proposal, but they are using harvest rates to determine utilization rather than hunter days and effort. If adopted, this proposal would also allow potentially twenty-five firearm hunters to hunt elk during the peak of the rut. Those choosing to use a firearm to hunt elk already have the choice between DE321 and DE323 to apply for and DE321 already affords them with hunting during a portion of the rut. If those advocating for this proposal have such a high desire to hunt in September, they already have the opportunity to apply for DE318 and hunt with archery equipment. ADFG opposes this proposal and has very detailed comments as to the negatives of adopting this it. We urge the Board **NOT** to adopt proposal 19 which would lead to less bowhunting opportunity and less general hunting opportunity overall.

## **Proposal 24 - *SUPPORT***

Proposal 24 advocates for opening a registration archery only hunt for black bear in the Petersburg Creek drainages of Kupreanof Island. There would only be up to 10 permits available for this hunt which would only be available in person at the Petersburg ADF&G office. This permit would only be available to residents of Alaska and would have a bag limit of one bear per regulatory year. The season for this hunt would be from April 15<sup>th</sup> – June 30<sup>th</sup> and these dates were purposely chosen by the proposer in order to be the least likely time for any user conflicts in the area. Proposal 24 would afford residents of the Petersburg area a great opportunity to pursue black bear locally with archery equipment. Again, this would be a spring only hunt in order to minimize conflicts between seasonal user groups. We ask the Board to strongly consider **SUPPORTING** the adoption of proposal 24.



## Proposal 29 - **SUPPORT**

Proposal 29 would expand the hunt area of the RG014 archery goat hunt in Unit 1C. This would afford more hunting opportunity to bowhunters and would not cause any population concerns according to comments submitted by ADFG. The proposed expansion of the hunt area should not negatively affect goat populations in the area as RG014 has a strict reporting requirement and ADFG could close the hunt by emergency order if needed. We ask the Board to vote in favor of added opportunity by **SUPPORTING** the adoption of this proposal.

## Proposal 30 - **SUPPORT**

Proposal 30 would open a fall archery goat hunt in Unit 1C, the southern end of the Chilkat Peninsula from August 1<sup>st</sup> – September 1<sup>st</sup>. If adopted, this hunt would afford more hunting opportunity while also having a low impact due to the limitations of archery equipment. According to ADFG, there are no biological concerns. We ask the board to consider **SUPPORTING** the adoption of this proposal thereby adding additional opportunity for bowhunters with no negative impact.

Respectfully,

Mike Harris - Legislative Vice President, Alaskan Bowhunters Association

**Submitted by:** Joseph Anselm

**Community of Residence:** Sitka, Alaska, 99835

**Comment:**

I propose that we leave the bag limit in Unit 4 alone, I've lived in Unit 4 my whole life and have been hunting since I was 11 years old in 1968 and all of a sudden people who do NOT live and hunt in Unit 4 want to lower our bag limits? Hogwash....

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

**Proposal 10:** Oppose

**Proposal 11:** Oppose

**Proposal 21:** Oppose

**Submitted by:** Karl Ashenbrenner

**Community of Residence:** Juneau

**Comment:**

Having lived in Juneau my entire life, hunting Douglas Is. for decades (since 1970) the idea to protect wolves on the island is appalling considering what they are doing to the deer population the last decade on Douglas. I am also against having a 6 deer limit, the 4 deer limit worked great with 6 deer being available to rural residents who rely more on venison for their dietary use.

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

**Proposal 10:** Support

**Proposal 11:** Support

**Proposal 12:** Support

**Proposal 13:** Support

**Proposal 14:** Support

**Proposal 21:** Support

**Proposal 36:** Support with Amendment

**Proposal 37:** Support

**Submitted by:** Karl Ashenbrenner

**Community of Residence:** Juneau

**Comment:**

i support the idea of reducing the deer bag limit to 4 from 6 deer. The bag limit was 4 for many many years and was just fine. As far as reducing the bag limit on sooty grouse from 5 to 3, in my opinion there is not enough pressure to justify the reduction.

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

**Proposal 1:** Oppose

**Proposal 2:** Oppose

**Proposal 3:** Oppose

**Proposal 4:** Oppose

**Proposal 5:** Oppose

**Proposal 6:** Oppose

**Proposal 7:** Oppose

**Proposal 8:** Oppose

**Proposal 9:** Oppose

**Proposal 10:** Oppose

**Proposal 11:** Oppose

**Proposal 12:** Oppose

**Proposal 13:** Oppose

**Proposal 14:** Oppose

**Proposal 15:** Oppose

**Proposal 16:** Oppose

**Proposal 17:** Oppose

**Proposal 18:** Oppose

**Proposal 19:** Oppose

**Proposal 20:** Oppose

**Proposal 21:** Oppose

**Proposal 22:** Oppose

**Proposal 23:** Oppose

**Proposal 24:** Oppose

**Proposal 25:** Oppose

**Proposal 26:** Oppose

**Proposal 27:** Oppose

**Proposal 28:** Oppose

**Proposal 29:** Oppose

**Proposal 30:** Oppose

**Proposal 31:** Oppose

**Proposal 32:** Oppose

**Proposal 33:** Oppose

**Proposal 34:** Oppose

**Proposal 35:** Oppose

**Proposal 36:** Oppose

**Proposal 37:** Oppose  
**Proposal 38:** Oppose  
**Proposal 39:** Oppose  
**Proposal 40:** Oppose  
**Proposal 41:** Oppose

**Proposal 42:** Oppose  
**Proposal 43:** Oppose  
**Proposal 44:** Oppose  
**Proposal 45:** Oppose  
**Proposal 46:** Oppose

**Proposal 47:** Oppose  
**Proposal 48:** Oppose  
**Proposal 49:** Oppose  
**Proposal 50:** Oppose  
**Proposal 51:** Oppose

**Proposal 52:** Oppose  
**Proposal 53:** Oppose  
**Proposal 54:** Oppose



**PC7**

**Submitted by:** Gwen Baluss

**Community of Residence:** Juneau, 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 portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 1:** Support  
**Proposal 2:** Support  
**Proposal 3:** Oppose  
**Proposal 5:** Oppose  
**Proposal 6:** Oppose  
**Proposal 7:** Oppose  
**Proposal 8:** Oppose  
**Proposal 9:** Oppose  
**Proposal 10:** Support  
**Proposal 11:** Support  
**Proposal 12:** Oppose  
**Proposal 13:** Oppose  
**Proposal 14:** Oppose  
**Proposal 15:** Support

**Proposal 16:** Support  
**Proposal 17:** Support  
**Proposal 18:** Support  
**Proposal 19:** Support  
**Proposal 20:** Support  
**Proposal 21:** Support  
**Proposal 22:** Support  
**Proposal 23:** Support  
**Proposal 26:** Support  
**Proposal 27:** Support  
**Proposal 28:** Support  
**Proposal 29:** Oppose  
**Proposal 30:** Oppose  
**Proposal 31:** Oppose

**Proposal 32:** Support  
**Proposal 33:** Support  
**Proposal 34:** Oppose  
**Proposal 35:** Oppose  
**Proposal 36:** Support  
**Proposal 37:** Support  
**Proposal 38:** Oppose  
**Proposal 39:** Support  
**Proposal 42:** Support  
**Proposal 43:** Support  
**Proposal 44:** Support  
**Proposal 48:** Support

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*See attachment on the following page.*



January 6, 2023

Dear Alaska Board of Game,

I would like to register my support for PROPOSAL 36 (5 AAC 85.065. Hunting seasons and bag limits for small game. Reduce the bag limit for grouse for drainages that cross the Juneau-Douglas Road system in Unit 1C as follows: Reduce the grouse bag limit to three per day for the drainages that cross the Juneau-Douglas Road System. If anything, it may be prudent to reduce limits even further.

Sooty Grouse is recognized by Boreal Partners in Flight, the primary working group for experts on landbird populations in Alaska, as an important stewardship species, particularly for Southeast Alaska, with an estimated 30% of the continental population in Alaska. (<https://www.usgs.gov/centers/alaska-science-center/science/boreal-partners-flight>)

There are concerns that Sooty Grouse have declined across their range: according to the North American Breeding Bird Survey (<https://www.mbr-pwrc.usgs.gov/bbs/spec15.html>), populations declined by about 1.8% per year between 1968 and 2015, resulting in a cumulative loss of 57% over that period.

These concerns have landed Sooty Grouse on the Audubon Alaska Watchlist ([https://ak.audubon.org/sites/default/files/2017\\_akwatchlist\\_final\\_panels\\_highres.pdf](https://ak.audubon.org/sites/default/files/2017_akwatchlist_final_panels_highres.pdf)).

While hunting is not implicated in grouse decline, the increasing scarcity of this species requires responsible and informed management.

As an avid bird-watcher who has been in Juneau for over 20 years, with training in estimation of bird distance and density, I suspect that local grouse densities in the accessible areas around Juneau likely cannot support a level of harvest in the current regulations should the popularity of grouse hunting increase.

I suggest taking a close look at the spring grouse acoustic surveys that have been conducted by ADF&G, perhaps requesting analysis as needed, for further insight into both the density and trends within Juneau and other communities in Alaska when setting realistic bag limits. ([http://www.adfg.alaska.gov/static/research/programs/smallgame/pdfs/carroll\\_merizon\\_status\\_grouse\\_ptarmigan\\_hare\\_alaska\\_2019\\_2020.pdf](http://www.adfg.alaska.gov/static/research/programs/smallgame/pdfs/carroll_merizon_status_grouse_ptarmigan_hare_alaska_2019_2020.pdf))

I also support PROPOSAL 37 (5 AAC 85.065. Hunting seasons and bag limits for small game. Reduce the bag limit for ptarmigan for drainages that cross the Juneau Douglas Road system in Unit 1C as follows: Reduce ptarmigan bag limit to five per day for the drainages that cross the Juneau-Douglas Road System.)

Like the Sooty Grouse, Boreal Partners in Flight recognizes that Rock and Willow Ptarmigan and important stewardship species in Southcoastal Alaska. Ptarmigan declines have not been noted to the same extent as for Sooty Grouse, but this may be a function of little monitoring across much of these species' range. As climate change reduces habitat for these cold-adapted species, Alaska may continue to grow in importance as refugia habitat.

I agree with the proposer Mr. Robertson that "the current regulation of 20 birds per day gives the illusion that the species is extremely bountiful". There is not local monitoring data to support this



PC7

assumption. In fact, I think that limiting the take to 5 birds per day would still give the impression of abundance that may not be supported by data, and that perhaps the number should be lower.

Rock Ptarmigan form flocks in the late fall, making them potentially vulnerable to having a significant portion of the local population being decimated by a single hunter.

Thank you for your consideration.

Sincerely,

*Gwen Baluss*

Gwen Baluss



**Submitted by:** Travis Bangs

**Community of Residence:** Wrangell alaska

**Comment:**

Deer are being displaced by elk. Prop 17/18

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

**Proposal 17:** Support

**Proposal 18:** Support



**Submitted by:** Bryan Barrett

**Community of Residence:** Juneau, Alaska

**Comment:**

No comments

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

**Proposal 1:** Oppose

**Proposal 14:** Support

**Proposal 36:** Support

**Proposal 48:** Oppose

**Proposal 2:** Oppose

**Proposal 21:** Oppose

**Proposal 37:** Support

**Proposal 49:** Oppose

**Proposal 3:** Support

**Proposal 28:** Support

**Proposal 38:** Support

**Proposal 50:** Oppose

**Proposal 4:** Support

**Proposal 29:** Support

**Proposal 39:** Support

**Proposal 51:** Oppose

**Proposal 10:** Oppose

**Proposal 30:** Support

**Proposal 40:** Support

**Proposal 52:** Oppose

**Proposal 11:** Oppose

**Proposal 31:** Support

**Proposal 41:** Support

**Proposal 53:** Oppose

**Proposal 12:** Support

**Proposal 34:** Support

**Proposal 46:** Support

**Proposal 54:** Oppose

**Proposal 13:** Support

**Proposal 35:** Support

**Proposal 47:** Oppose



**Submitted by:** Megan Bauman

**Community of Residence:** Juneau, AK

**Comment:**

PROPOSAL 10: OPPOSED

Based upon ADFG studies, the deer population in Unit 4 is currently at, or near, carrying capacity. This puts the deer population at high risk of a population crash from a hard winter (as seen in 2006/2007), which could happen in any year. The best use of resources for both deer & people (as well as serving as the best cushion for the deer) is to keep the bag limit at 6. This will help reduce pressure & competition among the deer for resources, & will hopefully help reduce the severity of impact on the population when the next hard winter happens (due to too many deer & not enough resources). I am a Juneau resident who solely hunts Unit 4 & in the last 5 years have not encountered any “competition” issues either from federally qualified hunters or non-federally qualified hunters. In my observations & conversations with Unit 4 residents, the limiting factor appears to be more of not dedicating sufficient time and/or effort to hunting. As a Juneau resident, I dedicate 10 days of vacation time to hunt Unit 4 annually and there is an enormous amount of deer there if you’re willing to put in the effort.

PROPSOAL 11: OPPOSED

Based upon ADFG studies, the deer population in Unit 4 is currently at, or near, carrying capacity. This situation puts the deer population at high risk of a population crash from a hard winter (as seen in 2006/2007), which could happen in any year. The best use of resources for both deer & people (as well as serving as the best cushion for the deer) is to keep the bag limit at 6. This will help reduce pressure & competition among the deer for resources, & will hopefully help reduce the severity of impact on the deer population when the next hard winter happens (due to too many deer & not enough resources). In addition, this proposal is worded in a way that makes it sound like bag limits are permanent, which is patently untrue. ADFG bases annual bag limits off of their regular assessment of population trends; emergency closures are an additional tool they use to protect populations mid-season. So for years when the population is at carrying capacity, the limit should be 6, for years when the population isn't as high it should be less. In regards to the proposer's opinion about 4 deer being sufficient to feed a family, that has no basis on proper wildlife management tactics (which are based upon population and environmental factors). Deer meat also keeps well for years (if packaged properly), for years when populations are high, a bag limit at 6 will allow hunters to have a small cushion for the following year should the hunter be unable to hunt for unforeseen reasons or a hard winter happens & hunting is rightfully shut down. While populations are at carrying capacity, a 6 bag limit will also help ensure those deer killed are put to good use vs. having a high number of deer die via winter kill (which provides much less "value", as they will most likely only be consumed by birds or small game).

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

**Proposal 10:** Oppose  
**Proposal 11:** Oppose

**Proposal 21:** Oppose  
**Proposal 36:** Oppose

**Proposal 37:** Oppose

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**Submitted by:** Megan Bauman

**Community of Residence:** Juneau, AK

**Comment:**

I mistakenly missed addressing the following proposals in my earlier submission (radial buttons not duplicated):

**PROPOSAL 13: SUPPORT**

As a regular hunter in north east Chichagof, I have grown increasingly uncomfortable with the large and growing number of brown bears and increased interactions that I have with them. Allowing a controlled and conservative thinning of the population would be a great benefit to both the bears and people.

**PROPOSAL 14: SUPPORT**

As a regular hunter in north east Chichagof, I have grown increasingly uncomfortable with the large and growing number of brown bears and increased interactions that I have with them. Allowing a controlled and conservative thinning of the population would be a great benefit to both the bears and people.

**PROPOSAL 39: SUPPORT**

**PROPOSAL 40: SUPPORT**

Eliminating invasive species is vital to the preservation of native Alaskan flora and fauna

**PROPOSAL 41: SUPPORT**

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

**Proposal 13:** Support  
**Proposal 14:** Support

**Proposal 39:** Support  
**Proposal 40:** Support

**Proposal 41:** Support



**Submitted by:** David Beebe

**Community of Residence:** Petersburg

**Comment:**

I Oppose the proposals of #24 & #25 to open Petersburg Creek to Black Bear sport hunting. They present highly problematic consequences to existing permitted activities. This includes the prospect of an arrow-wounded black bear encountering tourists and residents alike.

These proposals occur in an area which is literally a 10 minute skiff ride from town and an important international tourist destination supporting the local economy.

The negative consequences to hikers, canoe/kayaking (guided and unguided), recreational sport fishing, wildlife viewing, public safety, wildlife conservation, are seemingly self-evident to the majority of residents and visitors who recreate there.

These activities all occur within a narrow wildlife corridor at the base of a steeply sloped valley adjacent to a congressionally-recognized wilderness area.

Petersburg Creek provides an opportunity for bear viewing and peace of mind which is every bit as important to the residents of Petersburg as its visitors. The popularity of bear and other wildlife viewing of Annan Creek and Pack Creek demonstrate the importance of these conditions to the local and regional economy, as well as to the international tourists who seek an accessible, high quality, and fulfilling experience.

The rationale suggesting the opening of the creek to black bear hunting will somehow reduce the incidence of black bear pre-hibernation hyperphagia resorting to town garbage cans is misplaced reasoning.

Bears foraging town garbage is already widely recognized as a consequence of failed salmon runs resulting from land mismanagement and other drivers of anthropogenic climate disruption.

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**Proposal 24:** Oppose

**Proposal 25:** Oppose



**Submitted by:** Lavern Beier

**Community of Residence:** Juneau, 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 portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 12:** Oppose

*See attachment on the following page.*



I'm a retired non-permanent seasonal ADF&G Southeast Wildlife Research Technician from 1973-2016 and a former seasonal GMUs 1, 3 and 4 Guide, 1979-2017.

I'm submitting comments pertaining to Proposal 12-5AAC:92.510. Areas Closed to hunting.

Based on my long history and knowledge from different perspectives of the brown bears not only on Admiralty Island but throughout Southeast Alaska.

From 1973 to 2016 I was involved with a variety of wildlife research projects from Misty Fiords National Monument at the south along the mainland to Wrangell St. Elias National Park Preserve to the north of Southeast Alaska including most of the large islands that makeup the Tongass National Forest of Southeast Alaska. Primarily known as a brown bear expert having accumulated over 1000 bear captures radio-collared and tracked. I've captured and radio-collared more brown bears utilizing foot snares than anyone on the planet.

I also invented a single-catch DNA hair trap for brown bears as a tool for conducting population estimates. This methodology proved that by deploying these single-catch hair traps on any riparian stream in Southeast Alaska we could get the minimum number of bears utilizing any stream in Southeast. This brown bear DNA single-catch hair trap has been utilized in conducting population estimates in several locations on Chichagof Island and along the mainland of Southeast Alaska from Misty Fiords to Yakutat Forelands. Not to mention I traveled to Mongolia's Great Gobi Desert with a team of scientist to where this single-catch hair trap was utilized to gather DNA information on the Gobi Bears, the most endangered bears on the planet.

In addition, I have extensive experience safely capturing and radio-collaring and tracking Sitka black-tailed deer, wolves, wolverines and black bears that inhabit the temperate rainforests of Southeast Alaska and the only person to successfully capture and radio collar elk on both Etolin and Zorembo Islands, in addition I participated in the captures of mountain goats in Misty Fiords to trade for the Etolin elk and captured mountain goats for the Revilla Introduction plus I captured mountain goats for Mount Juneau reintroduction.

From 1979 to 2017 as a seasonal Guide in GMU's 1, 3 and 4, I have likely skinned out over 100 bears. No hunts were ever conducted where wildlife research studies were being conducted

ADF&G Wildlife Division conducted brown bear research on Admiralty Island from 1981 to 1999. Utilizing foot snares as a capture method in August of 1981 I fitted the first VHF radio-transmitter on a brown bear in Southeast Alaska on Admiralty Island in Hawk Inlet. During this Admiralty brown bear study I captured and fitted and radio-tracked over 300 brown bears with VHF radio-transmitters while simultaneously conducted population estimates and gathered basic brown bear ecology, home-range size, den sites etc. radio-tracking some individual bears for up to 13 years.

It also happens that in 1996 I safely captured a 2 year old brown bear on Killisnoo Island adjacent to the village of Angoon and relocated that bear. I also happen to own land on Killisnoo Island. And in July of 1999 with the urging and aide of the Village of Angoon and Department of Public Safety I safely captured a sow brown bear and her 4 coy female cubs in the village of Angoon and safely relocated the family group to another Admiralty location.



In September 2001 again utilizing foot snares I captured and fitted a NE Chichagof, Game Creek brown bear with the first GPS/VHF transmitter utilized in Southeast Alaska. Ever since GPS/VHF radio-transmitters have become the standard.

Between the combination of guiding and having been the primary brown bear capture person for any brown bear research project in Southeast from 1973 to 2016 I've pretty much slogged up nearly every one of 55 salmon streams on Admiralty Island and all of those on NE Chichagof and many of the mainland streams from Misty Fiords to Yakutat Forelands and Wrangell/St. Elias Preserve. While doing this work, I've survived 5 brown bear attacks.

This proposal appears to be thinly veiled as a "bear control" method that would somehow benefit the village of Angoon. I would argue that this proposal makes an assumption with no data to support it by making the suggestion that the bears that might stumble into the nearby village of Angoon are also the brown bears that have traveled exclusively from the Mitchell Bay Closed Area. There are only two salmon streams of any significance in Mitchell Bay, in recent years it's been well documented by ADF&G Commercial Fisheries that salmon escapements on numerous Admiralty salmon streams have been in decline or failed which in turn forces bears to roam and search more widely in other lesser valued habitats for other foods to forage on.

I would make the argument that there is plenty of data across Alaska and North America that a more probable cause as is well documented across rural Alaska and North America and if it is perceived that there are higher numbers of bears visiting Angoon more frequently, the village of Angoon which is essentially located on a peninsula, more often than not these bear visits might be more associated with the village landfill and villagers solid waste while fewer salmon and natural foods are scarce. Contrary to perception, it is well documented with some radio-collared brown bears utilizing rural landfills in Southeast Alaska those bears often travel to and from a landfill from a much greater distance in search of alternative foods.

And to add to the complexity of that, it's also well documented across North America within bear populations that female bears will bring their cubs closer to humans or human development as a survival strategy to keep their young from male bears. In times of food shortages among bear populations such moves may become more frequent.

Home range size of brown bears are driven by food quality and sex. The home range size of an adult female brown bear on Admiralty Island is 12 square miles. The home range of an adult male brown bear on Admiralty Island is 40 square miles. These are the smallest home range sizes for brown bears in North America. A female brown bear on Admiralty Island may live to be 30 years old, if one observes a female on a specific stream she likely grew up there on that stream or nearby and she will likely die there. Brown bears are the second slowest reproducing big game animal in North America, moreover, the female brown bears that inhabit Admiralty Island are the oldest female brown bears in North America to breed at the age of 6 years old plus they may keep their cubs for up to 4 years.

As an individual who has captured over 1000 bears, and radio-tracking over 300 hundred on Admiralty having been involved with plenty of brown bear food habit analysis and stable isotope analysis from 1981 to 1999 the presence of deer in an Admiralty brown bear diet is not unusual to occur from winter killed deer but a rare event for an Admiralty brown bear to actually stalk and kill deer.



I also would make the point that by opening the Mitchell Bay Closed Area as a hunting area, that area would be only utilized by a handful of the elite but simultaneously creating additional strife, conflicts and confrontations among other user groups in “the one way in and one way out” of Mitchell Bay, in addition in my view opening the Mitchell Bay Closed area would rob the local Angoon residents of the opportunity to explore a fledgling Mitchell Bay “Bear Viewing Area” business combined with the long existing since 1937 Across Admiralty Canoe Route, which would benefit far more locals than a few of the far away hunting elite.

Thank you for the opportunity to comment,

LaVern Beier

Juneau, Alaska



**Submitted by:** Patrick Bendon

**Community of Residence:** Tacoma, WA

**Comment:**

Proposal 10: I do not support this proposal

Proposal 11: I do not support this proposal.

Proposal 28: I do not support this proposal

Proposal 30: I support this proposal

Proposal 33: I support this proposal

Proposal 34: I support this proposal

Proposal 36: I do not support this proposal

Proposal 37: I do not support this proposal

Proposal 41: I support this proposal

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

**Proposal 10:** Oppose

**Proposal 28:** Oppose

**Proposal 36:** Oppose

**Proposal 11:** Oppose

**Proposal 30:** Support

**Proposal 37:** Oppose

**Proposal 21:** Oppose

**Proposal 34:** Support

**Proposal 41:** Support



**Submitted by:** Nick Bendon

**Community of Residence:** Buckley, WA

**Comment:**

Proposal 10: I do NOT support this proposal

Proposal 11: I do NOT support this proposal

Proposal 28: I do NOT support this proposal

Proposal 30: I support this proposal

Proposal 36: I do NOT support this proposal

Proposal 37: I do NOT support this proposal

Proposal 41: I support this proposal

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

**Proposal 10:** Oppose

**Proposal 28:** Oppose

**Proposal 37:** Oppose

**Proposal 11:** Oppose

**Proposal 30:** Support

**Proposal 41:** Support

**Proposal 21:** Oppose

**Proposal 36:** Oppose



**Submitted by:** Cody Bennett

**Community of Residence:** Juneau

**Comment:**

I oppose the following proposals to reduce the bag limit for deer:

Proposal 10 (Kevin Maier)

Proposal 11 (Paul Johnson)

As noted in ADFG response, this change does not provide biological benefit. Should adverse impact be noted in future years, this proposal could be reintroduced.

Thank you,

-Cody



**Submitted by:** William Bergmann

**Community of Residence:** Petersburg, Alaska

**Comment:**

I oppose Proposals #22 and #23 which would allow motorized vehicles in Section 1B, essentially Thomas Bay/Muddy River area.

I started hunting in that area more than 30 years ago. Now that I'm 75, I still like to walk or ride a bike while moose hunting there. I think it is a wonderful way to hunt moose rather than riding a motorized vehicle.

Please don't pass proposals #22 and #23. Thank you. William Bergmann

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

**Proposal 22:** Oppose

**Proposal 23:** Oppose

**Proposal 33:** Oppose



Mike Bethers  
PO Box 210003  
Adice Bag, AK  
99821

ADFG Boards Support  
Attn: Board of Game Comments  
PO Box 115526  
Juneau AK 99811-5526

12/14/22

Please provide to Bd for upcoming  
Bd meeting

Dear Board of Game

- Please oppose proposal 10, which proposes to reduce the unit 4 deer bag limit from 6 to 4. This proposal is totally unfounded and cannot be justified.
- The population is at or near carrying capacity with no conservation concerns
  - The claim that Juneau deer hunters are preventing Fed. Qualified hunters from getting their deer is totally bogus. Subsistence harvest is down because subsistence hunting effort is down 50%. They need to hunt to get deer. Refer to ADFG harvest data
  - The JDAC ~~Factor~~<sup>Does</sup> not support this proposal submitted by the chairman of the JDAC

The  
Mike Bethers



**Submitted by:** Rachel Biggs

**Community of Residence:** Klawock, AK

**Comment:**

Proposal #202

I oppose #202

I believe closures should be utilized to maintain healthy wolf populations.

Please also see optional Proposal survey below.

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

- |                             |                             |                             |                             |
|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| <b>Proposal 42:</b> Oppose  | <b>Proposal 46:</b> Oppose  | <b>Proposal 49:</b> Support | <b>Proposal 52:</b> Support |
| <b>Proposal 43:</b> Oppose  | <b>Proposal 47:</b> Support | <b>Proposal 50:</b> Support | <b>Proposal 53:</b> Support |
| <b>Proposal 45:</b> Support | <b>Proposal 48:</b> Support | <b>Proposal 51:</b> Support | <b>Proposal 54:</b> Support |

**Submitted by:** Rachel Biggs

**Community of Residence:** Klawock

**Comment:**

Please see optional survey below.

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

- |                             |                             |                             |                             |
|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| <b>Proposal 45:</b> Support | <b>Proposal 48:</b> Support | <b>Proposal 51:</b> Support | <b>Proposal 54:</b> Support |
| <b>Proposal 46:</b> Oppose  | <b>Proposal 49:</b> Support | <b>Proposal 52:</b> Support |                             |
| <b>Proposal 47:</b> Support | <b>Proposal 50:</b> Support | <b>Proposal 53:</b> Support |                             |



**Submitted by:** Robert Birk

**Community of Residence:** Saranac, New York

**Comment:**

Bowhunting is an effective and popular way to harvest game. It is a lot harder to harvest game but it is very popular way to hunt. To shorten the archery season is a disjustice to bowhunting especially to shorten it during the rut season and to put gun hunting during that time. Opening more archery seasons is a great ideal and would promote more bowhunters coming to Alaska.

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

- |                             |                             |                             |
|-----------------------------|-----------------------------|-----------------------------|
| <b>Proposal 16:</b> Support | <b>Proposal 24:</b> Support | <b>Proposal 30:</b> Support |
| <b>Proposal 19:</b> Oppose  | <b>Proposal 29:</b> Support |                             |

**Submitted by:** Arthur Bloom

**Community of Residence:** Juneau/Tenakee Springs, AK

**Comment:**

I am opposed to opening the Mitchell Bay Closed Area to bear hunting. Over 95% of Admiralty Island is already open to bear hunting and there is no need to open a traditionally closed area, especially in the vicinity of Angoon. The proponents logic concerning food security and bear/human conflicts is questionable. High quality bear viewing opportunities on private lands should be encouraged.

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

**Proposal 4:** Oppose  
**Proposal 5:** Support

**Proposal 10:** Oppose  
**Proposal 11:** Oppose

**Proposal 12:** Oppose  
**Proposal 21:** Oppose

---

**Submitted by:** Bob Bourland

**Community of Residence:** Damascus, oregon

**Comment:**

Oppose proposal 19 to shorten archery elk season on the island. There is not enough archery only opportunities in Alaska, don't recommend changing this one.

I also support the other proposals by the Alaska Bowhunters, proposals 16, 24,29,30.

*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 16:** Support  
**Proposal 19:** Oppose

**Proposal 24:** Support  
**Proposal 29:** Support

**Proposal 30:** Support

---

**Submitted by:** Forrest Bowers

**Community of Residence:** Juneau, 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 portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 36:** Oppose

**Proposal 37:** Oppose

**Proposal 41:** Support

---

*See attachment on the following page.*



Forrest R. Bowers  
2904 Simpson Avenue  
Juneau, Alaska 99801

January 3, 2023

Mr. Jerry Burnett  
Chair, Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811-5526

Comments on Proposal 36

Dear Mr. Burnett:

I oppose Proposal 36 seeking to reduce the bag limit for sooty grouse on the Juneau road system from 5 birds per day to 3 birds per day. There is no conservation concern for sooty grouse in the Juneau area. Current regulations and hunting practices provide considerable conservation buffer for sooty grouse in the Juneau area. Much of the sooty grouse habitat on the Juneau road system is inaccessible to hunters because of steep topography and remoteness, creating natural refugia for grouse. Most of the harvest is comprised of male birds and many hunters choose to only harvest male birds. Even in terrain that is accessible to hunters, not all birds present are hooting on a given day and some birds are positioned in areas where they can't be spotted or a clean shot is not possible.

Weather conditions likely play a larger role in grouse population size than does hunter harvest. The Juneau area has experienced several consecutive wet, cold springs recently, likely driving the downturn in grouse numbers observed in 2021 and 2022. Alaska Department of Fish and Game survey data suggest that sooty grouse cycle through periods of high and low density. While the 2022 density estimate is the lowest in the 8-year time series presented in staff comments, it is similar to estimates from prior years. Since sooty grouse are relatively short-lived birds, I expect grouse numbers to rebound quickly after a year or two with favorable weather conditions during the hatch.

Proposal 36 cites concerns over methods hunters use to access grouse habitat. Lowering the bag limit is not the tool to address this concern. Bag limits are a conservation measure and there is no conservation concern for sooty grouse in the Juneau area. Social concerns such as methods and means are better addressed through other restrictions. One option for the Alaska Board of Game to consider, if they felt compelled to act on social concerns raised in Proposal 36, would be to limit the use of motorized vehicles to boats and highway vehicles when grouse hunting in the Juneau area.

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

A handwritten signature in blue ink that reads "Forrest R. Bowers".

Forrest R. Bowers



**Submitted by:** Barry Brokken

**Community of Residence:** Juneau

**Comment:**

Proposal 41:

As a Juneau resident, hunter, and trapper, I would like to see this issue addressed for what it is. I sat on our regional advisory committee when this "management area" was proposed, and heard plenty from all sides.

Some thought a "local, viewable" wolf pack was a wonderful thing, with great commercial potential. Others liked the idea of "living amongst the wolves!".

Deer hunters were rightfully concerned, and I voted against the proposal.

Alas, it, and hunter's fears, came true.

As a Douglas Island deer hunter for 35+ years, I have seen the ups and downs of that population, have taken many dozens of deer there, but none, zero, in the last 6 years. I quit looking 3 years ago, as it is abundantly clear they need all the help they can get.

There is a robust black bear population on the very small island that un-doubtedly preys on fawns, but the presence of wolves on top of that is over the top.

The mainland has a very robust wolf population, and some of those animals move freely between the mainland and Douglas Island.

I see no reason to have any special regulations pertaining to wolves on the island.

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

**Proposal 41:** Oppose

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**Submitted by:** Mark Buchkoski

**Community of Residence:** Juneau Alaska

**Comment:**

Support of Prop1. Only makes sense and safety should always come first

Support of Prop 10. Limiting deer harvest in Unit 4 from 6 to 4 deer is a good start to finding a compromise w the federal subsistence push to ban non-rural hunters from hunting in much of Unit 4. Again a good start.....

Support of Prop 41. I have lived in Juneau since 1987....hunted deer on Douglas every year. Built a primary residence on the island in 2010. The wolf issue in my opinion is one that regulates itself(r & K species)

Seems the special management plan came about from public outcry more than an actual need to help protect a wolf population I'd be suspect to believe public dollars and department time can be spent better elsewhere

---



**Submitted by:** John Burick

**Community of Residence:** Juneau, AK

**Comment:**

Proposal 29:

I support this proposal if adopted, however a map with the designation of the additional hunting area needs to be included/provided for individuals registering for the hunt as well as to the public in an effort to eliminate harassment to hunters and false accusations to law enforcement (the public needs to know the area is now open for hunting). I saw no map included with the proposal.

Proposal 30:

I support this proposal witch would open and offer additional hunting grounds for those interested in Archery.

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**Proposal 29:** Support

**Proposal 30:** Support



**Submitted by:** Bryan Burkhardt

**Community of Residence:** Clarkston, Michigan

**Comment:**

I support proposals 16,24,29 and 30.

I strongly oppose proposal 19.

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

**Proposal 16:** Support

**Proposal 24:** Support

**Proposal 30:** Support

**Proposal 19:** Oppose

**Proposal 29:** Support



**Submitted by:** Olcay Caf

**Community of Residence:** Juneau

**Comment:**

Proposal 41. Too many wolf on Douglas island. harvest a deer almost a miracle... We can't eat wolf

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

**Proposal 10:** Oppose

**Proposal 41:** Support

**Submitted by:** Olcay Caf

**Community of Residence:** Juneau

**Comment:**

I like to keep bay limit the way.

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**Proposal 36:** Oppose

**Proposal 37:** Oppose



**Submitted by:** Ben Case

**Community of Residence:** Petersburg, Alaska

**Comment:**

Re: Proposal 5; change the waterfowl season....

Dear Board of Game Chairman and board members,

Thank you for the opportunity to comment and all your hard work.

I'm in opposition to changing the waterfowl season in Units 1-4 as proposed in #5, and strongly support addressing the issues related to this proposal by changing the proposal to a consistent waterfowl season of September 15-December 31.

As an avid waterfowl hunter of Southeast Alaska for 27 years I feel there is much more value in having the season open through November and through all of December, especially the holiday breaks when younger hunters have the opportunity to hunt. I've lived and hunted places in the lower 48 that split their seasons. While I realize there's good rationale in some places for split seasons it does create problems for hunters to keep track of mid-season closures. I also feel bird migrations in SE make it more challenging compared to places in the lower 48 to time it right. Thus, a mid-season closure here would be counter productive and frustrating because inevitably there will be times when the birds and weather align but the season is closed mid season. Also, opening the season September 1 is not appropriate for SE. It's my experience that fewer hunters pursue birds the first two weeks of September as compared to later in the season. Besides being too early in the migration for

consistent hunting, there are a plethora of other hunting and fishing opportunities during the first two weeks of September when the weather is milder.

Best regards,

Ben Case

Petersburg, AK

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**Proposal 5:** Oppose  
**Proposal 15:** Support

**Proposal 16:** Support  
**Proposal 17:** Support

**Proposal 22:** Support  
**Proposal 25:** Oppose

**Proposal 26:** Support



**PC29**

**Submitted by:** Dorothy Chapman

**Community of Residence:** Juneau, AK

**Comment:**

Prop 41) The wolves on Douglas Island are hurting the deer population that we rely on for food, more steps need to be taken to reduce their population.

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**Proposal 1:** Support  
**Proposal 2:** Support  
**Proposal 3:** Oppose  
**Proposal 4:** Support  
**Proposal 5:** Support  
**Proposal 6:** Support  
**Proposal 7:** Support  
**Proposal 8:** Support

**Proposal 9:** Support  
**Proposal 10:** Oppose  
**Proposal 11:** Oppose  
**Proposal 12:** Support  
**Proposal 13:** Support  
**Proposal 14:** Support  
**Proposal 17:** Support  
**Proposal 18:** Support

**Proposal 19:** Support  
**Proposal 21:** Oppose  
**Proposal 26:** Support  
**Proposal 28:** Support  
**Proposal 29:** Support  
**Proposal 30:** Support  
**Proposal 31:** Support  
**Proposal 32:** Support

**Proposal 34:** Support  
**Proposal 35:** Support  
**Proposal 36:** Support  
**Proposal 37:** Support  
**Proposal 38:** Support  
**Proposal 39:** Support  
**Proposal 40:** Support  
**Proposal 41:** Support



**PC30**

**Submitted by:** Wade Chappell

**Community of Residence:** Juneau, Alaska

**Comment:**

There is no need to reduce the bag limits on sooty grouse and/or ptarmigan in the Juneau area. ADF&G has stated that the populations are healthy and hunting has little impact on the population.



**Submitted by:** Joe Cisney

**Community of Residence:** Petersburg

**Comment:**

My name is Joe Cisney. I'm writing in opposition of proposition 22.

I am a resident of Petersburg and an occasional user of the Thomas bay road system.

I use the road system for recreational purposes which include hiking, fishing and hunting.

I do not see the need to change the hunting regulation to allow hunting from a Motorized vehicle. With the obvious decline of the moose population in that hunting area I feel it would put unnecessary pressure on the moose population.

Joe Cisney

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**Proposal 22:** Oppose

---



**Submitted by:** Jeremy Collison

**Community of Residence:** Petersburg, AK

**Comment:**

My name is Jeremy Collison, I live in Petersburg, AK. I am writing in support of proposal 16. To further expound on the reasons for this proposal I would like to point out that the vast majority of the existing Petersburg Management Area is mountainous with very little lowlands. This often results in being buried in snow by early november which leaves only a very small percentage of the area accessible. Two of the 3 main roads with access outside of town are not plowed in the winter further limiting access to even more of the lowlands.

Thank you for your time and service.

---

**Submitted by:** Jeremy Collison

**Community of Residence:** Petersburg, AK

**Comment:**

My name is Jeremy Collison, I live in Petersburg and I am an avid hunter. I am opposed to proposal 22 for the following reasons. We have watched a fairly steady decline in moose harvest numbers in the Thomas Bay/Pt. Agazi area over the past decade. I believe that opening up vehicle access to this area will only exacerbate the issue. This protection has been in place for a very long time and it is my belief that, if lifted, there will be a flood of new vehicles and hunters from the surrounding communities pouring in. With stringent antler restrictions already in place and the existing limitations on access, what other population controls are left, short of going to a draw hunt. As a secondary effect, I believe that this will also negatively impact the deer population. The amount of deer shot while road hunting for moose would, in my opinion, be a significant factor

for the surrounding areas. I would also like to point out that there are driving permits available to disabled hunters for use in non-motorized vehicle areas.

Thank you for your time and service.

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**Proposal 16:** Support

**Proposal 22:** Oppose



**PC33**

**Submitted by:** Amanda Compton

**Community of Residence:** Juneau, AK

**Comment:**

Re: Proposal 10

Position: Oppose

Rationale: There is no logic behind a reduction of the bag limit in this area. Why reinvent the wheel when ADF&G has illustrated deer populations are near habitat carrying capacities in Unit 4 and there is an adequate population to support hunting interests. Hunting deer is a healthy hobby that if populations are high enough to support, should be encouraged. It supplements our food costs which are notably escalated. Please oppose proposal 10.

---

**Submitted by:** Amanda Compton

**Community of Residence:** Juneau, Alaska

**Comment:**

Re: Proposal 36

Position: Oppose

Rationale: I see no logic behind a reduction of the grouse bag limit over the entire Juneau road system. The area is a substantial portion of land with a robust enough of a population to support hunters willing to put in the effort. Please oppose this proposal.

---

**Submitted by:** Amanda Compton

**Community of Residence:** Juneau, AK

**Comment:**

Re: Proposal 37

Position: Oppose

Rationale: I see no logic in a reduction of the ptarmigan bag limit for the entire Juneau road system area. This region is substantial enough to support all interested hunters of which there just don't exist enough to warrant this proposition. All it does is reduce the amount of affordable and approachable hunting opportunities for residents without boats; it skews the access to supplement our food costs which are notably substantial. Hunters target limited areas and there exist many areas to effectively hunt ptarmigan. Additionally, the effort to access

many of these birds is a natural management of bird kills; most people aren't going to climb 3K'. This low pressure hunt - combined with ADF&G's wisdom that it's weather conditions through the birds' nesting season that drives ptarmigan numbers - suggests a more effective approach is to change the weather. In other words, I think Proposition 37 is an ineffective population tool and I encourage opposition to the Proposal.

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**Proposal 10:** Oppose

**Proposal 36:** Oppose

**Proposal 37:** Oppose



**PC34**

**Submitted by:** Miguel Contreras

**Community of Residence:** Hoonah, Alaska

**Comment:**

Decrease the deer bag limit in unit 4 from 6 down to 4. Don't use deer poop counting as a data collector because its clearly inaccurate.

If you are not going to decrease deer bag limits, then limit the amount of does allowed per season from an open season down to 1 or 2 per season.

If you dont do either of those, limit to a minimum size bucks only per season. No shooting fawns does.

Don't group Admiralty, Baranof, and Chichagof islands into one unit. Hunting pressure is significantly different for each island and data becomes inaccurate when pooling some of the largest islands in Alaska.

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**Proposal 1:** Support with Amendment

**Proposal 2:** Support with Amendment

**Proposal 3:** Oppose

**Proposal 4:** Oppose

**Proposal 5:** Oppose

**Proposal 6:** Support

**Proposal 7:** Support

**Proposal 8:** Support

**Proposal 9:** Support

**Proposal 10:** Support

**Proposal 11:** Support

**Proposal 12:** Support

**Proposal 13:** Support

**Proposal 14:** Support

**Proposal 15:** Support with Amendment

**Proposal 16:** Oppose

**Proposal 17:** Support

**Proposal 18:** Support

**Proposal 19:** Support

**Proposal 20:** Support

**Proposal 21:** Support

**Proposal 22:** Support

**Proposal 23:** Support

**Proposal 24:** Support

**Proposal 25:** Support

**Proposal 26:** Support

**Proposal 27:** Support

**Proposal 28:** Support

**Proposal 29:** Support

**Proposal 30:** Support

**Proposal 31:** Support

**Proposal 32:** Support

**Proposal 33:** Support

**Proposal 34:** Support

**Proposal 35:** Support

**Proposal 36:** Support

**Proposal 37:** Support

**Proposal 38:** Support

**Proposal 39:** Support

**Proposal 41:** Support with Amendment

**Proposal 42:** Support with Amendment

**Proposal 43:** Support with Amendment

**Proposal 44:** Support with Amendment

**Proposal 45:** Support

**Proposal 46:** Support

**Proposal 47:** Support

**Proposal 48:** Support

**Proposal 49:** Support

**Proposal 50:** Support

**Proposal 51:** Support

**Proposal 52:** Support

**Proposal 53:** Support

**Proposal 54:** Support



**Submitted by:** Douglas Corl

**Community of Residence:** Petersburg, AK

**Comment:**

Proposal 16- I am opposed to the proposed lengthening of the bow hunting season for deer in the Petersburg Management Area for the following reasons:

- 1) As the regulation stands now, bowhunters enjoy double the length of the open season that rifle hunters do.
- 2) Bowhunters are allowed twice the legal possession limit that rifle hunters are.
- 3) Bowhunters are able to hunt deer for the entirety of the rut. Rifle hunters are cut short halfway through.

Being allowed to hunt 2 1/2 months to be able to harvest 2 deer is more than enough time; There really is no reason to modify the existing regulations.

Proposal 24- I oppose hunting for Black Bears anywhere within the Petersburg Creek drainage. While it is true that there are many other uses currently in effect for the area including deer and moose hunting, many locals and nonresidents-both hunters and nonhunters alike- enjoy being able to venture up the creek and see Bears all spring and summer into the Fall just about any day.

There are no shortage of Black Bears in Southeast Alaska. Hunters have many places to go to harvest bears. But there are not too many places people can go within a very short distance from a community and see Bears on a daily basis. The BOG has maintained a

longstanding precedent to allow Bears to roam the Petersburg Creek drainage unmolested. I hope this board continues to do so.

Proposal 5- This Department generated proposal is perplexing. The author(s) state

the current regulation is a "regulatory burden" because of "inconsistent interannual season dates" and that it creates a "complexity for hunters, enforcement", etc. I have trouble believing this because clearly one opening and closing day is half as complex as 2 opening and 2 closing days. And if there was an enforcement problem we would have heard about it by now, but we have not.

Furthermore, a split season will definitely disenfranchise young hunters home from school over the Thanksgiving holidays. Because that mandatory 2 week closure will in all likelihood fall around that time. Many families have customarily and traditionally hunted during the Thanksgiving holidays for generations for waterfowl. It does not seem right to take that opportunity away from them.

The Waterfowl Hunter survey that was conducted in either 2006 or 2008 by the department-and the data that was gleaned from that survey, helped set the new Regulation put in place at the 2019 SE Alaska BOG meeting, namely, the alternating annual starting date for Waterfowl hunting. Back then the BOG evidently chose to disregard the final tabulated data from that survey that indicated that 35% of the total hunters surveyed supported a September 1st opening, while 41% favored a September 15th opening and 24% wanted an October 8th starting date.

I hope the board will note this and return the opening day of Waterfowl season back to September 15th with a December 31st closure, which is clearly the best compromise.

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

**Proposal 5:** Oppose

**Proposal 16:** Oppose

**Proposal 24:** Oppose



**Submitted by:** Jonas Crabtree

**Community of Residence:** Wrangell, AK

**Comment:**

Jonas Crabtree

Proposal 17- Support

I've lived in Wrangell since 2015 and have spent over 60 days on and around the shores of Zarembo Island for personal pleasure and for work as a field guide. On several occasions I've seen large herds of elk (10+) grazing on the island. In my opinion, every elk I've spotted on Zarembo has looked healthy. In addition to seeing a good number of elk on Zarembo, I've also stumbled upon a lot of elk sign around the shoreline of Zarembo. If there is additional evidence of a health population of elk then I believe a properly managed elk drawing each fall is appropriate and fair for our community and for the sustainability of the natural resources on the island. I fully support proposal 17.

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**Proposal 17:** Support



**Submitted by:** Victoria Curran

**Community of Residence:** Sitka, 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 portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:*

**Proposal 24:** Oppose  
**Proposal 25:** Oppose  
**Proposal 45:** Support

**Proposal 46:** Oppose  
**Proposal 47:** Support  
**Proposal 48:** Support

**Proposal 49:** Support  
**Proposal 50:** Support  
**Proposal 51:** Support

**Proposal 52:** Support  
**Proposal 53:** Support  
**Proposal 54:** Support

*See attachment on the following page.*



Support: 45, 47, 48, 49, 50, 51, 52, 53, 54  
Oppose: 46, 202, 24 and 25

Dear Chairman and Board Members:

I implore the Board of Game to take meaningful, immediate steps to protect Alexander Archipelago wolves on Prince of Wales Island. These wolves are genetically distinct and are now being wiped out because of mismanagement by the Alaska Department of Fish and Game. Prince of Wales Island is home to the genetically distinct Alexander Archipelago wolves. The solution to a reduction in Sitka Black-tailed deer is habitat restoration, not increased wolf trapping.

In 2015, when the wolf population was below 90 animals, the Board took action to reduce harvest. This management was beginning to succeed but in the fall of 2019, the State estimated that the 2018 wolf population was about 170 wolves, so they opened a two-month season with **no limit** on the number of wolves a trapper could kill and **no limit** on the number of trappers who could trap that season. This, predictably, resulted in the almost complete slaughter of the wolf population – ADFG estimates 165 of the 170 wolves were killed. Although the population estimate is not exact, it is clear that the number of wolves killed is under reported.

How can you let this stand? I hope these wolves will soon be listed as the endangered species they are. Wolves belong in Southeast Alaska and it is infuriating to me that the Department tasked with protecting this species for sustainability instead is overseeing their rapid demise. It is a failure of leadership.

I have lived in Southeast Alaska for over 40 years. My family hunts and fishes and we make our living commercial fishing. We strongly believe that wolves should be protected. There are very few wild places left with healthy wolf populations. We should be protecting the remaining wolves here, not slaughtering them.

At this meeting I urge you to **support** the following proposals:

Proposal 45: Raise the population objective from 150-200 wolves to 250-350 wolves in Unit 2, and raise the threshold for closing the season from 100 to 200 wolves;

PROPOSAL 47 Require wolf harvest information be reported within 48 hours of recovery and sealing within 14 days in Unit 2

Proposal 48: The minimum population objective for wolves in Unit 2 shall be based on a biological population viability analysis, using available demographic data. Recommend that ADF&G contract with a qualified researcher to conduct a population viability analysis for wolves in Unit 2 using available demographic data.

Proposal 49: Utilize the lower confidence interval of the wolf population for estimating the population in Unit 2

Proposal 50: Establish a population estimate and harvest limit based on Prince of Wales Island wolf population that excludes extrapolation from outer islands in Unit 2



Proposal 51: Establish a percentage of the Unit 2 wolf population that can be harvested on a sustainable basis, develop a harvest quota each season, require in-season reporting, provide the harvest to the public in real time, and allow three days' notice before closing the season by emergency order

Proposal 52: Establish a harvest quota for wolves, between 20% and 35% of the estimated wolf population in Unit 2

Proposal 53: Establish an estimated unreported mortality rate for Unit 2 wolves to be used for establishing the harvest quota

Proposal 54: Identify an area in Unit 2 for protected status for wolves as follows: Task the department with identifying 2/3rds of Unit 2 land area for protected status for wolves. Work to ensure the protected areas have relatively high deer carrying capacity and are large enough to be buffered from trapping pressure.

The Alaska Wildlife Alliance has done a very thorough job of providing background, data and rationale to support their proposals. Other than the emotional connection of a resident of Southeast I have nothing to add to their information.

I am strongly opposed to proposals 46 and 202.

I am also strongly opposed to proposals 24 and 25 which would open black bear hunting in the Petersburg Creek drainage to resident and nonresident hunters, and eliminate the Petersburg Creek Closed Area. My understanding is that this closed area was implemented specifically to provide bear viewing opportunities close to town for both residents and visitors. There are plenty of other places for people to hunt black bear, leave this area closed.

It is hard to overstate the value to residents and visitors alike to see bears and wolves in the wild here. Hunting and trapping are not the only human use of these species, they have intrinsic value, and economic value, living and breathing and going about their business as they have for thousand of years. My husband, who has spent the last 45 years on the ocean and in the woods throughout coastal Alaska ranks seeing wolves on the beach in Chatham and running along a river bank in Yakutat as the most breathtaking and memorable experiences he has had. Visitors who have the good fortune to hear or see a wolf will be telling that story the rest of their lives.

Please protect the Alexander Archipelago wolf population.

Support: 45, 47, 48, 49, 50, 51, 52, 53, 54

Oppose: 46, 202, 24 and 25

Thank you for your time and consideration.

Victoria Curran



**Submitted by:** Richard Curran

**Community of Residence:** Sitka

**Comment:**

I support proposals 45 and 47-54. Please adopt these scientifically based and reasonable proposals for wolf management. I do not support increased harvest of wolves and do not support current management - limit trappers not wolves. I oppose proposals 24, 25, 46 and 202 (which is not in your vote list below for some reason).

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**Proposal 24:** Oppose  
**Proposal 25:** Oppose  
**Proposal 45:** Support

**Proposal 46:** Oppose  
**Proposal 47:** Support  
**Proposal 48:** Support

**Proposal 49:** Support  
**Proposal 50:** Support  
**Proposal 51:** Support

**Proposal 52:** Support  
**Proposal 53:** Support  
**Proposal 54:** Support



**Submitted by:** Phillip Dalrymple

**Community of Residence:** TUCSON, ARIZONA

**Comment:**

I am an active bowhunter that has traveled to Alaska big game hunting on multiple occasions. I am commenting on the proposals specifically related to bowhunting opportunities in Alaska.

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**Proposal 16:** Support  
**Proposal 19:** Oppose

**Proposal 24:** Support  
**Proposal 29:** Support

**Proposal 30:** Support



**Submitted by:** Atlin Daugherty

**Community of Residence:** Juneau, Ak

**Comment:**

Hello my name is Atlin Daugherty I am 38 years old a third generation life long Alaskan born and raised in Juneau. I commercial fish and own and operate a big game hunting guide service operating in Units 1 and 4 here in Southeast Alaska.

10-11) Support, Four deer has been the Juneau bag limit before statehood. I think it would be wise for the state to try and work with and compromises with Federal Substance Board. A four deer bag limit is a lot better than what they have in their proposals.

12,13,14) Oppose, these three proposals go against The Brown Bear Management Plan . There was a tremendous amount of work put into the BBMP and people and organizations from across the board agreed to this plan and it is important to stay true to it and do not start altering it for our personal gains. My guide use areas are within Proposals 13 and 14 and would allow more opportunities for my self and business, I am still opposed due to the reasons stated above. We have a great stable system working in southeast please don't mess with it.

28) Support, Having an obvious land mark such as the one proposed in any hunt area is always a good idea. The current one in this particular hunt area is very vague when actually standing on the mountain in the hunt area. Due to the braiding of little sheep creek and try to decipher which braid is actually the right one to follow is very difficult. GPS malfunction and there should be a distinct land mark that does not leave a person guessing if they are with in the hunt area or not . With the proposed line change any guessing will be eliminated.

32) Support, Putting an emphasis on harvesting Billys is a good idea and I believe this proposal should be adopted region wide.

36) Support, This would slow and spread out the harvest on the Juneau road system. Another way to do this would be limit motorized accesses with in the Juneau road system. Increased accessibility due to snow-machines being able to access more country has increased harvest and has also increased access to grouse that were historically not accessible and were your breeding stock.

37)Support, Ptarmigan that are flocked up are very susceptible to multiple birds getting shot. Growing up I limited out many times. I have since realized that was probably a bit much. I have also observed a decline in the number of birds observed in areas I have hunted for the last 30 years. Going up and getting 5 per person is a lot more responsible.

41) Support, Why we are micromanaging these wolves has been a mystery to me ever since it started. Since when does the state do that!? Now with food security concerns and a documented decline of the deer population on Douglas Island and more restrictions of deer hunting on Douglas island, this proposal needs to be adopted.

5)Oppose, This really complicates things. Why mess with a season that has been in place for generations. There will be unnecessary confusion and more citations due to this proposal.

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**Proposal 5:** Oppose  
**Proposal 10:** Support  
**Proposal 11:** Support  
**Proposal 12:** Oppose

**Proposal 13:** Oppose  
**Proposal 14:** Oppose  
**Proposal 21:** Support  
**Proposal 28:** Support

**Proposal 32:** Support  
**Proposal 36:** Support  
**Proposal 37:** Support  
**Proposal 42:** Support



**PC41**

**Submitted by:** Dylan Davis

**Community of Residence:** Juneau, AK

**Comment:**

See attached

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**Proposal 36:** Oppose

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*See attachment on the following page.*



Regarding Juneau area proposal #36

My name is Dylan Davis. I was born here in Juneau and have been a grouse hunter since 6 years old all the way up to my 34 years of age. Grouse hunting being my favorite type of hunting as well as my favorite outdoor activity is of great importance to me and I believe reducing the daily bag limit in the Juneau area is unnecessary, arbitrary and unfair. Snowmobiles and advanced backcountry ski setups have been in use for decades and while they are useful in some capacity when it comes to grouse hunting their utility and overall effectiveness in terms of the sport is quite situational. Snowmobiles, while dominant in areas above the timberline are ill suited for old growth forests and drainages of the lower elevations. Maintained trails are required for them to access more open terrain where their superior mobility comes into play. Juneau only has 2 such trails that permit these machines, these being the Dan Moller trail and the Lake Creek trail to Spaulding Meadows. This limits the hunting area accessed by snowmobile to certain parts of central and south Douglas island and a small corridor of terrain above the Spaulding plateau. Backcountry ski sets, while versatile in proper terrain are downright frustrating to use in 85% of available grouse hunting terrain in the Juneau area. They cannot be used without snow and must be carried to their usable altitudes in spring when much of the lower level snow has melted. Travel with skis is extremely difficult and dangerous when attempting a steep, straightline climb and their bindings and traction skins must be reset constantly in uneven terrain requiring amounts of uphill and downhill travel. They as well as snowmobiles are often foiled by the steep grades, stream gullies and dense fingers of trees which the targeted males of the species prefer to call from. Arguably the most effective tools for covering ground and trying to take a daily limit in the least amount of time and travel are simple snowshoes. The main advantage yielded by the two offending modes of transport highlighted first and foremost in this proposal is the ability of fast travel once in their area of influence allowing access to better and more productive grouse habitat at such distances to be unfeasible or unreachable by travel on foot. These areas are located on the west (backside) and south sides of Douglas and do not receive high hunting pressure by multiple user groups. If this proposal is directly or indirectly aimed at reducing the number of birds taken by skiers and snowmobilers, it will do no such thing as the Juneau road system does not intersect any of these drainages. This will, ironically allow those with the means to afford and possess these tools the ability to still make 5 bird takes while limiting the hunter on foot accessing from somewhere, for example, above the Methodist camp out the road to 3. A large part of what makes grouse hunting so special and unique is it's extremely low cost in both money and time when compared to other types of hunting and only allowing a daily limit of 5 to those with expensive ski setups, snowmobiles, boats and other motorized transport all but required to get away from all the road system drainages is an exclusionary decision. There are only 2 places in the Juneau area where these different user groups have the potential to out compete inexperienced, novice hunters and these are the Dan Moller trail and the greater Eaglecrest area. These most accessible and heavily used areas make up but a fraction of the productive grouse habitat accessed via the Juneau road system. Even if these situations existed



in multiple other areas of town a few contested areas should not be locations on which a rule of this type which affects the entire Juneau road system should be modeled. As for young or new grouse hunters there exists a vast amount of strategic options. From hills above Echo cove to the drainages of Lemon, Salmon, Lawson and sheep creeks as well as Thane road. Essentially anywhere a tall hillside can be climbed, there exist strong populations of grouse. Grouse hunting is fun and unique, but it is by no means easy, nor is the terrain that it takes place in. It is not something that everyone is capable of doing. Aside from physical endurance and fitness being a component the essential attributes required are force of will, determination and mastery over one's sense of quit. The daily limit currently stands at 5 but seldom is this number reached. The majority of my own outings have ended with a number fewer than this. To shoot a limit is an experience to be savored and to be proud of and if someone so chooses to push their day's take to 5 even if they out compete me they should still be allowed to regardless of location.



**Submitted by:** John Der Hovanisian

**Community of Residence:** Shelton, WA

**Comment:**

Proposal 5. I currently live in WA, but lived in AK for 30 years and continue to return to SEAK to hunt deer and waterfowl. I OPPOSE this proposal, but would favor a late November - late December split (say, close after the Thanksgiving weekend, reopen before the Christmas break) because most of the northern migrants I persue pass through the areas I hunt late October - early November.

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**Submitted by:** Bjorn Dihle

**Community of Residence:** Juneau, Alaska

**Comment:**

This comment is submitted by Bjorn Dihle to address the following: PROPOSAL 12 5 AAC 92.510. Areas closed to hunting. Open the Mitchell Bay Closed Area in Unit 4 to brown bear hunting as follows: It is proposed to open: "Mitchell Bay Area: Kootznahoo Inlet, Kanalku Bay, Favorite Bay and all land within 660 feet of mean high tide within that area; area open to the taking of brown bears".

I, Bjorn Dihle, a lifelong resident, hunter and bear guide of Southeast Alaska, am opposed to open these areas to bear hunting for the following reasons.

1. The vast majority of Unit 4 is open to bear hunting. There are only a few areas closed to bear hunting and only one, Pack Creek, that offers enough of a closed area to encompass the home range of some bears. These closed areas are vital for numerous reasons, including the skyrocketing demand of bear viewing tourism.
2. The village of Angoon's corporation Kootznoowoo is working to develop bear viewing in these areas and create a number of sustainable jobs for Angoon residents. Opening these areas to hunting would negatively affect bear viewing and lose Angoon a lot of potential economic benefits.
3. All Angoon residents I talked to are opposed to bear hunting in these areas. The Proclamation establishing Admiralty Island National Monument recognizes the importance of protecting the interest of Angoon and Alaska Native culture.
4. Bear hunting will not help resolve subsistence issues; it will cause more conflict and issues between sport and subsistence users. Elsewhere in the state bears can be significant predators of ungulates, but there are no studies and little to no observational data in Unit 4 that bears prey much on deer. Nor will it cut down on human and bear conflict. It will make things more tense.
5. The Proclamation establishing Admiralty Island National Monument declares the island is an outdoor living laboratory for the study of the bald eagle and Alaska brown bear." The few closed to hunting areas on the island support bear populations across the island and are useful laboratories for studying bears. These closed areas should and will become more useful economic drivers for bear viewing, photography and other non-lethal industries.

Thankyou,

Bjorn Dihle

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**Proposal 1:** Oppose  
**Proposal 2:** Oppose  
**Proposal 3:** Support  
**Proposal 4:** Oppose  
**Proposal 6:** Oppose

**Proposal 8:** Oppose  
**Proposal 9:** Oppose  
**Proposal 10:** Oppose  
**Proposal 11:** Oppose  
**Proposal 12:** Oppose

**Proposal 13:** Oppose  
**Proposal 21:** Oppose  
**Proposal 32:** Support  
**Proposal 34:** Oppose  
**Proposal 35:** Oppose

**Proposal 36:** Support  
**Proposal 37:** Support  
**Proposal 40:** Oppose  
**Proposal 41:** Support

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**PC44**

**Submitted by:** Luke Dihle

**Community of Residence:** Juneau, AK

**Comment:**

I'm a lifelong Alaskan. I live in Juneau.

Proposal 10 & 11 I vote against. Winters are the major drivers of deer population. If we are concerned about hunting impact limit the number of does or limit out of state hunters. I don't believe limiting the bag limit to 4 will make any difference to the group who wants to limit non rural residents from hunting on public land.

Proposal 12 I'm against. This seems like a really good way to deepen the divide and increase hostility between rural and non rural residents and is unnecessary

Proposal 31 I support. I have hunted goats a number of times in this area. Seems safer to let people hunt earlier. If the quota is met then it will be shut and shouldn't harm numbers

Proposal 32I support. I support some sort of penalty like being unable to hunt for a certain period if you kill a nanny in all areas. Goats are vulnerable and this is a good incentive to make your most honest effort to kill a billy. Seems to really be working on Baranoff

Proposal 36 and 37 I support. As an avid grouse hunters numbers seem to have plummeted the last several years and taking some pressure off seems like a good idea

Proposal 41 I oppose. Douglas should not be treated the same as the ABC island. It's deer population is under a lot more pressure and therefore more vulnerable

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**Proposal 10:** Oppose  
**Proposal 11:** Oppose  
**Proposal 12:** Oppose

**Proposal 21:** Oppose  
**Proposal 31:** Support  
**Proposal 32:** Support

**Proposal 36:** Support  
**Proposal 37:** Support  
**Proposal 40:** Oppose



**PC45**

**Submitted by:** Andrew Dilley

**Community of Residence:** Juneau, Alaska

**Comment:**

After looking at the ADF&G provided data, I believe that all three of the proposals are unnecessary. I have grown up hunting the woods around Juneau including Douglas, Admiralty, and Chichagof. If anything I have seen deer more frequently over the past couple of seasons than any other years. The Juneau hunters that I know of that hunt any areas near Angoon, Hoonah, or Gustavus are few and far between. To suggest that Juneau residents are causing a problem for deer populations around any of those areas is absurd. I completely disagree with these proposals and I don't think I am alone or wrong. It has been backed by SCIENCE, I don't know what else we need to do to prove that we are not having a negative effect. As far as the proposed grouse and ptarmigan regulation changes, I know of very few upland bird hunters in Juneau and those that I do know probably do not kill a single bag limit all season. Please to not back these proposals.



**PC46**

**Submitted by:** Robert Dilley

**Community of Residence:** Juneau

**Comment:**

I am not in favor of any of these proposals. There are no shortages of grouse, ptarmigan, or deer in the Juneau area. ADF&G does not support these changes and they are the experts. Do not enact these proposed changes please. If a grouse or ptarmigan hunter takes the time to hike their but off to get to the needed elevation to find these birds, good on them. I have rarely ran into anyone upland bird hunting when I have been out. In regards to the deer hunting, there is plenty of sign whenever I go out. I like having the option of taking 6 deer, as I can share meat with my extended family and we all can enjoy the harvest. Thank you for hearing my thoughts. Please deny the proposed changes.



**PC47**

**Submitted by:** Levi Dow IV

**Community of Residence:** Wrangell, Alaska

**Comment:**

17 I would like to be able have a chance to a elk someday.

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**Proposal 17:** Support



**PC48**

**Submitted by:** John Dupree

**Community of Residence:** Petersburg Alaska

**Comment:**

Oppose proposal #5... No alternating season... No split season.. leave season at Sept 16 to Dec 31... Thanksgiving is a traditional family waterfowling opportunity as well as X-Mas vacation... for kids on school vacation... college and local alike ..ADFG has no skin in the game to bring this proposal to the table

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**Proposal 5:** Oppose

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**PC49**

**Submitted by:** Tamara Eastaugh

**Community of Residence:** Wrangell AK

**Comment:**

Please open up elk hunting on zarembo island

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**PC50**

**Submitted by:** Stuart Eddy

**Community of Residence:** Petersburg Ak

**Comment:**

I have been a Petersburg resident my entire life and have hunted Pt. Agazi for many many years. I'm opposed to any changes to the existing laws already in place.

My wifes family are property owners and have a cabin at Pt. Agazi and it's never been an inconvenience too hunt on foot or by bike from there or to drive and set up a tent and hunt out of that.

All other areas around Petersburg you are able to drive and it's nice that we have one area out of it all that's strictly walking or bike riding. Give's something for everyone.

Stuart Eddy

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**Proposal 22:** Oppose

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