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Ahtna Intertribal Resource Commission

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PC1

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February 27th, 2024

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Submitted electronically via adfg.alaska.gov and email to kristy.tibbles@alaska.gov

Subject: AITRC Opposes the Reauthorization of the Antlerless Moose Seasons in GMU 13 A, C, E

Dear Chairmen Jerry Burnett and Board of Game Members,

I am writing on behalf of the Ahtna Intertribal Resource Commission (AITRC), which represents the eight federally and state recognized tribes and the two ANCSA corporations within the Ahtna Territory. Our Board of Directors is composed of representatives from each of these ten entities; they possess deep connections to the land and have spent their lives fostering a profound understanding of the delicate balance between ecological systems and human activity. Through their invaluable guidance, AITRC is dedicated to harmonizing scientific best practices with our indigenous communities' wealth of Traditional Ecological Knowledge (TEK). The TEK for the Ahtna Hwt'aene (Ahtna people) is not to hunt cows or older bulls, as they are needed for breeding.

The Copper Basin Advisory Committee seats fifteen local subsistence users, trappers, game and fish guides, and local knowledge holders. Ten committee members at the February 8, 2024 meeting unanimously opposed the antlerless moose hunt proposals. This action speaks volumes because, in the past, they supported the antlerless moose hunt. ADF&G's Area Biologist supplied the Advisory Committee with a report that showed that subunit 13A's calf:cow ratio was below the objective. Calf:cow and bull:cow ratios were not provided for subunits 13C and 13E. Based on the incomplete data provided to the committees and public, AITRC does not support ADF&G's proposed antlerless moose hunt for GMU 13A, 13C, and 13E.

It seems counterintuitive to try to stabilize a declining moose population by killing cow moose in the absence of data indicating declining twinning rates, current low calf:cow ratios, and three successive years of deep snow conditions. These snow conditions have undoubtedly increased predation on moose. It is more likely that this is the cause of low calf:cow ratios and not nutritional stress.

Proposal 192- Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 13A. Proposed by: Alaska Department of Fish and Game.

Ahtna Intertribal Resource Commission **opposes** Proposal 192, reauthorizing the antlerless moose hunt for subunit 13A, based on limited data presented at the Copper Basin Advisory Committee to make an informed decision.

Moose populations estimates were not provided for GMU 13 subunits; the only information offered was that the estimates were met at the mid-point for objectives for GMU 13. In the past, management reports for moose in GMU 13 showed total harvest, population estimates, population trends, and



calf:cow and bull:cow ratios. This information is necessary for an informed decision based on the objectives set for each subunit.

For subunit 13A, the calf: cow ratio was reported to be 11:100. The ADF&G's current objective for a calf:cow ratio is 25:100. With calf:cow less than half of the current objective, AITRC urges that the Board of Game do not reauthorize the antlerless hunt at this time.

Public comments at the Copper Basin Advisory Committee meeting and Tribal observations reported at AITRC's Fish and Wildlife Committee stating that moose observations are not consistent with the population estimates that are being reported in combination with the fact that harvest in GMU 13 has dropped since 2009 to the lowest total harvest, do not lend cause to a cow hunt.

Proposal 193- Hunting seasons and bag limits for moose. Reauthorize the antlerless moose seasons in Unit 13C. Proposed by: Alaska Department of Fish and Game.

Ahtna Intertribal Resource Commission **opposes** Proposal 193, reauthorizing the antlerless moose hunt in subunit 13C. Please refer to the comments for Proposal 192.

No calf:cow, bull:cow, or population estimates were provided for subunit 13C from ADF&G at the February 8, 2024, Copper Basin AC meeting. The inconsistency and lack of data provided are enough to say that an informed decision cannot be made pursuant to precautionary management principles.

Proposal 194- Hunting seasons and bag limits for moose. Reauthorize the antlerless moose seasons in Unit 13E. Proposed by: Alaska Department of Fish and Game.

Ahtna Intertribal Resource Commission **opposes** Proposal 194, reauthorizing the antlerless moose seasons in subunit 13E. Please refer to the comments for Proposal 192.

Again, no calf:cow or bull:cow or population information is provided in the numbers presented. An informed decision cannot be made with the lack of information.

ADF&G suggests opening the cow hunt for subunit GMU 13E because the population is and has been abundant for the subunit, and they plan to issue resident permits. Their main concerns are nutritional constraints for the rest of the moose without providing data on browse and habitat conditions. What was provided was purely anecdotal. With a 12.5% decline overall Unit 13 based on the limited data provided by the Department at the Copper Basin AC meeting, it is difficult to the continued take of cow moose will stabilize a declining population experiencing low calf:cow ratios.

Other Proposals Considered:

Proposal 48- Brown Bear Tag Exemption

Ahtna Intertribal Resource Commission **supports** Proposal 48, waiving the brown bear tag fee.

Proposal 108- Intensive Management Plans III. Reactive wolf control in a portion of Units 12, 20D, and 20E to benefit moose.

Ahtna Intertribal Resource Commission **supports** Proposal 108, Intensive Management Plans III. Reactive wolf control in a portion of Units 12, 20D, and 20E to benefit moose.

Reactivation of the intensive management plan in units of 12, 20D, and 20E to benefit moose will have the additional benefit of reducing predation on the Nelchina Caribou Herd which regularly migrate through these units.



Proposal 111- Hunting seasons and bag limits for moose.

Add an archery-only, five-day season for residents and non-residents in Game Management Unit 12.

Ahtna Intertribal Resource Commission **opposes** Proposal 111, Hunting Seasons and Bag Limits for moose. We do not support a special hunt season for weapon-restricted hunts, archery can be used during the regular season.

Proposal 117- Special provisions for Dall sheep and mountain goat drawing permit hunts.

Ahtna Intertribal Resource Commission **opposes** Proposal 117, the proposal for special provisions. A non-resident is a non-resident regardless of relationship to an Alaskan resident.

Proposal 178- Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20B. Proposed by Alaska Department of Fish and Game.

Ahtna Intertribal Resource Commission **opposes** Proposal 178. In support of our relatives in the Upper Tanana area.

Due to previous instances when the take of ceremonial cow moose were prohibited, successive years of hard winters, and populations are below objectives, the reauthorization of a cow hunt is inappropriate.

Proposal 179- Hunting seasons and bag limits for moose.

Shift the moose season dates in Unit 20B.

Ahtna Intertribal Resource Commission **opposes** Proposal 179. The proposed extension of the season to September 30, may lead to more wanton waste as moose will be in rut.

Units 20 and 13 are the most heavily hunted areas in the state because they are on the road system.

Adoption of this proposal will serve draw more hunting pressure on an already heavily hunted area.

In Conclusion, precautionary management is necessary to ensure sustainable customary and traditional uses of moose and caribou that Ahtna Tribal Citizens and their neighbors are dependent on now, and for future generations.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Karen Linnell".

Karen Linnell
AITRC Executive Director

Attached: Wildlife report from CBAC 2.8.24 meeting



Proposals to vote on:

- 192- 13A Antlerless reauthorization: population stabilizing around the midpoint of the objectives; 2023 harvest was 13 cows
- 193- 13C Antlerless reauthorization: population still near the high end of the objectives; 2023 harvest was 0 cows
- 194- 13E Antlerless reauthorization: population around the midpoint of the objectives; 2023 harvest was 2 cows
- 189- Brown bear tag fee exemption

NCH Update

- Productivity and neonate survival were both low in the spring of 2023; based on this information, combined with high overwinter mortality data from collars, we were able to make the decision to cancel state hunts before permits were printed.
- All state and federal hunts were canceled for 2023/24 season
- No state hunt opportunity is offered for 2024/25 season
- Nelchina Caribou News published in September 2023
 - Summer minimum count of 7,384 caribou; Rivest estimate of 8,823 +/- 1,738
 - 13 calves per 100 cows in July
- October, 2023:
 - Fall composition survey
 - 3 calves per 100 cows
 - 25 bulls per 100 cows
 - Fall herd estimate less than 10,000 animals with a minimum of 7,000
 - Deployed 17 VHF collars on female calves
 - average 115.7lbs; broken antlers, polled antlers, and abnormal coats concerning
 - investigating cornea lesions as well
 - Deployed 1 VHF collar on a female yearling
 - Deployed 15 GPS collars on adult cows
- Winter 2023/24 (so far)
 - Wintering around the Nabesna Rd, in the Mentasta Mountains, and on the Tetlin flats (largely on federal lands)
 - Good news: Much less snow than we have in the Copper Basin so far, and the herd is staying closer to home (less energy expenditure)
 - Bad news: So far we've lost 3 calves, 1 yearling, and 3 adults (roughly 10% of the collar pool), and all but one of those are confirmed or have strong indications of predation, predominantly wolf; this is better calf survival than what we saw during last year's fall migration, but overall this level of early winter predation is different from what we saw over the past 2 winters, when the herd wintered further north and we had significant late winter mortality, much of it not associated w/predation.
- Range assessment:
 - ADF&G FaWNA lab (Palmer) has contracted with ACCS (UAA) to assess quality and quantity of forage across the spring & summer range, including vegetation mapping and biomass assessment, with plans to assess winter range in the future. Our concern right now is the state of the spring/summer range, so this work will help inform that concern.
 - ACCS and AITRC conducted sampling efforts in 2023 and ACCS is working with ABR and AECOM to develop vegetation maps in 2024

Predator Update

- Brown bear CMR survey completed in 13A (Nelchina calving grounds) in 2022 and preliminary results indicate continued decline in the population:
 - 1998: 21.3 independent bears per 1,000km²
 - 2011: 13.0 independent bears per 1,000km²
 - 2022: preliminary estimate 8 independent bears per 1,000km²
- Aerial wolf control program active in 13A,B,D,E this winter; as of 2/2/24 about 60 wolves have been harvested out of 300–350 wolves estimated in Unit 13 this fall.



Unit 13 Moose Updates

Population Surveys

- 13A: Slight increase in adults observed on the landscape compared to last year but only 11 calves per 100 cows and only 2 yearling bulls per 100 cows. Population stabilizing near midpoint of objectives with 26 bulls:100 cows. We estimate that 1% of the cow population this year is 26 cows, and we're issuing 20 permits for 2024/25 season; in recent years only females have been harvested; so far 13 cows harvested this season. Wolf control is active to protect the remaining calves and yearling bulls; wolf control here will also benefit Nelchina caribou on the calving grounds.
- 13B: about 20% drop in adults from last year; 31 bulls:100 cows, 10 calves:100 cows, 4 yearling bulls:100 cows; wolf control active
- 13C: abundance this year remains above the midpoint of the objectives; goal is to stabilize around the midpoint. Estimate 1% of cow population would be 19 cows, and we've issued 15 permits for the 2024/25 season; no cows were harvested in in the 2023/24 season.
- 13D: continued decline in abundance; 3yr average is now below the lower objectives but calf:cow ratios and yearling bull:cow ratios improved. Wolf control is active for the second year in this area.
- 13E: 3yr average is right at the midpoint of the objectives; goal is to stabilize around the midpoint to provide a more productive population, similar to what we see in 13A. We estimate 1% of the cow population to be 34 cows, and we will issue 20 permits for 2024/25 season. Wolf control also active to stabilize this population at the midpoint of the objectives and protect calves and bulls on the landscape.

Moose Harvest:

Participation and harvest in the Moose CSH hunt and Unit 13, regulatory years 2009 through 2022.

Regulatory Year	Number of Groups	Number of Permits Issued	Number of "any-bull" locking tags issued	Total Number of CM300 Moose Harvested	Total Moose Harvested in all GMU13 Hunts
2009	1	378	-	100 (68 "any-bull")	866
2010 ^a	-	-	-	-	946
2011	9	814	-	86 (59 "any-bull") ^b	952
2012	19	969	-	98 (73 "any-bull") ^b	720
2013	45	2,066	-	156 (81 "any-bull") ^b	723
2014	43	1,771	281	150 (77 "any-bull") ^b	937
2015	43	1,984	344	171 (92 "any-bull") ^b	1,058
2016	73	3,023	485	201 (114 "any-bull") ^b	1,089
2017	83	3,136	521	188 (102 "any-bull") ^b	1,006
2018	57	2,331	355	155 (92 "any-bull") ^b	801
2019	61	2,143	350	159 (94 "any-bull") ^b	914
2020	45	1,699	350	138 (79 "any-bull") ^b	880
2021	54	1,831	350	130 (84 "any-bull") ^b	839
2022	47	1,703	350	124 (74 "any-bull") ^b	689
2023	46	1,757	350	108 (65 "any-bull")	528*

^a The community hunt was not offered in regulatory year 2010.

^b Emergency orders were issued to prevent the any-bull harvest from exceeding the quotas for some subunits.

***Preliminary total will increase as reports are finalized. Reports from 2023 season suggested that significant rain and wind made for a difficult hunting season and leaves didn't fall until after the season ended, making moose harder to find. There were less hunters on the landscape with no caribou season; preliminary results from moose surveys suggest there were more legal bulls left on the landscape than we typically see in some heavily hunted areas. Overall abundance declined 12.5% compared to last year's counts, and the 3yr running average declined 7%. Much of this decline was seen in 13B and 13D. Cow harvest is necessary in 13A, 13C, 13E to stabilize those populations and increase overall population productivity.**



Organization: Alaska Outdoor Council

Name: Rod Arno

Community of Residence: Palmer, Alaska

Comment:

The Alaska Outdoor Council (AOC) represents thousands of Alaskans who hunt, trap, fish, and recreate on public lands/waters in Alaska. AOC has reviewed a number of critical proposals that the board will be deliberating on at Interior and Eastern Arctic Region meeting and provide these comments.

Proposal 46. Do not adopt.

Dall sheep populations in most of Alaska are below longtime population and harvest objectives adopted by the Alaska Board of Game (board) over many years. AOC has not reviewed any scientific data that would indicate these Dall sheep population declines are due to over harvest by regulated or illegal hunters. All scientific data suggests the declines are all weather related.

AOC has not reviewed any data or scientific publications suggesting that curtailing hunting of full curl, mature Dall sheep rams will have any positive effect on the populations, ability to rebound.

Statutorily, AS 16.05.255(a)(10), direct the board, among other duties, to adopt regulations regulating sport hunting and subsistence hunting as needed for the conservation, development, and utilization of game.

Allocating full curl ram Dall sheep harvest through a permit drawing system will not add to the conservation of declining Dall sheep populations. Dall sheep populations are currently declining in GMUs where permit drawings have all ready been adopted by the board.

Only stopping the harvest of lambs and ewes by subsistence hunters (GMU24B) and predators reduction programs would help speed up recovery of Dall sheep populations below their population objectives.

Proposal 52. Adopt.

Wolf and coyote predation on low populations of ungulates keeps those populations in predator pits conditions requiring a much greater time to rebound to meet population and harvest objectives. The board could quicken recovery of low ungulate populations by allowing new technology to increase harvest of furbearers.

Proposal 60. Adopt.

Reducing wolf predation on moose as well as Dall sheep in GMU19C is a positive action that the board has authority to adopt.

Proposal 64. Do not adopt.

Clearly the board has put enough written justification to regulate nonresident hunter allocation in Findings 2017-222-BOG to adopt any allocation it so chooses for moose in GMU19C.

Current regulations on antler restrictions and cow harvest are consistent with sustained yield management. This proposal if adopted would not aid conservation of the moose population, but it could certainly restrict development and utilization required in AS16.05.255(10).

Proposal 71 & 72. Adopt.

The Holitna-Hoholitna CSU was created to reduce hunting pressure from downriver Kuskokwim hunters who accessed the area with boats outfitted with +40hp engines.

AOC would prefer not having the board restrict motorized access to one users group to provide a greater opportunity for other users traveling to the area.

Proposal 78 & 78 & 79 & 80 & 81. Adopt.

Again, regulated hunting of mature Dall sheep rams has not lead to the decline in the Dall sheep population in GMU19C. Again, AOC to date has not been made aware of any scientific data that confirms mature, full curl, Dall sheep rams taken by licensed hunters during times of low sheep abundance are not the cause of conservation concerns. Again, there is no data showing that areas requiring Dall sheep drawing permit are any better of populations wise than areas open for general hunts.

Unnecessary banning of all nonresident Dall sheep hunters is not in the best interest of the state. Nonresident hunting license and tag fees account for the majority of F&G Funds allocated for game management. Loss of hunting opportunities for nonresident hunters cuts into the dedicated match for PR funding for the department to conduct surveys and inventories of game, including Dall sheep. Without that data the Department could not report back to the board what the harvestable surplus, and without that data the board can not allocate harvest on the sustained yield principle, Article 8, Section 4.

AS 16.05.255(a)(10). Regulations of the Board of Game; Management Requirements. allows the board to adopt regulations to regulate hunting as needed for conservation, utilization, and development. It's the board's duties, among other things, to adhere to Article 8, Sections 2 and 4 of the Alaska State Constitution. Both sections emphasize the importance of development and utilization of game.

Proposal 97. Adopt.

Providing more hunting opportunities for bear harvest within sustained yield limits is what the board is required to do.

Proposal 105 and 106. Adopt.

The board has the authority to adopt bear baiting regulations when bear populations allow for additional harvest.

Proposal 154. Adopt.

The board is required in statute to provide more harvest opportunities when harvestable surplus is available.

Proposal 184. Adopt.

Providing opportunities to harvest bear at a sustainable level when hunters are in the field harvesting ungulates makes sense.

The Alaska Outdoor Council appreciates the Department's efforts to provide population and harvest data on game species pertinent to the proposals in 2024 Interior & Eastern Region. Often the Department is unable to make the recommendations available to the public in a timely manner. With that said, AOC reserves the right to amend its comments and provide additional comments prior to the Boards deliberations.

Rod Arno

Public Policy Director for AOC



ALASKA

PROFESSIONAL HUNTERS ASSOCIATION, INC.

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March 1st, 2023

Dear Alaska Board of Game Members,

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

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

APHA commissioned its first socioeconomic report with the McDowell Group in 2014, titled *“Economic Impacts of Guided Hunting in Alaska.”* More recently (2019), APHA partnered with Dallas Safari Club to add to and update McDowell’s 2014 seminal work. *“The Economic Importance of Hunters Visiting Alaska; Alaska’s Guided Hunting Industry 2019”* provides new information on funding for conservation that our visiting clients contribute to wildlife management. Guiding hunters is primarily an activity that occurs in rural areas of Alaska.

<ul style="list-style-type: none"> 91.8 Million total economic output (2019) 	<ul style="list-style-type: none"> 57.4 Million new dollars to Alaska (2019)
<ul style="list-style-type: none"> 59% of guide industry spending occurs in rural areas (2019) 	<ul style="list-style-type: none"> 1,380 people directly employed, total employment with multipliers; 1,890 (2019)
<ul style="list-style-type: none"> 85% Active Guides are AK Residents (2019) 	<ul style="list-style-type: none"> Visiting hunters (guided & non-guided) purchase 14% of total Alaska hunting licenses (2019)
<ul style="list-style-type: none"> Guided nonresidents represented only 3% of 	<ul style="list-style-type: none"> Visiting hunters (guided & non-guided) contribute 76% of total revenue to the ADFG wildlife conservation fund (2019)



current licenses but 30% of License/tag revenue	
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Significance to Alaskans & Meat Sharing

Guiding hunters in Alaska has its origins in Territorial days. Because of our rich history, guides have deep roots in communities across Alaska, with many guides living in remote communities or “Bush Alaska.” The APHA worked with McDowell to quantify what some of the benefits that Alaskans reap from Guided Hunting. In 2019, 31.9 million new dollars went to Alaska business that were directly attributed to Guided Hunting. This generated another 19.1 million in economic activity in the support sector. Hunting guides do what they can to share the harvest; 223,500 lbs of well cared for, high quality game meat was shared with their fellow Alaskans in 2019.

Individual Proposal Comments

Below you will find our comments on individual proposals under your consideration for Region III regulatory change. Leading up to the drafting of these comments the APHA held multiple teleconferences and invited all members to participate in the drafting of these comments. Our teleconferences were well attended with over 15 individual guides representing small Alaskan businesses participating. You will find that there are some proposals that we don’t have comments listed for. These were proposals that we felt did not directly impact guides or were outside of the group’s purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations. While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. Because the APHA takes a statewide perspective when approaching Board proposals, we urge you to consider regional expertise from our members even when their position is different from that of the APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or regional basis. Given the opportunity, Alaska’s hunting guides will continue to bring a wealth of wildlife and hunting knowledge to the table.



Sheep Hunting Proposals- Oppose (43-46, 118-119, 130-135, 141-143, 158-162, 181)

Except for GMU 19C, APHA OPPOSES all of the allocative sheep proposals set to be considered in the Region III meeting. The APHA is OPPOSED to allocation proposals targeting resident hunters, nonresident hunters, rifle hunters and airplane hunters. There is ZERO data to support any reduction in hunting opportunity for full curl sheep will have population level benefits for dall sheep.

Drawing Hunt Impacts on Guided Sheep Hunting:

Implementing nonresident sheep drawing hunts is the best way to kill or destroy guide businesses. It is impossible for a guide to make a living on public lands if they are managed by drawing hunt. Drawing hunts impact Alaska resident guides the most, especially small guide businesses domiciled in rural communities. To be successful as a guide competing in a drawing hunt you must apply the most potential clients possible. This means you need numbers of applicants to have a chance to have any business. This model requires that you offer your hunts as cheap as possible to entice hunters to apply with you. You also cannot plan your season until the drawing results come out in February. Good guides have a solid workforce who knows whether or not they will have work year to year. Not being able to plan your season until February destabilizes our workforce and lowers the quality of the guides we have in the field guiding for us.

When hunts go to draw small Alaskan guides must look for ways to make contact with numbers of hunters who will apply. There are large businesses in the lower 48 who specialize in this service but who charge a fee to assist guides with this process. Once you implement a drawing hunt you have created an economic value for OUT OF STATE booking and draw hunt stuffing businesses. Once you implement a drawing hunt you have put downward pressure on the value of Alaska's game. Once you implement a drawing hunt you hurt the little guy the most, especially you, qualified Alaskan resident assistant guides.

The APHA strongly OPPOSES the use of drawing hunts to allocate nonresident hunting opportunity UNLESS there is a conservation need to do so.

Drawing Hunt Impacts on Resident Sheep Hunters:

Drawing hunts are bad for guides but they are WORSE for resident hunters, especially young hunters. Residents who draw a hunt usually only draw a unit once ever so often. This means that they are going into a hunt area they have never hunted before and are almost completely at the mercy of a transporter to find a place to land them. Sheep hunting in ANY area for the first time puts you at a disadvantage. Drawing hunts are an unreliable way to maintain hunting opportunity. Each year most people who apply for draws are disappointed and fail to get the tag they applied for. It is general hunts that keep the hunting tradition alive and are the baseline to keep hunting going as an activity. Managing resident sheep hunting by draw is a great way to steal the best years away



from young hunters who are in sheep shape. Worse yet, resident military hunters may only be in Alaska for two to four years. If you go to drawing hunts to manage resident sheep hunting military hunters may not be able to go hunting for sheep their entire time they qualify as an Alaskan resident.

The APHA supports resident sheep drawing hunts if there is a conservation benefit ONLY.

Guide Concessions:

The APHA is fully aware sheep hunting on state lands is lower quality than on federal lands where guides are limited in number. This is a fact. The APHA is a strong advocate for hunting guides concessions and advocating for Senate Bill 253 in the legislature. The APHA sees limiting the number and type of guides on public lands as the solution to problems attributed to guided hunting in the field. Every guide, resident and nonresident client who hunts on federal land where guides are limited to by concessions has a BETTER hunt than the same hunters who are hunting in areas with many guides managed by drawing hunt.

The APHA again urges the Board of Game to support guide concessions so we can move forward and manage commercial hunting for the benefit of all users.

Sheep Declines:

Hunting guides across region III report various levels of declines in the areas they hunt in. Some guides in the northern Alaska Range report 70-80% estimated declines, others on the north slope of the Brooks Range report a recovering population (guides in GMU 26 reported 40-70% declines in 2013) unaffected by the recent harsh weather events. All of the guides report missing age classes attributed to low recruitments in 2013-14. Sheep have declined significantly in most of Region III.

Sheep Declines and Management Strategies:

Sheep hunting in Region III is managed under the full curl strategy. Region III has large open, over the counter sheep hunting opportunities as well as drawing areas and large units completely closed to hunting in national parks. All areas have experienced declines in the sheep population. Areas closed to hunting have declined, areas managed by drawing hunt have declined areas open to general hunting opportunity have declined. In fact, some of the most dramatic declines have occurred in the Tok management area, managed by draw, and in the Gates of the Arctic National Park. In fact declines in the aforementioned Tok and NPS units have exceeded declines in many areas open under general harvest ticket opportunities. If drawing hunts helped conserve sheep these units would be expected to fair better in a harsh weather event than areas open under general hunts. If hunting full curl sheep impacted sheep populations then NPS lands would be expected to fair better than areas incurring human harvest. The facts do not support the conclusion that closing hunting or managing sheep hunting by draw have ANY population level benefits.



Hunting Quality/Crowding:

Most hunters define and high-quality sheep hunt as being one where they do not encounter other hunters, and they see legal rams. Any allocation of hunting opportunity that removes opportunity and concentrates effort in any area or time period of the season works to increase crowding. Seeing legal rams is reliant on lamb recruitment 8 to 11 years prior to the year hunters are in the field. Reducing crowding is best achieved by keeping large areas open to general hunting or devising a strategy to encourage distribution of hunting effort during the long sheep hunting season. The current practice of keeping large contiguous areas open to general sheep hunting effort is the best approach to dealing with crowding and results in hunters choosing to hunt closer to access points or further away depending on their financial means and/or physical abilities. Legal rams are currently hard to find because there are blank recruitment years attributed to 2013 AND the recent hard winters.

Summary:

The APHA is deeply concerned recent sheep declines will result in passage of proposals that merely reallocate sheep hunting opportunity but result in ZERO population level benefits.

As a board you can close ALL sheep hunting in Region III and sheep will not recover any faster. As a board you can pass a nonresident draw here, or a shortened season there or even give a whole unit to bow hunters. None of these actions will bring sheep back any faster.

If you as a board want to do something for sheep, you need to work with the department on a plan for reduction ewe mortality and increase lamb survival. If you as a board want to reduce sheep hunting opportunity for future generations to come and crush small, family run Alaska businesses passing a bunch of allocation proposals that cut one user group out or another will do that. The APHA is fully supportive of hunting restrictions to support wildlife conservation. We prefer any approach that is not a drawing hunt, but we must support a drawing hunt if that is the only way to maintain harvestable surplus. We urge you to be prudent and wise and let the next three years play out before you make drastic changes to sheep hunting opportunity in Region III.

GMU 19C Sheep Proposals--- Proposals- 76-92- Amend/Defer

The APHA supports fully closing ALL sheep hunting in 19C to residents and nonresidents until the sheep management plan is finalized. If the board chooses not to close all hunting then we support re-opening nonresident sheep hunting until the management plan is finalized and implemented. Whatever action the board takes on the proposals we hope you put conservation first and allocate hunting opportunity fairly.

19C Sheep Management Plan:



Proposals 76-92 should all be sent to the sheep management group and put on the table for the team to consider as part of their planning process.

The board's action to close nonresident sheep hunters in 19C was patently unfair and legally tenuous. However, the sheep decline in the area is real and local input highlighted concerns for the resource that could not and cannot be ignored. The APHA is hopeful the sheep management plan in 19C will help stakeholders, the board and the department get back to a reset point with sheep management in Alaska. We need the process to succeed. We urge the board and department to keep an open mind and look for ways to conserve sheep even if it requires assistance from private NGO's, federal agencies and of course the public. If the working group in 19C supports drawing hunts as a solution moving forward, this is a horrible option for guides, we will be forced to support this solution because the process is about putting the resource first. Drawing hunts are used as an example to emphasize how important this management plan is to us and the hope that we have for a plan that will help rebuild the sheep and allow hunting to continue for generations.

Most of sheep hunting in Alaska is managed by full curl. At this time this appears to be the perfect management strategy. However, many guides, especially guides with areas on federal lands, are cautious and do not believe it is a good idea to kill every full curl ram. But the guides trust the department and believe in ADFG managers. All of the guides agree that recovering sheep populations more rapidly will require predator control but there is disagreement on how best to do this economically and in a way the non-hunting public can understand. The APHA see the 19C management plan as the venue for working to understand full curl management better and how and when predator control will be effective and in the public's interest.

Hunting Quality:

At a population level full curl management may be the perfect way to ensure hunting does not impact Alaska's wild sheep. But from a hunting quality perspective there may be a better way to manage sheep. We need the sheep management group to consider hunting quality.

Proposal 48- Support

We support Prop. 48 based on the department comments.

Proposals 56&58- Support

Proposals 60-62- Support

Proposal 65- Support

The APHA strong supports reauthorizing the unit 19C IM program.



Proposals 93 – 97- Support

The APHA supports expanded bear hunting opportunities in GMU 19C but we prefer Prop. 94.

Proposal 108- Support

Proposal 112- Oppose

The APHA opposes Prop. 112 because caribou are migratory and limiting nonresident hunting to one zone sets up a total closure of nonresident opportunity some years. Clearly the intent of zones in a management scheme is to give the department tools to manage harvest based on herd locations. Prop. 112 is an ill-conceived, bad faith effort to take tools away from wildlife managers at a time when they need more tools not less.

Proposal 117- Support

The APHA supports Prop. 117 because this aligns the Tok Management Area with other draw hunts.

Proposal 120- Support

Proposal 122- Support

Proposal 130- Oppose

Proposal 131- Support

Proposal 136 – 138- Support

The APHA supports Props. 136, 137 & 138 but we prefer 137.

Proposal 140- Oppose



The APHA opposes Prop. 140 but may support the proposal if the department identifies a conservation benefit. At the time of writing these comments (March, 1st) department comments had not been posted.

Proposals 146-151- Support

The APHA supports additional wolf hunting and trapping opportunity because wolf populations are robust and additional harvest will not affect wolf population viability.

Proposal 167-169 – Support

The APHA supports Props. 167, 168 & 169 because bear population on the N. slope are reported to be high at this time. We believe additional opportunity will be sustainable.

Proposal 180- Oppose

The APHA strongly opposes Prop. 180. This proposal is purely allocative without a conservation benefit. The current allocation of 25% of the caribou drawing permits going to nonresidents was based on the board following the nonresident allocation policy where nonresidents play an important role in maximizing the benefit for the resource. The area encompassed by DC827 is remote and some of it is within a CUA making access hard. Allocating 25% of the permits to nonresident ensures opportunities will be utilized while still giving a vast majority of tags to residents.

Passing Prop. 180 will add to a growing stack of hardships guides are experiencing in 20A and is unnecessary. The authors of Prop. 180 seek to impose a one-size fits all approach to allocation that is not supported in law and would be troubling precedent.

Proposals 182-185- Support

The APHA supports Props. 182, 183, 184 & 185 but we prefer Prop. 185.

Proposal 186- Oppose

Proposal 207- Defer

The APHA is supportive of Prop. 207 being considered on statewide basis but opposes its implementation only in Region III. We encourage this concept to be considered by the



19C working group. If removing the “age legal” criteria will result in a conservation benefit it should be adopted statewide.



Alaska Trappers Association
PO Box 82177
Fairbanks, AK 99708

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

1/12/24

Dear Chairman and members of the Board:

On behalf of over 1200 members of the Alaska Trapper's Association, we wish to share our opinions on a number of proposals you will be considering at your March Interior and Eastern Arctic Region meeting in Fairbanks.

PROPOSAL #50

With all due respect for the Eastern Interior Regional Advisory Committee, and in spite of our frequent support for expanded trapping opportunity, ATA does not support this proposal. By mid-March, marten fur quality is in decline through wearing as well as bleaching. Closure on February 28 has been standard for decades. Marten that have survived to that point should be left alone to start the population recovery for the next season.

PROPOSAL #51

ATA supports moving the muskrat trapping season forward to align with the beaver trapping season. A short open water period would allow expanded trapping opportunity for an under-utilized resource. Like beaver, the fur may not be at its mid-winter prime but, it is pretty and marketable.

Proposal #52

ATA does not take a position on the use of night vision equipment. It seems more like hunting than trapping but we understand the relationship between the two. If such harvest were to become prevalent, we might develop a position since it is our opinion that trapping should be the primary means of fur harvest. We defer to the judgement of the Board.

**PROPOSAL #109**

ATA does not support this proposal. Wolves, as a big game animal, should be subject to the same flying rules as most other big game species are subject to. We suspect that most of the harvest under this proposal would be during early moose and caribou seasons. Fur quality that early is poor and pups are likely to still be dependent on the adults.

PROPOSAL #122 and #123

ATA is opposed to extension of wolf hunting or trapping seasons into summer. The fur is well beyond prime and harvest would extend into the litter raising season. While we are not necessarily always concerned regarding general public reaction, these proposals seem repugnant even to trappers.

PROPOSAL #124

With all due respect for the Eagle Fish and Game Advisory Committee, ATA does not support this proposal for the same reasons we do not support Proposal #50.

PROPOSAL #149

ATA defers to the judgement of the Board regarding this proposal. We do ask that consideration be given to keeping regulations consistent with adjacent units to the extent practical.

PROPOSALS #150 and #151

ATA opposes extending the wolf season into summer for the same reasons as we oppose Proposals #122 and #123. Summer fur has little value and harvest would overlap the litter raising season.

PROPOSAL #153

With all due respect to a fellow trapper, ATA does not support wolverine trapping in April. The late fur quality has degraded and denning is in full swing.

PROPOSAL #166

ATA takes no position on this proposal. While it would involve snaring, it does not involve the management of a furbearer. If bears were ever classified as furbearers, we would weigh in on such proposals.

PROPOSAL #170

Consistent with our input on Proposal #153, and with all due respect to a fellow trapper, ATA does not support extension of Interior wolverine seasons into April. The fur quality is reduced and such a late season would be in conflict with litter production.

**PROPOSAL #186**

This is a perennial attempt by the National Park Service (and support groups) to extend Park management onto adjacent State land. For decades they have made assertions ranging from “trapping will eradicate wolves” to “prohibition of trapping will increase viewing opportunities in the Park”. For the same number of decades, the status quo has worked. Trapping some of the harvestable surplus has little impact on the overall wolf population. Wolf fecundity is such that the huge Park Service managed area assures that any wolf habitat in the region will be populated to its natural capacity. ATA vehemently opposes this attempt to assert Park management onto adjacent State land. We also oppose the Park Service attempt to eliminate perfectly viable trapping opportunity.

PROPOSAL #187

ATA does not support extension of the wolverine trapping season further into March. Such extension is in conflict with litter production. We understand the logic of longer seasons in more remote areas but the eastern portion of Unit 20C is not especially remote. We also understand the logic of keeping seasons within units, subunits, and adjacent units, consistent but we don't support standardizing by extending seasons beyond what is sound.

PROPOSAL #188

ATA does not support this proposal. The current prohibition on beaver trapping in the lower Chena River has worked well. The nuisance beaver policy of ADF&G has made it possible to take out specific problem beaver. Much of the area is within city boundaries where trapping without an ADF&G permit is prohibited anyway. The potential for conflict between trapping and the general public is high in this populated area. Also, the area has proven valuable (with permits) for trapper training, particularly youth training.

ATA appreciates the opportunity to participate in the regulatory process.

Sincerely,

Randall L Zarnke, president

On behalf of the Alaska Wildlife Alliance membership, staff, and Board, we submit the following comments on 2024 Interior proposals.

Proposal 51: Oppose

This proposal seeks to change the trapping season for muskrat in Units 19, 20 (except 20E), 21, 24, 25, 26B, and 26C to align with the beaver trapping seasons in those units (i.e. shift muskrat season from November - June to September until June) to allow for simultaneous open water trapping of these two species in the fall, winter, and spring.

While we understand the Board's interest in reducing regulatory discrepancies between game units, we encourage the Board to inquire as to why the muskrat season starts November 1 as opposed to September, and ensure that there are no conservation concerns with harvesting muskrat in the fall. Muskrat populations are not widely surveyed in the state, so we encourage the Board to consider the latest available data (including the implications of no data) in their deliberations.

Proposal 52: Oppose

This proposal seeks to allow the use of night vision goggles and forward-looking infrared devices for taking furbearers under a trapping license in all of Region III. We oppose this proposal because we believe artificial light (headlamp) is sufficient in winter months, as has been practiced for decades.

Proposal 55: Oppose

This proposal seeks to establish a positive Intensive Management (IM) finding for moose in Unit 19C.

We oppose this proposal for the following reasons:

- 19C does not meet 5 AAC 92.106(b) criteria "accessibility to harvest". At the March 1998 Interior Region Board of Game meeting the board discussed adopting an IM finding for Unit 19C and ultimately adopted a negative IM finding; one reason given was the lack of access. There is only one landing strip, and the unit is too remote to conduct moose surveys. Should this population have a positive IM finding, the Board must likely establish population and harvest objectives. Given the difficulty of surveying the unit, as well as the current lack of surveying, the Board must consider if the State can maintain survey standards under IM to lawfully manage IM under this finding.
- We presume the interest in establishing IM for moose is to request the State support predator reduction efforts to bolster moose populations (see proposal 60). We support Alaskan subsistence, and encourage the Board to wait until the harvest implications of the non-resident cap established in RY23 are better understood. Basing IM findings and objectives on historic harvest levels that are mostly 1) non-resident and 2) expensive (fly-in) does not accurately reflect the subsistence value of the moose in that Unit to residents.
- If there is a positive finding for moose and the harvest objective falls low because the non-resident harvest cap is suppressing effort, we feel this would be a back-door strategy to

invoke predator control when the limiting factor is not predators, but hunter effort. Falling below a high harvest objective wouldn't mean there's not enough moose, but would more clearly reflect that 19C is a difficult and expensive area to hunt. This could be a likely future as, on average, residents harvested 57 moose and nonresidents harvested 67 moose annually between RY 13-22. In RY22, 183 moose were harvested with 73 taken by residents and 110 by nonresidents. If the harvest is low following the RY23 change, we urge the Board not to conclude that the moose population is declining because of predators, but because this moose population is only being managed/surveyed by harvest data and the harvest regulations have undergone extreme reductions.

- If the Board does find a positive IM finding for moose, we strongly encourage the corresponding harvest objective to be based on scientifically-ground population estimates. We fear that the Board will apply an unrealistically high harvest objective that would be far above the average resident harvest. We fear that a poorly-reasoned harvest objective would invoke predator control when predators aren't the cause of low harvest.
- In our understanding of ADFG's comments, the resident harvest has never exceeded 100 moose. We understand that the IM statute does not discern non-resident vs resident harvest in its harvest criteria, but we oppose creating IM plans for the benefit, primarily, of nonresidents. This discussion could be included in 5 AAC.92.106 criteria (d) "level of hunter demand: as reflected by total hunter effort, number of application for permits, or other indicators".
- We encourage the Board to explore the criteria under 5 AAC.92.106 (c) "utilization for meat" a population that is used primarily for food" in the context of non-resident hunters. Does the Department have an understanding of how many non-residents use the moose for food or trophy (how much of the non-resident meat is donated?)

Proposal 57: Oppose

This proposal seeks to modify the IM Plan for Unit 19 to include 19E.

We understand the administrative burden facing the Department with the split of 19A and 19E, however, this proposal copies the bear and wolf population data from 19A directly. Before adopting a Predator Control program in 19E, the Board must understand the bear and wolf population densities (and therefore consequences of proposed Predator Control) in the *specific subunit* it is adopting. As the proposal currently reads, the bear and wolf populations are exactly the same in 19A and 19E, leading us to believe that the data were based on 19 A/E together, not individually.

Without this level of analysis, the Board may inadvertently pass a Predator Control program with unknown effects on the 19E bear and wolf populations.

Proposal 58: Oppose

This proposal seeks to authorize a predator control program in 19A.

By ADFG's admission, the 2004-2009 wolf control program was unsuccessful, and discontinued because of a lack of success removing wolves. Reasons for the lack of success primarily included land status which was a mix of private and federal lands, and poor snow conditions. While the primary private landowner has given permission, our understanding is that the majority of this program would not be permitted by federal land managers. Additionally, reliable snow conditions are still a challenge and likely to continue or worsen. Finally, and most importantly, **population objectives are currently being met.**

We understand that this proposal was requested by the Board to investigate a 2020 proposal, but neither the evidence for needing this program nor the logistics for implementing it are provided.

Proposal 60: Oppose

This proposal seeks to allow aerial predator control without a positive IM finding for moose in 19C.

We strongly oppose this proposal for the following reasons:

- 19C does not meet 5 AAC 92.106(b) criteria "accessibility to harvest". At the March 1998 Interior Region Board of Game meeting the board discussed adopting an IM finding for Unit 19C and ultimately adopted a negative IM finding; one reason given was the lack of access in Unit 19C. There is only one landing strip, and the unit is too remote to survey. Should this population have a positive IM finding, the Board must likely establish population and harvest objectives. Given the difficulty of surveying the unit, as well as the current lack of surveying, the Board must consider if the State can maintain survey standards under IM to lawfully manage IM under this finding.
- We support Alaskan subsistence, and encourage the Board to wait until the harvest implications of the non-resident cap established in RY23 are better understood. Basing IM findings and objectives on historic harvest levels that are mostly 1) non-resident and 2) expensive (fly-in) does not accurately reflect the subsistence value of the moose in that Unit to residents. Nor does this reflect the moose population - it simply reflects hunter effort.
- If there is a positive finding for moose and the harvest objective falls low because the non-resident harvest cap is suppressing effort, we feel this is an illogical strategy to invoke predator control when the limiting factor is not predators, but hunter effort. Falling below a yet-to-be-determined harvest objective wouldn't mean there's not enough moose, but would more clearly reflect that 19C is a difficult and expensive area to hunt. This could be a likely future as, on average, residents harvested 57 moose and nonresidents harvested 67 moose annually between RY 13-22. In RY22, 183 moose were harvested with 73 taken by residents and 110 by nonresidents. If the harvest is low following the RY23 change, we urge the Board not to conclude that the moose population is declining because of predators, but because this moose population is only being managed/surveyed by harvest data and the harvest regulations have undergone extreme changes.
- If the Board does find a positive IM finding for moose, we strongly encourage the corresponding harvest objective to be based on scientifically-ground population estimates. We

fear that the Board will apply an unrealistically high harvest objective that would be far above the average resident harvest. We fear that a poorly-reasoned harvest objective would invoke predator control when predators aren't the cause of low harvest.

- In our understanding of ADFG's comments, the resident harvest has never exceeded 100 moose. We understand that the IM statute does not discern non-resident vs resident harvest in its harvest criteria, but we oppose creating IM plans for the benefit, primarily, of nonresidents. This is discussing could be included in 5 AAC.92.106 criteria (d) "level of hunter demand: as reflected by total hunter effort, number of application for permits, or other indicators".
- We encourage the Board to explore the criteria under 5 AAC.92.106 (c) "utilization for meat" a population that is used primarily for food" in the context of non-resident hunters. Does the Department have an understanding of how many non-residents use the moose for food or trophy (how much of the non-resident meat is donated?)
- This proposal would be extremely constantly for a unit that sees highest participation (historically) from non-residents, does not have a moose survey program in place, and is hardly hunted outside the Farewell area.

In short, this proposal is in response to a predator problem that doesn't exist. If harvest is low because of access, or because the non-resident harvest was capped, that does not mean predators are suppressing the moose population.

Proposal 61: Oppose

This proposal seeks to allow the take of wolves in Unit 19C the same day a person has been airborne and create an Intensive Management Plan for Unit 19C. We oppose this proposal because same-day aerial wolf hunting is prohibited unless part of an Intensive Management program. We also opposed the creation of an IM program in 19C for the reasons stated in comments on Proposal 60. Succinctly, there is no positive IM finding for moose in 19C, and no harvest objective to warrant whether harvest has fallen below an IM objective. If/until those criteria are met, and IM program cannot be enacted.

Proposal 62: Oppose

This proposal seeks to establish an IM program for 19C. We oppose this proposal for the reasons stated in comments on Proposals 60 and 61. We appreciate the proposer's interest in working with ADFG to understand wolf carrying capacity to find a wolf population that is sustainable for wolves and amenable to the communities. Many predator control programs are enacted in the state with very old, or at times non-existent predator data (as was the case in the establishment of the Bear Control program in Mulchatna). We support the proposer's interest in ecosystem health, which includes predators such as wolves.

Proposal 73: Oppose

This proposal seeks to reauthorize the Intensive Management plan for Unit 21E for six years.

Before re-authorizing this plan, we implore the Board to consider the following commitments and recommendations set forth by the Operational Plan for this program (set to expire in 2022). Particularly, the “other considerations” on Page 8 of the Operational Plan for Intensive Management of Moose in Game Management Unit 21E Document Version [6], [November 2016]:

“The perceived decline in moose numbers during the mid-1990s may very well have taken place, however the department has no data to document this. Currently, moose numbers appear to be high again, and the population in Unit 21E is well above the density objective established in this plan. However, the BOG and GASH AC want to remain proactive by having an IM plan in place if a future decline is detected. In Unit 19A ADF&G was not able to measure a response in moose densities with wolf control alone. Unit 19D research demonstrated a substantial reduction in predation rates following both wolf and bear removals (Keech 2012). Using this case history, it was determined that a reduction in bear numbers would also be required in Unit 19A.

Based on this experience, a BCFA is also established as part of this plan. However, we also recommend that a calf mortality study be initiated to assess the impact of bear predation in Unit 21E before any predator reductions begin. Unit 21E is unique with very high concentrations of moose in the winter, and assessing the influence of various sources of mortality is important. The bear control conducted in Units 19A and 19D required substantial financial and staff resources. For those reasons, conducting a calf mortality study in Unit 21E will be central to focusing predator removal efforts in a cost effective manner.”

Therefore, we encourage the Board to determine:

- Is there a decline in the moose population to justify extending the Predator Control program?
- Has the Predator Control been effective? If not, will continuing the program make it more effective?
- Has the Department conducted the calf mortality study it recommended?
- Can the Department measure the response of moose density with wolf control in this program?

Proposals 93: Oppose

These proposals seek to lengthen the brown bear seasons in 19B and C by 22 days. The proposers’ interest in this regulation stems from an interest in suppressing bear predation on moose, caribou and sheep.

We are concerned that these proposals are seeking to step around the rigorous and expensive demands of a scientifically-based IM program by promoting liberalized hunting and trapping regulations for carnivores outside designated Predator Control Areas.

The Department comments that the existing bear harvest is “stable” at 35 bears per year. Bears that pose a threat to the ungulate hunting seasons may still be taken as DLPs. We encourage the Board to

explore how much the bear harvest would be likely to increase in this 22 period, and the mechanisms for ADFG to ensure there is not an overharvest.

Proposal 94,98: Oppose

These proposals seek to increase the bear season in 19C by 52 days (currently 273 days, increase to 325 days). This would increase the hunting season by 16%, and create a management system where during the 365 days of the year, only 40 days are closed.

The estimated bear population is 260 bears, with harvest levels averaging 22 bears per year. This proposal seeks to extend the bear season by 52 days. With no cap on harvest or participation, how many bears are estimated to be taken in ADFG's admission that "additional bears [will be] harvested" with the additional 52 days of hunting time? Assuming the harvest rates stay the same across the proposed open period (with paired hunter effort), that would lead to approximately 4 additional bears harvested. That would increase the human harvest from 8% of the bear population (22 of 260 bears) to 10% of the bear population (26 of the 260 bears).

Sustainable harvest rates have been difficult to pinpoint in Alaska. In a simulation study, the maximum sustainable harvest rate for a highly productive brown bear population with minimal levels of natural mortality was estimated at 5.7% (Miller 1990a,b). Other studies have estimated lower sustainable harvest rates (2-3% for Yukon bears [Taylor et. al 1987]). In an intensively-studied portion of 20A where most bears had been marked, harvests of 6.5% of the marked population did not immediately affect the number of adult females, but harvests of 14.3% resulted in significant declines (Reynolds and Boudreau 1992). While we recognize that this hunt does not include sows with cubs, we encourage the Board to seek information from the Department about what a sustainable harvest rate could be, and determine if the season length ensures a sustainable rate.

Proposal 96, 99: Oppose

These proposals seek to increase the bear season in 19C by 22 days (currently 273 days, increase to 295 days). Assuming the harvest rates stay the same across the proposed open period (with paired hunter effort), that would lead to approximately 2 additional bears harvested. That would increase the human harvest from 8% of the bear population (22 of 260 bears) to 9% of the bear population (24 of the 260 bears).

Sustainable harvest rates have been difficult to pinpoint in Alaska. In a simulation study, the maximum sustainable harvest rate for a highly productive brown bear population with minimal levels of natural mortality was estimated at 5.7% (Miller 1990a,b). Other studies have estimated lower sustainable harvest rates (2-3% for Yukon bears [Taylor et. al 1987]). In an intensively-studied portion of 20A where most bears had been marked, harvests of 6.5% of the marked population did not immediately affect the number of adult females, but harvests of 14.3% resulted in significant declines (Reynolds and Boudreau 1992). While we recognize that this hunt does not include sows with cubs, we encourage the

Board to seek information from the Department about what a sustainable harvest rate could be, and determine if the season length ensures a sustainable rate.

Proposal 97: Oppose

This proposal seeks to increase the bag limit to 2 brown bears per year and increase the seasons in 19C by 52 days (currently 273 days, increase to 325 days). This would increase the hunting season by 16%, and create a management system where during the 365 days of the year, only 40 days are closed. Additionally, it could double the bear harvest if every hunter takes 2 bears instead of the previous 1/year limit.

The estimated bear population is 260 bears, with harvest levels averaging 22 bears per year. Keeping the same bag limit (1/year) and assuming the harvest rates stay the same across the proposed open period (with paired hunter effort), that would lead to approximately 4 additional bears harvested. But if the Board approves all of this proposal and increases the bag limit, **that could increase the harvest to 52 bears** (double the historic average(22x2), plus the 52 day increase with a 2 bear bag limit (4x2)). That would increase the human harvest from 8% of the bear population (22 of 260 bears) to **20% of the bear population (52 of the 260 bears)**.

Sustainable harvest rates have been difficult to pinpoint in Alaska, but 20% far exceeds a sustainable level. In a simulation study, the maximum sustainable harvest rate for a highly productive brown bear population with minimal levels of natural mortality was estimated at 5.7% (Miller 1990a,b). Other studies have estimated lower sustainable harvest rates (2-3% for Yukon bears [Taylor et. al 1987]). In an intensively-studied portion of 20A where most bears had been marked, harvests of 6.5% of the marked population did not immediately affect the number of adult females, but harvests of 14.3% resulted in significant declines (Reynolds and Boudreau 1992). While we recognize that this hunt does not include sows with cubs, we encourage the Board to seek information from the Department about what a sustainable harvest rate could be, and determine if the season length ensures a sustainable rate. Should historic trends continue, this would open the door to almost a quarter of the 19C bear population being lawfully taken in one year. This proposal simply asks for too much, too soon.

Proposal 105 - 107: Oppose

These proposals seek to allow hunting of black and brown bears with the use of bait or scent lures in Unit 21E. Bear baiting has spread rapidly across the state in recent years, often without detailed review of the bear populations that are baited. Should baiting be permitted, we strongly encourage the Board and the Department to consider how increased hunter effectiveness (via baiting) impacts harvest levels, the bear population, and bear habituation to bait/food near population centers. We also request that the Board and Department track the number of bait stations, as low baiting participation seems keystone to the Department's support of these proposals. Finally, we oppose the Department's recommendation to consider allowing the take of brown bears at bait stations in Unit 21A the same day the person has flown, provided the hunter is 300 feet from the plane.

Proposal 108: Oppose

This proposal seeks to reactivate wolf control in a portion of Units 12, 20D, and 20E for the proposed benefit of moose.

We support the component of the proposal that seeks cooperation with Tok forestry to allow habitat enhancement for moose. We oppose the Predator Control components of this proposal:

In reviewing the Operational Plan for Intensive Management of the Fortymile Caribou Herd in the Upper Yukon–Tanana Predation Control Area, we seek clarification from the Board and the Department:

- Wolf control was suspended in the UYTPCA in RY18, as part of a 9–year evaluation of the program being conducted during RY15–RY23. This research will document the recovery of the wolf population in the control area as part of this evaluation. This research must be considered in deliberations to reinstate this program.
- Success of aerial wolf control by the public has been variable during the life of the program, largely depending on late-winter tracking conditions. Additional department effort will be necessary in years of active control when public permittees have reduced success. For example, RY08–RY17 required considerable operational funding and staff time. This will continue to be a major consideration in the future when department wolf control is conducted.

The Alaska Wildlife Alliance acknowledges that Intensive Management can be applied to temporarily increase the recreational harvest of moose, caribou, and Sitka black-tailed deer on State of Alaska lands. We recognize that control of predators is a wildlife management tool that in some circumstances may be appropriate to restore or prevent the extinction of rare or threatened species, small populations, and insular populations such as those on islands. In limited circumstances, control of wolf populations can have a positive but temporary effect on mainland populations of moose and caribou. In some placed-based situations around communities, predator reduction may be needed to control disease (e.g., rabies) or ameliorate negative human-wildlife conflict.

However, AWA has the following concerns regarding IM and other efforts to reduce predator populations in Alaska broadly, and in this proposal:

- We are concerned that IM population and harvest objectives have not been reassessed since their inception as recommended by the Alaska Chapter of The Wildlife Society (Alaska Chapter of the Wildlife Society. 2013. Position statement intensive management of big game in Alaska (adopted June 2013).
- We are concerned that ADF&G and BOG have neither established a standard to determine if the “prey population is feasibly achievable utilizing recognized and prudent active management techniques,” nor a process to disapprove IM action if it is likely to be “ineffective, based on scientific information.”

- We are concerned that predator control has effectively become the default mechanism that the BOG uses to accomplish the IM law's desired outcome of sustaining or increasing ungulate harvest.
- We are concerned that big game management in Alaska has become a process whereby population objectives for wild ungulates are established based on public demand rather than on habitat capacity, promoting unsustainable management.
- We are concerned that "sustained yield" as currently defined in AS 16.05.255(k)(5) is an artificial construct that does not appropriately consider large scale variation in native ungulate populations that occur because of wildfire regimes and cyclic insect defoliation, as well as the cascading effects of rapid climate change including the recent immigration of mule deer and white-tailed deer from Canada and the likely introduction of ungulate pathogens.
- We are concerned that the economic costs of sustained predator control at landscape scales are generally so high that sustained yield becomes a euphemism for subsidized yield (in fact, the need to apply predator control is antithetical to scientifically-accepted definitions of sustained yield).
- We are concerned that the secondary ecological (e.g., loss of marine derived nutrients) and economic (e.g., loss of wildlife viewing) effects of predator control are not considered.
- We are concerned that other human sources of ungulate mortality (e.g., moose-vehicle collisions, illegal and unreported harvest) are being ignored in the current BOG's interest in promoting predator control.
- We are concerned that predator control undermines the ethos of humans learning to coexist with wildlife.
- Lastly, we are concerned that predator control promotes a utilitarian view of wildlife as commodities rather than recognizing the intrinsic value of all wildlife (including large carnivores) and sustaining intact ecosystems.

Proposal 109: Oppose

This proposal seeks to allow wolves to be killed in Unit 12 the same day a person has been airborne. The Board of Game can only allow the take of wolf same-day airborne under a predator control plan for which a permit is required. No such program is in place for Unit 12.

Proposal 116: Oppose

This proposal seeks to implement a non-intensive management predator control plan within the Tok Management Area (TMA) via aerial coyote and wolf control. We oppose this proposal on technical and substantive grounds.

Technical opposition: The Board of Game can only allow the take of wolf same-day airborne under a predator control plan for which a permit is required. If the goal is predator control, we seek clarity on what 'non-intensive' management means and how the Board could lawfully mandate or regulate predator control without an IM program.

Substantive opposition: The proposer, nor the Department, has provided evidence to suggest that wolves and/or coyotes are a significant source of mortality for sheep in the TMA. The decline of sheep is largely a climate and habitat issue; according to scientific literature, scapegoating wolves and coyotes has been deemed ineffective by any medium-long term measures.

Proposal 120: Oppose

These proposals seek to increase the brown bear bag limit for residents within Unit 12 from one bear to two bears per year. In consideration of this proposal, we encourage the Board to explore current harvest levels and the impacts of potentially double harvest on the Unit 12 bear population. Further, the Board must consider Federal Subsistence Board regulations, particularly on the Preserve lands.

Proposal 122-123: Oppose

These proposals seek to increase the wolf hunting season in Units 12 and 20E by six weeks, allowing harvest during late spring and summer months. The fur is in poor condition during these times, suggesting that the Board would only be approving this as an unofficial predator control effort. Without comments from the Department, we cannot determine if this poses a risk to the wolf population, but encourage the Board to inquire during deliberations of these proposals.

Proposal 136- 138: Oppose

Proposal 136 seeks to allow brown bears to be taken over bait in Unit 20D south of the Tanana River, and require a registration permit; Proposal 137 seeks to allow brown bears to be taken over bait in all of Unit 20; Proposal 138 seeks to allow brown bears to be taken over bait in Unit 20D south of the Tanana River.

We comment in opposition to these proposals based on the [Brown Bear Management Report and Plan, Game Management Unit 20D](#). In the Conclusions and Management Recommendations section (page 9), the report reads (with our emphasis added):

“The Unit 20D brown bear population should be monitored closely, especially now with the newly added baiting season. Brown bear populations in Unit 20D south should be the primary focus of study and population monitoring, especially the areas with a high degree of developed access, such as the area west of the Gerstle River. Bear populations should be monitored closely to assess long-term effects of liberal hunting regulations, road-accessibility, and human habitation. There has been much public interest to allow brown bear baiting in southern Unit 20D with multiple proposals at the last 2 Board of Game meetings asking for liberalization in this area. The Delta Fish and Game Advisory Committee (Delta AC) made informal and formal inquiries to the department about harvestable surplus of brown bear populations. The Delta AC stated they support increased brown bear harvest but wanted to ensure the department has science-based information about brown bear population dynamics. They would like this information to be available to the AC before they make recommendations to the Board of Game regarding proposals that would liberalize brown harvest. The Delta AC was one of the biggest

proponents in authorizing brown bear baiting in Unit 20D at the 2017 board meeting. They also supported allowing baiting in Unit 20D north only at this time until new data is available to show that baiting in Unit 20D south would be sustainable. We recommend we continue to work with the Delta AC to provide the most up-to-date information available to help guide them in their decision-making framework.

As of now, with the information available, the department is not comfortable with additional harvest pressure in Unit 20D. Total harvest and especially percent females in the harvest are at the maximum level within our harvest objectives that were developed based on DuBois 1995 estimate. It will likely be difficult to get a more detailed population estimate in the next few years because of the lack of a financially feasible technique being available. We remain committed to analyzing all available Unit 20D data that is available to the highest degree possible, including harvest data and collar tracking data regarding brown bears in this area. We also recommended a full population estimate of Unit 20D brown bears, especially Unit 20D south when funding and a technique becomes available to complete such an estimate. While the 5-year female harvest is averaging right at the recommended limit of 45%, and overall harvest is creeping up since the initiation of baiting in RY17 harvest trend data and anecdotal observations suggest the brown bear population is stable in Unit 20D. Therefore, no changes to the hunting season dates and bag limits are recommended at this time. With brown bear baiting only being authorized since RY17 very little harvest data is available at this time and the effects may not be fully noticed well into the next reporting period; therefore, harvest should be monitored closely during the next reporting period.”

Essentially, Unit 20 and particularly 20D, have seen growing hunting pressures in recent years. We share the same concerns outlined in this Department report that increasing bear hunting in this area should only be approached with caution.

Proposal 146, 148: Oppose

These proposals seek to adopt and implement a wolf Intensive Management program and wolf control program in Unit 24A and 25A.

There has never been an IM program in 24A or 25A, but an IM program in 24B was suspended in 2018. In the recommendations of the [2018 report](#), the Department states “Predator control activities have been suspended in Unit 24B, and the department recommends that this program remain inactive. We will continue monitoring the results of the program through moose harvest estimates and periodic population surveys.”

The Board must find compelling reasons for the development of IM, assessed against the criteria set forth by statute. Further, the Department would need to conduct a Feasibility Assessment and Operational Plan. In short, this proposal does not provide evidence to the degree required for an IM finding, and without such a finding wolf control cannot lawfully be permitted.

Proposal 147: Oppose

This proposal seeks to allow same-day aerial wolf hunting in Units 24 and 25. The Board can only allow the take of wolf same-day airborne under a predator control plan for which a permit is required. No such program is in place for Unit 24 or 25.

Proposal 149, 150, 151: Oppose

These proposals seek to lengthen the wolf hunting season in Units 24 and the remainder of 25, and proposal 151 seeks to increase the bag limit to 10 wolves. Aside from predator control, the authors cite no additional rationale for the season expansion. The Board can only enact predator control through an IM program. With pelt quality being poor in October, we are concerned that these proposals seek to step around the rigorous and expensive demands of a scientifically-based IM program by promoting liberalized hunting and trapping regulations for carnivores outside designated Predator Control Areas.

Proposal 152: Oppose

This proposal seeks to establish a resident two bear bag limit for residents in Units 24C and 24D *and* establish a fall bear baiting season in Unit 21B and 24B. We oppose this proposal on the grounds that it seeks multiple changes in different game units. Each of these changes should be considered individually, given their regional differences and potential impacts to bear populations.

Proposal 165: Oppose

This proposal seeks to create wolf control program in Unit 25D.

There has never been an IM program in 25D, but an IM program in 24B was suspended in 2018. In the recommendations of the [2018 report](#), the Department states “ Predator control activities have been suspended in Unit 24B, and the department recommends that this program remain inactive. We will continue monitoring the results of the program through moose harvest estimates and periodic population surveys.”

The Board must find compelling reasons for the development of IM, assessed against the criteria set forth by statute. Further, the Department would need to conduct a Feasibility Assessment and Operational Plan. In short, this proposal does not provide evidence to the degree required for an IM finding, and without such a finding wolf control cannot lawfully be permitted.

Proposal 166: Oppose

This proposal seeks to add bucket snaring under trapping regulations as a legal method of taking black and brown bear in Unit 25D. Alaska Wildlife Alliance and our membership *strongly* oppose this proposal on the grounds that bear snaring is indiscriminate, cruel, and unethical.

Besides the many wildlife conservationists who oppose snaring on moral grounds, many wildlife scientists find the practice to be ethically repugnant, as demonstrated by their statements against bear

snaring [when the issue was last before the Board in 2012. Public outcry was so robust.](#) even the former Governor Tony Knowles joined the testimony.

John Schoen, a former Fish and Game bear researcher and a wildlife scientist, in collaboration with other biologists, wrote a statement highly critical of bear snaring. It reads:

Bears are usually snared by hanging a bucket of bait in a tree. When a bear reaches into the bucket for the bait, its front leg is caught (trapped) by a cable attached to the tree. The only way the bear can be released by the hunter/trapper is by shooting it. If a female with first year cubs is snared and killed, the cubs will most likely starve or be killed by another bear. Unlike hunting, where a hunter can carefully select for large, male bears, snaring is indiscriminate. Snares catch black bears and brown bears, female bears with cubs, and sometimes even older cubs. With unlimited numbers of snares and long open seasons, snaring may kill more bears than is sustainable. Snaring and killing of bears regardless of age, species, and gender is incompatible with the scientific principles and the ethics of modern wildlife management, including the North American Model for Wildlife Conservation.

David Klein, another former state biologist and professor emeritus at the University of Alaska Fairbanks Institute of Arctic Biology and among the most acclaimed of Alaska's wildlife scientists, expressed:

"the need to emphasize to the BOG that we speak not just as old and retired ADF&G biologists who understand bear biology, but also as a majority of Alaskans who value bears as part of Alaska's wild heritage and who also have pride in the concept of hunting ethics that has guided wildlife management and associated sport and trophy hunting in Alaska's past. . . . Bears are generally held in high regard by most Alaskans who expect ethical behavior of both hunters and nonhunters toward bears."

Larry Aumiller, who managed the McNeil River State Game Sanctuary for three decades, also briefly participated in bear research that involved ground snaring: *"I helped snare bears in the 1970s [for radio-tracking] and it produced images that I still find in my dreams. When snared, brown bears go absolutely crazy with fear and tear up everything within reach."*

Former Board Chair Ted Spraker has claimed that BOG members and state wildlife managers "strive to adopt harvest or removal techniques that are acceptable or at least understandable to the majority of the public."

To our membership, and the majority of the Alaskan public, **bucket snaring is neither acceptable or understandable.**

While certain types of trap sets kill animals quickly, bear snares keep their normally wide-ranging captives handcuffed in place in a way that can only be traumatic, and can do so for indefinite periods (there is no trap-check requirement). The public, by and large, is not comfortable with bear snaring either. One example is the outcry from Juneau in 2018 when [two black bears were snared and euthanized.](#)

We understand the proposer's interest in increasing bear harvest, but bait stations and liberal hunting seasons are enough. Should the Board consider passing this proposal, we encourage you to deliberate the image this sets forward about Alaska's wildlife management. Should a video of bears suffering in bucket snares be released, Alaska's reputation would be rightfully damaged. As the Board setting the management direction for wildlife, we urge you to oppose this proposal on grounds of decency and humane harvest.

Proposal 182: Oppose

This proposal seeks to lengthen the brown bear season in Units 20A, 20B, and 25C by two weeks.

This proposal seeks extensions in multiple subunits with an unknown impact on brown bears. We agree with the Department that, if the board is interested in providing more brown bear hunting opportunity in this area, then the Board should adopt only one of the proposals rather than all of them, so as to increase opportunity incrementally rather than at a large scale (for example, not increasing both spring and fall seasons). If the Board seeks an extension of hunter opportunity, we recommend Proposal 183 as it is the most moderate.

Proposal 184: Oppose

This proposal seeks to lengthen the bear hunting season in 20A by 21 days. We oppose this proposal because it is too dramatic a change, particularly when the Department lacks data on the population size of brown bears in Unit 20A and only manages on harvest data. We agree with the Department that, if the board is interested in providing more brown bear hunting opportunity in this area, then the Board should adopt only one of the proposals rather than all of them, so as to increase opportunity incrementally rather than at a large scale (for example, not increasing both spring and fall seasons). If the Board seeks an extension of hunter opportunity, we recommend Proposal 183 as it is the most moderate.

Proposal 185: Oppose

This proposal seeks to extend the brown bear hunting season in 20A and 20B by 30 days. We oppose this proposal because it is too dramatic a change, particularly when the Department lacks data on the population size of brown bears in Unit 20A and 20B and only manages on harvest data. Both areas have a high density of hunters that hunt using bait in the spring; hunter opportunity, per the Department's comment, is already abundant.

We agree with the Department that, if the Board is interested in providing more brown bear hunting opportunity in this area, then the Board should adopt only one of the proposals rather than all of them, so as to increase opportunity incrementally rather than at a large scale (for example, not increasing both spring and fall seasons). If the Board seeks an extension of hunter opportunity, we recommend Proposal 183 as it is the most moderate.

Proposal 186: Support

This proposal seeks to restore a prohibition on wolf harvest in within portions of Unit 20C; those portions of Uniform Coding Unit (UCU) 0607, 0605, and 0502 west of George Parks Highway and bounded by Denali National Park on three sides.

Alaska Wildlife Alliance has long-supported a solution to the “wolf buffer” issue. A historical context is helpful:

- 1980: ANILCA Senate Committee cites the need to bring wolf townships into the Park in future land exchange.
- 1985: State proposed bringing townships in the Park in exchange for the Kantishna/Dunkle Mine being excluded from the Park. No action taken.
- 1992: First and largest “wolf buffer” covering 800 square miles along eastern boundary.
- 1993: Three months later, BoG eliminated the buffer in retaliation of Gov. Hickel’s suspension of wolf control programs in other parts of the state.
- 2000: BoG passes smaller (29 square miles) buffer in western Stampede Trail.
- 2001: Gov Knowles proposes transfer of Stampede Trail/townships to UAA, to then sell to NPS. Legislature declines proposal.
- 2001: ADFG requests to enlarge buffer to 72 square miles. BoG approves.
- 2008: Independent biologists petition ADFG Commissioner to enlarge buffer to 300 square miles. Commissioner declines.
- 2010: BoG hears many proposals to expand buffer. BoG declines all expansion proposals, eliminates buffer entirely, imposes 6-year moratorium on any proposals.
- 2012-2016: Requests for Emergency Closures, submitted proposals. All declined.
- 2013-2016: Traction for a land trade between USDOl and State for conservation easement. Election in 2016, proposal was dropped.
- 2016: NPS requests move trapping closure 6 weeks earlier to prevent overlap with bear baiting, BoG approves.
- 2016: Fairbanks Borough adopts resolution calling on Governor to establish buffer, Governor declines.
- 2017: HB105 requests 500 mile buffer. Bill dies in Senate Resources Committee.
- 2017: BoG denied proposals to re-establish wolf buffers. Was talk of Governor executed Special Use Area, never materialized.
- 2018-2020: Petitions for Emergency Closure, mostly denied.
- 2020: NPS proposal to shorten season. AWA supported. All wolf conservation proposals in corridor denied.

The pendulum has swung back and forth over the decades, and this issue will continue to rise to the Board of Game unless a compromise is reached. We support this proposal because it is moderate in size, yet creates contiguous protections for wolves moving in and out of the Park within the townships.

In Alaska, wolves are among the most desired species for viewing (Shea & Tankersley 1991), and state wildlife management includes mandates to provide for multiple uses, including non-consumptive uses such as wildlife viewing (Alaska Department of Fish and Game 2006). Wildlife viewing also brings an important socio-economic benefit to the state of Alaska, with wildlife viewing activities in Alaska supporting over \$2.7 billion dollars in economic activity in 2011. Forty percent of visitors to Alaska reported hoping to view wild wolves during their visit. (ECONorthwest 2012). More than anywhere else in Alaska, wolves in the eastern region of Denali National Park (Denali), provide significant wolf viewing opportunities as visitors travel along the Park Road. Denali is recognized as one of the best places in the world for people to see wolves in the wild and several thousand park visitors may see wolves in a given year. In addition, viewing large carnivores, particularly wolves and grizzly bears, is a main indicator of a satisfying visitor experience in Denali National Park (Manning & Hallo 2010).

The National Park Service's wolf study is also among the oldest in the world, providing key data on predators in Denali's changing landscape. For the sake of the variety of users who enjoy this area, and the scientific value of the Stampede Corridor in contiguous research, we support this proposal.

Further, this small closure area would have minimal impact on area trappers. Per National Park Service [Proposal 152 in 2020, page 2 reads:](#)

"It should also be noted that the presence of the buffer did not decrease the average annual number of wolves harvested in UCUs overlapping the Stampede Corridor (UCUs 502, 605, 607), in fact harvest was higher during the years the buffer was in place (Alaska Department of Fish & Game 2013); note that these UCUs extend beyond the buffer area. During the presence of the buffer zone, harvest of wolves adjacent to DNPP (7 ± 11.25 SE) was on average greater than during the period without the presence of the buffer zone (2.6 ± 4.3). Simultaneously the buffer was associated with substantially increased wolf sightings (Borg et al 2016). Therefore, it is reasonable to conclude that closure of wolf hunting and trapping in an area within the Wolf Townships would present the optimal solution in meeting both consumptive and non-consumptive objectives of state and federal management agencies, and benefit about 400,000 visitors to Denali NPP with potentially a greater likelihood of observing wild wolves."

This moderate buffer would have minimal impact on trappers, as nothing east of the Park would be included and wolf trapping is permitted in the remainder and surrounding game units. We truly seek resolution and believe this could be an amenable compromise.

Proposal 187: Oppose

This proposal seeks to lengthen the wolverine trapping season Units 20A, 20B, 20D, and 20F by two weeks to align with 20C. We do not support liberalizing harvest seasons based on regulatory convenience alone. Should the Board wish to unify the regulations across game units, we recommend that instead of changing four subunits to match 20C, the Board aligns 20C's regulations with 20A, 20B, 20D, and 20F.



PC6

Name: Sam Albanese

Community of Residence: Eagle River, Alaska

Comment:

I am commenting in opposition to Proposal 43: The registration permits should be annually, not limited to every two years.

For Proposal 44: This should be applied to non-residents and hunters using professional guide services.

For Proposal 45: the reduced bag limit should be for non-residents and hunters using professional guide services.

Sam Albanese

Proposal 43: Support with Amendment

Proposal 44: Support with Amendment

Proposal 45: Support with Amendment

Proposal 46: Oppose



PC7

Name: Travis Albanese

Community of Residence: palmer AK

Comment:

I strongly oppose the following proposals: 43, 44, 45, and 46. Limiting resident sheep hunting opportunities before further limiting non-residents is not the direction the state should be going. Residents should be prioritized not the guiding industry. The first step in limiting hunting needs to be limiting non residents as they are not a priority for the state. Go to a draw only format statewide for non-residents. Non-resident success rates are 45%, they are 43% of the total harvested sheep in 2022 and we are wanting to limit resident hunting why? If the goal is to keep more sheep on the mountains by limiting hunting it needs to start with non-residents. If losing revenue is a worry for the state then propose a locking tag requirement for resident sheep hunting just like there is for brown bear. The main priority for fish and game should be the residents and the animals in our state not non-residents and the guide industry so lets focus on them.

Proposal 43: Oppose

Proposal 44: Oppose

Proposal 45: Oppose

Proposal 46: Oppose



PC8

Name: Marshall Alexander

Community of Residence: Anchorage, AK

Comment:

I want to say I support this proposal 52. The use of thermal scopes for coyote and wolves would help and encourage more people to take the opportunity to hunt and manage predator that are detrimental to our moose and sheep populations. With limited daylight, hunters could extend their time enjoying the pursuit of game. Thermal scopes are not magic nor do they offer an unfair advantage. They actually greatly reduce your shooting range in exchange for greater target acquisition and visibility during limited light. Our moose and sheep need all the help they can get. Please use reason and common sense and advance this proposal.

Thank You,

Marshall Alexander

Proposal 52: Support



PC9

Name: Richard Anderson

Community of Residence: Anchorage, Alaska

Comment:

I am a 21-year Alaska resident. I support proposal 186 to protect wolves in the Stampede Corridor.

Proposal 186: Support



PC10

Name: Kenneth & Vickie Armstrong

Community of Residence: Fairbanks, Ak

Comment:

Dear Members of the Alaska Board of Game-

As Borough residents for almost 50 yrs., we want to show our SUPPORT for Proposal 176. We are seeing the decline of the number of moose our local residents are obtaining in our hunting area on the Salcha River. Moose already fight the elements, predators, heavy snow fall & forest fires and will be a smaller quantities for our residents to hunt from.

Proposal 176 would limit non-resident hunters on the entire Salcha River. As of now they are allowed any bull above Goose Creek. As resident hunters we need to put some form of restrictions on non-resident hunters, over time an increased amount of non-residents hunters seems to have risen. The pressure of this has become very noticeable. Many hunters are having to share their bounty with others who have not been successful. We would like to see some small changes now, before it's too late and our hunting opportunities are severely restricted later on.

Thank you for your serious consideration to support Proposal 176

Sincerely,

Kenneth & Vickie Armstrong

Proposal 176: Support



PC11

Name: Austin Atkinson

Community of Residence: Cedar City, Utah

Comment:

I do not support Proposal #74 as it proposes a requirement for DM837 applicants to submit their draw application with a transporter's UVC code. While most permit holders will hire a transporter for their moose hunt, it is not required to hire a transporter. If the applicant does not have a UVC, they would therefore be unable to apply in the draw. This is not consistent with other draw hunts for unguided species for nonresidents across the state.

It would be better to have an "intent to use permit" requirement that would allow unused permits to be reissued to other hunters or to an alternate draw list.

Proposal 74: Oppose



Name: Nancy Bale

Community of Residence: Anchorage, Alaska

Comment:

For more than 20 winters, I lived remotely in GMU 19C in a small cabin on the Tonzona River. I have reviewed Proposals 60-62, which advocate declaring 19C an intensive management area and instituting wolf control there. I oppose wholeheartedly the establishment of an intensive management program in 19C. Although this area has been popular for residents and resident guides with outside clients, it should not be described as a bread basket or an area where high harvest can be expected. Much of the country is quite rugged, Alaska Range foothills, leading up to the crest of the Range. I lived there from the 1970s to early 1990 and found that it did not seem to vary much in animal productivity, based on tracks observed in our local travels.

For intensive management to be established in the first place, adequate census of moose and caribou populations is needed and a harvestable surplus calculated. I do not believe scientific analysis will show that this area can produce the sort of high harvest anticipated in the IM law. I have not seen data from the department that indicates this possibility, and recent hard winters will make the data difficult to interpret accurately, unless you have numbers covering several years. In addition, high value as food of the ungulates hunted in this area can be trumped by the logistical difficulty of securing and transporting legal quantities of meat. I have seen no data on a high census of wolves, either. We saw them occasionally when we lived out there. They were not a regular presence.

In addition, even if aerial wolf control were anticipated, I believe, knowing how remote this area is, that this form of management will not be able to achieve the goals set and will be dangerous and expensive. Much of 19C is, as mentioned, in the Alaska Range, a difficult area in which to conduct anything aviation-related. I urge the board not to enact these proposals.

I also hope that those who bring proposals for intensive management or wolf control based on an intensive management plan will understand that sheep are not considered a population to be managed under that law.

Proposal 60: Oppose

Proposal 61: Oppose

Proposal 62: Oppose



PC13

Name: Brian Barcelona

Community of Residence: Anchorage

Comment:

Frankly I'm tired of guides trying to restrict residents of Alaska of their God given right to hunt these lands responsibly. If we're trying to save the sheep population which I'm all for, then let's do it together. If you propose resident hunters to hunt every other year, then a guide can guide every other year. I hunt sheep to fill my freezer with the best meat in Alaska not for money. I love this land I hunt this land and use the resources of this land if sheep biologists believe in their heart of hearts and not politically driven that we all need together stop hunting for sheep because we are the or should be the responsible stewards of our brethren (sheep) then I'm game let's do it but you can't tell the residents of Alaska to do something guides aren't willing to do themselves. Alaska's resources are for Alaskans first period.

Proposal 43: Oppose

Proposal 44: Oppose

Proposal 45: Oppose

Proposal 46: Support



PC14

Name: Lyle Becker

Community of Residence: Anchorage AK

Comment:

I oppose proposal 158. There is currently no problem with the resident/non-resident sheep hunting process in ANWR. As the proposal states, guides in ANWR are already limited by the number of sheep hunters they can take in their guide use areas by reason of their permit conditions. The areas where guides are limited by a guide concession program such as these Federal areas are areas where there is the least hunter conflicts in the field.

I support proposal 170. Extending the Wolverine Trapping season will not hurt the resource in any way, and makes sense given the weather conditions in this area.

Proposal 158: Oppose

Proposal 170: Support



PC15

Name: Sarah Behr

Community of Residence: Central, AK

Comment:

For the record and to provide clarification on proposal #115. The proposal was intended to apply to all Fortymile Caribou Hunts. Additionally, in my submission I said "require hunters taking Fortymile caribou to gut the animals in the field." By "in the field" I meant "at the kill site" and by "gut" I meant "dispose of the viscera." As such, I would like to see the following requirement:

“All Fortymile caribou hunters, in all Fortymile Caribou Hunts (RC860/RC867, YC831 and AC999), are required to dispose of the viscera of harvested caribou at the kill site.”



PC16

Name: Alan Best

Community of Residence: Fairbanks, Alaska

Comment:

Members of the Alaska Board of Game

I have written this letter to voice my support of proposal 176 I am a lifelong Alaskan of 62 years

As well as a property owner on the Salcha river and I hunt on the upper river, which has seen a large increase in hunting pressure over the years especially from non-residents. Twenty years ago, you might have seen two or three boats go by a day now I'm seeing as many as ten. A large part of these boaters are close to 30 percent of nonresidents Part of this is do to more capable boats and part of it is do to being one of the only any bull areas left with relative easy access if you have the gas money .

I feel additional regulatory control will alleviate some of the pressure on the moose in the upper Salcha drainage while still giving a high quality hunt for everyone.

Proposal 176: Oppose



PC17

Name: Davyd Halyn Betchkal

Community of Residence: Cantwell, AK

Comment:

Greetings Board of Game members. Thank you for your participation as deliberators in this body of the public of which we are all part. I write to you in support of Proposal 186.

In years past I used to live in Healy, but I live in Yedatene Na now (it's a better fit for me culturally). A central passion of mine is travelling into the mountains near my home - walking, floating, or skiing through them. I can't say I'm as active as some people, but I've enjoyed 100+ nights camping in the Denali region of the Alaska Range and many more days out and about, too. I've seen a wolf on only 3 occasions without a pane of glass between us. I consider it a rare, thrilling opportunity. I remain convinced that Proposal 186 would help me enjoy this opportunity more often. The evidence is quite clear.

This is the third time I've written in support of closures similar to Proposal 186. Every time I spoke, the Board of Game has refused to listen. I notice that none of you live in my area, and so I would appreciate additional deference as a local - who actually spends time in the areas affected by this small portion of Unit 20C - as you weigh your decision. I would ask you to consider a utilitarian approach: honestly weigh the value of wolves to a few individual hunters/trappers against by their value to hundreds of thousands of wildlife enthusiasts. Or, if you are concerned with the idea of Denali's visitors "counting" in that sum, I challenge you to sum up just us locals. The believe the result would be similar: the value to a few individual hunters/trappers versus hundreds of us who would love to meet that same wolf (or its progeny) face to face. Choosing the few over the many - especially in matters of public policy - would seem unjust to most people at face value.

In a previous iteration of this proposal citizens were punished by the Board of Game with a lengthy hiatus period - silencing us in this important forum. I must be honest with you, I found that deeply disrespectful. In that surprising act your predecessors tarnished my trust in the Board of Game. I had previously held the naive impression that you made unbiased decisions. I am more cautious now. I have read your simple biographies on the ADF&G website and I realize we likely hold different worldviews. You probably value the thrill of the hunt in a way I may never understand, but I think at least we can agree that animals have a power that is magnified in these personal experiences. To some of us that amounts to a spiritual power. Please do not punish our beliefs so casually again.

Group deliberations on complex public problems sometimes involve many factors into the final decision. Clearly describing the factors you considered to members of the public is the basic currency of trust in your institution. I look forward to hearing of the outcome of this decision on Proposal 186.

Thank you for your service to the State of Alaska.

Davyd Halyn Betchkal

Proposal 186: Support



PC18

Name: Luke Boles

Community of Residence: Fairbanks, AK

Comment:

I support Proposals 154 and 155. ADF&G population estimate indicates the the current CAH population is above the management objective and recommends additional harvest opportunities.

I support Proposal 179 as requested by ADF&G.

Thanks for considering my comments.

Proposal 154: Support

Proposal 155: Support

Proposal 178: Support



PC19

Organization: Denali Mountain Works and personal opinion

Name: Juliette Boselli

Community of Residence: Denali

Comment:

I strongly urge the board of game to support proposal 186, as a resident of Alaska and Denali and owner of an outdoor store at the entrance to Denali National Park. The wolf buffer zone has a long sad history with evidence that many wolves from the park are killed in this area by only a few hunters and trappers. Protecting wolves in this area protects park wolves that tens of thousands of Alaskans and visitors from around the world come to Denali to see. To continue to not protect Denalis wolves is a great injustice to Alaskans who both visit the park and work and make their living from tourism. Wildlife viewing is the largest draw for Denali visitors and a Centerstone of Alaskas tourism industry. As a board tasked with managing wildlife for all Alaskans you cannot ignore that supporting proposal 186 serves the majority of Alaskans rather than a small handful of hunters and trappers that have thousands of state acres to hunt in. It is long over due, please support protecting Alaskas Denali wolves by supporting proposal 186.

Thank you,

Juliette Boselli

Proposal 186: Support



PC20

Name: Lindsey Botts

Community of Residence: Baltimore, Maryland

Comment:

I support the passage of proposal 186. Wolves are one of the most valuable species in terms of wildlife viewing in the state of Alaska. Given the proximity to Denali, where people from across the world come to visit to see wolves and spend money, rules to protect this population are especially needed. In addition, wolves are keystone species whose populations do not need trapping and hunting to regulate their number. Numerous studies has shown that wolves are more than capable of regulating their own populations through competition, food availability, and other natural factors like disease, old age, and vehicle strikes. Furthermore, wolves are highly social and, thus, sentient. They rely on complex interspecies dynamics that create an environmental for a species-specific culture. Killing random wolves can increase conflict when more experience adults are suddenly removed from family groups and inexperience sub-adults are forced to fend for themselves. Lastly, saying yes to Proposal 186 will help ensure that the people who visit Denali get that once-in-a-lifetime photo opportunity that they've spent months or even years saving for. Please close these areas to hunting and trapping so that wolves have at least some safe spaces in the great the state of Alaska.



PC21

Name: John Braham

Community of Residence: North Pole Alaska

Comment:

Board Members,

I strongly urge you to support Proposal 176. If some limitation are not put upon the moose harvest in areas of 20B, mentioned in Proposal 176 the moose population could decline to a level where even more restriction will need to be put in place. Yes to Proposal 176.

Thank You

John Braham

Proposal 176: Support



Name: Christine Byl

Community of Residence: Healy, AK

Comment:

I support Proposal 186 which will provide enhanced protection for those wolves that leave Denali National Park onto state lands in the Stampede townships, and then return to the park for denning, pupping and summer activities. Though the overall regional wolf population is not threatened, this particular area is important to wolves that are studied, viewed and spend much of their lives within the national park. Loss of even one wolf could disrupt an entire pack and severely diminish opportunity to study and view these wolves.

Management for conservation of wolves is not practiced on most state lands, but the Alaska Department of Fish and Game and the Board of Game have the authority to manage in this way, authority that is derived from statute and internal policy. Management for conservation makes sense in this area, where more than 40 years of research (the Denali Wolf Program) has revealed detailed information on the life habits of wolves and where a large constituency of Alaskans supports conservation of wolves, for science, for viewing, and for their value to the ecosystem.

Proposal 186 does not remove all risks to wolves, as starvation, weather events, and other wolves are all potential factors. However, human harvest is a not trivial, as established by NPS research. The loss of even one wolf could negatively affect a wolf family that is viewed and enjoyed within the boundaries of the National Park.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game itself in the early 90s considered the value of state lands around the park as pointing to a different strategy for state management there. Through the years, the importance of consumptive use has become a dominant strain of thinking in state wildlife management, to the point where actions such as the ones proposed in Proposal 186 have been deemed somehow against the law. This action is, however, not against any constitutional law or policy.

Proposal 186: Support



Organization: Camp Denali

Name: Jenna Hamm

Community of Residence: Denali National Park, AK

Comment:

Dear Board of Game Members,

My name is Jenna Hamm and with my husband, Simon Hamm, and our two teenage children, we own and operate Camp Denali, a 72-year summertime wilderness lodge in the Kantishna, inside Denali National Park and Preserve. In winters, we live, work, attend public school and recreate in the McKinley Village area, along the Parks Highway.

During your upcoming Interior and Eastern Arctic Region Meeting you will take up Proposal 186 and we ask that you support it. This proposal brings back to the Board a closure to hunting and trapping of wolves in the Stampede Area near the north-east corner of Denali National Park and Preserve.

We know first-hand how meaningful for park visitors the experience of viewing wolves in the wild is. At Camp Denali, we offer multiple-night stays and provide our guests the opportunity to explore the park's iconic wilderness and wildlife. We've hosted tens of thousands of visitors during this time. The ability to view wildlife in the wild— bears, caribou, moose, wolves, Dall sheep, and birds from all seven continents—is hands-down one of the primary reasons our guests choose to visit Denali National Park and stay at Camp Denali. Quite frankly, this opportunity anchors and makes viable our small tourism business, thus our interest in and support for Proposal 186.

As you know, wolves from Denali's packs often move outside the park boundary and into the Stampede Corridor, following caribou and other prey, especially in the winter months. The hunting and trapping pressure here has a measurable and negative impact on Denali's wolf population and on the function of its packs. This pressure has diminished the potential for visitors to view wolves in the wild. Likewise, it compromises the integrity of Denali's wolf monitoring program, a unique, decades-long effort with one of the only (and mostly) protected populations of wolves in the State.

For the scientific value of the Park's ongoing monitoring effort and to maximize the potential for Alaska's visitors to have quite literally transformative life experiences with the opportunity to view wolves in the wild, I urge you to take up and support Proposal 186. Thank you for your consideration.

Proposal 186: Support



PC24

Name: David Cannon

Community of Residence: Plains, PA

Comment:

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.



PC25

Name: Kathryn Carssow

Community of Residence: Homer, Alaska

Comment:

I am a 45-year resident of Alaska and have backpacked throughout Denali National Park many times over the years. It is a thrill to come upon wolves and wolf families in the park and watching them for hours through my binoculars.

I support the National Park Service Proposal 186, to provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. I, along with the majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support



PC26

Name: Allison Charles

Community of Residence: Hickory, North Carolina

Comment:

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support



PC27

Name: Wallace and Jerryne Cole

Community of Residence: Denali Park, Alaska

Comment:

DATE: 1/1/2024

TO: Board of Game

Alaska Department of Fish and Game

FROM: Wallace and Jerryne Cole

██████████

Denali Park, AK ██████████

RE: Proposal 186

We have been year-round residents of the greater Healy-Denali community for over 50 years and are the retired owners/operators of a visitor service in the area that specializes in wildlife observation field trips. It is a business now handed down to the next generation of our family.

We strongly support your adoption of Proposal 186. Non-consumptive values, i.e. wildlife-viewing and scientific inquiry are within the state's management options. Between 2004 and 2010 the Alaska Board of Game had such a closure in place. The Board recognized that wildlife

viewing was an essential consideration for the state's next-door neighbor, Denali National Park, where observation of wolves in the wild was a once-in-a lifetime experience for thousands of visitors each year. Secondly, the Board recognized that a closure in the Stampede Townships would help the National Park Service maintain the stability of its study of a relatively non-hunted population.

We realize that no closure can protect all wolves that also use state lands but also believe that reducing the risk from hunting and trapping in the proposed closed area will contribute to the stability of the Denali wolf population. As Proposal 186 states, "While wolf harvest just outside the northeastern boundary of the park may have little

effect on regional wolf populations, it can have significant effects on wolf packs whose territories intersect the Park Road and on the experience of Denali's visitors." To this reality, we have borne witness over our 50 years of travel over the park road with Alaska's visitors.

Thank you for your consideration.

Proposal 186: Support



TO: The Alaska Board of Game
RE: Proposals for Region III Board of Game meeting in Fairbanks, AK in March 2024
From: The Denali Citizens Council (DCC)



The Denali Citizens Council, founded in Cantwell, Alaska in 1974, is a grassroots public education and advocacy organization whose focus is Denali National Park and its gateway regions. Many of our members live or have lived, worked and owned land in the region, and have a direct and personal interest in the national park.

On behalf of our members, DCC has commented over the past two decades on Denali-relevant proposals. We appreciate efforts by the Board of Game to limit motorized hunting in the Yanert and Wood River Valleys, and to limit the impact of bear bait stations on wolves in the Stampede area. The Board of Game, in the past, has recognized the conservation value of wolves who den and spend most of the year in the national park by establishing “no kill” areas (or “buffer zones”) on state lands bordering the national park.

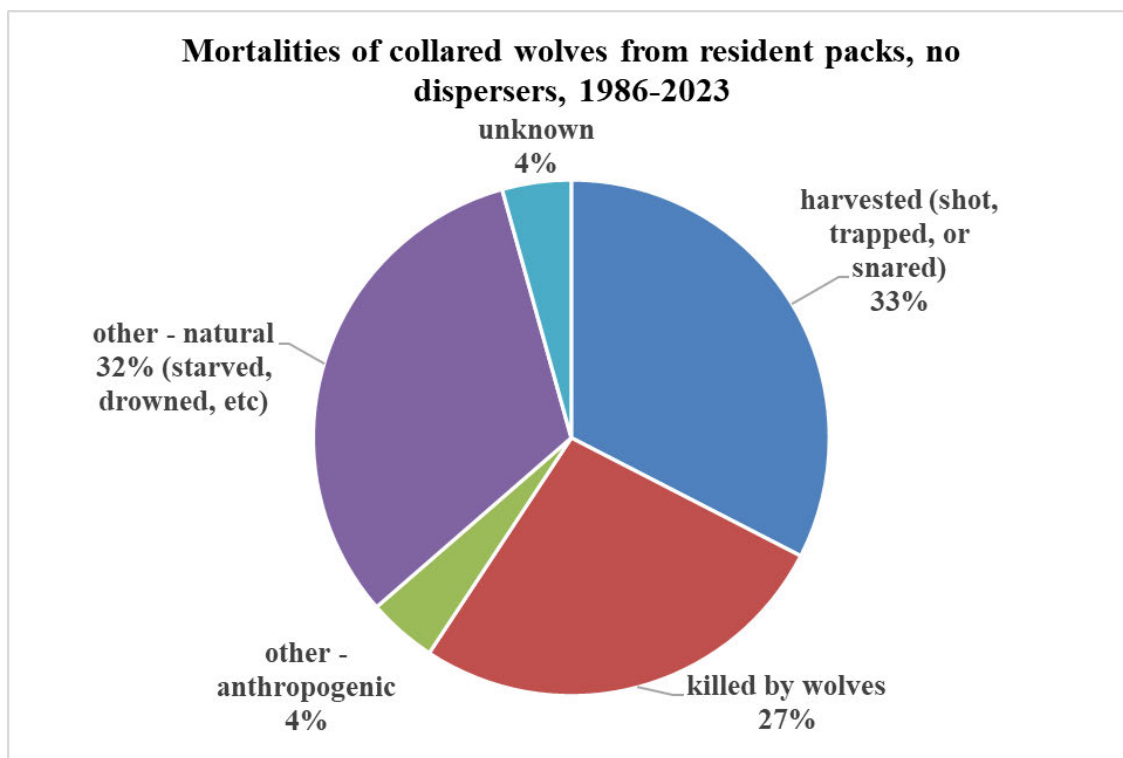
No such areas exist at this time, and we are advocating for their re-establishment by supporting Proposal 186.

We urge you to support Proposal 186 for the following reasons:

- 1. Non-consumptive values, such as wildlife viewing and scientific study, have been recognized as valid and important in Alaska wolf management. They are not “federal values” only, but are a solid part of the state management toolbox. These values are particularly important in the Denali National Park region where tourists come from around the world to view wolves.**
 - a. It has been recognized that the opportunity to view a wolf in its natural habitat is very important to Denali National Park visitors.
 - b. Tourism (which includes viewing large mammals) is an important part of the Alaska economy, bringing in millions of dollars each year (in 2022, Denali accounted for \$475 million in spending within Alaska).
 - c. The Denali National Park wolf monitoring program has continuously studied wolves who den and spend most of their time within the park, since the 1980s. The annual census and data on genetic, physical and immunological characteristics of wolves obtained in this program will be important for evaluating long-term changes in wolf populations throughout the state. There are no state programs that provide this degree of scientific evaluation on wolves. Part of what motivates the National Park Service to request a closure in the Stampede Townships (Proposal 186) is to maintain the stability of this study in a relatively non-hunted population.

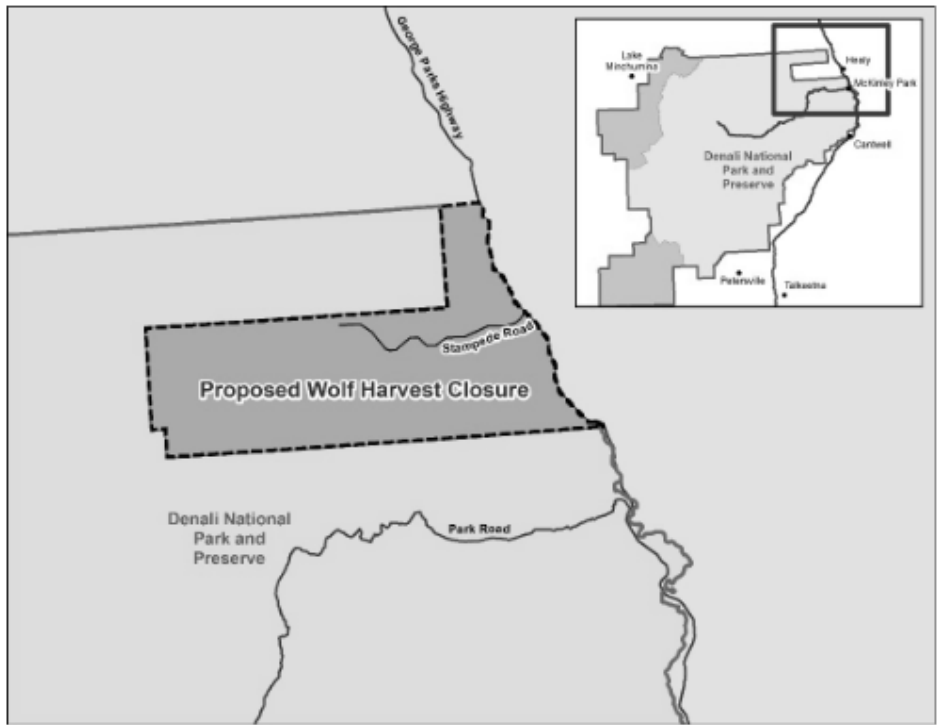
- 2. Our members and many Alaskans have attended and commented at numerous meetings since 2000 urging the Board of Game to remember the importance and relevance of these values. Proposal 186 responds to these values by closing the Stampede Area to hunting and trapping of wolves, reducing risk on wolves that are studied and enjoyed inside the national park when taking forays onto state lands close by. There is no area of the state better suited for such a closure, given the special value in the viewing and study of living wolves there. The Board of Game has long expressed that it is sensitive to public comment, and public comment from throughout the state supports this closure.**

3. We recognize that no closed area can protect all wolves that venture onto state lands, but we strongly believe that reducing the risk from hunting and trapping in the proposed closed area (see map) will promote stability in the Denali wolf population. The risk is real; long seasons (August 15-April 15 hunting/November 1-April 30 trapping) and high bag limits (10 wolves for hunters, unlimited for trappers) on state lands adjacent to the national park enhance the level of risk for wolves. Hunting wolves in August places young wolves, just out of the den and learning how to hunt, at enhanced risk. Surely there are other risks to wolves, but hunting and trapping risks are significant and can be managed. See image below, from *NPS data*.



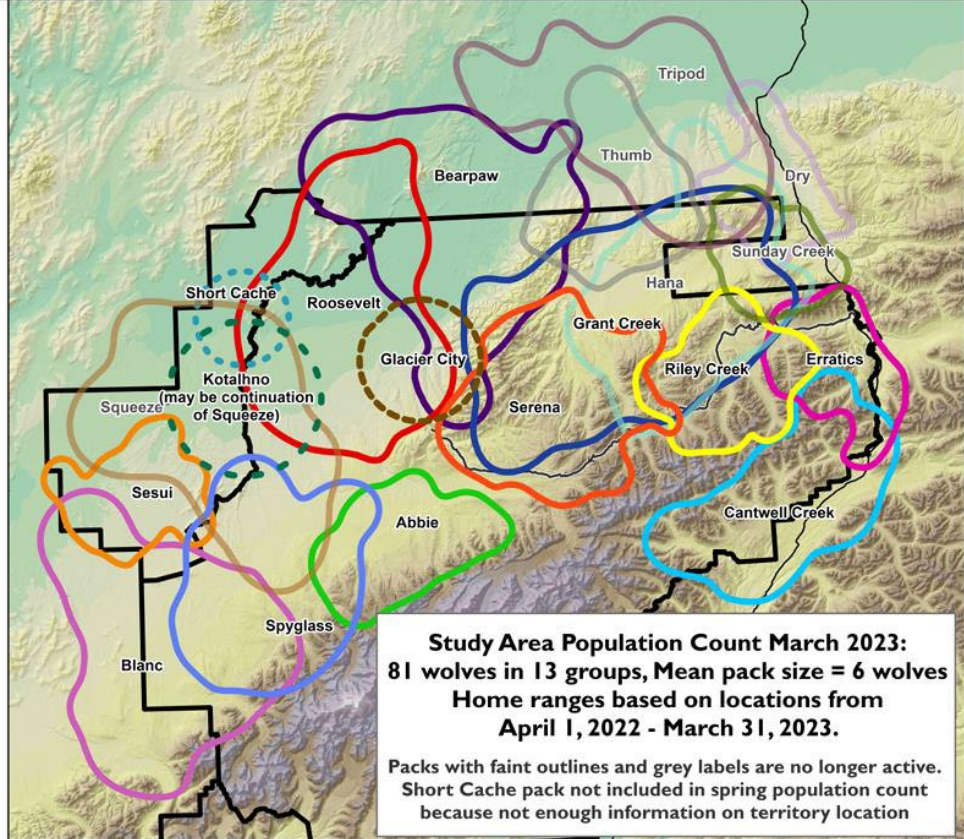
4. We accept that there is not a biological concern for the overall population of wolves in the Denali region. However, the loss of even one wolf has been shown to be disruptive to an entire family group, especially in early spring, after mating and before pups are born. Pack disruption and dissolution have occurred in the past following hunting/trapping losses. Maps below demonstrate the area of proposed closure and how the territories of wolves overlap it.

a. Just recently the only three collared wolves from the Grant Creek pack have gone offline, appearing that they had been trapped and collars destroyed. Note that it is their territory that occupies part of the Stampede townships.



Spring 2023 Denali Wolf Map

National Park Service
U. S. Department of the Interior
Denali National Park and Preserve



Pack (Pack size as of 3/15/2023)

- Abbie (8)
- Bearpaw (7)
- Blanc (3)
- Cantwell Creek (4)
- Dry (0)
- Erratics (4)
- Glacier City (5)
- Grant Creek (9)
- Hana (0)
- Kotalhno (7) (may be continuation of Squeeze)
- Riley Creek (12)
- Roosevelt (7)
- Serena (6)
- Sesui (7)
- Short Cache (4)
- Spyglass (2)
- Squeeze (0)
- Sunday Creek (0)
- Thumb (0)
- Tripod (0)

0 10 20 40 KM
 April 27th 2023



5. **Historically, the Alaska Board of Game has recognized the economic importance of studying and viewing wolves in the Denali Park region, along with the desires of many Alaskans who support wolf protection there. The board has taken action on these matters, as indicated below:**
- a. 1990-1993 – ADFG held an extensive public process to establish zones for state wildlife management on state lands adjacent to national parks. Although a consensus was not reached, this process indicated a recognition by the State of Alaska that wildlife management could be different in different areas of the state, depending on distinct values present in those areas
 - b. Board of Game Interior Meeting March 2000 – Proposal 80 asked for a small, “no kill” area west of the Savage River in the Stampede Townships. The Board of Game amended this proposal to reduce the area, and stated that *“although this is an allocation issue between wildlife viewers and trappers, the department recommend implementation of this proposal as an initial step in a process to provide for a wide array of wildlife values held by Alaskans. It considered this action would result in a long-term benefit to trappers because of fostering a public climate recognizing different wildlife values...Members looked at the strength of data supporting the benefit of a buffer to the population of the pack and to individual habituated wolves...The board elected to defer the amended proposal in order to allow more time for public discussion and for a committee to review and make recommendations...”*
 - c. Board of Game Meeting November 2000 – Proposal 38 – The board established a closed area on a small area of land west of the Savage River in the Stampede Townships. The Summary document from this meeting stated, *“The board listened to emotional testimony from individuals on both sides of the issue. The action is an effort to meet the desires of the wildlife viewers while recognizing the long-standing use of wolves by local residents. The board will revisit this matter in two years to see if the boundary adjustments or other changes are necessary.”*
 - d. Board of Game Meeting October 2002 – Proposal 53, request for a “no kill” area west of the Savage River, by the Alaska Department of Fish and Game, passed by the Board of Game. Summary document from this meeting stated, *“Board members heard considerable public testimony concerning the existence of the current wolf buffer zone, its effectiveness in enhancing viewing opportunities within Denali National Park, and an implied linkage with wolf control in other locations in the state. Agency staff presented data on wolf pack distribution, wolf mortality patterns, and human use patterns in this portion of Unit 20C. Board members recognized the importance of the Toklat wolf pack for non-consumptive uses and noted the comparatively low level of trapping effort in the years preceding 2001 in this 72 square mile area. The board stated that continuation of the closure would allow further opportunity to gather information regarding the effectiveness of this type of closure.”*
 - e. Board of Game Meeting October 2002 – Proposal 55, by Alaska Wildlife Alliance, requested a closed area in Unit 20A east of the park, where one of the Denali wolf family groups spent considerable time. Board of Game amended this proposal and then passed it. Summary documents stated, *“Board members heard considerable public testimony concerning the establishment of a wolf buffer zone east of Denali National Park. Agency staff presented*



data on wolf pack distribution, wolf mortality patterns, and human use patterns east of the park boundary. The board determined that the Margaret wolf pack is subject to consumptive uses upon ranging beyond park boundaries, and that providing a buffer will secure the viewing opportunities of this pack within the park boundaries. The board heard that based on the proposed boundaries trappers could be displaced and forced to encroach existing traplines. Board members discussed the need to determine the smallest area that meaningfully secures the core range of the Margaret wolf pack, while minimizing impacts on other uses of wolves in Unit 20A. The board noted that it was not practical to close all areas used in extra-territorial forays of individual animals from any given pack. The board recognized the importance of having a boundary that is easily identifiable on ground and determined the Anchorage–Fairbanks Intertie powerline to be a distinct boundary.”

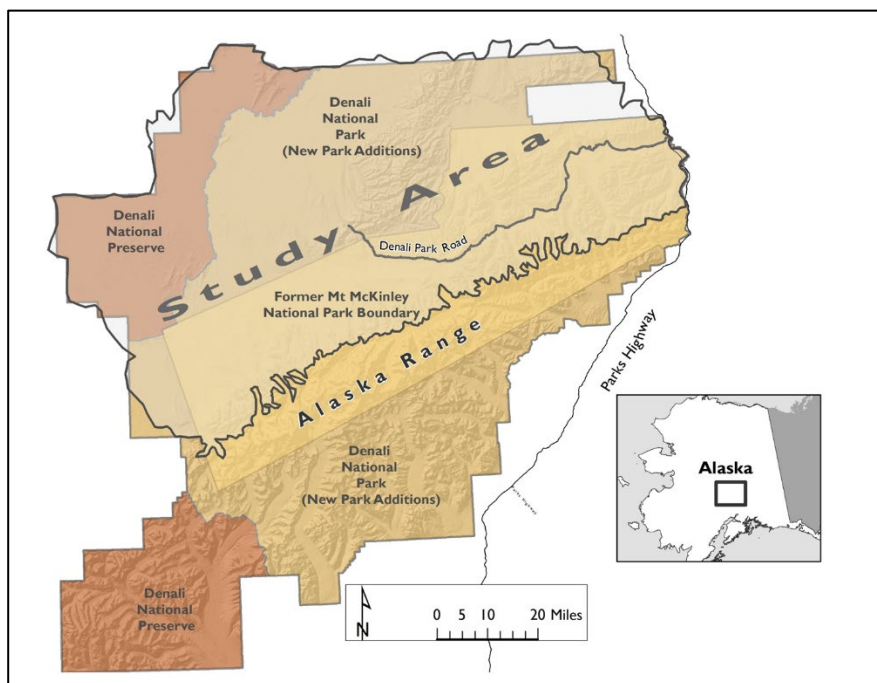
- f. Board of Game Meeting February 2004 – Proposal 156 – this proposal, reflecting opinions from several Advisory Committees, sought to remove all the existing Denali buffer zones. Instead. However, the Board of Game retained the Stampede Townships buffer, west of the Savage River, and amended the Nenana Canyon buffer. In addition, the board placed a moratorium on all new considerations of wolf buffers around the park until 2010. In the Summary document, it was stated, “Scientific results suggested that the Stampede Closed Area and Nenana Canyon Closed Area would have no measurable effect on the biological parameters of the Denali wolf population. However, removal of any wolves is objectionable to those who place a high value on the potential to view event a single animal. The board received considerable testimony in support of maintaining trapping closures near Denali National Park and noted its willingness to make allowances where possible. Trapping opportunities negated by these closures was considered to be negligible. Board members stated their willingness to protect the viewing of wolves along a relatively small area the wolves routinely visit and are viewed, while not trying to protect across their range....In setting a six-year moratorium on changes to the existing closure boundaries, the board intends to evaluate its affect on trappers and the tourism industry.”
- g. Board of Game Meeting February 2010 – Several proposals were submitted by conservation organizations including DCC, the Anchorage AC, and by NPS to expand the buffer zone. The board spoke about Proposal 65 (by NPS) and then failed to consider all the others (55,56,57,58,59, 60 and 61). The board determined that it would not approve any expansions. On Proposal 63, a move to remove the existing buffers, there was active discussion. In reference to the existing Stampede Closed Area and Nenana Canyon Closed Area, member Spraker voted to retain the existing closed areas (referring to the fact that hunters/trappers appear to have adjusted to the existing two closed areas). Member Ben Grussendorf advocated retaining existing closed areas, stated that people had adjusted and it seemed to have worked and consumptive users had found alternative areas, saying “I hope we as a board recognize that there are other users of this.” The vote was very close, 4-3, with Hoffman, Spraker and Grussendorf voting to retain existing closed areas, too few votes to retain them.

6. **Consider replicating your past closures in this area.**

The previously Board-approved Nenana Canyon and Stampede Closed Areas, enacted in their final form in 2004 and successfully in place for **6 years** until 2010, are a solid and workable example of the Alaska Board of Game's acting to recognize the importance of Denali wolves for science and tourism. As shown above, thoughtful board members supported these.

Proposal 186 has slightly different boundaries, but its central justification and purpose are the same. We hope that the Board of Game, this year, will carefully consider its history of protecting the wolves of Denali and will support Proposal 186. Or, as a way to continue examining the potential for closed areas to protect viewing and scientific inquiry, reinstitute the 2004 closures, closures that were accepted and settled over many years.

Area of Denali National Park Wolf Monitoring Program (approx. 17,000 sq. km. north of Alaska Range)



Wolf Pack Research, Pack Narratives, and Population data at Denali from Denali National Park website:

<https://www.nps.gov/dena/learn/nature/wolf-research.htm>



We offer brief comment on a few other proposals from the Denali region scheduled for the Region III meeting:

Proposal 183 – Would not support without more data

These would lengthen brown bear season by two weeks, until June 15th. Both proposals assert that there are increasing numbers of brown bears in 20A. Has ADFG censused bears in these areas recently? If brown bears tend to visit bait stations in early June, as mentioned in the proposals, allowing them to be hunted then is tantamount to allowing brown bear baiting. This creates some confusion and could lead to overharvest. This concern pertains to **Proposal 185** also.

Proposal 185 – Do not support

Further lengthening of the brown bear season in 20A and part of 20B until June 30th. The habitat and characteristics of these units vary from the rest of GMU 20, and scientific data on bear numbers and the health of the bear population will be needed to change existing policy. Aligning with the rest of the unit is not an adequate justification without data. The same argument holds for **Proposal 184**, earlier opening of hunting season in 20A.

Proposal 60-62 – Do not support with current data

These proposals call for Wolf Control under Intensive Management Plans for a portion or all of Unit 19C. Because 19C is not currently identified for Intensive Management, the bar is high and would require a lot of data. We do not see data showing a reasonably calculated population estimate or harvest objective for moose/caribou in this very remote and rough area that has experienced two harsh winters in a row, making it likely that numbers of ungulates are lower than in previous years. GMU 19C has no permanent villages and most all hunting, be it resident Alaskan or guided hunter, is aircraft-supported. We generally oppose aerial wolf control unless an emergency exists. We doubt if it would be effective in this rugged country, it is unsustainable over many years, and it is quite expensive. Also, it needs to be kept in mind, in the language of proposals, that sheep were never intended to be an intensively managed population, and declines in sheep numbers have multi-factorial causes.

Sincerely,

***Denali Citizens Council Board of Directors
PO Box 78, Denali Park, Alaska 99755***

Nancy Bale, Steve Carwile, Nan Eagleson, Charlie Loeb, Scott Richardson, Nancy Russell



PC29

Name: Kody Deweese

Community of Residence: Fairbanks, Ak

Comment:

This proposal (176) would be a great change for the moose population and the success of local residents.

Proposal 176: Support



PC30

Name: Ernest Dickson

Community of Residence: North Pole, AK

Comment:

I am a cabin owner on the Salcha River. Every year I see "trophy" hunters headed up the River by the boatload. It gripes me that our local residents and cabin owners cannot find a moose because they have been taken down by the many nonresident hunters that are just doing it for sport...not to have meat for the winter. This proposal will help alleviate this situation and let the moose population grow again for our Alaskan residents. Thank you for the opportunity to comment.

Proposal 176: Support



PC31

Name: Merrie Dickson

Community of Residence: North Pole, AK

Comment:

I strongly support this proposal. I am a cabin owner on the Salcha River. I have lived in Alaska most of my life and grew up on moose, caribou, and salmon. I think it is wrong to have nonresident hunters take our resources for their "big adventure" while leaving less for our Alaskan residents. The number of folks on the River who get a moose has drastically dwindled in the last few years. This is in part due to Nonresidents being taken up-River to shoot moose for the sport, not for the meat. This proposal will give the moose the opportunity to revive their numbers in these critical areas so Alaskan residents can get meat to put in the freezer.

Proposal 176: Support



PC32

Name: James Dickson

Community of Residence: Shelton Washington

Comment:

We need to use archery as a tool for opportunity and sustainability in wild Dall sheep populations.

Opportunity is far more important than harvest success. I believe archery, bridges this gap. Thank you.

Proposal 88: Support



PC33

Name: Emily Donaldson

Community of Residence: Fairbanks, AK

Comment:

As an Alaskan resident and in the career of natural resources, I find Fish and Games focus on culling predators without science-backed management recommendations abhorrent. Wolves, especially in and around Denali, contribute to local tourism and many residents' love for this unique and wild state. Wolves, including those in the Stampede townships, deserve apolitical management that helps keep their populations in balance with their surrounding ecosystems.

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Michael Dow
Fairbanks, AK



PC34

I strongly oppose proposals 43, 44, 45, 46. All proposals are attempting to institute a way to reduce resident and in some cases nonresident opportunities to hunt for sheep. All of them cite the issue of hunting pressure as a problem and if these proposals are enacted it would just further concentrate hunters and guides onto open lands such as unit 11, 13D (Tonsina Controlled Use Area), 13A, 13B, 13E, 14B, 7, 16B, etc. These proposals are doing the exact opposite of their intended purpose in that regard. The number of sheep hunters is usually tightly tied to the health of sheep populations and since it is harder and requires more time and effort to find a legal sheep that self regulates hunter numbers down. Sheep harvest has been decreasing but so have hunter numbers. Just having the ability to hunt sheep is more valuable than harvesting a sheep in my opinion, and taking away opportunity is only helping the people that are writing these proposals. Guides have different clients every year so reducing resident competition to once every 2 or 4 years will make their operation easier. Since guides are having falling success rates perhaps taking less clients and regulating their client numbers to the health of the population should be their priority. Due to the population of sheep being down hunting has become more challenging and success rates have decreased but that does not mean that it isn't a quality experience. Sheep hunting is about pushing your limits, challenging your mental fortitude, and enjoying the most incredible terrain on the planet with the opportunity and bonus to harvest a legal ram. Sheep hunting is the ultimate form of dedication, persistence, and challenge. To take that yearly opportunity away would be a shame to all aspiring and current sheep hunters considering the very conservative and biologically sound full-curl management strategy employed in Alaska.

I support proposal 52. With the downturn of caribou, sheep, and moose in some areas, the ability to use night vision could help to take furbearers and reduce predation on these populations of ungulates. This will help increase population recovery while providing economic trapping opportunities.

I oppose proposal 84. Taking away an opportunity usually doesn't result in that opportunity coming back. I think it is a slippery slope to take this opportunity from residents unless there is a guarantee it would revert back to opportunity every year at a certain population threshold or within a certain time frame.

I support proposals 56, 57, 58, 60, 61, 62, 73, 108, 109, 116, 120, 121, 122, 123, 136, 137, 138, 146, 147, 148, 149, 150, 151, 152, 153, 165, 167, 168, 169, 170, 182, 183, 184, 185, 187. All proposals seek to manage predators either under intensive management plans or other means. These proposals are useful and one of the few actionable methods in which to help game population recovery in those areas.

I oppose proposal 117. Nonresidents should not be guaranteed 10% of the draw because this puts them in a completely different applicant pool and allows them to have guaranteed permits

compared to the random process of the draw. Non Residents should be awarded up to 10% of the permits based on the random draw.

I support proposal 130. The fact that there are guaranteed permits for guided nonresidents takes away the entire draw process because the hunt was undersubscribed which resulted in 6 permits being given out on a first come first serve basis. This is a highly coveted draw and for nonresidents looking to sheep hunt having almost guaranteed opportunities should not be the intent behind the draw. Nonresidents are able to circumvent the system in order to hunt this highly coveted tag at will.

I oppose proposal 131 for the reasons stated above about proposal 130.

I strongly oppose proposal 140. The nonresident harvest is negligible to the population considering they are limited to one bull. This proposal is purely political to keep nonresidents out of this area. This is one of the largest herds in the state and yet it can not sustain very minimal nonresident harvest? Meanwhile residents are permitted to harvest 5 caribou per day of either sex. Obviously cow caribou harvest is more detrimental to herd recovery. This proposal clearly does not make biological sense.

I strongly support proposal 180. DC827 is a coveted caribou tag for the potential to harvest a large caribou bull and get meat that is affordable and accessible off of the road system. Residents should have clear priority for this hunt considering how hard it is to hunt caribou due to herd down trends and remote locations. DC827 is one of the best opportunities for residents to hunt. The fact that nonresidents are guaranteed 25% of the permit allocation is nonsensical and doesn't support residents that rely on caribou meat. As of 2023 draw odds, nonresidents had a higher chance to draw the permit than residents which is also absolutely ridiculous. Nonresidents were awarded 39 permits and had 700 total applicants. Residents were awarded 111 permits with 2771 applicants. For this accessible and valuable caribou herd residents need to be given priority.

I strongly oppose proposal 207. The age criteria under full curl management allows for the harvest of mature sheep that may never reach full curl due to inferior genetics or deep wide curls. This proposal doesn't seem to make any logical sense. Most sheep hunters understand that aging sheep is very challenging and they are very conservative when doing so to prevent illegal harvest. I would argue that most illegal sheep are shot based on curl because when viewing sheep from below it makes them appear full curl. Younger sheep are being killed due to full curl horn growth rather than age. A lot of sheep are legal by the ages of 6 or 7 because they have full curl horns, but this regulation would not allow a 12 year old less than full curl ram to be harvested even though it is potentially twice the age of the other "legal" sheep.

Additionally I would like to point out the hypocrisy in proposal 45 and 78. The same people write both proposals and yet are arguing for complete opposite things only to support self interests. Proposal 45 they argue to limit residents to 1 sheep every 4 years because of "higher hunting pressure" and yet they are looking to reinstate nonresident hunting with proposal 78 in unit 19C

because sheep populations are “unutilized”. The two conclusions that are made from these proposals are completely inconsistent with each other.



Name: Jesse Dunshie

Community of Residence: Fairbanks, AK

Comment:

Proposal 44: I support this proposal as sheep hunting should be a quality over quantity hunt in every hunter's mind who cares about the resource.

Proposal 46: I oppose this proposal. Residents do not need to be allocated by drawing permit. I would support NON-RESIDENTS being allocated to a drawing permit only system for sheep hunting, however.

Proposal 116: I support this proposal. TMA sheep are in dire straits at the moment, and coyotes have been proven to be a significant predator for sheep lambs.

Proposal 119: I support this proposal. Sheep hunting is a trophy hunt. Plain and simple. Their legality for harvest is judged solely on their horn configuration or how old they are. They are tough to access and do not yield that much meat. Implementing a rule like proposal 119 isn't taking any opportunity away from hunters but it will certainly make them more selective on what they harvest. Harvesting faster growing but younger rams from an area, year after year, will have a detrimental effect on the huntable population that could take years to rebuild, if ever.

Proposal 177: I support this proposal. While providing good opportunity, 5 extra days of bow hunting will not negatively affect the moose population.

Proposal 181: I strongly support this proposal. 20A is a very accessible/affordable unit for resident sheep hunters using a variety of transportation methods. 20A sees high hunter effort for both residents and non-residents. With no exclusive guide use areas in place in 20A, the number of guides and their hunters can be overwhelming at times. There are documented cases of multiple outfits/hunters racing to get into range of the same legal ram. Non-resident hunters are also harvesting the majority of the sheep in 20A, which should never be the case with any big game animal in Alaska from an area that sees such high resident participation.

Proposal 128: I support this proposal. The youth hunt should be antlerless and/or any bull. It is a once in a lifetime permit if drawn and offers hunters a short hunting window in a small area. The surrounding area of 20D is already antler restricted which will keep a fresh supply of moose into the small huntable area of the bison range each year.

Proposal 129: I support this proposal. The youth moose hunt should be any moose. The hunters drawn are restricted to just the bison range for hunting and are given short timeframes to hunt. The any moose bag limit is warranted because the area surrounding the youth hunt area has no antlerless hunts and is antler restricted for bull moose. The surrounding areas restrictions ensures that there will always be a fresh supply of new animals into the youth hunting area.

Proposal 44: Support

Proposal 46: Oppose

Proposal 116: Support

Proposal 119: Support

Proposal 128: Support

Proposal 129: Support

Proposal 177: Support

Proposal 181: Support



Name: Raymie Eatough

Community of Residence: Skagway, AK

Comment:

Hello, My name is Raymie and I have been an Alaska Resident for over 20 years. Before that I lived in Wyoming where we were able to witness how the protection of the wolves benefited the land in Yellowstone, they restored balance to the land and the animals and even the health of the rivers.

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support

Josh Ellis
Anchorage, AK



PC37

Board of Game Proposal Comments as submitted by Josh Ellis, born and raised resident hunter of Alaska since 1979.

Proposal 130

I **OPPOSE** Proposal 130.

For many years, certain residents and their advocacy groups have lobbied to allocate drawing permits on the percentage of 90 percent to residents and 10 percent to non residents. Now that the department is doing as such and allocating certain drawing permits with this ratio, it would be a step backwards and have negative repercussions to once again include non residents and residents in the same pool of DCUA (Delta Controlled Use Area) sheep hunt drawing applicants.

One consequence of the passage of this proposal would be the possible decrease in the odds of a resident drawing a DCUA sheep permit. Guides operating in the area would be forced to enter many applicants and “flood” the draw in the hopes of obtaining permits for clients, which could conceivably lower the odds of a resident drawing a permit. This is unfair to residents.

By maintaining the current 90/10 allocation, this structure allows guides to reliably operate in the DCUA with a certain reasonable expectation of non resident clients obtaining a permit. Currently, only two small outfitters are operating sheep hunts in the DCUA. The current allocation structure has allowed these two outfitters to offer high quality sheep hunts to their clients and maintain their business. If this proposal is passed, it would in turn make their business unsustainable when it comes to providing quality sheep hunts to non-resident hunters. It would also disadvantage residents and their current odds of drawing a permit as non residents and outfitters would have to enter many more applicants into the combined pool in the hopes of their clients obtaining a permit.

The common use clause of the Alaska State Constitution provides that *“Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.”* The Alaska Supreme Court found in the Owsicheck decision that this common use clause also includes guides and their access to these wildlife resources. The current allocation (90/10) of sheep permits in the Delta sheep hunts is more than fair to both the residents and non-resident applicants, and provides guides and outfitters their constitutional protected access to the wildlife resources as defined under the common use clause and affirmed in the Owsicheck decision.

I thank the board for their time and consideration in all of this years proposals, and ask that the board **oppose proposal 130** as it is unfair and will have negative repercussions to both residents and non-resident hunters alike.

Proposal 131

I **SUPPORT** Proposal 131.

Currently, the Delta sheep hunts are being allocated with 90 percent of available permits going to residents, and 10 percent of permits going to non-residents. Resident Hunters such as myself have been advocating this allocation for many years, as it provides access to both residents and non resident sheep hunters, with the great majority of permits awarded to residents, yet maintaining non-resident opportunity.



The passage of this proposal will maintain this fair allocation of permits between residents and non-residents and allow for certainty to the guides operating in the DCUA a reasonable expectation of obtaining a permit and maintaining their small businesses. This current allocation structure provides the vast majority of permits to residents (90 percent), yet also provides certainty to non-residents that their constitutional right to access is maintained.

The common use clause of the Alaska State Constitution provides that *"Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use."* The Alaska Supreme Court found in the Owsichuk decision that this common use clause also includes resident guides and their access to these wildlife resources. The current allocation (90/10) of sheep permits in the Delta sheep hunts is more than fair to both the residents and non-resident applicants, and provides guides and outfitters their constitutional protected access to the wildlife resources as defined under the common use clause and affirmed in the Owsichuk decision.

By adopting this proposal, the board will affirm the common use clause by maintaining reasonable guided non-resident access, yet provide the vast majority of permits to resident hunters as has been their request for many years. The adoption of this proposal will codify this certainty in the regulations, and clear up any misconceptions to the DCUA sheep permit allocation.

I respectfully ask the board to **ADOPT proposal 131.**

Proposals 132 and 133

I **OPPOSE** these proposals.

Bow hunters are currently allowed to use their weapon of choice during the DCUA sheep hunts. Creating a special season and distributing permits based upon the choice of weapon will decrease current hunter opportunity and disadvantage those hunters that choose to use a rifle in their odds in obtaining a DCUA sheep permit.

By asking hunters to learn to shoot a bow, as outlined in this proposal, this will apply a special condition on hunters who wish to obtain a DCUA sheep permit by asking them to learn a skill and become proficient in a weapon that they may not wish to use.

Whereas, by maintaining the current allocative structure of the DCUA sheep permits, equal opportunity is afforded to all hunters no matter their weapon of choice.

I respectfully ask the board to **OPPOSE proposals 131 and 132.**

Proposals 136, 137, 138

I **SUPPORT** these proposals and I respectfully ask the board to do so as well, as to provide relief to ungulates and provide increased hunter opportunity with this method and means.



PC38

Name: Audun Endestad

Community of Residence: Fairbanks, Alaska

Comment:

Proposals #136, 137, 138 Opposed to baiting of grizzly bears.

I have hunted grizzly bears in this area for the past 40 years. Typically, I spent a total of 2 months per year in this area. In the past 10 years, I have seen a decrease in grizzly bear population. This is one of the last remaining areas that grizzly bear baiting is prohibited. It is my opinion that there should be at least one area that is not open to grizzly bear baiting. This will allow hunters the opportunity for a true spot and stalk hunt.

Proposal 136: Oppose

Proposal 137: Oppose

Proposal 138: Oppose



PC39

Name: Nina Faust

Community of Residence: Homer

Comment:

I support Proposal 186 to protect wolves entering state lands in the Stampede townships. These wolves return to the park where they den, hunt, and raise their families. Wolves do not know borders, so not providing a buffer jeopardizes these important wolves that are being studied and are so popular for viewing by the visitors to the national park. There is strong support to protect these that are so important for the continuing scientific studies, wildlife viewing, and for balance in the ecosystem.

It is time for the Board of Game to work cooperatively on the valuable and longterm management programs that depend on these wolves having their habitat protected from hunting and trapping. Let's return to a more cooperative approach by again approving these reasonable requests for wolf protections by approving Proposal 186.

Proposal 186: Support

**Proposal 43:**

I strongly **OPPOSE** this proposal because it is unnecessary and unfairly restricts resident hunters without any limitation imposed on the ability of guides and outfitters to continue hunting in essentially the same way they are now. This is in opposition to the stated goals of the board of game's formation stating that, "article VIII of the Alaska Constitution is the result of historic achievement in which the state of Alaska established the chief principle that **all resources should be managed under a public trust doctrine for the citizens of Alaska.**"

A more consistent solution would be to either continue the closure for non-residents as the Board as wisely seen fit to do initially or to resume the hunt to all but with sensible weapons restrictions such as making the unit ARCHERY only or even blackpowder or open sight rifles. These latter solutions maintain opportunity for all hunters while still decreasing harvest. Because of decreased ram harvest from weapons restrictions, overall hunt able ram numbers will increase in a few years yielding a more quality hunting experience for all.

Furthermore, if the goal is to decrease harvest while maintaining opportunity, it would make much more sense to limit non-resident guided hunters who have much higher success rates. For example, in 2022 non-residents had a 46% success rate in 19c while residents success rate 8%. Decreasing a few resident tags would have much less impact on OPPORTUNITY while having a much greater impact on harvest. Statistically, decreasing non-resident allocation by 10 tags would reduce the harvest of 4-5 rams while taking away 10 Alaska resident's opportunity to hunt would statistically only decrease harvest by less than one ram per year. I.e, if tags have to be limited, it makes much more sense to decrease the number of tags of non-resident hunters who have six times higher success rates. Put another way, you'd have to remove 60 resident hunters to get the same decrease in harvest as removing 10 resident hunters.

Proposal 44:

I strongly **OPPOSE** this proposal because it is unnecessary and unfairly restricts resident hunters without any limitation imposed on the ability of guides and outfitters to continue hunting in essentially the same way they are now. Even though non-resident hunters are limited to one sheep every 4 years, the guides and outfitters continue hunt every year with zero imposed limitations despite high success rates and increased resources such as aerial scouting.

This proposal is in opposition to the stated goals of the board of game's formation stating that, "article VIII of the Alaska Constitution is the result of historic achievement in which the state of Alaska established the chief principle that **all resources should be managed under a public trust doctrine for the citizens of Alaska.**" A more consistent solution would be to either continue the closure for non-residents as the Board as wisely seen fit to do initially or to resume the hunt to all but with sensible weapons restrictions such as making the unit ARCHERY only or even blackpowder or open sight rifles. These latter solutions maintain opportunity for all hunters while still decreasing harvest. Because of decreased ram harvest from weapons restrictions, overall hunt able ram numbers will increase in a few years yielding a more quality hunting experience for all. This would be a much more equitable way to achieve the authors goals of "Allowing more breeding age mature yet less than full curl rams to remain in the herd after hunting season will reduce pressure on the sheep herd while maintaining resident priority."

(Furthermore, if the goal is to decrease harvest while maintaining opportunity, it would make much more sense to limit non-resident guided hunters who have much higher success rates. For example, in 2022 non-residents had a 46% success rate in 19c while residents success rate 8%. Decreasing a few resident tags would have much less impact on OPPORTUNITY



while having a much greater impact on harvest. Statistically, decreasing non-resident allocation by 10 tags would reduce the harvest of 4-5 rams while taking away 10 Alaska resident's opportunity to hunt would statistically only decrease harvest by less than one ram per year. I.e., if tags have to be limited, it makes much more sense to decrease the number of tags of non-resident hunters who have six times higher success rates. Put another way, you'd have to remove 60 resident hunters to get the same decrease in harvest as removing 10 resident hunters.)

Proposal 45:

I strongly **OPPOSE** proposal 45 because it is unnecessary and unfairly restricts resident hunters without any limitation imposed on the ability of guides and outfitters to continue hunting in essentially the same way they are now. Even though non-resident hunters are limited to one sheep every 4 years, the guides and outfitters continue hunt every year with no imposed limitations despite high success rates and increased resources such as aerial scouting.

This proposal is in opposition to the stated goals of the board of game's formation stating that, "article VIII of the Alaska Constitution is the result of historic achievement in which the state of Alaska established the chief principle that **all resources should be managed under a public trust doctrine for the citizens of Alaska.**"

A more consistent solution would be to either continue the closure for non-residents as the Board as wisely seen fit to do initially or to resume the hunt to all but with sensible weapons restrictions such as making the unit ARCHERY only or even blackpowder or open sight rifles. These latter solutions maintain opportunity for all hunters while still decreasing harvest. Because of decreased ram harvest from weapons restrictions, overall hunt able ram numbers will increase in a few years yielding a more quality hunting experience for all. This would be a much more equitable way to achieve the authors goals of "creat[ing]an overall enjoyable hunting experience and keep Dall sheep from going to a draw statewide, and most importantly keep sheep on the mountain, a mechanism needs to be put in place to decrease the pressure on the resource, even if it's a minor one."

(Furthermore, if the goal is to decrease harvest while maintaining opportunity, it would make much more sense to limit non-resident guided hunters who have much higher success rates. For example, in 2022 non-residents had a 46% success rate in 19c while residents success rate 8%. Decreasing a few resident tags would have much less impact on OPPORTUNITY while having a much greater impact on harvest. Statistically, decreasing non-resident allocation by 10 tags would reduce the harvest of 4-5 rams while taking away 10 Alaska resident's opportunity to hunt would statistically only decrease harvest by less than one ram per year. I.e., if tags have to be limited, it makes much more sense to decrease the number of tags of non-resident hunters who have six times higher success rates. Put another way, you'd have to remove 60 resident hunters to get the same decrease in harvest as removing 10 resident hunters.)

Proposal 46:

I strongly **OPPOSE** proposal 46.

This is another proposal that will have great adverse affects on the OPPORTUNITY of resident hunters while effectively creating no change in the way that guides and outfitters in the area operate. While true that individual non-resident hunters will be limited, the overall ability of guides and outfitters in the area will be minimally impacted because they will still be able to take all of the non-resident hunters who draw tags each year. Meanwhile, resident hunters,



many of whom have structured their lives around living and working in Alaska so that they can hunt sheep each fall, will have their opportunity greatly decreased.

This proposal is also in opposition to the stated goals of the board of game's formation stating that, "article VIII of the Alaska Constitution is the result of historic achievement in which the state of Alaska established the chief principle that **all resources should be managed under a public trust doctrine for the citizens of Alaska.**"

(Furthermore, if the goal is to decrease harvest while maintaining opportunity, it would make much more sense to limit non-resident guided hunters who have much higher success rates. For example, in 2022 non-residents had a 46% success rate in 19c while residents success rate 8%. Decreasing a few resident tags would have much less impact on OPPORTUNITY while having a much greater impact on harvest. Statistically, decreasing non-resident allocation by 10 tags would reduce the harvest of 4-5 rams while taking away 10 Alaska resident's opportunity to hunt would statistically only decrease harvest by less than one ram per year. Ie, if tags have to be limited, it makes much more sense to decrease the number of tags of non-resident hunters who have six times higher success rates. Put another way, you'd have to remove 60 resident hunters to get the same decrease in harvest as removing 10 resident hunters.)

Proposal 52:

OPPOSE. In general hunting and trapping does not need more sophisticated technology but rather a return and emphasis on traditional skills and woodsman ship. Night vision goggles have no place in hunting and trapping.

Proposal 78:

OPPOSE- The board was wise in it's decision to restrict non-resident hunting in this unit and this should set a precedent for other areas of the state with general decline in sheep numbers. A possibly more equitable approach that might even be more beneficial in decreasing harvest and increasing the quality of the overall hunting experience would be to adopt a weapons restriction such as "by bow and arrow only" for all hunters, resident and non-resident alike.

Proposal 79:

OPPOSE- The board was wise in it's decision to restrict non-resident hunting in this unit and this should set a precedent for other areas of the state with general decline in sheep numbers. A possibly more equitable approach that might even be more beneficial in decreasing harvest and increasing the quality of the overall hunting experience would be to adopt a weapons restriction such as "by bow and arrow only" for all hunters, resident and non-resident alike.

Proposal 80:

OPPOSE- The board was wise in it's decision to restrict non-resident hunting in this unit and this should set a precedent for other areas of the state with general decline in sheep numbers. A possibly more equitable approach that might even be more beneficial in decreasing harvest and increasing the quality of the overall hunting experience would be to adopt a weapons restriction such as "by bow and arrow only" for all hunters, resident and non-resident alike.

Proposal 81:

OPPOSE- The board was wise in it's decision to restrict non-resident hunting in this unit and this should set a precedent for other areas of the state with general decline in sheep numbers. A possibly more equitable approach that might even be more beneficial in decreasing harvest and increasing the quality of the overall hunting experience would be to adopt a weapons restriction such as "by bow and arrow only" for all hunters, resident and non-resident alike.

**Proposal 82:**

SUPPORT- This proposal is a viable option for bringing non-resident hunters back into the area and could set precedent for creating a drawing or registration allotment for non-resident hunting.

A possibly more equitable approach that might even be more beneficial in decreasing harvest and increasing the quality of the overall hunting experience would be to adopt a weapons restriction such as “by bow and arrow only” for all hunters, resident and non-resident alike.

Proposal 83:

Strongly SUPPORT- This would be the most equitable approach to addressing the concerns in the 19c sheep hunting area and would provide maintained or even increased (once mature ram numbers increase due to decreased harvest despite maintained opportunity). **This is the kind of common sense management approach that would benefit everyone.** And to those who say that this decreases opportunity, I would remind them that a bow is no more expensive than a rifle and that a skilled hunter can still find success. They just have to accept that things like sheep hunting don't have to be made as easy as possible. It's okay for sheep hunting to be challenging and transitioning to weapons restrictions would do this.

Proposal 84:

OPPOSE- As above, decreasing resident hunter opportunity is problematic for many reasons. Even from a purely mathematical perspective decreasing resident opportunity makes much less sense than decreasing non-resident hunters through some other process such as a draw hunt or an area allocation per outfitter.

If the goal is to decrease harvest while maintaining opportunity, it would make much more sense to limit non-resident guided hunters who have much higher success rates. For example, in 2022 non-residents had a 46% success rate in 19c while residents success rate 8%. Decreasing a few resident tags would have much less impact on OPPORTUNITY while having a much greater impact on harvest. Statistically, decreasing non-resident allocation by 10 tags would reduce the harvest of 4-5 rams while taking away 10 Alaska resident's opportunity to hunt would statistically only decrease harvest by less than one ram per year. I.e, if tags have to be limited, it makes much more sense to decrease the number of tags of non-resident hunters who have six times higher success rates. Put another way, you'd have to remove 60 resident hunters to get the same decrease in harvest as removing 10 resident hunters.

Proposal 85:

SUPPORT- This is a novel strategy that would encourage the harvest of older rams and would directly impact the recent increase in younger rams. As pointed out in the proposal, in Unit 19C the average age of rams killed was under eight years-old and if a few old outliers are removed, from then ~50 or so rams killed when calculating, the average age of a sheep killed is under 7.5-years-old with a concerning number of six and even a five year-old ram having been killed. This proposal would help create a more responsible approach to harvest.

Proposal 86:

SUPPORT- This is a novel strategy that would encourage the harvest of older rams and would directly impact the recent increase in younger rams. As pointed out in the proposal, in Unit 19C the average age of rams killed was under eight years-old and if a few old outliers are removed, from then ~50 or so rams killed when calculating, the average age of a sheep killed is under 7.5-years-old with a concerning number of six and even a five year-old ram having been killed. This proposal would help create a more responsible approach to harvest.

**Proposal 88:**

I am the author of this proposal and strongly **SUPPORT** it for all of the reasons stated in the proposal.

Archery is an ideal management tool for species with decreased populations and/or increased hunting pressure. As described, almost anyone who can climb into the mountain to hunt sheep, can also hunt with a bow so there is no loss of opportunity. In the 21st century of internet information, GPS, airplane access, long range shooting and so many other technological ways to make hunting easier than ever before, we could allow sheep hunting to be challenging again and, at the same time, have a positive affect on the quality of the hunting experience and sheep population without decreasing opportunity.

Proposal 89:

Support but would amend to make it “by bow and arrow only” to decrease harvest while maintaining opportunity.

Proposal 90:

Support but would amend to make it “by bow and arrow only” only to decrease harvest while maintaining opportunity.

Proposal 118:

SUPPORT: Archery only hunts are a very effective management tool and are used successfully throughout the USA and even for other species in Alaska. This hunt would increase the opportunity for those wishing to hunt with a bow and arrow and who want some increased challenge in their sheep hunting.

In this case, this proposal would allow for an increased chance of a drawing a tag for those willing to accept the challenge of bowhunting while maintaining overall hunting opportunity (essentially anyone who can sheep hunt can quickly learn to shoot a bow) and will likely decrease overall harvest during a time when there are concerns for over harvest in this area.

Proposal 119:

SUPPORT-This is a novel strategy that would encourage the harvest of older rams and would directly impact the recent increase in younger rams. As pointed out in the proposal, In Unit 12 recent harvest statistics show an average age of around 7.2-years-old in 2022 and a concerning number of even younger rams. This proposal would help address this issue.

Some may contest that aging sheep in the field is difficult and fraught with false annuli but I would respond that such a regulation will only increase the vigilance of hunters studying the sheep before taking a shot.

Proposal 131:

OPPOSE

Proposal 132:

SUPPORT: As the proposal describes, assigning some allocation of existing sheep hunts to archery hunting only will likely decrease the total number of rams in the area by decreasing harvest without decreasing opportunity (no change in the total number of rags given). Ideally



this hunt could take place during a different time but even allowing it during the regular draw season would a great step in the right direction toward accepting archery as a potential management strategy. It's okay for sheep hunting to retain some challenge in the face of so much technology that has entered into the hunting realm and this would allow for some increased opportunity for those willing to accept that challenge.

Proposal 133:

SUPPORT: As the proposal describes, assigning some allocation of existing sheep hunts to archery hunting only will likely decrease the total number of rams in the area by decreasing harvest without decreasing opportunity (no change in the total number of rags given). Ideally this hunt could take place during a different time but even allowing it during the regular draw season would a great step in the right direction toward accepting archery as a potential management strategy. It's okay for sheep hunting to retain some challenge in the face of so much technology that has entered into the hunting realm and this would allow for some increased opportunity for those willing to accept that challenge.

Proposal 141:

SUPPORT-Despite my support of the youth hunts in general, I cannot support any hunt which would allow for any form of aerial scouting. In my opinion, using a plane to spot sheep whether in or out of any season is unethical and antithetical to basic fair chase principles and should be uniformly illegal.

Proposal 142:

I strongly **SUPPORT** this proposal. Expanding the archery only corridor to 15 miles from the dalton highway would be an extremely effective tool to address the concerns cited in the WSA22-02 while maintaining opportunity for all hunters (anyone who can sheep hunt can also do so with a bow as discussed in the proposal). This would also, finally, create an area where those who choose to accept the increased challenge of hunting with a bow could utilize without fear of being shot over or around by nearby rifle hunters.

In the face of increased federal and state closures for sheep, we must consider novel strategies such as this that will maintain opportunity for all hunters while decreasing impact on the ram population thereby increasing the number of breeding rams, decreasing impact on local subsistence hunters, and increasing the overall quality of the hunt for anyone there. The time has come to consider weapons restricted hunts as a management strategy as has been employed throughout North America.

Proposal 143:

Either SUPPORT or amend the existing hunt to state that any aerial scouting is prohibited. I agree with the author that using airplanes in any way, at any time during or before the season is antithetical to fair chase, ethical hunting.

Proposal 144:

SUPPORT-Transitioning to draw makes sense for this area. An alternative would be to transition to archery only in this area and continue to allow the current opportunity.

Proposal 158:

SUPPORT



This proposal is a reasonable and fair approach to concerns about declining populations and over harvest of sheep in this region by non-resident hunters. In this area non-resident hunters have incredibly high success rates. This is likely in part due to how easy it is to locate rams by air prior to the season (an act which is antithetical to fair chase hunting at baseline) given the nature of the terrain. Allowing biologists to control the harvest through a draw permit would continue to allow outfitters to conduct their business while providing some guard rails to prevent over harvest. It's again worth noting that success rates in these units for non-resident hunters is often over 80%, an astounding figure for a sheep hunt and highlighting how decreasing opportunity only slightly will have significant affect on decreased harvest (almost a 1:1 ratio of decreasing hunters to decreasing ram harvest!).

Based on historical data supplied by the refuge managers, many of these likely cannot even sustain a 7 ram harvest but this can be adjusted as needed per area with an absolute maximum of 7. I agree with the author that allowing those who charge upwards of \$25,000 per hunt to self regulate, is not a viable long term strategy especially given the overall trend and uncertainty of sheep populations in the arctic (and throughout the state).

Proposal 159:

I strongly support proposal 159. This is a novel approach to increasing hunter opportunity while creating very minimal impact on the sheep population and on the ability of local subsistence hunters. The airplane limitations further allow this hunt to be a true challenge and the kind of thing that we should accept more of as sheep hunters who value a challenge and the increase of hunter opportunity would be a rare bright spot in a state environment in which we're currently losing opportunity.

Proposal 160-162:

Strongly SUPPORT: As it says in the proposal,. despite biologists consistently telling us that sheep numbers, overall are in decline in much of the Brooks Range (and elsewhere in the state), the harvest numbers from the nonresident hunters in ANWR have shown no significant decrease. Statistics since 2012 show that guided hunters in ANWR had their highest harvest number ever in 2020, with the third highest being 2021. With use of extensive aerial scouting hunters in these areas year after year, have success rates above 80%. Based on ADF&G statistics resident hunters using airplanes in those same areas are also reporting success rates above 60-70% despite official and anecdotal reports that overall sheep are much more sparse than they've been in decades. We must find ways to address this level of harvest by non-residents and outfitters and a novel and equitable approach would be to add a little additional challenge for all hunters in whichever of these units mentioned in proposals 160-162.

As the author of this proposal I would also include the following statistics. Here are the non-resident success rates in the respective GUA's, with some areas averaging 8-9 rams per year just from the non-residents in these relatively small areas despite surveys and anecdotal evidence suggesting overall decreasing numbers. In a nutshell, there are fewer sheep on the landscape but outfitters in these areas have generally *increased* their harvest in the past 10 years with almost every area increasing in take over the years.



Success Rates by GUA	
GUA	% Success
ARC-01	12.50
ARC-02	57.14
ARC-03	73.49
ARC-04	88.89
ARC-05	56.52
ARC-06	81.69
ARC-07	75.00
ARC-08	51.43
ARC-09	60.87
ARC-10	70.83
ARC-11	66.67
ARC-13	64.10
ARC-14	69.23

ARC-03	ARC-04	ARC-05	ARC-06	ARC-07	ARC-08	ARC-09	ARC-10	ARC-11	ARC-13
6	N/A	8	N/A	N/A	2	4	8	1	
10	N/A	4	N/A	N/A	4	2	3	2	
6	N/A	0	6	N/A	1	4	3	3	
4	N/A	1	7	N/A	1	3	2	3	
8	N/A	1	6	N/A	2	4	5	1	
5	N/A	1	5	N/A	1	0	2	1	
7	N/A	1	9	1	2	3	4	1	
5	N/A	4	9	2	1	3	1	0	
5	6	2	8	2	2	2	4	N/A	
5	2	4	8	1	2	3	2	N/A	
61	8	26	58	6	18	28	34	12	

**Proposal 169:
SUPPORT**

PROPOSAL 176:



SUPPORT: I agree with the sentiment that this is a meat hunt that many Alaska residents rely upon and should be limited to residents.

Proposal 177:

SUPPORT: An additional five days of hunting is a reasonable request for an archery only moose hunt.

Proposal 181:

SUPPORT: This is a well conceived and supported proposal. An alternative to address the authors concerns would be to transition to an archery only hunt which would do even more to decrease harvest but without limiting opportunity.

Paul Forward
Girdwood/Kotzebue, AK



PC41

Name: Tyler Freel

Community of Residence: Fairbanks, AK

Comment:

I would like to voice my strong opposition to proposals 43, 44, 45, and 46 which seek to reduce or otherwise restrict the bag limits and hunting opportunities for Dall sheep in applicable reasons. Based on information from ADF&G biologists, the current low sheep numbers are not the result of, nor is recovery being slowed by hunting. I have been hunting sheep myself annually for the past 20 years and these same types of complaints of crowding and unhappy hunters have always been present. There are actually fewer people hunting sheep in Alaska now than ever before, and restricting the opportunity of the relatively few hunters who hunt every year — and even fewer that are successful year after year would not have a positive impact on either hunter experience or the numbers of legal, huntable rams on the mountains. These measures would only act to reduce opportunity for resident hunters, and would have no impact on pressure from outfitters (which can be contentious in some of the traditionally hard-hunted areas). My belief is that many people are using the current and unfortunate slump in sheep numbers as fuel for personal agendas rather than a genuine effort to ensure future hunting opportunity and healthy sheep populations.

Proposal 43: Oppose

Proposal 44: Oppose

Proposal 45: Oppose

Proposal 46: Oppose

Proposal 47: Oppose

Proposal 48: Oppose

Proposal 49: Oppose

Proposal 52: Support



PC42

Name: Lydia Furman

Community of Residence: Shaker Heights OH

Comment:

I am writing because I support our planet and our fragile ecosystems. I have travelled to Alaska and I care about wolves everywhere. Wolves are the regulators of the ecosystem and the optimal top predator that sustains the health of the biome. I support respect for wolves and am opposed to abuse, shooting and killing of this essential predator.

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in

Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support

**COMMENTS ON PROPOSAL 186****SUBMITTED BY ISABEL AND MICHAEL GAWEL, FEBRUARY 20,2024,**

OUR FAMILY OWNS PROPERTY IN ALASKA UNIT 20C ON PINTO CREEK JUST OUTSIDE THE ORIGINAL DENALI NATIONAL PARK BOUNDARY AND NEAR THE WEST BANK OF SAVAGE RIVER. WE HAVE NOT DEVELOPED IT AND HAVE MANAGED IT AS A WILDERNESS CONSERVATION AREA FOR OVER FIFTY YEARS. WE HAVE SEEN THE INCREASE IN VISITATION TO THE PARK OVER THE YEARS AND THE GREAT VALUE TO VISITORS OF OBSERVING WOLVES AND BEARS IN PARTICULAR. THE LOCAL COMMUNITY BENEFITS ECONOMICALLY FROM SATISFACTION OF THESE VISITORS.

DURING THAT TIME STARTING IN THE 1960'S WE HAVE FOLLOWED THE DENALI PARK WILDLIFE STUDIES. WE BEGAN OBSERVING WOLVES AND BEARS AND WORKING WITH BIOLOGIST ADOLPH MURIE AND HAVE CONTINUED PROMOTING SCIENTIFIC STUDY AND CONSERVATION OF PARK WILDLIFE. WE HAVE HAD THE INTENTION TO PREVENT HUNTING ON OUR LAND OF THE ANIMALS PROTECTED IN THE ADJACENT PARK AND PRESERVE OUR LAND'S ENVIRONMENTAL VALUES. OUR PROPERTY HAS BEEN IN THE RANGE OF THE WOLF PACKS AND OTHER WILDLIFE THAT MOVE BEYOND THE PARK BOUNDARIES BUT ARE OFTEN SEEN ALONG THE DENALI PARK ROAD'S MOST HEAVILY TRAVELED SECTORS. WE HAVE NOT MARKED OUR PROPERTY BOUNDARIES BUT FEAR THAT HUNTERS AND TRAPPERS MAY ENTER OUR PROPERTY AND BADLY IMPACT THE WILDLIFE THERE.

WE ARE VERY CONCERNED ABOUT THE ALLOWANCE OF WOLF AND BEAR HUNTING IN THIS AREA AND ESPECIALLY SETTING TRAPS, BAITING BEARS AND KILLING WOLVES AND EXTENSION OF SEASONS AND TAKE LIMITS AND CREATION OF REGULATIONS ALLOWING THESE ACTIVITIES OR RELAXING OF CURRENT CONTROLS ON TRAPPING AND HUNTING IN UNIT 20C. WE KNOW THAT STATE WILDLIFE VALUES INCLUDE PROTECTION OF WOLVES WHERE IT MAKES SENSE TO DO SO, AS IN THE STAMPEDE AREA ADJACENT TO THE ORIGINAL PARK.

THE NATIONAL PARK SERVICE HAS THE RESPONSIBILITY TO MANAGE WILDLIFE ON ITS LANDS ACCORDING TO ITS ENABLING LEGISLATION, ANILCA AND THE NATIONAL PARK SERVICE ORGANIC ACT, WHICH REQUIRE MANAGING FOR DIVERSE AND NATURAL ANIMAL AND PLANT POPULATIONS WITHOUT FOCUSING ON REDUCTION OF PREDATORS.

WE OPPOSE THE IDEA THAT THE WOLVES AND OTHER PREDATORS PROTECTED BY THE NATIONAL PARK SERVICE AT DENALI ARE SUBJECT TO HUNTING AS THEY RANGE THROUGH OUR PROPERTY AND OUTSIDE THE PARK BOUNDARIES.

PLEASE ACCEPT AND RECORD OUR COMMENTS.

THANK YOU,

ISABEL AND MICHAEL GAWEL AND FAMILY.



PC44

Name: Warren Giuchici

Community of Residence: Fairbanks

Comment:

I am writing this letter in support of proposal 176. As a resident and hunter on the Salcha river, i would like to see the regulation match the lower section as well as align with the other hunting areas in the interior. Thank you for your attention in this matter, would appreciate your support of Proposal 176.

Proposal 176: Support



PC45

Name: John Giuchici

Community of Residence: fairbanks , alaska

Comment:

Proposal 176

I am very much in support of Proposal 176. I have hunted the Upper Salcha for over fifty years. This proposal would spread the hunting pressure out over the entire season. There are the meat hunters and there are the trophy hunters. The trophy bulls move later in the season. The meat hunters usually take the smaller bulls early in the season leaving the bigger bulls for nonresident hunters later in the season.

Thank You, John Giuchici



Proposal 1: I Disagree: This hunt should remain closed until such a time that a healthy population capable of supporting hunting exists. At that time it should be reopened with age restrictions on the rams available to harvest. Similar to Proposal 119.

Proposal 2: I Agree: Resident subsistence hunters are by far the largest user group. Their harvests far exceed anything that is sustainable. It must be limited.

Proposal 3: I Disagree: Nonresident harvest of caribou is extremely minimal, but the amount of money brought into local communities has a large, beneficial, impact. This proposal will not benefit the herd. Only by limiting resident subsistence hunters will we be able to allow the herd to come back.

Proposal 4: I Agree: I feel that even more limitations are warranted. There should be a maximum of 4 caribou total and only one or none may be cows. If we want the population to increase harvest must be restricted and cows must be allowed to stay in the breeding population.

Proposal 5: I Agree: Limiting resident subsistence harvest is the only way to successfully allow the herd to recover.

Proposal 6: I Disagree: The scientific evidence does not support this.

Proposal 15: I Disagree: If the musk ox herd is a healthy population capable of supporting hunting, then the opportunity should be opened up for all AK residents, not just subsistence users.

Proposal 18: I Agree: I agree only if the scientific evidence is there to support hunting of this herd. If this season was indeed closed without scientific evidence to support the decision then it should be reopened.

Proposal 32: I Disagree: This is an unnecessary proposal and would put undue hardship on all other user groups in favor of one.

Proposal 33: I Agree: Only if the scientific data supports this reduction. Residents must also do what we can to help the sheep population return.

Proposal 34: I Disagree: This hunt should remain closed until it has a population capable of supporting hunting wherein it should reopen with age restricted harvest similar to proposal 119. The tool does not matter, only the harvest age and numbers.

Proposal 36: I Agree: This must be done to allow the herd to return.

Proposal 37: I Agree: This must be done to allow the herd to return.



Proposal 38: I Disagree: Nonresident harvest is extremely minimal. Closing the hunt to nonresidents would accomplish nothing as long as resident subsistence users continue to harvest huge numbers of caribou every season.

Proposal 43: I Disagree: Resident hunters should have precedents. Regulations should be levied on nonresident hunters first. Nonresident hunters should be draw only and only allowed one every five years. Secondly there is no justification for any ram or any sheep hunts while restrictions are being considered and they should be abolished.

Proposal 44: : I Disagree: Resident hunters should have precedents. Regulations should be levied on nonresident hunters first. Nonresident hunters should be draw only and only allowed one every five years. Secondly there is no justification for any ram or any sheep hunts while restrictions are being considered and they should be abolished.

Proposal 45: I Disagree: Resident hunters should have precedents. Regulations should be levied on nonresident hunters first. Nonresident hunters should be draw only and only allowed one every five years. Secondly there is no justification for any ram or any sheep hunts while restrictions are being considered and they should be abolished.

Proposal 46: I Disagree: Resident hunters should have precedents. Regulations should be levied on nonresident hunters first. Nonresident hunters should be draw only and only allowed one every five years. Secondly there is no justification for any ram or any sheep hunts while restrictions are being considered and they should be abolished.

Proposal 47: I Disagree: Bison should not be a proxy animal. They are not a primary food animal.

Proposal 76: I Disagree: Sheep populations are struggling and should not be open to subsistence use period. Secondly this proposal seeks to create an advantage for Subsistence and Nonresidents over resident hunters. This area is closed for a reason and should remain closed.

Proposal 77: I Disagree: Sheep populations are struggling and should not be open to subsistence use period. Secondly this proposal seeks to create an advantage for Subsistence and Nonresidents over resident hunters. This area is closed for a reason and should remain closed.

Proposal 78: I Disagree: Sheep populations are struggling and should not be open to subsistence use period. Secondly this proposal seeks to create an advantage for Subsistence and Nonresidents over resident hunters. This area is closed for a reason and should remain closed.

Proposal 79: I Disagree: Sheep populations are struggling and should not be open to subsistence use period. Secondly this proposal seeks to create an advantage for Subsistence



and Nonresidents over resident hunters. This area is closed for a reason and should remain closed.

Proposal 80: I Disagree: Sheep populations are struggling and should not be open to subsistence use period. Secondly this proposal seeks to create an advantage for Subsistence and Nonresidents over resident hunters. This area is closed for a reason and should remain closed.

Proposal 81: I Disagree: Sheep populations are struggling and should not be open to subsistence use period. Secondly this proposal seeks to create an advantage for Subsistence and Nonresidents over resident hunters. This area is closed for a reason and should remain closed.

Proposal 82: I Disagree: Sheep populations are struggling and should not be open to subsistence use period. Secondly this proposal seeks to create an advantage for Subsistence and Nonresidents over resident hunters. This area is closed for a reason and should remain closed.

Proposal 83: I Disagree: Sheep populations are struggling and should not be opened back up in 19C, an already closed area. Secondly this proposal seeks to create an advantage for Nonresidents over resident hunters. This area is closed for a reason and should remain closed.

Proposal 84: I Disagree: Sheep populations are struggling statewide and should not be open to subsistence use period. This area is closed for a reason and should remain closed.

Proposal 85: I Agree: This is a good management plan similar to Proposal 119. It should also be applied to nonresident hunters and Guides. Keeping younger breeding age rams in the population is of the utmost importance.

Proposal 86: I Agree: This is a good management plan similar to Proposal 119. It should also be applied to nonresident hunters and Guides. Keeping younger breeding age rams in the population is of the utmost importance.

Proposal 87: I Disagree: Sheep populations are struggling statewide and should not be open to subsistence use period. This area is closed for a reason and should remain closed.

Proposal 88: I Disagree: Sheep populations are struggling statewide and should not be open to subsistence use period. This area is closed for a reason and should remain closed.

Proposal 89: I Disagree: Sheep populations are struggling statewide and should not be open to subsistence use period. This area is closed for a reason and should remain closed.



Proposal 90: I Disagree Sheep populations are struggling statewide and should not be open to subsistence use period. This area is closed for a reason and should remain closed.

Proposal 91: I Disagree: Sheep populations are struggling statewide and should not be open to subsistence use period. This area is closed for a reason and should remain closed.

Proposal 92: I Disagree: Resident hunters should have precedents. Regulations should be levied on nonresident hunters first. Nonresident hunters should be draw only and only allowed one every five years. Secondly there is no justification for any ram or any sheep hunts while restrictions are being considered and they should be abolished.

Proposal 112: I Agree: All hunting should be regulated and reduced until the herd is back within management goals.

Proposal 113: I Agree: All hunting should be regulated and reduced until the herd is back within management goals. Furthermore this would help with serious safety issues associated with this hunt.

Proposal 115: I Agree: Proper meat care is a common sense issue. I have seen many caribou from this hunt that were spoiled from poor field care.

Proposal 118: I Disagree: Hunting is hunting, it does not matter what tool is used. Harvest numbers are the real indicator that needs to be monitored. This proposal is unnecessary and seeks to create an advantage for one specific user group.

Proposal 119: I Agree: This proposal has been used for years in Canada. It should be applied state wide as well as applied to all Guides and their clients. Guides should be allocated a determined number of tags based on years in business and other pertinent information. They should then loose tags from that allocation for every ram killed under 8 years old. This is the same management that is used in Canada with great effect.

Proposal 130: I Agree: Resident hunters should have precedence. Currently the regulations are weighted towards guided clients and that needs to change.

Proposal 131: I Disagree: Resident hunters should have precedence. Up to 10% of the permits is acceptable, however it should not be required. If nonresidents are randomly issued less than 10% then that is what is issued and the remaining permits should be allocated to resident hunters.

Proposal 132: I Disagree: This is unnecessary and seeks to create an advantage for one specific user group. The tool used is irrelevant. Harvest numbers are all that matters.



Proposal 133: I Agree: This is unnecessary and seeks to create an advantage for one specific user group. The tool used is irrelevant. Harvest numbers are all that matters.

Proposal 134: I Disagree: Random draw is the fairest system. This is not necessary simply because the author wants the tag.

Proposal 135: I Disagree: Nonresidents must be allowed access to hunting in Alaska, however Residents deserve precedence. A specialized hunt such as this should be one every 5-10 years for nonresidents.

Proposal 139: I Agree: Something must be done and local subsistence hunters are by far the heaviest user group.

Proposal 140: I Disagree: Nonresident hunters do not take enough animals to make a difference, but the money brought in to the local economy is substantial. Resident Subsistence hunters kill such large numbers of caribou that regulations on any other user group would not accomplish anything.

Proposal 141: I Agree: There is no justification for youth sheep hunts especially when sheep are struggling. Sheep are not food species, they are a trophy species. They are not the best option for creating opportunities to get youths into the sport hunting.

Proposal 142: I Disagree: This is unnecessary and seeks to create an advantage for one specific user group. The tool used is irrelevant. Harvest numbers are all that matters.

Proposal 143: I Agree: Sheep are struggling and extended seasons put undue stress on the population.

Proposal 144: I Agree: Sheep are struggling and guided clients are more heavily using areas that are still open. It is not sustainable to keep increasing the hunting pressure in these areas.

Proposal 154: I Disagree: Increased harvest when caribou are struggling statewide is a poor idea and unnecessary.

Proposal 155: I Disagree: Increased harvest when caribou are struggling statewide is a poor idea and unnecessary

Proposal 156: I Disagree: This hunt remains one of the few hunts still open. As long as the population can support hunting it should remain open. I would support turning this hunt into a registration hunt for all as it is one of the most accessible and should be monitored closely.

Proposal 158: I Agree: All nonresident sheep hunts should be draw only.



Proposal 159: I Disagree: Sheep populations are struggling. Increasing hunting regardless of the weapon used, also increases the pressure and stress on the animals. If the population is able to support hunting it should be open with age restrictions on harvest, not weapon restrictions.

Proposal 160: I Disagree: This proposal is not necessary and seeks to create an advantage for one user group. If the population is able to support hunting it should be open with age restrictions on harvest, not weapon restrictions.

Proposal 161: I Disagree: This proposal is not necessary and seeks to create an advantage for one user group. If the population is able to support hunting it should be open with age restrictions on harvest, not weapon restrictions.

Proposal 162: I Disagree: This proposal is not necessary and seeks to create an advantage for one user group. If the population is able to support hunting it should be open with age restrictions on harvest, not weapon restrictions.

Proposal 180: I Agree: Residents should have precedence over nonresidents in any and all hunting opportunities within the state. Allocating more than 10% of tags available to nonresidents should not be allowed.

Proposal 181: I Agree: We all have to do our part to help sheep recover. Nonresident sheep hunts should be a draw for the entire state.

Grant Gullicks
Chugiak, AK



PC47

Name: Kent Hall

Community of Residence: Bandon, Oregon

Comment:

My name is Kent Hall and I now live in Oregon. I am writing in support of proposal 186.

I lived in Alaska almost 40 years in areas including the Aleutian Islands, above the arctic circle and southeast. The main reason I lived and worked in Alaska is because it is still mostly wild and home to abundant fish and wildlife.

I support proposal 186 for the reasons listed by the Park Service and the attempt to manage a balanced ecosystem. Wolves are a vital part and deserve the protection and opportunity to wander off park lands to remain a viable contributor to the health of the park.

Thanks for considering my comments.

Proposal 186: Support



PC48

Name: Hardy Hamilton

Community of Residence: Fairbanks, Alaska

Comment:

Hardy Hamilton of Fairbanks in Support of proposal 176

I feel proposal 176 would be an excellent for not only resident moose hunters, but as well as nonresident, moose hunters

This would still allow for a non-resident to be able to come to Alaska and enjoy a moose hunt as well as have a chance to fill his freezer while harvesting a matured bull moose, witch is what most non-resident hunters come to Alaska to achieve!

Resident hunters would still be able to take their children as well as elderly hunters out to the field and fill our freezers for winter time

I was born and raised here in Alaska and now take my children out to hunt moose every year! I am not a horn hunter but do strive to hunt a mature bull moose myself!

But at the end of the day its meat in the freezer is the main goal.

I Support proposal 176 and it's my hope that the fish and game board will take each resident hunter comments to heart. Thank you for your consideration

Hardy Hamilton

Proposal 176: Support



PC49

Name: Deondric Henderson

Community of Residence: Fairbanks

Comment:

Hello,

I would like to concur with proposal 176. I am a born and raised Alaskan hunter of the Salcha river drainage. I have personally seen the decline of moose along this drainage during my many trips to the Salcha river cabin. Being a non residential hunting unit and so close to town, the hunting pressure and boat traffic is horrendous during hunting season. I believe this affects the salmon population as well. Limiting non residents to one bull with 50-inch antlers, or antlers with four or more brow tines on at least one side; is much more reasonable for this GMU. Removing the opportunity of antlerless moose for nonresidents should be implemented for this GMU and if not the whole state.

All resident bag limits and season remain the same.

Thank you for your time and what you guys do.

Deo

Proposal 176: Support



PC50

Name: Cole Heuer

Community of Residence: Fairbanks ak

Comment:

Proposal 52

I am in favor of 52

I believe the use of night vision goggles as well as the use of forward looking infrared devices should in fact be made legal In the taking of fur bearers. We live in a state where the optimal time of year as well as the legal season for taking said fur bearers falls during the darkest and coldest time of the year. Allowing night vision and other infrared optics could be very beneficial to the population boost of moose and caribou.

The taking of fur bearers and predators has long been practiced to provide income for families and to help mitigate the over harvest of subsistence populations by wildlife. Allowing the use of these new age optics allows us to help the moose and caribou populations thrive and survive a little easier during the winter months and help put money into local pockets through the fur trade. This in turn will boost calf survival rates, in theory, and truthfully could provide the community with other benetits.

More curb appeal to kids with the simplification of locating their target. More money for fish and game through the increased purchase of trapping licenses.

We all know that having a good optic does

NOT infact make you a good shot.

Thank you

Cole Heuer

Proposal 187

I am for proposal 187

I believe the unification of the trapping season dates is only fair, as the other units are allowed to experience a longer season to harvest Wolverine. The season should be longer to help avoid non target catch that is also out of season. It would also be nice to allow a little more time to trap them during the optimal season. Thank you

Cole Heuer

Proposal 52: Support

Proposal 187: Support



Name: Raymond Heuer

Community of Residence: Fairbanks, Alaska

Comment:

I am the author of proposal 187. I support this proposal with the following changes. It was not my intent to standardize the wolverine season throughout the region to mirror 20C season dates. I simply want all of 20C to close on the same day (which is one month longer, for the small portion of 20C East of the Toklat and South of the Kantishna rivers). There may verywell be good reason to leave the other units or subunit dates as they are. I am simply suggesting that this small offset of 20C does not appear to be of significant enough importance to the wolverine populations to demand it to be seperated from the remainder of 20C. In fact the portion of the unit that remains open longer is actually better wolverine habitate and there is no trapping allowed in the National Park.

I would recomend striking:

west of the Toklat and Kantishna rivers.

And

20C remainder.

The regulation should then read :

Area.	Open Season
Unit 19, 20C, 21, 25A, 25B, and 25D	Nov 1- Mar 31

Proposal 187: Support with Amendment



PC52

Name: Bill Iverson

Community of Residence: Soldotna Alaska

Comment:

Proposal 195. Do not Adopt

The cow population in the area around Deska Landing is almost nonexistent. I've seen 4 cows in the last three years. I am in the area for most of the entire season

The area biologist said that most of the count numbers were in the upper areas. Therefore they need to focus the hunts there instead of in the easily accessible areas. Limit the hunts to the northeast side of the Parks highway in the upper sections only.

We really need to break up 14a into some smaller units.

I have hunted this area for close to 50 years and it has been decimated by these aggressive Antlerless hunts.

The winter hunts are the worst idea as the moose are already distressed and the snow machines chasing them around burns up the needed fat they need to survive.

Proposal 154: Oppose

Proposal 159: Oppose



PC53

Name: Diane Jewkes

Community of Residence: North Pole, Alaska

Comment:

Members of Alaska Board of Game

I am writing to express my support for Proposal 176. I believe the changes in 176 will allow continued quality hunts for both residents and nonresidents. As a 50yr resident, I have hunted the Salcha River as a way to fill the freezer and enjoy the State of Alaska for most of those years.

Please adopt proposal #176.

thank you.

Diane Jewkes



Proposal 176: Support



PC54

Name: Eric Jewkes

Community of Residence: Fairbanks, Alaska

Comment:

I am writing to express my support for Proposal 176. Several factors continue to place increased hunting pressure on the upper Salcha river. Factors such as; rapid and steady increases in modes of transportation, increases in the 40 mile caribou hunt, widespread antler restrictions and shorter seasons in other areas of the state, make proposal 176 a needed adaptation.

While the upper Salcha area may be a relatively large area, the hunting area is almost universally limited to the river corridor. As you well know the upper Salcha is accessed through the lower Salcha, effectively increasing hunting pressure on both areas. A corridor which is also home to a large property owners group, and used by caribou hunters. Proposal 176 will spare this corridor from an influx of non-resident hunters looking to avoid the restrictions of most other areas. As their ability to access this area becomes easier from increased technology, the long term effect would be to impose restrictions on all hunters.

Thank you,

Eric Jewkes

Proposal 176: Support



PC55

Name: Leonard Jewkes

Community of Residence: North Pole, Alaska

Comment:

Proposal 176

Please adopt 176, because of moose decline, harsh winters, increase of hunting pressure from non-residents because of antler restrictions in many other areas of the state and predators. This offers residents a hunt to fill freezers and still offers non-residents a quality hunt.

If not adopted, I believe all user groups will need to be restricted in the future.

Proposal 176: Support



PC56

Name: Kaylene Johnson-Sullivan

Community of Residence: Palmer

Comment:

I live in Palmer, AK, and would like to comment in support of NPS Proposal 186. The value of wildlife must be measured in more than consumptive uses for harvest and subsistence. The majority of Alaskans and visitors to Alaska support the conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support



PC57

Name: Nick Jouflas

Community of Residence: Anchorage, AK

Comment:

Proposal 88 - Unit 19C

Hello,

I am writing in opposition of proposal 88 in unit 19C to change from a general season hunt to an archery only season.

After the 2022 season, when the moratorium for non-resident hunters was placed on unit 19C, there were only 3 rams harvested by resident hunters in unit 19C. Mr. Forward claims in his proposal that resident success was as high as 40%, however the harvest data from 2022 shows that Resident success was only 7.9%.

I believe that the moratorium on Non-Resident hunting in 19C was appropriate given the condition of the statistics. However, changing 19C to an archery only season is not only unnecessary, but an unfair resource allocation to a specific user group. Changing 19C to an archery only season for Residents, will have a net-zero impact on the sheep population in 19C.

Thank you for your consideration.

Proposal 88: Oppose

Proposal 130: Oppose

Proposal 131: Oppose

Proposal 181: Oppose



PC58

Name: Chris Keefe

Community of Residence: Denver, Colorado

Comment:

Wildlife management must be driven by science, not politics and special interest. Wolves don't recognize human boundaries.

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.



PC59

Name: Michael King

Community of Residence: Fairbanks, Ak

Comment:

I support this proposal.

Proposal 176: Support



PC60

Name: Jenna Klein

Community of Residence: Anchorage, Alaska

Comment:

My name is Jenna Klein, and I moved to Alaska in September 2018 from California. I have made this beautiful place my new home, in part, because of the incredible respect Alaskans show for its wild places and wild animals.

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support



Name: Grant Kopplin

Community of Residence: Palmer Alaska

Comment:

You have to approve proposal 130

And go back to the way things were. Proposal 131 is just a tag grab to give more hunts to guides to sell. If 10% of the tags happen to go to nonresidents because they got lucky and beat the 1% odds we all face, then great. But do not guarantee them

10%. That's just taking away opportunities and tags from residents. Please go back to the way it was with the delta tags, like the Delta AC is requesting.

Proposal 130: Support

Proposal 131: Oppose

If you approve 130 first to prevent 10% of all tags being guaranteed to non residents , then 133 would be great way to give bow hunters an exciting opportunity at delta sheep. I've never hunted sheep with a bow, but would apply for this tag with the hope of having slightly better draw odds and then getting to pursue sheep in DCUA

Proposal 130: Support

Proposal 133: Support

In regards to these 19c sheep proposals. I ask that the board realize that these are basically all written from commercial users who stand to gain financially from selling dall sheep hunts in 19c. Regardless of how low the sheep population is right now over there, guides and outfitters will continue to sell sheep hunts and hunt every last ram They find because they are just worried about getting paid. There is no guide concessions over so any outfitter can go back to selling however many sheep hunts they want.

All that being said, I do not believe non resident opportunity should be completely gone or taken away. I think proposal 82 is the best way to reintroduce non resident opportunity. A very limited draw hunt like to non residents still presents opportunity for them and then they can hire whatever guide they want and the guides still make money but it doesn't over run the hills with outfitters hunting down every ram and will

Hopefully let a few more make it and spread their genes and have a few older age class rams on the land scape. Residents have already reduced their pressure in the area.

The only thing stopping an army of guides is you guys so please do the right thing. A small draw hunt is the best way I believe to bring non residents back into the picture in 19c

There does not need to be winter subsistence sheep hunt. Thats ridiculous. Sheep are not a subsistence animal. Go bag a moose or caribou to fill the freezer.

I also support proposal 85. I think having some sort of consequence for shooting a younger ram would be good for the sheep and residents as well. This proposal would encourage residents to

pursue older rams which would improve hunt quality and be good for the resource. Proposal 86 would be good as well. I think proposals to encourage older age class ram Harvest and pushing the sheep hunting culture that direction would be good. There would hopefully be more mature rams on the land scape.

Proposal 76: Oppose
Proposal 77: Oppose
Proposal 78: Oppose
Proposal 79: Oppose

Proposal 80: Oppose
Proposal 82: Support
Proposal 84: Oppose
Proposal 85: Support

Proposal 86: Support
Proposal 87: Oppose
Proposal 89: Oppose
Proposal 90: Oppose

Proposal 43-46.

The board of game is looking at a lot of proposals aimed to limit resident opportunity. Besides proposal 43, all of these proposals were written by commercial users who stand to gain finically from the loss of resident opportunity. Or at least gain from having less pesky residents in the field competing for the same sheep that they make money from. The resources of the state belong to the people of the state, and the vast majority of your constituents, are residents of Alaska and I hope that you all remember that and put them first. If there is to be any reduction in opportunity or allocation of dall sheep to residents, than the non residents and guided hunting industry also need to give and should bear the brunt of any allocative reductions.

Any resident of Alaska who is a guide will still be able to hunt sheep and enjoy the resource, they just might not be able to exploit it for \$25,000-\$50,000 a head anymore or have less of an opportunity to do so. The average Alaska resident hunter is the primary individual that the board of game represents and I please ask that you remember that and put that individual first in your decision making when dealing with these dall sheep proposals. If someone isn't a resident of Alaska, especially non resident guides, then their concerns or worries don't matter because it's our state and our resources. I know there are a lot of resident outfitters and guides, and they would enjoy the same benefits or resident opportunity like every other resident. They just might face some reduction in being able to exploit the resource for finical gain.

If there is going to be any reduction to resident opportunity or allocation, then there should be HEAVY reduction to non resident/guiding opportunity first

Proposal 43: Oppose
Proposal 44: Oppose

Proposal 45: Oppose
Proposal 46: Oppose

Proposal 181 is great way to reduce to pressure and harvest on 20a sheep. There is a lot of guide pressure and user conflict from the amount of outfitters in the area, due to there being non guide use

Concession areas. Non residents have accounted for over half the harvest of sheep in 20a for the last several years and this limited draw hunt for non residents would protect their opportunity and also improve the quality of the hunt in the area by more rams surviving to mature age

Proposal 188: Support

This proposal would help with pressure and user conflict in this area of the state. It still allows some non resident opportunity, but reduces it and will ultimately reduce the harvest, which has been a concern in this area recently. Reducing non resident pressure before residents is the logical thing to do and falls inline with our state constitution. Putting

Non residents on a limited draw (say 10% of historical harvest for an area?) is the best way to limit their pressure but also protect their opportunity.

Proposal 144: Support

Proposal 117 is just a tag grab from residents to the guides. Please do not do this. If a nonresident draws the tag then great they can hire a guide and hunt it. But make them face the less than 1% draw odds residents face to get it. This is just taking away opportunity from residents and giving it to guides and non residents. They did this with DCUA tags (which you need to reverse and approve the proposal from the delta AC) and the tag went undersubscribed! All this is is a tag grab to give guides more hunts to sell. If a non resident wants to hunt tok or delta, make them face the same odds everyone else has to!

Proposal 119 is a great way to encourage residents to harvest older rams in a heavily pressured area. It would hopefully produce some older rams on the landscape

Proposal 117: Oppose

Proposal 118: Support



Name: Wayne Kubat

Community of Residence: Wasilla Alaska

Comment:

March 2024 BOG Comments

43 support - I see it as a compromise solution to complete closure and drawing permits

47 oppose – drawing permits are my least favorite option

48 support – I agree with making it as easy as possible for residents to take grizzlies

56-58 support – I’m in support of intensive mgt. efforts by ADF&G

60-62 I support - I support liberalized seasons and methods and means through a mgt plan to decrease current wolf numbers in 19C

76 – 81, 91 & 92: I support proposal 91 to form a sheep mgt. plan as first choice. I would hope to find a way to help the sheep and not just deal with allocation. Short of that, I’m torn between opening it back up as per proposals 76-81 or closing it completely as per proposal 92. In support of opening it back up to like it was, I generally support full curl management. I don’t think FC management is contributing to the decline or will slow the rebound. In support of closing it completely, sometimes it takes drastic action to get serious about fixing something and or making it better.

83 – 88 oppose - 87 is my proposal. I think there are better solutions as mentioned above.

93 – 99 – I could support any of these but 94 & 95 are probably my favorites. I support liberalized bear seasons and methods and means. Prey species in 19 C need help.

101 support

103 support

*Proposal 43: Support
Proposal 47: Oppose
Proposal 48: Support
Proposal 56: Support
Proposal 57: Support
Proposal 58: Support
Proposal 60: Support
Proposal 61: Support
Proposal 62: Support*

*Proposal 83: Support
Proposal 84: Support
Proposal 85: Support
Proposal 86: Support
Proposal 87: Support
Proposal 88: Support
Proposal 91: Support
Proposal 93: Support
Proposal 94: Support*

*Proposal 95: Support
Proposal 96: Support
Proposal 97: Support
Proposal 98: Support
Proposal 99: Support
Proposal 101: Support
Proposal 103: Support*



PC63

Name: Thomas Lamal

Community of Residence: Fairbanks, Alaska

Comment:

Proposal 176 tries to address an overcrowding issue which limits success for moose hunters. I know several families that hunt both the Salcha and Chena drainages and the current moose populations are stressed. These are narrow rivers and added boats make navigating a little challenging. Everyone that I know who hunts these drainages has a goal of filling their freezer.

This proposal will help make a trip for families and their kids more enjoyable and hopefully successful.

Proposal 176: Support



PC64

Name: Donald Lee

Community of Residence: Fairbanks, AK

Comment:

Proposal #110

I strongly oppose any cow moose hunts in any portion of unit 20E. I have hunted moose as a resident of first Tok and then Fairbanks for many decades including the Ladue (winter) hunts. On the ground evidence in the areas I have hunted would suggest that moose numbers have declined. I have seen less cows in both fall and winter hunts over the last 4 years than I have seen in many many years! ADFG's own data suggests moose numbers have at the very least, plateaued. The reasoning that allowing cow hunts would bring cow:bull ratios more in line with what it desired seems like a backward way to address the ratio "problem." Killing cows is only going to result in even less bulls on the landscape (in the future) and less cows too for that matter. Another proposal in this current cycle is to reinstate aerial wolf hunting (presumably to increase moose/caribou numbers). Which is it? Are we going to try to encourage moose numbers to rise through predator control or are we going to start killing cows??? I would instead suggest that we undertake intensive habitat measures. In otherwords, managing for increased opportunity, improved bull:cow ratios and habitat/forage that can support increased numbers of ungulates should involve the regular usage of prescribed burning.

Thankyou for this opportunity to comment.

Donald Lee III

Proposal 110: Oppose



PC65

Name: Mike Lee

Community of Residence: Central point Oregon

Comment:

I have archery hunted off the Dalton for 2022 and 2023 seasons. This proposal is written to only address an acute area. Limiting tags unit wide to address one transporters ability to take a massive number of people upriver is not a solution. The archery hunters that are hunting within the 5 mile area would be the ones negatively impacted by this. This proposition is written to address an over pressure in one area that is caused by one transporter. A simpler solution would be to limit the number or time frame a transporter can operate in the affected area.

Proposal 156: Oppose



PC66

Name: Dave Leonard

Community of Residence: Bettles Field, AK

Comment:

Proposal #44

In order to be consistent with current Non Resident requirements and in consideration of the current Sheep populations across the state, the board should adopt a one Full curl ram every four years for Residents until the Sheep population recovers.

Proposal #45

I strongly support the Department on the 4 regulatory year requirement for Residents.

Non Resident 4 year requirements have been in place for a good number of years.

Proposal #46

With the condition that Non Resident Sheep hunters receive 20% of the drawing permits and Guides who are currently conducting Sheep hunts on Federal Lands receive a specific number of Sheep permits. This could be based similar to the Kodiak system.

Proposal#140

Harvest of Caribou in Unit 24B specifically by non residents is incidental to the overall harvest. Therefore there is no need for a closure.

Proposal #181

Using the data provided for GMU 20A, if a drawing hunt was implemented, in order to be consistent, it should be required for both Residents and Non Residents.

In addition, the Board should consider limiting both Residents and Non Residents to one Full Curl Ram every 4 Regulatory years.

Proposal 43: Support
Proposal 44: Support with Amendment
Proposal 45: Support
Proposal 46: Support with Amendment
Proposal 47: Support

Proposal 48: Support
Proposal 49: Support
Proposal 50: Support
Proposal 51: Support
Proposal 52: Support
Proposal 140: Oppose
Proposal 146: Support

Proposal 147: Support
Proposal 149: Support
Proposal 150: Support
Proposal 151: Support
Proposal 152: Support
Proposal 181: Support with Amendment



PC67

Organization: Cory Lescher Photography

Name: Cory Lescher

Community of Residence: Anchorage, AK

Comment:

I support the National Park Service Proposal 186. I own and operate my own photography business in the State of Alaska and value the protection of Alaska Wildlife. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. Thank you for considering my comments today, I hope you will approve Proposal 186.

Proposal 186: Support



PC68

Name: Sherry Lewis

Community of Residence: Fairbanks, Alaska

Comment:

I support proposal 186. Wolves are very important for the tourist industry and for study for science in Denali National Park. Tourism is one of the businesses that brings in the most money to Alaska. Many tourist come to Alaska to see wolves as they figure it's their only chance to see them. Denali National Park is one of the places they come to see wolves, however, because of heavy trapping and hunting of wolves, especially in the stampede area, there has been very few wolves seen in the park in recent years. I used to work in the Park in the 80s and we saw wolves all the time. Now they are rarely seen, which is a very sad state of affairs.

Please pass proposal 186 and help protect wolves on state lands in the wolf townships.

Thank you, Sherry

Proposal 186: Support



PC69

Name: Farhana Loonat

Community of Residence: Mount Vernon, WA

Comment:

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support



PC70

Name: Eugene Lunceford

Community of Residence: North Pole, Alaska

Comment:

171- No. Hunting opportunities near Fairbanks should not be restricted, but expanded.

172- Yes, more opportunities are better and I dont think there are that many muzzleloaders hunters.

173- No, Too many cow moose were taken in previous years and the winter die off that closed the season proved it. Give them a few more years and re-address. A better option would be a bounty on wolves.

182, 183, 184, 185. Any proposal to extend grizzly season in unit 20 should considered. In 20A we never saw a Grizzly for decades. Last September had a sow and cub 2 miles from camp and a boar (I was forced to take) just behind moose camp on Salchaket. Change the regulatory year to be Calender year. If you kill one in the fall you cant the next spring.

186- Each wolf kills something like 7 moose a year. Less wolves, more moose survive.

Proposal 171: Oppose

Proposal 172: Support

Proposal 173: Oppose

Proposal 182: Support

Proposal 183: Support

Proposal 184: Support

Proposal 185: Support

Proposal 186: Oppose



PC71

Name: Mont Mahoney

Community of Residence: Big Lake, Alaska

Comment:

Proposal # 43, Mont Mahoney

I wholeheartedly support this proposal as submitted by the Upper Tanana/Fortymile Fish and Game Advisory Committee. Reducing the number of sheep hunters in an equitable manners, as stated in the proposal, will not only improve the sheep hunting experience but reduce the pressure on the sheep. In the name of CONSERVATION, we can give the sheep a little break! This is a win win proposal!

Proposal # 45, Mont Mahoney

I support this proposal to reduce the bag limit for Dall Sheep for residents, to one ram every four years but keep the current Alaska Fish & Game Regulation for a legal ram to not only full curl but also the three other methods of determining a legal ram such as, double broom and 8 years old, as in counting annul, etc.

Proposal 43: Support

Proposal 45: Support



PC72

Name: Sylvia Maiellaro

Community of Residence: Anchorage, AK

Comment:

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support

Dear Members of the Board of Game,



PC73

My name is Herb Mansavage and I would like to make a comment regarding Dall sheep rams of Alaska, which pertains equally to proposals being brought up for the 2024 Interior and Eastern Arctic region Board of Game meeting.

As a lifelong resident Dall sheep hunter, and member of this unique user group, we have seen our Dall sheep numbers fall dramatically in the past several years. Much of this can be attested to unfortunate icing conditions and harsh winters. Development of predator roles in this decline has been observed by the department and lamb take by predators seems to be a significant issue as well. But one subject that I do not believe is being monitored from a biological perspective enough is the trophy quality of rams being taken. Higher trophy quality with Dall sheep rams is, in most cases, synonymous with old rams. Whether mature rams are taking larger hardships due to harsh winters, icing conditions or predators, they are fundamental in creating and maintaining healthy sheep herds. Their ability to teach younger rams how to survive is essential to the health of the individual herds.

While I believe full curl, 8 years or older and/or broomed on both sides is a sound management strategy, there needs to be more focus on the take of older rams and even more focus on not harvesting younger rams. The latter I believe is extremely pivotable to the success of our Dall sheep herds. Environmental factors are uncontrollable, besides predator management, but creating a plan to limit the take of rams under 8 years old is one way that the future of our sheep herds would only see benefit from.

There are proposals that seek to penalize hunters for harvesting rams under 8 years old by restricting hunting rights for future years after a harvest of said ram. While I support this idea, I do not believe the penalty is correct and believe there are other options that could be explored. A couple options that could be explored would be:

- Education for hunters explaining the biological reasons for harvesting larger/older rams and avoiding harvesting young, but still legal rams.
- Encouraging guides to limit client numbers when known areas do not hold trophy/old rams.
- Changing regulations to an older age. Such as from 8 years old to 9 years old. Or even from 8 years old to 10 years old.

The caveat to the whole issue is that Dall sheep are one of the most prized animals to hunt in the world. Sheep hunters generally do not want to share information, understandably, and others do not find the trophy value as significant as others. There is no doubt that harvesting any legal ram is an incredible experience. While I understand changing the legal requirements would not be a popular opinion, this is not being proposed from a perspective of healthy and strong Dall sheep populations. Unless we address the need for more trophy/old Dall sheep rams on the mountain, we may soon discover that we have crossed a line that will only mean a slower return of Dall sheep and lost hunting opportunities due to this population crisis.

For next year's meeting I will provide more data regarding the decline of trophy/old sheep in the state of Alaska in hopes of bringing less anecdotal evidence to the table. I would ask the board to carefully consider the Dall sheep proposals this year and amend where needed to create a larger focus on the need for more trophy/old sheep in the mountains.

Sincerely,

Herb Mansavage



PC74

Name: Melinda Marquis

Community of Residence: Nederland, Colorado

Comment:

I support the National Park Service Proposal 186.

I live in Colorado and frequently go backpacking in Alaska. The National Park Service Proposal 186l will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Sincerely,

Melinda Marquis

Proposal 186: Support



PC75

Name: Dominick Martinson

Community of Residence: Valdez Alaska

Comment:

Taking of full curl rams has no effect on the population of rams, so this rule change is not for conservation purposes.

All it will do is take opportunities from the residents and give it to the guides. These guides by the way are mostly all based out of state, so most of the money isn't even staying in the state. These proposals are not going to help the sheep populations and there not going to help the residents of the state so what is the point ?

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

*Proposal 47: Oppose
Proposal 48: Oppose
Proposal 49: Oppose*



PC76

Name: Margaret McGinnis

Community of Residence: Hull, MA

Comment:

Although I don't live in Alaska, I want to see wolves protected. I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem. Wildlife, including wolves, and vast wilderness are the reasons people come to Alaska - there are no Disneylands, tropical beaches, etc. Without healthy wolf and other wildlife populations, why would anyone come?

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support



PC77

Name: Thomas Meade

Community of Residence: Anchorage, Alaska

Comment:

I strongly support Proposal 186 limiting wolf hunting.

Proposal 186: Support



PC78

Name: Peggy Meisch

Community of Residence: North Branch, MN

Comment:

I was a volunteer, teaching about wolves for many years. Alaska occupies a large part of my heart with wonderful memories of my 7 trips there. The mindset of many Alaskans against wildlife causes me great concern. Alaska is their home. We do not have the right to destroy any

animal that is an inconvenience. The Lower 48 is a bleak example of what happens when humans destroy their natural habitat. Please don't make Alaska "Outside."

Proposal 43: Support

Proposal 44: Support with Amendment

Proposal 45: Support

Proposal 48: Oppose

Proposal 50: Oppose

Proposal 51: Support

Proposal 52: Oppose



PC79

Name: Dan Montgomery

Community of Residence: Wasilla, Alaska

Comment:

Thank you chairman Burnett for this opportunity to comment on these proposals.

My name is Dan Montgomery. I'm a 42 year resident of Alaska, I've lived in Southeast Alaska, the Arctic and the last 32 years in the Mat- Su Valley. I've served on the Mat Valley A/C for the last 15 years. I've made my living as a big game guide since 1993.

Proposal 46. I'm the author of this proposal and I support it. I think going to draw permits in these units is the best way to reduce the hunting pressure on the ram population in these areas. There has been a 50% to 80% decline in the sheep populations in unit 19 and 20 and unit 12 is down some and is receiving a tremendous amount of resident pressure the last 2 years. There were 340 rams harvested statewide last year by 1,491 sheep hunters. About 40% or 136 of these rams were 7 years old or younger. Almost all of these rams were full curl or they were broken on both horns otherwise they wouldn't have been legal to harvest. These are the rams with superior genetics that reach full curl at a young age that you want to live and breed in the fall but they never had a chance too. My only goal for this proposal is to turn down the hunting pressure on these sheep populations and get more mature rams back in the populations and have all hunters have a better experience with less crowding. Winter weather is the main reason for the population declines and we can't change that. I envision a large number of permits for unit 19 and 20, somewhere around 120 in each unit. There were 282 resident hunters and only 21 non-residents hunters in unit 12 in 2023. I envision about 200 total permits for this unit. That would be 160 resident permits and 40 non-resident permits. Not all of the non-resident permits would be used at this time because most of the sheep are on federal ground and the guides have exclusive guide use areas and have reduced the number of hunters they are taking because of the lack of mature full curl rams in the population. This is a good solution to the problems these sheep populations are having.

Proposals 76,77,78,79,80,81and 87. I support all these proposals to reopen 19C to non-residents with amendments. I would amend them to have the non-resident season from August 10th to August 19. This 10 day season would reduce the number of hunters guides could take in that short season. The resident season would be August 10th to August 31st eliminating any hunting

during the moose and caribou seasons. There is no justification for a 42 day season with these depressed populations.

Proposal 131. I wrote this proposal and it is some house cleaning to lock in the 10% of permits for non-resident that the board adopted in the last statewide meeting and do away with any up to language in regulation.

Proposal 130. I appose this proposal it would take away the guaranteed 10% for non-residents.

Proposal 43: Oppose
Proposal 44: Support
Proposal 45: Oppose
Proposal 46: Support
Proposal 47: Oppose
Proposal 48: Support
Proposal 49: Support
Proposal 52: Oppose
Proposal 60: Support
Proposal 68: Support
Proposal 71: Oppose
Proposal 72: Oppose
Proposal 74: Oppose
Proposal 75: Oppose
Proposal 76: Support with Amendment
Proposal 77: Support with Amendment
Proposal 78: Support with Amendment
Proposal 79: Support with Amendment
Proposal 80: Support with Amendment
Proposal 81: Support with Amendment
Proposal 82: Oppose
Proposal 83: Oppose

Proposal 84: Support
Proposal 85: Support
Proposal 86: Support
Proposal 87: Support with Amendment
Proposal 88: Oppose
Proposal 91: Support
Proposal 92: Oppose
Proposal 93: Support
Proposal 94: Support
Proposal 95: Support
Proposal 96: Support
Proposal 97: Support
Proposal 98: Support
Proposal 99: Support
Proposal 100: Support
Proposal 101: Support
Proposal 102: Support
Proposal 103: Support
Proposal 104: Oppose
Proposal 105: Support
Proposal 106: Support
Proposal 107: Support
Proposal 108: Support
Proposal 111: Oppose
Proposal 112: Oppose
Proposal 118: Oppose
Proposal 119: Support

Proposal 130: Oppose
Proposal 131: Support
Proposal 132: Oppose
Proposal 133: Oppose
Proposal 134: Oppose
Proposal 135: Oppose
Proposal 136: Support
Proposal 137: Support
Proposal 138: Support
Proposal 142: Oppose
Proposal 156: Oppose
Proposal 157: Support
Proposal 158: Oppose
Proposal 159: Oppose
Proposal 160: Oppose
Proposal 161: Oppose
Proposal 162: Oppose
Proposal 163: Oppose
Proposal 164: Oppose
Proposal 165: Support
Proposal 167: Support
Proposal 168: Support
Proposal 177: Oppose
Proposal 181: Oppose
Proposal 182: Support
Proposal 183: Support
Proposal 184: Support
Proposal 185: Support



PC80

Name: Lenora Morford

Community of Residence: Chugiak Alaska

Comment:

BOARD OF GAME

I support Proposition 186 to protect the wolves north of Denali Park.

I have lived in Alaska since Feb. 1982.

I have never seen a wolf except in Denali National Park.

I have made many visits to the Park with friends and tourists. It is important to them that they see wolves in the wild.

The wolves are important for the ECONOMICS of the tourist industry (\$2 billion value last year) but also for the packs that are studied for science in the Park.

These important wolves need extra protection, and are MUCH MORE VALUABLE alive than dead. These Wolf townships used to protect wolves. Why not now??

Please vote to support Proposition 186.

Thank you,

Lenora Morford

42 year resident

Chugiak

Proposal 186: Support



United States Department of the Interior

NATIONAL PARK SERVICE

Interior Region 11 • Alaska
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

Date: 02/26/2024

Mr. Jerry Burnett, Chairman
ATTN: Alaska Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Burnett,

The National Park Service (NPS) appreciates the opportunity to comment on proposals for the Interior and Eastern Arctic Region being considered by the Alaska Board of Game. Below are our recommendations on proposals that affect or have the potential to affect NPS areas. We recognize and support the State's primary stewardship role in wildlife management, while ensuring that federal laws and regulations applicable to the NPS are upheld.

Proposal 43, 44, 45, 46, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 98, 90, 91, 92, 119, 158: NPS Recommendation: Neutral

The NPS has partnered with the Alaska Department of Fish and Game and others to document recent declines and changes in Dall's sheep populations across the state. We generally support creative solutions to address harvest reductions where needed, while recognizing the importance of sheep as a traditional source of sustenance for Alaskans. The NPS is currently funding sheep population surveys across multiple park units.

Proposal 52: NPS Recommendation: Oppose

This proposal would allow the use of night vision goggles and forward-looking infrared devices for taking furbearers with a trapping license in Game Management Units (GMUs) 12, 19, 20, 21, 24, 25, 26B, and 26C. The NPS opposes this proposal as the use of night vision goggles, forward-looking infrared devices, and artificial light runs counter to the principles of fair chase and sportsmanship. The use of artificial light is also prohibited for subsistence purposes under Federal hunting regulations, with few exceptions. If the Board adopts this proposal, NPS lands should be excluded.



Proposal 61, 62, 109, 147: NPS Recommendation: Oppose

Proposals 61 and 62 seek to establish an Intensive Management plan/program for Unit 19C and proposals 61, 109 and 147 would allow for the take of wolves the same day a person has been airborne in GMUs 19C, 12, and 24A and 25A, respectively. The NPS opposes all 4 proposals on the basis that these State determined predator control and Intensive Management strategies are not consistent with NPS 2006 Management Policy 4.4.3, and therefore are not allowed on NPS managed lands. Intensive Management programs are authorized under non-hunting regulations, and therefore they require NPS approval on national preserves. If the Board adopts these

proposals, NPS lands should be excluded from predator control efforts.

Proposal 120, 121: NPS Recommendation: Oppose

These proposals would increase the brown/grizzly bear bag limit for residents in a portion of GMU 12, which is almost entirely within Wrangell-St. Elias National Preserve, from one to two bears every regulatory year. The NPS has concerns with these proposals to liberalize brown bear harvest. There is a lack of reliable biological data on this brown bear population, although current densities are not considered high. This lack of information, coupled with inherently low brown bear reproductive rates, should be considered when evaluating these proposals. The Alaska National Interest Lands Conservation Act requires that subsistence and sport harvest be managed to minimize the likelihood of irreversible or long-term adverse effects upon such populations and species. If the Board adopts either of these proposals, we request that NPS lands be excluded.

Proposal 122, 123: NPS Recommendation: Oppose

These proposals would lengthen the wolf hunting season by approximately six weeks from April 30 to June 15 in GMUs 12 and 20E. The justification for Proposal 123 is predator control, which the NPS cannot support on NPS managed lands based on NPS 2006 Management Policy 4.4.3. Further, a hunting season extending past April 30 may allow take of females with dependent young during the pupping and rearing season. Therefore, an extended hunting season could jeopardize pup production and survival. Additionally, the quality of wolf pelts declines later in spring, so a result of this season extension could be to deny prime pelts to hunters the following fall.

Proposal 139, 140: NPS Recommendation: Neutral

Proposal 139 would reduce the bag limit for taking caribou from five caribou per day to four caribou per year, only one of which may be a cow, in GMUs 21D Remainder, 22, 23, 24B Remainder, 24C, 24D and 26A. Proposal 140 would close nonresident



caribou hunting in GMUs 21D Remainder, 22, 23, and 24B Remainder, 24C, 24D, and 26A. The NPS has partnered with the Alaska Department of Fish and Game and others to document recent declines and changes in migratory habits of the Western Arctic Caribou Herd, and we recognize the challenges facing those who depend on these caribou as a primary source of sustenance, both culturally and physically. While the current population size is not unprecedented, the environmental conditions facing the herd largely are unprecedented. Regulatory bodies must emphasize reductions in harvest, especially cows, while considering the needs and practices of local residents. We encourage and actively support efforts to improve harvest reporting to allow for the evaluation of impacts of regulation changes. The NPS is and will continue to be actively engaged with the Western Arctic Caribou Herd Working Group and supports actions consistent with the Western Arctic Caribou Herd Cooperative Management Plan's "Preservative Declining" management level.

Proposal 150: NPS Recommendation: Oppose

This proposal would lengthen the wolf hunting season by approximately six weeks from April 30 to June 15 in GMUs 24 and 25. The justification for Proposal 150 is predator reduction, to allow for incidental wolf harvest during spring bear hunting, benefiting prey species in the area, which the NPS cannot support on NPS managed lands based on NPS 2006 Management Policy 4.4.3. Further a hunting season extending past 30 April may allow take of females with dependent young during the pupping and rearing season. Therefore, an extended hunting season could jeopardize pup production and survival. Additionally, the quality of wolf pelts declines later in spring, so a result of this season extension could be to deny prime pelts to hunters the following fall.

Proposal 152: NPS Recommendation: Oppose

This proposal would increase the resident bag limit for brown bear in GMUs 24C and 24D and would open a fall bait season in GMUs 21B and 24B. NPS research on bears in this area indicates this is a low-density population, warranting caution when considering increased harvest. The Alaska National Interest Lands Conservation Act requires that subsistence and sport harvest be managed to minimize the likelihood of irreversible or long-term adverse effects upon populations and species. If the Board adopts this proposal, we request that NPS lands be excluded.

Proposal 157: NPS Recommendation: Support

This proposal would change the GMU 26A and 26B muskox hunt area boundaries to match federal hunt boundaries, effectively expanding state hunt areas. The NPS supports bringing federal and state regulations into alignment.



Proposal 167, 169: NPS Recommendation: Neutral

Proposal 167 would lengthen the season for nonresident drawing brown bear hunt DB987 by opening the season two weeks earlier in GMU 26B, and proposal 169 would remove the resident registration permits RB988 and RB989 for brown bear in GMU 26B. NPS research on bears in this area indicates this population is at low density and warrants caution when considering increased harvest opportunities. The NPS is concerned with minimizing the likelihood of irreversible or long-term adverse effects upon this brown bear population.

Proposal 186: NPS Recommendation: Support

This proposal would close a portion of GMU 20C to wolf hunting and trapping. Wolves in this area use portions of Denali National Park and Preserve where visitors come to enjoy wildlife viewing. Wildlife viewing provides important socioeconomic benefit to the state of Alaska. If this proposal is not adopted, wolves from the most commonly viewed packs will continue to be trapped and hunted just outside of park boundaries, in places as close as four miles from the park road. If the board supports this proposal, wolf packs important for wildlife viewing within Denali National Park will be protected.

Thank you for this opportunity to provide comments on these important wildlife regulatory matters. Should you or your staff have any questions, please feel free to contact me.

Sincerely,

**GRANT
HILDERBRAND**

Digitally signed by GRANT
HILDERBRAND
Date: 2024.02.27 12:16:25
-09'00'

Grant Hilderbrand
Associate Regional Director - Resources
National Park Service - Alaska Region
240 W. 5th Avenue
Anchorage, AK 99501

cc:

Superintendents, National Park Service, Alaska Region
Regional Director, National Park Service, Alaska Region
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Regional Director, U.S. Fish and Wildlife Service



To: Alaska Board of Game
Re: Proposal 186
From: National Parks Conservation Association

Dear Board of Game Members,

National Parks Conservation Association (NPCA) respectfully requests the Board adopt Proposal 186 in order to increase the chance visitors to Denali National Park will have the opportunity to see a wolf in the wild.

NPCA is a non-profit organization focused on protecting national parks for today and for future generations. Denali National Park is one of the great visitor experiences in the world, and people come from all over to drive the 90-mile road and be surrounded by wilderness. It is the closest many of them—particularly those with mobility challenges—will ever be to some of the things that make Alaska such an incredible place.

Surveys have shown that seeing a large carnivore is the highlight of such a trip. This goes for visitors from out of state, but for Alaskans too. Most Alaskans do not have the opportunity to see wolves in the wild in their daily lives and Denali is a relatively affordable, road-system alternative.

By adopting Proposal 186, the Board can significantly increase the percentage chance that visitors to Denali will see wolves. For many visitors, this can be a transformative, once in a lifetime experience. This is important in itself. It is also important for Alaska. The better people's experience visiting Alaska National Parks, the better Alaska's chance of increasing the size of our tourism industry and the better jobs and opportunities Alaskans will have in the Interior of the state.

Thank you for your consideration.

Jim Adams
Alaska Regional Director
National Parks Conservation Association
750 West Second Ave, #205
Anchorage, AK 99501



Organization: Tim's Alaskan guide Service

Name: Tim Nelson

Community of Residence: Chitina, AK

Comment:

#43

I oppose this proposal. As an outfitter operating out of units 24 and 25, it would be very inconvenient and expensive for my clients to end their hunt due to a registration hunt closure. It would also be logistically difficult for me to move their hunt to a new date because my hunts are already booked in advance.

#44

I support this proposal. Non-residents are already limited to 1 sheep every 4 years. Limiting residents to 1 sheep every 2 years would lower the overall harvest while still allowing residents to have more opportunities to hunt than non-residents.

#141

I support this proposal. Not only does the youth hunt in 24A and 25A allow spotting from the air, but it was created after the sheep population had already begun to decline and I believe that it should never have been put into regulation in the first place.

#142

I oppose this proposal. There is already a bow-only five-mile corridor on either side of the Dalton highway. I have a permitted camp inside the proposed 15-mile corridor and another one a few miles outside of the area. This proposal would be detrimental to my business and my livelihood.

#143

I support this proposal. Not only does the late-season archery hunt in 24A and 25A allow spotting from the air, but it was created after the sheep population had already begun to decline, and in my opinion, it should never have been put into regulation in the first place.

#144

I oppose this proposal. My main camp is in 24A. If sheep went to draw only in 24A it would be very difficult to book hunts which would put my business in jeopardy. I believe conservation could be better addressed by increased predator control.

#147

I support this proposal. Allowing hunters to take wolves in Units 24 and 25 the same day they have been airborne would help decrease sheep predation in turn helping to increase the local sheep population.

#149

I support this proposal. Extending the wolf trapping season in Units 24 and 25 would increase the harvest of wolves which would help decrease sheep predation in turn helping to increase the local sheep population.

#150

I support this proposal. Extending the wolf hunting season in Units 24 and 25 would increase the harvest of wolves which would help decrease sheep predation in turn helping to increase the local sheep population.

Proposal 43: Oppose

Proposal 44: Support

Proposal 141: Support

Proposal 142: Oppose

Proposal 143: Support

Proposal 144: Oppose

Proposal 147: Support

Proposal 148: Support

Proposal 149: Support

Proposal 150: Support



PC84



PC84



United States Department of the Interior
Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199

In Reply Refer To:
OSM 24026

Mr. Jerry Burnett, Chairman
Attention: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Burnett:

The Office of Subsistence Management (OSM) appreciates the opportunity to comment on the Alaska Board of Game proposals during the March 15-22, 2024 Interior and Eastern Arctic Region Meeting.

The Office of Subsistence Management, working with other Federal agencies, reviewed each of these proposals. The attached document includes comments from OSM regarding proposals that have the potential to impact federally qualified subsistence users or associated wildlife resources on or adjacent to Federal public lands in Alaska. During the meeting, we may wish to comment on other agenda items that might impact federally qualified subsistence users or wildlife resources.

Again, we appreciate the opportunity to comment on these important regulatory matters and look forward to working with the Board of Game and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822 or george_pappas@fws.gov, with any questions you may have concerning this material.

Sincerely,

Amee Howard
Acting Assistant Regional Director

Enclosure



PC84

cc: Federal Subsistence Board
Office of Subsistence Management
Interagency Staff Committee
Western Interior Alaska Subsistence Regional Advisory Council
Eastern Interior Alaska Subsistence Regional Advisory Council
North Slope Subsistence Regional Advisory Council
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director Wildlife Division, Alaska Department of Fish and Game
Administrative Record



PC84

OFFICE OF SUBSISTENCE MANAGEMENT

RECOMMENDATIONS

on

ALASKA BOARD OF GAME PROPOSALS

Interior/Eastern Arctic Region Meeting

March 15—22, 2024

Fairbanks, Alaska

Office of Subsistence Management (OSM)

**PROPOSAL 43 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Change all general season sheep harvest tickets in Units 12, 19, 20, 21, 24, 25, 26B, and 26C to registration permits, and allow hunters to obtain a registration permit once every two years.

Current Federal Regulations:**Unit 12 – Sheep**

Unit 12—1 ram with full curl or larger horn Aug. 10–Sep. 20.

Unit 12, that portion within Wrangell-St. Elias National Park and Preserve—1 ram with full curl horn or larger by Federal registration permit only by persons 60 years of age or older Aug. 1–Oct. 20.

Unit 19 – Sheep

Sheep: 1 ram with 7/8 curl horn or larger Aug. 10–Sep. 20.

Unit 19C, that portion within the Denali National Park and Preserve—residents of Nikolai only—no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system. Oct. 1–Mar. 30.

Unit 20 – Sheep

Unit 20E—1 ram with full-curl horn or larger Aug. 10–Sep. 20.

Unit 20, remainder No open season.

Unit 24 – Sheep

Units 24A and 24B (Anaktuvuk Pass residents only), that portion within the Gates of the Arctic National Park—community harvest quota of 60 sheep, no more than 10 of which may be ewes, and a daily possession limit of 3 sheep per person, no more than 1 of which may be an ewe July 15–Dec. 31.

Units 24A and 24B (excluding Anaktuvuk Pass residents), that portion within the Gates of the Arctic National Park—3 sheep, no more than one of which may be an ewe, by Federal registration permit only, with exception for residents of Alatna and Allakaket who will report by a National Park Service community harvest system Aug. 1–Apr. 30.



Unit 24A, except that portion within the Gates of the Arctic National Park—1 ram by Federal registration permit only Aug. 20–Sep. 30.

Unit 24, remainder—1 ram with 7/8 curl or larger horn Aug. 10–Sep. 20.

Unit 25 – Sheep

Unit 25A, that portion within the Dalton Highway Corridor Management Area No open season.

Units 25A, Arctic Village Sheep Management Area—2 rams by Federal registration permit only. Aug. 10–Apr. 30.

Federal public lands are closed to the taking of sheep except by rural Alaska residents of Arctic Village, Venetie, Fort Yukon, Kaktovik, and Chalkyitsik hunting under these regulations.

Unit 25A remainder—3 sheep by Federal registration permit only Aug. 10–Apr. 30.

Units 25B, 25C, and 25D—1 ram with full-curl horn or larger Aug. 10–Sep. 20.

Unit 26 – Sheep

Units 26A and 26B (Anaktuvuk Pass residents only), that portion within the Gates of the Arctic National Park—community harvest quota of 60 sheep, no more than 10 of which may be ewes and a daily possession limit of 3 sheep per person, no more than 1 of which may be a ewe July 15–Dec. 31.

Unit 26B, that portion within the Dalton Highway Corridor Management Area—1 ram with 7/8 curl or larger horn by Federal registration permit only Aug. 10–Sep. 20.

Unit 26A, remainder and 26B, remainder, including the Gates of the Arctic National Preserve—1 ram with 7/8 curl or larger horn Aug. 10–Sep. 20.

Unit 26C—3 sheep per regulatory year; the Aug. 10–Sep. 20 season is restricted to 1 ram with 7/8 curl or larger horn. A Federal registration permit is required for the Oct. 1–Apr. 30 season Aug. 10–Sep. 20.
Oct. 1–Apr. 30.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. The Federal Subsistence Board (Board) will consider two proposals (WP24-25 and WP24-26) submitted by the Western Interior Alaska Subsistence Regional Advisory Council at the Board's April 2024 regulatory meeting. WP24-25 requests to reduce the sheep harvest limit in Units 24A and 24B (excluding residents of Anaktuvuk Pass), that portion within Gates of the Arctic National Park from 3 sheep, no more than one of which may be an ewe, to 1 ram. WP24-26 requests that Dall sheep hunting on Federal public lands in Unit 24A and Unit



26B, west of the Sagavanirktok River be closed to all users for the 2024-2026 wildlife regulatory cycle. This would be a two-year continuation of the closure initiated by Wildlife Special Action WSA22-02.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users currently have opportunities to harvest sheep within these units on Federal public lands. Adopting this proposal would not affect that opportunity. However, federally qualified subsistence users that hunt under State regulations would need to obtain a State registration permit instead of a harvest ticket and would be limited to one ram every two years, which would reduce their opportunities under State regulations.

Adopting this proposal could benefit sheep populations, which are generally declining across the state (ADF&G 2022). Changing all harvest ticket hunts to registration permit hunts would provide ADF&G with better harvest data and more management flexibility, which could help conserve these sheep populations and enhance long-term hunting opportunity. Limiting everyone hunting under State regulations to one ram every two years by registration permit should decrease overall sheep harvest as well as the number of hunters targeting a dwindling number of available rams, which would also relieve overcrowding issues reported by the proponent.

Adopting this proposal would misalign State and Federal permit requirements, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: OSM supports changing the harvest ticket hunts to registration permit hunts. Improved harvest reporting data would provide a better understanding of harvest mortality, enhancing sheep management, while the increased management options provided by registration permit hunts (i.e., closing seasons early and limiting the number of permits issued) could help conserve sheep, ensuring long-term hunting opportunity.

OSM is neutral on limiting hunters to one permit every two years (except in Unit 19; see comments on Proposal 84). This could help conserve sheep populations, but it would also substantially decrease opportunity for federally qualified subsistence users hunting under State regulations.

Literature Cited

ADF&G. 2022. Board of Game Sheep Informational Meeting Presentation. Alaska Department of Fish and Game, Division of Wildlife Conservation. <https://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2022-2023/sheep/adfg-presentation.pdf>. Accessed January 24, 2024.

PROPOSAL 44 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reduce the sheep bag limit for resident hunters in Units 12, 19, 20, 24, 25, 26B and 26C to one ram with full-curl horn or larger every two regulatory years.

See comment for Proposal 43.



PROPOSAL 45 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Reduce the Unit 12, 19, 20, 24, 25, 26B, and 26C sheep bag limit for residents to one ram with full-curl horn or larger every four regulatory years.

See comment for Proposal 43.

PROPOSAL 46 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. 5 AAC 92.057. Special provisions for Dall sheep and mountain goat drawing permit hunts.

Change all sheep hunting in Units 12, 19, and 20 to drawing permit only for residents and nonresidents, with a set allocation of permits between user groups.

NOTE: These comments only apply to the resident hunt portion of this proposal and do not apply to the nonresident hunt or allocation portion of this proposal.

See comment for Proposal 43.

PROPOSAL 48 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska.

Current Federal Regulations:

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

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

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: It is unlikely there would be any impact on the brown bear population if this proposal is adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

Rationale: There are no known conservation concerns for brown bear in the affected units. If this proposal is adopted, it would continue the tag fee exemption, which eliminates the requirement that federally qualified subsistence users purchase a \$25 tag before hunting brown bears in these units. This decreases costs and maintains opportunity for federally qualified subsistence users. Retaining this tag fee exemption is particularly important in areas where there are few vendors.

**PROPOSAL 50 – 5 AAC 84.270 Furbearer trapping.**

Lengthen the marten trapping season in Units 12, 19, 20, 21, 24 and 25 by two weeks to end March 15.

Current Federal Regulations:**Units 12, 19, 20, 21, 24, and 25 – Marten**

Marten: No limit

Nov. 1–Feb. 28.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. The Board will consider Proposal WP24-32 at their April 2024 meeting. This proposal, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council, requests extending the Federal marten trapping season in Units 12, 19, 20, 21, 24, and 25 from Nov. 1–Feb. 28 to Nov. 1–Mar. 15.

Impact to Federal subsistence users/wildlife: Extending the marten season will increase the opportunity for federally qualified subsistence users to trap marten under State regulations, especially since many subsistence users are still trapping lynx during this time. Subprime fur conditions during March may reduce participation during the extended season, reducing trapper effort.

Milder temperatures and more daylight in March may allow an increase in trapping effort and harvest as people would have greater access to areas farther from the roads. This may be a concern as trappers have reported more females than males get trapped in the late winter. Since this is the breeding portion of the population that is close to parturition, this would be considered additive mortality. However, much of the affected areas are very remote with little trapping pressure. Currently, with no harvest limit and the 2020 Alaska Trapper Report considering marten abundance stable (Bogle 2021), there does not appear to be a conservation concern, and impact to the marten population is expected to be minimal in most of the affected units. The exception may be the road accessible areas where trapping pressure is likely higher.

If both Proposal WP24-32 and this proposal are adopted, Federal and State season dates would remain in alignment. However, if only one of these proposals is adopted, Federal and State season dates would become misaligned, increasing regulatory complexity and confusion.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on the proposal.

Rationale: This proposal would increase trapping opportunity for federally qualified subsistence users. The marten population in these units seems stable with no conservation concerns, although definitive data is lacking. Trappers are noted to self-regulate harvest of marten when populations are perceived as low, mitigating concerns for potential overharvest.

Literature Cited

Bogle, S. E. 2021. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau.

**PROPOSAL 51 - 5 AAC 84.270. Furbearer trapping.**

Align muskrat trapping seasons with beaver trapping seasons in Units 19, 20 (except 20E), 21, 24, 25, 26B, and 26C.

Current Federal Regulations:**Muskrat**

Units 19, 20A, 20B, 20C, 20D, 20F, 21, 22, 23, 24, 25, and 26—No Nov. 1- June 10. limit.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal would increase trapping opportunity for federally qualified subsistence users under State regulations. It could also eliminate incidental take of muskrat in the fall when the State beaver season is open. However, OSM notes that there is no open season for beaver trapping under State regulations in Units 26B and 26C, counter to what is written in Proposal 51.

The impact to the muskrat population is uncertain. While the ‘no limit’ harvest limit suggests no conservation concerns, according to trapper questionnaires, muskrats are considered scarce in Region III (Bogle 2022). As trapping reports are voluntary, harvest information is lacking.

It would also misalign the opening dates for muskrat trapping under State and Federal regulation, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 51.

Rationale: This proposal would increase trapping opportunity for federally qualified subsistence users under State regulations. While extending the trapping season seems unlikely to create conservation concerns for muskrat in these units, more data on muskrat population and harvest pressure are needed to effectively evaluate the impacts of this proposal.

Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau, AK.

**PROPOSAL 59 - 5 AAC 85.045. Hunting seasons and bag limits for moose.**

Lengthen the resident only Tier II moose hunt, TM680, in Unit 19A by opening the season five days earlier.

Current Federal Regulations:**Unit 19A—Moose**

Unit 19A, remainder—1 antlered bull by Federal drawing permit or a State permit. Sept. 1-20.

Federal public lands are closed to the taking of moose except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under these regulations

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Closure Review WCR24-43 reviews the current closure to moose hunting on Federal public lands, except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek in Unit 19A, remainder.

Additionally, Proposal WP24-24 requests splitting Unit 19A into two subunits, Unit 19A and 19E, to match the recently divided State subunits.

Impact to Federal subsistence users/wildlife: This proposal would provide an additional five days of harvest opportunity for federally qualified subsistence users under State regulations.

The Unit 19A moose population has increased over the years but remains at the lower end of the State's population goals (Seavoy 2014). The population survey in winter 2020 yielded estimates of 5,224 moose and 0.9 moose/mi² (Peirce 2022, pers. comm.). This represents a 26% increase in the population since the last survey in 2017. At the 2019 winter meeting of the Western Interior Alaska Subsistence Regional Advisory Council, the ADF&G area biologist stated that the harvestable surplus is currently 160-165 moose per year while total reported harvest is roughly 150 moose per year (WIRAC 2019). Harvest success rate for the TM680 has remained approximately 63% since 2019 (ADF&G 2022).

As harvest is closely managed through a Tier II hunt, minimal impact on the moose population is expected. While hunt success may increase due to a longer season, permit numbers could be adjusted as needed to maintain harvest within sustainable levels.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025. Given the current Federal lands closure, eligible Tier II permit holders could only hunt on Federal public lands during September if this proposal passes. Hunting during the August season would be limited to State-managed lands only.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 59.



Rationale: This proposal would increase hunting opportunity for federally qualified subsistence users hunting under State regulations. Adding five days at the beginning of the State hunting season is not likely to create any conservation concerns due to the ability to adjust permit numbers, the growing moose population, and the current harvestable surplus.

Literature Cited

ADF&G. 2022. General Harvest Reports. Alaska Department of Fish and Game.
<https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvestreports.main>. Accessed Sept 1, 2022.

Peirce, J.M. 2022. Wildlife Biologist. Personal communication: e-mail. Alaska Department of Fish and Game. McGrath, AK.

Seavoy, R.J. 2014. Units 19A, 19B, 19C, and 19D moose. Chapter 21, pages 21-1 through 21-34 [In] P. Harper and L.A. McCarthy, editors. Moose management report of survey and inventory activities 1 July 2011-30 June 2013. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2014-6, Juneau, AK

WIRAC. 2019. Transcripts of the Western Interior Alaska Subsistence Regional Advisory Council proceedings. March 26, 2019. Fairbanks, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

PROPOSAL 63 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Change the Unit 19C registration permit moose hunt RM653, to a drawing permit for nonresidents, issue up to 20 permits, and shorten the season to September 8-17.

NOTE: OSM’s comment only applies to the resident season portion of this proposal. OSM has no position on the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 19C—Moose

<i>Unit 19C—1 antlered bull.</i>	<i>Sept. 1-20</i>
<i>Unit 19C—1 bull by State registration permit</i>	<i>Jan. 15–Feb. 15</i>

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal would reduce harvest opportunity for federally qualified subsistence users under State regulations. The shorter season would likely decrease harvest from this moose population.

There is limited population data for the moose population in Unit 19C. State management objectives is to maintain a minimum fall post hunt bull:cow ratio of 30 bulls:100 cows. The ratio was 29 bulls:100 cows in the 2010 composition survey. No other composition surveys have been conducted in 19C due to



unfavorable weather and other priorities (Peirce 2018). Residents, on average account for less than half of the total moose harvest in Unit 19C (ADF&G 2024).

Additionally, adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 63.

Rationale: This proposal would decrease hunting opportunity for federally qualified subsistence users hunting under State regulation. OSM does not have enough recent biological data to effectively assess whether there are conservation concerns for the Unit 19C moose population that would warrant shortening the season and reducing opportunity.

Literature Cited

ADF&G. 2024. General Harvest Reports. Alaska Department of Fish and Game.
<https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvestreports.main>. Accessed Jan 8, 2024.

Peirce, J. M. 2018. Moose management report and plan, Game Management Unit 19: Report period 1 July 2010–30 June 2015, and plan period 1 July 2015–30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018-22, Juneau, AK.

PROPOSAL 64 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

5 AAC 92.069. Special provisions for moose and caribou drawing permit hunts.

Change the Unit 19C moose hunts to a drawing hunt for both residents and nonresidents, and specify the number of permits available for residents, guided nonresidents, and nonguided nonresidents.

NOTE: OSM’s comment only applies to the resident permit portion of this proposal. OSM has no position on the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 19C—Moose

Unit 19C—1 antlered bull.

Sept. 1-20

Unit 19C—1 bull by State registration permit

Jan. 15–Feb. 15

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal would substantially curtail harvest opportunity for federally qualified subsistence users under State regulations. Currently, an unlimited number of registration permits are available, while this proposal would limit permit numbers to only 100



drawing permits. Additionally, federally qualified subsistence users would need to apply for the drawing permits in the preceding fall with no guarantee of receiving a permit.

Changing to a drawing hunt with limited permits would decrease harvest from this moose population. There is limited population data for the moose population in Unit 19C. The State management objective is to maintain a minimum fall post-hunt bull:cow ratio of 30 bulls:100 cows. The ratio was 29 bulls:100 cows in the 2010 composition survey. No other composition surveys have been conducted in 19C due to unfavorable weather and other priorities (Peirce 2018). Residents, on average account for less than half of the total moose harvest in Unit 19C (ADF&G 2024).

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 63.

Rationale: While OSM opposes decreasing hunting opportunity for federally qualified subsistence users, OSM does not have enough recent biological data to effectively assess whether there are conservation concerns for the Unit 19C moose population that would warrant such a restriction in permit numbers and administration.

Literature Cited

ADF&G. 2024. General Harvest Reports. Alaska Department of Fish and Game. <https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvestreports.main>. Accessed Jan 8, 2024.

Peirce, J. M. 2018. Moose management report and plan, Game Management Unit 19: Report period 1 July 2010–30 June 2015, and plan period 1 July 2015–30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018-22, Juneau, AK

PROPOSAL 66 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Modify the moose hunting season dates and permit requirements in Unit 19D.

Current Federal Regulations:

Unit 19D—Moose

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

Unit 19D, remainder of the Upper Kuskokwim Controlled Use Area—1 bull Sept. 1–30.
Dec. 1–Feb. 28.

Unit 19D, remainder—1 antlered bull Sept. 1–30.
Dec. 1–15.

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal subsistence users/wildlife: This proposal would increase hunting opportunity for federally qualified subsistence users under State regulations but would eliminate the Federal subsistence priority during the existing Federal-only season of September 26-30. It would also provide additional opportunity by establishing a draw permit hunt for up to 20 cows in a portion of Unit 19D, although this opportunity would be very limited due to the small number of permits available. Adopting this proposal would also align fall State and Federal seasons, reducing regulatory complexity.

Extending the season five days may increase harvest of the Unit 19D moose population. It may have negative impacts on the Unit 19D population if bull harvest substantially increases during the five-day season extension. According to ADF&G in Proposal 67, the bull:cow ratio in Unit 19D is low at 21 bulls:100 cows. This suggests there are not many surplus bulls available for harvest. Based on the existing Unit 19D winter antlerless moose and ADF&G’s Proposal 67, the Unit 19D moose population can support some cow harvest. However, it is unclear how a fall cow season could impact the winter antlerless moose hunt and overall opportunity for federally qualified subsistence users.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 66.

Rationale: Adopting this proposal would increase opportunity for federally qualified subsistence users hunting under State regulations. OSM supports providing opportunity to harvest some cows but is neutral on whether this opportunity occurs in the fall or the winter. However, the impacts of an extended fall bull season on the moose population are uncertain. Low bull:cow ratios suggest the Unit 19D moose population cannot withstand additional bull harvest. However, harvest pressure during the extended fall season may be low enough that the Unit 19D moose population is not negatively affected.

PROPOSAL 67 - 5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during February in a portion of Unit 19D.

Current Federal Regulations:

Unit 19D—Moose

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

Unit 19D, remainder of the Upper Kuskokwim Controlled Use Area—1 bull Sept. 1-30.
Dec. 1-Feb. 28.

Unit 19D, remainder—1 antlered bull Sept. 1-30.
Dec. 1-15.

Is a similar issue being addressed by the Federal Subsistence Board? No



Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for federally qualified subsistence users. As ADF&G states in their proposal, additional harvest opportunity is available for the Unit 19D moose population. In past years, this permit has only been available in person in McGrath, Nikolai, and Takotna. If permit numbers are limited, OSM supports residents who are closest to and most dependent on the Unit 19D moose population receiving the permits.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 67.

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for federally qualified subsistence users, and this moose population can withstand some additional harvest.

PROPOSAL 68 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Allow moose registration permit RM682 to be obtained online.

Current Federal Regulations:

Unit 19A—Moose

*Unit 19A, north of the Kuskokwim River, upstream from but excluding Sept. 1-5.
the George River drainage, and south of the Kuskokwim River
upstream from and including the Downey Creek drainage, not
including the Lime Village Management Area—1 antlered bull by State
registration permit available in Sleetmute and Stoney River on July 24.
Permits issued on a first come, first served basis (number of permits to
be announced annually).*

Is a similar issue being addressed by the Federal Subsistence Board? No. However, Wildlife Proposal WP24-24 requests dividing Unit 19A into two subunits, Units 19A and 19E, to align with State subunit boundaries.

Impact to Federal subsistence users/wildlife: Adopting this proposal may decrease opportunity for federally qualified subsistence users most dependent on the resource by increasing competition and potentially limiting the number of permits available to them. Any resident of Alaska would be able to obtain this registration permit online rather than requiring a special trip to the area to receive a permit in person. Distributing permits in person only provides those who live within the hunt area with an advantage in acquiring permits. This method of distribution is typically used when there is a very limited harvestable surplus of the wildlife population being permitted.

The impact on the Unit 19E moose population would be minimal since ADF&G could continue adjusting the total number of permits available in response to the Unit 19E moose population status. However, as the number of permits for this hunt is limited and available on a first come-first serve basis, making them available online could disenfranchise people with slow, unreliable or no internet connections, which is often the case in small villages like Sleetmute and Stoney River. Online registration greatly increases



competition for permits, and those in nonrural areas with better, more reliable internet access have an advantage.

This proposal would also misalign State and Federal regulations, increasing regulatory complexity. However, if this proposal is adopted, Federal regulations could be corrected administratively.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 68.

Rationale: This proposal would greatly increase competition for permits, and federally qualified subsistence users may be at a disadvantage due to internet capabilities. This would likely result in reduction or elimination of hunting opportunity for users closest to and most dependent on the Unit 19E moose population.

PROPOSAL 69 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Allow hunters that hold registration moose permit RM682 in Unit 19 to be eligible to hold other moose permits in the Kuskokwim River drainage.

Current Federal Regulations:

Unit 19A—Moose

Unit 19A, north of the Kuskokwim River, upstream from but excluding Sept. 1-5. the George River drainage, and south of the Kuskokwim River upstream from and including the Downey Creek drainage, not including the Lime Village Management Area—1 antlered bull by State registration permit available in Sleetmute and Stoney River on July 24. Permits issued on a first come, first served basis (number of permits to be announced annually).

Is a similar issue being addressed by the Federal Subsistence Board? No. However, Wildlife Proposal WP24-24 requests dividing Unit 19A into two subunits, Units 19A and 19E, to align with State subunit boundaries.

Impact to Federal subsistence users/wildlife: This proposal would increase competition for federally qualified subsistence users during the RM682 permit hunt under both State and Federal regulations (Federal regulations also require the RM682 permit). Conservation concerns exist for this proposal, as it precludes a method of reserving harvestable animals for local residents and limiting harvest without resorting to a Tier II permit hunt. However, some users reside along hunt area boundaries. The ability to hold multiple permits for those users would increase the opportunity to meet their subsistence needs.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 69

Rationale: This proposal would increase competition for *some* federally qualified subsistence users, while increasing opportunity for other federally qualified subsistence users. Conservation concerns exist



for this proposal, as it precludes a method of reserving harvestable animals for local residents and limiting harvest without resorting to a Tier II permit hunt. However, some users reside along hunt area boundaries. The ability to hold multiple permits for those users would increase the opportunity to meet their subsistence needs.

PROPOSAL 70 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Make fifteen registration moose permits for the Unit 19E moose hunt available in Bethel.

Current Federal Regulations:

Unit 19A—Moose

Unit 19A, north of the Kuskokwim River, upstream from but excluding the George River drainage, and south of the Kuskokwim River upstream from and including the Downey Creek drainage, not including the Lime Village Management Area—1 antlered bull by State registration permit available in Sleetmute and Stony River on July 24. Permits issued on a first come, first served basis (number of permits to be announced annually). Sept. 1-5.

Is a similar issue being addressed by the Federal Subsistence Board? No. However, Wildlife Proposal WP24-24 requests dividing Unit 19A into two subunits, Units 19A and 19E, to align with State subunit boundaries.

Impact to Federal subsistence users/wildlife: Adopting this proposal would decrease opportunity for federally qualified subsistence users most dependent on the resource by increasing competition and reducing the number of permits available to them. Permits that are restricted in this manner are intended to limit the people who receive them to people who live within the hunt area. This is typically done because there is a very limited harvestable surplus of the wildlife population being permitted. The impact on the Unit 19E moose population would be minimal, since ADF&G could continue adjusting the total number of permits available in response to the Unit 19E moose population status.

This would also misalign State and Federal regulations, increasing regulatory complexity. However, if this proposal is adopted, Federal regulations could be corrected administratively.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 70.

Rationale: This proposal would increase competition for federally qualified subsistence users and could decrease opportunity for users closest to and most dependent on the Unit 19E moose population.

**PROPOSAL 75 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.**

Reauthorize a winter any-moose season during part of February and March in Unit 21E.

Current Federal Regulations:**Unit 21 – Moose**

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

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

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Reauthorizing this antlerless season would maintain opportunity for federally qualified subsistence users and easier access to moose habitat closer to rural communities. According to ADF&G in their proposal, additional harvest opportunity is available. The 2022 population estimation was 9,300 moose, which is within population objectives, and declining twinning rates indicate that this moose population could benefit from antlerless harvest.

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

Rationale: No conservation concerns exist as the moose population in Unit 21E can support some antlerless moose harvest. Also, the additional opportunity to harvest moose closer to rural communities under State regulations benefits federally qualified subsistence users.

PROPOSAL 84 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Change the sheep bag limit in Unit 19C for resident hunters to one ram with full-curl horn or larger every two regulatory years.

Current Federal Regulations:**Unit 19 – Sheep**

Sheep: 1 ram with 7/8 curl horn or larger Aug. 10–Sep. 20.



Unit 19C, that portion within the Denali National Park and Preserve—residents of Nikolai only—no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system.

Oct. 1–Mar. 30.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may currently harvest a 7/8 curl ram in Unit 19 under Federal regulations. Adopting this proposal would not affect that opportunity. However, federally qualified subsistence users that hunt under State regulations would be limited to one ram every two years, decreasing their opportunity to harvest sheep. This proposal would also modify the State subsistence hunt, which would take away the opportunity of federally qualified subsistence users to harvest a ¾ curl or smaller ram under State regulations. While not stated in the proposal, implementation of a registration permit during the early fall hunt would likely be needed to track hunter participation, limiting them to one permit every two years.

Both hunted and nonhunted sheep populations in and around Unit 19C have decreased in concert with each other, by approximately 50% since 2017. Sheep population estimates within Denali National Park and Preserve have decreased since 2019 (Borg 2023, pers. comm.), paralleling the declining sheep populations in the adjacent Unit 19C. ADF&G survey data indicates about a 60% decrease in Unit 19C sheep abundance since 2017. Reported harvest of sheep in Unit 19C has also followed this declining trend, decreasing by about 75% in recent years (ADF&G 2022).

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

Rationale: Although opportunity for federally qualified subsistence users hunting sheep under State regulations in Unit 19C would be restricted, conservation concerns exist for Unit 19C sheep populations and potential increases in sheep abundance may provide more opportunity in the future. Since total sheep, legal ram, and harvest numbers have all severely decreased in the last five years, continuing to allow harvest from the Unit 19C sheep population may exacerbate conservation concerns.

OSM also supports implementing registration permits for the Unit 19C sheep hunts, which is likely necessary to effectively implement this proposal and would also improve harvest monitoring and sheep management (see comments on Proposal 43).

Literature Cited

Alaska Department of Fish and Game. 2022. Board of Game Sheep Informational Meeting. Presentation. ADF&G DWC. Juneau, AK. 56 pp.

Borg, B. 2023. Wildlife Biologist. Denali National Park and Preserve. Personal communication: e-mail. National Park Service, Healy, AK.

**PROPOSAL 87 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Shorten the sheep hunting season in Unit 19C for residents and open a season for nonresidents in Unit 19C.

NOTE: These comments only apply to the resident hunt portion of this proposal and do not apply to the nonresident hunt portion of this proposal.

Current Federal Regulations:**Unit 19 – Sheep**

Sheep: 1 ram with 7/8 curl horn or larger *Aug. 10–Sep. 20.*

Unit 19C, that portion within the Denali National Park and Preserve—residents of Nikolai only—no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system. *Oct. 1–Mar. 30.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may currently harvest a 7/8 curl ram in Unit 19 from Aug. 10-Sep. 20 under Federal regulations. Adopting this proposal would not affect that opportunity. However, federally qualified subsistence users hunting under State regulations would be limited to a season of Aug. 15-Sep. 10, reducing their opportunity.

Both hunted and nonhunted sheep populations in and around Unit 19C have decreased in concert with each other, by approximately 50% since 2017. Sheep population estimates within Denali National Park and Preserve have decreased since 2019 (Borg 2023, pers. comm.), paralleling the declining sheep populations in the adjacent Unit 19C. ADF&G survey data indicates about a 60% decrease in Unit 19C sheep abundance since 2017. Reported harvest of sheep in Unit 19C has also followed this declining trend, decreasing by about 75% in recent years (ADF&G 2022).

Adopting this proposal would misalign State and Federal sheep seasons in Unit 19C, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: Although opportunity for federally qualified subsistence users hunting sheep under State regulations in Unit 19C would be restricted, conservation concerns exist for Unit 19C sheep populations and potential increases in sheep abundance may provide more opportunity in the future. Since total sheep, legal ram, and harvest numbers have all severely decreased in the last five years, continuing to allow harvest from the Unit 19C sheep population may exacerbate conservation concerns.



Literature Cited

Alaska Department of Fish and Game. 2022. Board of Game Sheep Informational Meeting. Presentation. ADF&G DWC. Juneau, AK. 56 pp.

Borg, B. 2023. Wildlife Biologist. Denali National Park and Preserve. Personal communication: e-mail. National Park Service, Healy, AK.

PROPOSAL 88 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Change all sheep hunting in Unit 19C to archery only and require future nonresident sheep hunting in Unit 19C to be by bow and arrow only.

NOTE: These comments only apply to the resident hunt portion of this proposal and do not apply to the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 19 – Sheep

Sheep: 1 ram with 7/8 curl horn or larger *Aug. 10–Sep. 20.*

Unit 19C, that portion within the Denali National Park and Preserve—residents of Nikolai only—no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system. *Oct. 1–Mar. 30.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may currently hunt sheep with a rifle in Unit 19C under Federal regulations. Adopting this proposal would not affect that opportunity. However, federally qualified subsistence users that hunt sheep in Unit 19C under State regulations would be restricted to harvesting with only archery equipment. This would decrease opportunity for federally qualified subsistence users under State regulations by requiring a less efficient means of harvest.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: This proposal would decrease opportunity for federally qualified subsistence users to harvest sheep under State regulations in Unit 19C. While OSM supports conservation measures for the declining



Unit 19C sheep population, OSM supports measures other than weapon restricted hunts. Weapon restricted hunts could disenfranchise federally qualified subsistence users who do not own a bow or have experience using one.

PROPOSAL 100 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the brown/grizzly bear season in Unit 19E to year-round.

Current Federal Regulations:

Unit 19A–Brown bear

Unit 19A and 19B, those portions which are downstream of and including the Aniak River drainage—1 bear by State registration permit only Aug. 10 – June 30

Unit 19A, 19B remainder, and 19D–1 bear. Aug. 10 – June 30

Is a similar issue being addressed by the Federal Subsistence Board? No. However, the Federal Subsistence Board will consider Proposal WP24-24, which requests splitting subunit 19A into subunits 19A and 19E, at their April 2024 meeting.

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional brown bear hunting opportunity for federally qualified subsistence users under State regulations.

Brown bears are distributed throughout Unit 19, with very little biological information available. Population surveys have never been done in Unit 19E (previously part of Unit 19A), and population estimates are based on areas with similar habitats (Seavoy 2015).

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 100.

Rationale: Adopting this proposal would provide additional opportunity for federally qualified subsistence users harvesting brown bears under State regulations; however, the impacts on the Unit 19E brown bear population are uncertain.

Literature Cited

Seavoy, R. J. 2015. Units 19, 21A, and 21E brown bear. Chapter 18, pages 18-1 through 18-17 [In] P. Harper and L. A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2012–30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-1, Juneau, AK.

**PROPOSAL 103 – 5 AAC 85.015. Hunting seasons and bag limits for black bear.**

Increase the bag limit for black bear in Units 19B and 19C.

Current Federal Regulations:**Unit 19–Black Bear**

3 bear

July 1 – June 30

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional black bear hunting opportunity for federally qualified subsistence users under State regulations.

Black bears are distributed throughout Units 19B and 19C, with very little biological information available and population estimates are based on areas with similar habitats (Barton 2021). There is no monitoring of black bear harvest numbers in Units 19B or 19C (Barton 2021). This is typically done through a harvest ticket or a sealing requirement, neither of which are required in Units 19B or 19C.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 103.

Rationale: Adopting this proposal would provide additional opportunity for federally qualified subsistence users harvesting black bears under State regulations; however, the impacts on the Unit 19B and 19C black bear population are uncertain.

Literature cited

Barton, J. S., 2021. Black bear management report and plan, Game Management Units 19, 21A, and 21E: Report period 1 July 2013–30 June 2018, and plan period 1 July 2018–30 June 2023. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-14, Juneau, AK.

PROPOSAL 104– 5 AAC 85.015. Hunting seasons and bag limits for black bear.

Remove the requirement of a general season black bear harvest ticket in Unit 19D.

Current Federal Regulations:**Unit 19–Black Bear**

3 bear

July 1 – June 30



Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Eliminating the harvest ticket requirement would decrease the administrative burden for federally qualified subsistence users hunting black bear under both State and Federal regulations in Unit 19D. (Federal regulations require compliance with State permit and harvest reporting requirement unless a Federal permit is required.) No impacts on the Unit 19D black bear population are expected if this proposal is adopted.

Harvest tickets and sealing requirements are used to help monitor black bear populations and track their harvests (Barton 2021). As sealing is not required for harvested black bears in Unit 19D, removing the harvest ticket requirement would eliminate the primary method of monitoring this population. However, Unit 19D is currently the only subunit in Unit 19 where a harvest ticket is required. Harvest tickets are also not required for black bears in many other units (i.e. Units 21, 22, 23, 24) across the State.

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

Rationale: There are no known conservation concerns for black bears in Unit 19D. Adopting this proposal would decrease the administrative burden for federally qualified subsistence users to harvest black bears in Unit 19D, while neighboring subunits already do not require a harvest ticket.

Literature cited

Barton, J. S., 2021. Black bear management report and plan, Game Management Units 19, 21A, and 21E: Report period 1 July 2013–30 June 2018, and plan period 1 July 2018–30 June 2023. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-14, Juneau, AK.

PROPOSAL 105 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

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

Allow brown/grizzly bears to be take over bait in Unit 21A.

Current Federal Regulations:

§ 100.26(21)(iv)(a) *You may use bait to hunt black bear April 15-June 30; and in Koyukuk Controlled Use Area, you may also use bait to hunt black bear between September 1 and September 25.*

Use of bait or scent lures to harvest brown bears in Unit 21A is not authorized under Federal subsistence regulations.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for federally qualified subsistence users to harvest black and brown bear under State



regulations. While the proposal language is a bit unclear, OSM understands the proponent is requesting a fall black bear baiting season as well as a fall and spring brown bear baiting season in Unit 21A.

Black Bears

Black bears are distributed throughout Unit 21A, with very little biological information available and population estimates are based on areas with similar habitats (Barton 2021). There is no monitoring of black bear harvest numbers in Unit 21A (Barton 2021). This is typically done through a harvest ticket or a sealing requirement, neither are currently required in Unit 21A.

Brown Bears

Brown bears are distributed throughout Unit 21A, with very little biological information available. Population surveys have never been done in Unit 21A, and population estimates are based on areas with similar habitats (Seavoy 2015).

Total reported harvest of brown bears in Unit 21A between 2009-2013 averaged 1.4 bears per year (Seavoy 2015). It is unlikely there would be a significant impact on the brown bear population if this proposal is adopted due to very low reported harvest rates.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

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

Rationale: There are no known conservation concerns for brown bears in Unit 21A. If this proposal is adopted, it would provide additional opportunity for federally qualified subsistence users to harvest brown bears under State regulations.

Literature Cited

Seavoy, R. J. 2015. Units 19, 21A, and 21E brown bear. Chapter 18, pages 18-1 through 18-17 [In] P. Harper and L. A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2012–30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-1, Juneau, AK.

PROPOSAL 106 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

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

Allow hunting of black and brown bear with the use of bait and scent lures in Unit 21E.

See comments on Proposal 107. This proposal as submitted does not specify a baiting season. OSM provided comments on Proposal 107, which also requests a brown bear baiting season in Unit 21E with dates specified. Also, a spring baiting season for black bear is already allowed in Unit 21E and Proposal



106 only discusses brown bear baiting seasons, so OSM does not consider this proposal to affect black bear baiting seasons.

PROPOSAL 107 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Open a fall brown/grizzly bear baiting season in Unit 21E.

Current Federal Regulations: Not applicable. Use of bait or scent lures to harvest brown bears in Unit 21E is not authorized under Federal subsistence regulations.

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for Federally qualified subsistence users to harvest brown bears under State regulations. This proposal requests both a spring and fall baiting season for brown bears. As a spring black bear baiting season is already in State regulation, adopting this proposal would enable federally qualified subsistence users to harvest both black and brown bears over bait in the spring; however, only brown bears could be harvested over bait in the fall, even though black bears might also be attracted to the bait stations.

Brown bears are distributed throughout Unit 21E, with very little biological information available. Population surveys have not been done in Unit 21E, and population estimated based on areas with similar habitats (Seavoy 2015).

Total reported harvest of brown bears in Unit 21A between 2009-2013 averaged 5 bears per year (Seavoy 2015). It is unlikely there would be a significant impact on the brown bear population if this proposal is adopted due to very low reported harvest rates.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

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

Rationale: There are no known conservation concerns for brown bears in Unit 21E. If this proposal is adopted, it would provide additional opportunity for federally qualified subsistence users to harvest brown bears.

Literature Cited

Seavoy, R. J. 2015. Units 19, 21A, and 21E brown bear. Chapter 18, pages 18-1 through 18-17 [In] P. Harper and L. A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2012–30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-1, Juneau, AK.



PROPOSAL 110 - 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20E.

Current Federal Regulations:

Unit 20E — Moose

Unit 20E, that portion within Yukon-Charley Rivers National Preserve - 1 bull Aug. 20-Sept. 30.

Unit 20E, that portion drained by the Middle Fork of the Fortymile River upstream from and including the Joseph Creek drainage - 1 bull Aug. 20-Sept. 30.

Unit 20E, remainder - 1 bull by joint Federal/State registration permit Aug. 20-Sept. 30.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for federally qualified subsistence users. No impact to the moose population is expected since ADF&G states in their proposal that they do not plan on announcing an antlerless season in Unit 20E next year because the moose population has stabilized. However, maintaining the antlerless season provides flexibility in managing this population and maximizing harvest opportunity in the future when warranted.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 110.

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for federally qualified subsistence users and retains a management tool that ADF&G can enact if needed. Conservation concerns are mitigated as this is a drawing permit hunt with a limited number of permits that can be adjusted or not announced annually based on population status.

PROPOSAL 120 – 5 AAC 85.020. Hunting seasons and bag limit for brown bear.

Increase the brown/grizzly bear bag limit for residents in a portion of Unit 12.

Current Federal Regulations:

Unit 12–Brown Bear

1 bear Aug. 10 – June 30

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for Federally qualified subsistence users to harvest brown bears under State regulations and would enable hides of brown bears harvested in this area to be sold.



Brown bears are distributed throughout Unit 12, with very little biological information available. Population surveys have not been done in Unit 12, and brown bear populations are estimated based on areas with similar habitats (Wells 2021). Brown bear management objectives in Unit 12 are to manage harvests so 3-year mean harvest does not exceed 28 brown bears (of which no more than 5 can be females greater than 5-years old) per year, and includes at least 55% males in the harvest. From 2014-2018, brown bear harvest ranged from 16-26 bears/year with an average of 21 bears. Over the same time period, male bears comprised 59% of the total harvest, meeting management objectives (Wells 2021).

After take of brown bears over bait was allowed in Unit 12 under State regulations in 2012, brown bear harvest did not increase. Similarly, brown bear harvest is not expected to increase significantly if this proposal is adopted, especially because the affected hunt area is very remote and difficult to access.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

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

Rationale: The proposal would provide additional opportunity for federally qualified subsistence users. Based on the most recent information available, there are no conservation concerns for brown bears in Unit 12. However, harvest approached management objectives according to the most recent management report available. While adoption of this proposal is not anticipated to significantly increase the number of brown bears harvested in Unit 12, even a small increase in harvest might be unsustainable. Additionally, OSM does not have enough current biological or harvest information to effectively evaluate the conservation concerns for and impacts of this proposal on this brown bear population.

Literature cited

Bentzen, T. W. 2013. Unit 12 brown bear. Pages 132–142 [In] P. Harper and L. A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2010–30 June 2012. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR2013-4, Juneau, AK.

Wells, J. J. 2021. Brown bear management report and plan, Game Management Units 12 and 20E: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-28, Juneau, AK.

PROPOSAL 121 – 5 AAC 85.020. Hunting seasons and bag limit for brown bear.

Increase the brown/grizzly bear bag limit for residents in a portion of Unit 12.

See comment for Proposal 120.

**PROPOSAL 122 – 5 AAC 85.056. Hunting seasons and bag limits for wolf.**

Lengthen the wolf hunting season in Units 12 and 20E by approximately six weeks to end on June 15.

Current Federal Regulations:**Unit 12 – Wolf Hunting**

Unit 12—10 wolves

Aug. 10–Apr. 30.

Unit 20 – Wolf Hunting

Unit 20—10 wolves

Aug. 10–Apr. 30.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for federally qualified subsistence users hunting wolves under State regulations.

The impact of this proposal on the wolf population is uncertain. The existing individual hunting harvest limit of ten wolves per year (and trapping harvest limit of ‘no limit’) suggests no conservation concerns for wolves in Units 12 and 20E. According to the annual report on Intensive Management for the Fortymile Caribou Herd, wolf harvest has exhibited a slight overall decreasing trend from 2004–2022, while the wolf population appears to have remained stable (ADF&G 2023). Population management objectives are to maintain a combined 160 post-harvest wolves in both units (Gross 2021), although the spring post-harvest wolf population estimates have never been that low (ADF&G 2023). While adopting this proposal would likely increase wolf harvest, it seems unlikely to cause conservation concerns, as the wolf population estimate has always been above management objectives.

Adopting this proposal would misalign the closing date of the State and Federal wolf seasons, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: Adopting this proposal would provide additional opportunity for federally qualified subsistence users to hunt wolves under State regulations. While impacts to the wolf population are uncertain, wolf numbers in Units 12 and 20E appear healthy enough to withstand more harvest.

Literature Cited

ADF&G. 2023. Annual Report on Intensive Management for Fortymile Caribou Herd with Wolf Predation Control in the Upper Yukon–Tanana Predation Control Area. Alaska Department of Fish & Game, Division of Wildlife Conservation, February 2023.



Gross, J. A. 2021. Wolf management report and plan, Game Management Units 12 and 20E: Report period 1 July 2010–30 June 2015, and plan period 1 July 2015–30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-4, Juneau.

PROPOSAL 123 – 5 AAC 85.056. Hunting seasons and bag limits for wolf.

Lengthen the wolf hunting season by approximately six weeks.

See comments for Proposal 122.

PROPOSAL 124 – 5 AAC 84.270 Furbearer trapping.

Lengthen the marten trapping season in Units 20E and 25B by two weeks to close March 15.

See comment for Proposal 50.

PROPOSAL 139 – 5 AAC 85.025. Hunting seasons and bag limits for caribou.

Reduce the bag limit for taking caribou in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D and 26A to four caribou per year, only one of which may be a cow.

NOTE: OSM submitted these same comments on Proposal 2 for the Western Arctic/Western Region meeting.

Current Federal Regulations:

Unit 21D—Caribou

Unit 21D, remainder— 5 caribou per day, as follows: Calves may not be taken.

Bulls may be harvested.

July 1-Oct. 14.

Feb. 1-June 30.

Cows may be harvested.

Sept. 1-Mar. 31.

Unit 22—Caribou

Unit 22B that portion west of Golovnin Bay and west of a line along the west bank of the Fish and Niukluk Rivers to the mouth of the Libby River and excluding all portions of the Niukluk River drainage

Oct. 1-Apr. 30.

May 1-Sept. 30, a season may be



upstream from and including the Libby River drainage - 5 caribou per day by State registration permit. Calves may not be taken. announced.

Units 22A, that portion north of the Golsovia River drainage, 22B remainder, that portion of Unit 22D in the Kuzitrin River drainage (excluding the Pilgrim River drainage), and the Agiapuk River drainages, including the tributaries, and Unit 22E, that portion east of and including the Tin Creek drainage - 5 caribou per day by State registration permit. Calves may not be taken. July 1–June 30.

Unit 22A, remainder - 5 caribou per day by State registration permit. Calves may not be taken July 1-June 30, season may be announced.

Unit 22D, that portion in the Pilgrim River drainage - 5 caribou per day by State registration permit. Calves may not be taken Oct. 1-Apr. 30. May 1-Sep. 30, season may be announced

Units 22C, 22D remainder, 22E remainder - 5 caribou per day by State registration permit. Calves may not be taken July 1-June 30, season may be announced

Unit 23–Caribou

Unit 23—that portion which includes all drainages north and west of, and including, the Singoalik River drainage—5 caribou per day by State registration permit as follows:

Bulls may be harvested July 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 15–Oct. 14. July 15–Apr. 30

Unit 23, remainder—5 caribou per day by State registration permit as follows:

Bulls may be harvested July 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 31–Oct. 14. July 31–Mar. 31

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National



Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed to caribou hunting except by federally qualified subsistence users hunting under these regulations.

Bureau of Land Management managed lands between the Noatak and Kobuk Rivers and Noatak National Preserve are closed to caribou hunting from Aug. 1-Sep. 30 for the 2022-24 regulatory cycle, except by federally qualified subsistence users hunting under these regulations.

Unit 24—Caribou

Unit 24B remainder - 5 caribou per day, as follows: Calves may not be taken.

<i>Bulls may be harvested.</i>	<i>July 1-Oct. 14.</i>
	<i>Feb. 1-June 30.</i>

<i>Cows may be harvested.</i>	<i>July 15-Apr. 30.</i>
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Units 24C, 24D - 5 caribou per day, as follows: Calves may not be taken.

<i>Bulls may be harvested.</i>	<i>July 1-Oct. 14.</i>
	<i>Feb. 1-June 30.</i>

<i>Cows may be harvested</i>	<i>Sep. 1-Mar. 31.</i>
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Unit 26—Caribou

Unit 26A - that portion of the Colville River drainage upstream from the Anaktuvuk River, and drainages of the Chukchi Sea south and west of, and including the Utukok River drainage - 5 caribou per day by State registration permit as follows: Calves may not be taken



Bulls may be harvested

July 1-Oct. 14.

Dec. 6-June 30.

Cows may be harvested; however, cows accompanied by calves may not be taken July 16-Oct. 15

July 16-Mar. 15.

Noatak National Preserve is closed to caribou hunting from Aug. 1-Sep. 30 for the 2022-24 regulatory cycle, except by federally qualified subsistence users hunting under these regulations.

Unit 26A remainder - 5 caribou per day by State registration permit as follows: Calves may not be taken

Bulls may be harvested

July 1-Oct. 15.

Dec. 6-June 30.

Up to 3 cows per day may be harvested; however, cows accompanied by calves may not be taken July 16-Oct. 15

July 16-Mar. 15.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Four proposals affecting the Western Arctic Caribou Herd (WACH) will be considered by the Federal Subsistence Board in April 2024.

Proposal WP24-28 is the Federal counterpart to State Proposal 2. It was also submitted by the WACH working group and requests the same harvest limit reductions in the same units. Proposal WP24-29 requests a reduction in the caribou harvest limit in Unit 23 only to four caribou per year, only one of which may be a cow.

Proposals WP24-30 and WP24-31 request closing Federal public lands in Unit 23 to caribou hunting by non-federally qualified users from August 1 to October 31.

Impact to Federal subsistence users/wildlife: If this proposal is adopted, the individual caribou harvest limit throughout the range of the WACH would be reduced from five caribou per day to four caribou per year, only one of which may be a cow. The decreased harvest limits and more restrictive cow harvest would reduce hunting opportunity and harvest under State regulations. However, these regulatory changes could help conserve the WACH and aid in its recovery, which, in turn, could provide more hunting opportunity in the future. The Teshekpuk and Central Arctic caribou herds occupy portions of Unit 26A.

As these herds have not experienced substantial population declines like the WACH, adopting this proposal may unnecessarily restrict harvest from these herds.

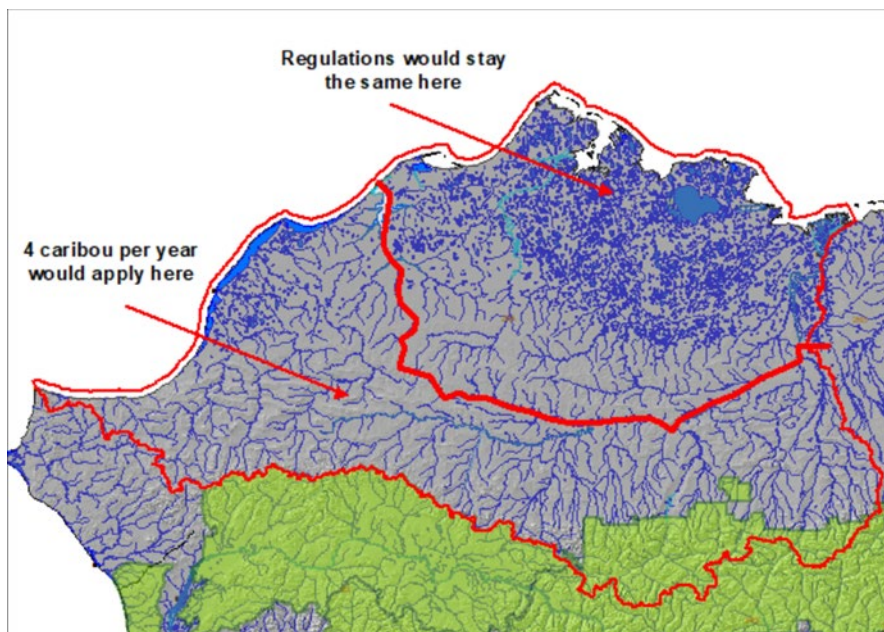
Additionally, reduced harvest limits could also impact sharing networks, which are an important cultural component for subsistence users in these areas and contribute to food security. While four caribou per year may be enough for individuals and some families (NWARAC 2022), many families and elders depend on higher harvesting households (the “super households”) to provide caribou meat (Wolfe et al. 2007).

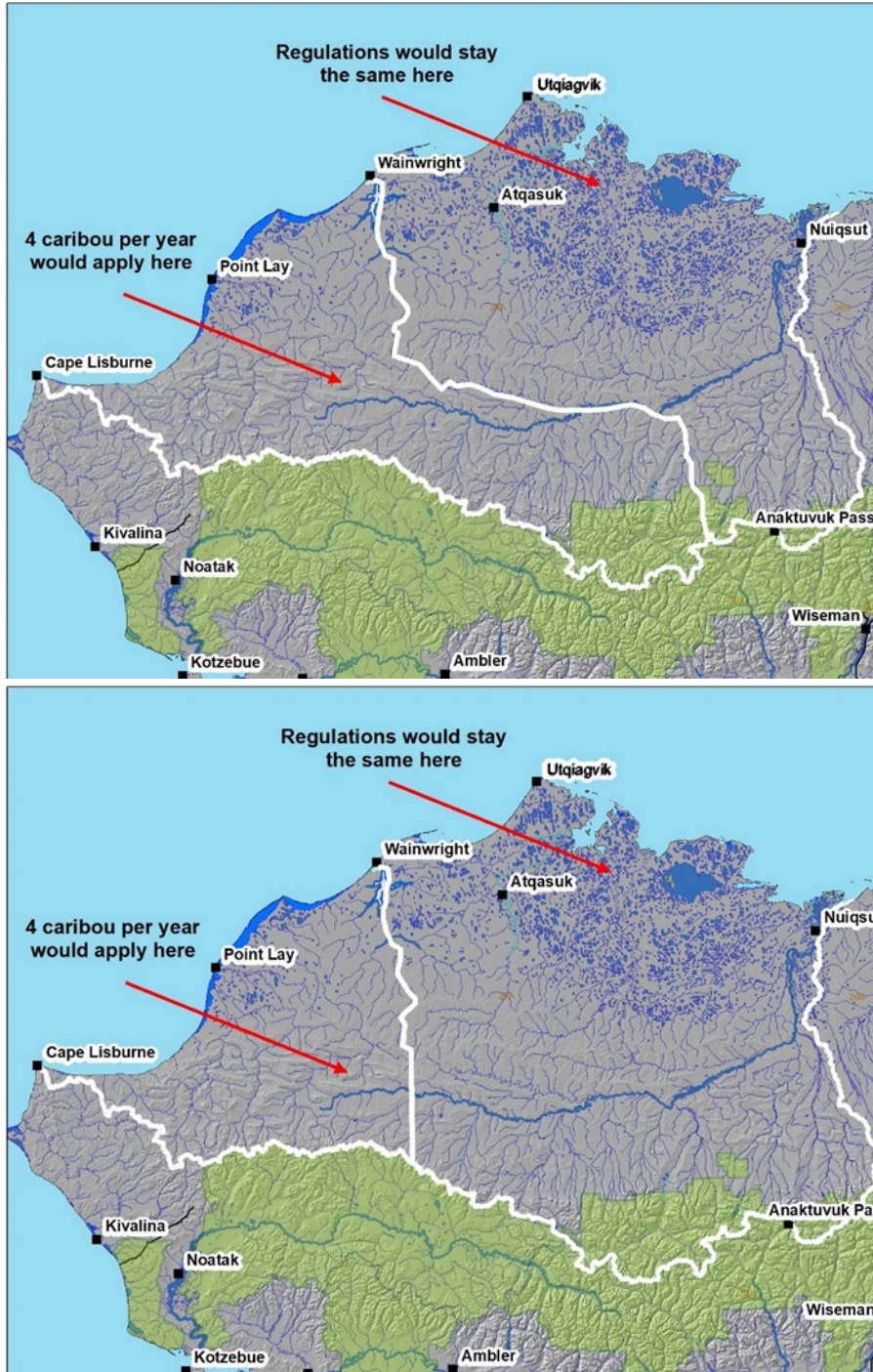
Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 2 **with modification** to exclude the eastern portion of Unit 26A from the harvest limit reductions (**Map 1**).

Rationale: OSM supports measures to reduce conservation concerns for the WACH. The lengthy and precipitous decline of the WACH warrants strong measures to aid in the recovery and conservation of this population. Current harvest rates, especially the taking of cows, could prolong or worsen the current decline, and hamper recovery efforts. Additionally, while causes of the decline are multi-faceted and uncertain, reducing human harvest is the most controllable factor.

However, reducing the individual harvest limit to four caribou per year throughout the range of the WACH may prevent some communities from meeting their subsistence needs. While OSM believes harvest reduction is necessary to conserve the WACH, OSM supports conservation measures that are workable for and supported by the affected communities and subsistence users.

This proposal, as written, may also cause unnecessary hardship and restrictions for users in the portions of the WACH range that are primarily occupied by other caribou herds that are above State population objectives and are currently not of conservation concern. Therefore, OSM supports excluding the eastern portion of Unit 26A from the harvest limit reductions, although OSM is neutral on the exact boundaries. Several examples are provided below (**Map 1**).





Map 1. Examples of the eastern portion of Unit 26A to be excluded from the individual caribou harvest limit reductions.

Literature Cited

NWARAC. 2022. Transcripts of the Northwest Arctic Subsistence Regional Advisory Council proceedings, October 31 and November 1, 2022, in Kotzebue, AK. Office of Subsistence Management, USFWS. Anchorage, AK.



Wolfe, R.J., C.L. Scott, W.E. Simeone, C.J. Utermohle, and M.C. Pete. 2007. The “Super-Household” in Alaska. Native subsistence economics. National Science Foundation, ARC 0352677. Washington DC. 31 pages.

PROPOSAL 145 – 5 AAC 85.045(a)(19)(B). Hunting seasons and bag limits for moose.

Reauthorize a winter any-moose season during March in a portion of Unit 21D.

Current Federal Regulations:

Unit 21D–Moose

Unit 21D, that portion south of the south bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek—1 moose by State registration permit Aug. 22–31. Sept. 5–25.

Antlerless moose may be taken only during Sep. 21–25 season if authorized jointly by the Koyukuk/Nowitna/Innoko NWR Manager and the BLM Central Yukon Field Office Manager. Antlerless moose may be harvested during any of the winter seasons. Harvest of cow moose accompanied by calves is prohibited Mar. 1–31 season may be announced.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Reauthorizing this antlerless season would maintain opportunity for Federally qualified subsistence users and easier access to moose habitat closer to rural communities. Additionally, reauthorization would maintain alignment between State and Federal regulations, reducing regulatory complexity and law enforcement concerns, which is especially important in this hunt area given the checkerboard pattern of land ownership in this area.

The Unit 21D moose population has been stable, within State management objectives and can sustain limited antlerless moose harvest (Bryant 2022). The USFWS conducted surveys in 2022, indicating stable moose populations that are above the long-term average and recommended to maintain the harvest opportunity for Federally qualified subsistence users (Bryant 2022). Additionally, ADF&G states in their proposal there a harvestable surplus of cow moose in this area.

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

Rationale: No conservation concerns exist as the moose population in Unit 21D is healthy enough to sustain antlerless moose harvest. Also, the additional opportunity to harvest moose closer to rural communities under State regulations benefits federally qualified subsistence users.

Literature Cited

Bryant, Jenny. 2022. Moose Trend Survey Summary 2022. USFWS. Galena, AK. 34 pp.

**PROPOSAL 149 – 5 AAC 84.270. Furbearer trapping.**

Lengthen the wolf trapping season in Units 24 and the remainder of 25 by one month, to open October 1.

Current Federal Regulations:**Unit 24 – Wolf Trapping**

Wolf: No limit

Nov. 1–Apr. 30.

Unit 25 – Wolf Trapping

Wolf: No limit

Oct. 1–Apr. 30.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for federally qualified subsistence users trapping wolves under State regulations.

The impact of this proposal on the wolf population is uncertain. While little is known on the status of the wolf population in this area, the lack of an individual harvest limit suggests no conservation concerns exist for wolves in Units 24 and 25. Reported wolf harvest is low but provides for sustained opportunity to engage in wolf hunting or trapping, meeting an ADF&G management goal (Caikoski 2023). Recent Alaska Trapper Reports classify the relative abundance of wolves in Region 3 as scarce or common with no change in population trend since the previous year (Bogle 2021, 2022). From 2015-2021, the number of wolves sealed in Region 3 has remained relatively stable, with an average of 500 wolves sealed per year (Bogle 2021, 2022). While extending the State trapping season by one month would likely increase wolf harvest, it seems unlikely to cause conservation concerns, as harvest has been low and any increases would likely be minimal.

Adopting this proposal would align State and Federal wolf trapping seasons in Unit 25, reducing regulatory complexity. However, it would misalign State and Federal wolf trapping seasons in Unit 24, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: Adopting this proposal would provide additional opportunity for federally qualified subsistence users to trap wolves under State regulations. While impacts to the wolf population are uncertain, the limited information available indicates harvest is low and has remained stable, while the wolf population is able to support some additional harvest.

Literature Cited

Bogle, S. E. 2021. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau.



Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau.

Caikoski, J. R. 2023. Wolf management report and plan, Game Management Units 25A, 25B, 25D, 26B, and 26C: Report period 1 July 2015–30 June 2020, and plan period 1 July 2020–30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-25, Juneau.

PROPOSAL 150 – 5 AAC 85.056. Hunting seasons and bag limits for wolf.

Lengthen the wolf hunting season in Units 24 and 25.

Current Federal Regulations:

Unit 24 – Wolf Hunting

Unit 24—15 wolves; however, no more than 5 wolves may be taken prior to Nov. 1 Aug. 10–Apr. 30.

Unit 25 – Wolf Hunting

Unit 25A—No limit Aug. 10–Apr. 30.

Unit 25, remainder—10 wolves Aug. 10–Apr. 30.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for federally qualified subsistence users hunting wolves under State regulations.

The impact of this proposal on the wolf population is uncertain. While little is known on the status of the wolf population in this area, the lack of an individual harvest limit suggests no conservation concerns exist for wolves in Units 24 and 25. Reported wolf harvest is low but provides for sustained opportunity (Caikoski 2023). Recent Alaska Trapper Reports classify the relative abundance of wolves in Region 3 as scarce or common with no change in population trend since the previous year (Bogle 2021, 2022). From 2015-2021, the number of wolves sealed in Region 3 has remained relatively stable, with an average of 500 wolves sealed per year (Bogle 2021, 2022). While extending the State trapping season by one month would likely increase wolf harvest, it seems unlikely to cause conservation concerns, as harvest is considered low.

While the increase in wolf harvest resulting from this proposal may be small, the take of lactating females may result in loss of pups as well, compounding mortality and having undue effects on the wolf population (Joly, et al 2018).

Adopting this proposal would misalign the closing date of State and Federal wolf hunting seasons in these units, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.



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

Rationale: Adopting this proposal would provide additional opportunity for federally qualified subsistence users to hunt wolves under State regulations. However, the impacts to the wolf population are uncertain and may be compounded by harvesting during the denning and pup rearing season, which is a sensitive time for pack cohesion and survival (Joly et al. 2018).

Literature Cited

Bogle, S. E. 2021. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau.

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau.

Caikoski, J. R. 2023. Wolf management report and plan, Game Management Units 25A, 25B, 25D, 26B, and 26C: Report period 1 July 2015–30 June 2020, and plan period 1 July 2020–30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2023-25, Juneau.

Joly, K., M. S. Sorum, and M. D. Cameron. 2018. Denning ecology of wolves in east-central Alaska, 1993-2017. *Arctic Institute of North America* 71(4).

PROPOSAL 151 – 5 AAC 85.056. Hunting seasons and bag limits for wolf.

Increase the hunting bag limit for wolves in Units 24 and 25.

See comments for Proposal 150.

PROPOSAL 152 – 5 AAC 85.020. Seasons and bag limits for brown bear.

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

Increase the resident bag limit for brown bear in Units 24C and 24D, and open a fall bait season in Units 21B and 24B.

Current Federal Regulations: Use of bait or scent lures to harvest brown bears in Units 21B and 24B is not authorized under Federal subsistence regulations.

Unit 24–Brown Bear

Unit 24B, that portion within Gates of the Arctic National Park—2 bears by State registration permit Aug. 10 – June 30

Unit 24 remainder—1 bear by State registration permit Aug. 10 – June 30

Is a similar issue being addressed by the Federal Subsistence Board? No. In 2022, the Federal Subsistence Board adopted Proposal WP22-46 to increase the harvest limit for brown bears in Unit 24B, that portion within Gates of the Arctic National Park to 2 bears by State registration permit.



Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for Federally qualified subsistence users to harvest brown bears under State regulations and would enable the hides of brown bears harvested in Units 24C and 24D to be sold.

Unit 21

The brown bear population of Unit 21 is estimated to be 350-400 bears, with Unit 21A estimated to only have 50 bears (Longson 2021). The average brown bear harvest in Unit 21 during regulatory years 2014-2018 was 24 bears (**Table 1**) (Longson 2021). Based on data from other areas of Interior Alaska, the minimum sustainable harvest rate for brown bears is 5-6% of the population. This indicates a minimum annual harvest rate for Unit 21 being 18-24 brown bears, indicating no additional bears are available for harvest (Longson 2021).

Table 1. Harvest information for brown bears in Unit 21. The reported harvest in Unit 21 is only in 21B, 21C, and 21D (Longson 2021).

Regulatory Year	Unit 21 Reported Harvest	Unit 21 Unreported Estimated Harvest	Unit 21 Total Bears Harvested
2014	8	10	18
2015	11	10	21
2016	16	10	26
2017	18	10	28
2018	17	10	27

Unit 24

Brown bears are distributed throughout Units 24B, 24C, and 24D, with very little biological information available and population estimates are based on areas with similar habitats (Longson 2021). The estimated brown bear population is 450 in the northern portion of Unit 24 and 180-320 in the southern portion of Unit 24 (Schmidt 2021). As the sustainable harvest rate is estimated at 5-6% of the population, 39-56 bears could be harvested sustainably from Unit 24. However, the average brown bear harvest in Unit 24 during regulatory years 2014-2018 was 21 bears (**Table 2**), indicating additional bears are available harvest (Longson 2021).



Table 2. Harvest information for brown bears in Unit 24 and the three applicable subunits (Longson 2021).

Regulatory Year	Unit 24 Reported Harvest	Unit 24 Unreported/Illegal Estimated Harvest	Unit 24 Total Bears Harvested	Unit 24B Bears Harvested	Unit 24C Bears Harvested	Unit 24D Bears Harvested
2014	19	5	25	8	0	3
2015	19	5	24	5	0	1
2016	17	5	23	3	0	0
2017	12	5	17	1	0	0
2018	13	5	18	7	0	0

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 152 **with modification** to only adopt the Unit 24 portion of the proposal.

Rationale: There is currently no conservation concern for brown bears in Units 24B, 24C, and 24D. Based on the available information, additional brown bears may be available for harvest within these units. This would also provide more opportunity for federally qualified subsistence users.

There is currently no conservation concern for brown bears in Unit 21. However, the harvest objective is consistently met in Unit 21 and no additional bears appear available for harvest. Unit 21B has an estimated low density of bears and providing a more efficient means of harvest could increase harvest to unsustainable levels and have a negative impact on the population. Therefore, OSM opposes establishing a fall brown bear baiting season in Unit 21B.

Literature cited

Longson, S. M. 2021. Brown bear management report and plan, Game Management Units 21B, 21C, 21D, and 24: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-24, Juneau, AK.

Schmidt, Joshua, H., H.L. Robison, L.S. Parrett, T.S. Gorn, B.S. Shults. 2021. Brown Bear Density and Estimated Harvest Rates in Northwestern Alaska. *The Journal of Wildlife Management* 85(2):202–214; 2021; DOI: 10.1002/jwmg.21990



PROPOSAL 153 – 5 AAC 85.057. Hunting seasons and bag limits for wolverine. 5 AAC 84.270. Furbearer trapping.

Lengthen the wolverine hunting and trapping seasons in Unit 21 by one month to end on April 30.

Current Federal Regulations:

Unit 21–Wolverine Hunting

Wolverine: 1 wolverine

Sept. 1–Mar. 31.

Unit 21–Wolverine Trapping

Wolverine: No limit

Nov. 1–Mar. 31.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Extending the wolverine hunting and trapping season will provide federally qualified subsistence users more harvest opportunity under State regulations. Changing weather patterns and late springs have allowed access and reportedly kept fur in prime condition later in the season.

Little is known about the Unit 21 wolverine population as they are difficult to study. Most information regarding wolverines comes from sealing records and the annual trapper questionnaire, which in 2021 had a reporting rate of only 6.7% in Region 3. The relative abundance of wolverines was reported as scarce but with no change in population trend. Using harvest as an index for population, sealing records show harvest has remained stable since RY2016, indicating the wolverine population has also remained stable (Bogle 2022). OSM has some reservations over the possibility of trapping lactating females with kits during April, which could have a disproportionate impact on the wolverine population. However, any increases in harvest resulting from this proposal are expected to be small due to the remoteness of Unit 21 and likely low harvest pressure throughout the unit.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: No conservation concerns appear to exist for the Unit 21 wolverine population as harvest has remained stable. However, an April season could result in higher mortality of females with kits. Also, the additional opportunity to harvest wolverine later in the season under State regulations benefits federally qualified subsistence users.

Literature Cited

Bogle, S. E. 2022. 2021 Alaska trapper report: 1 July 2021–30 June 2022. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2022-1, Juneau.



PROPOSAL 154 - 5 AAC 85.025 Hunting seasons and bag limit for caribou.

Change the bag limit for caribou in the Remainder of Unit 26B.

Note: OSM’s comment only applies to the resident hunt portion of this proposal. OSM has no position on the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 26B—Caribou

Unit 26B, that portion south of 69°30' N lat. and west of the Dalton Highway—5 caribou per day as follows:

<i>Bulls may be harvested</i>	<i>July 1–Oct. 14.</i>
	<i>Dec. 10–June 30.</i>
<i>Cows may be harvested</i>	<i>July 1–Apr. 30.</i>

Unit 26B remainder—5 caribou per day as follows:

<i>Bulls may be harvested</i>	<i>July 1–June 30.</i>
<i>Cows may be harvested</i>	<i>July 1–May 15.</i>

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal would increase hunting opportunity for federally qualified subsistence users under State regulations. This may be particularly beneficial due to the decline of the Western Arctic Caribou Herd, although the far distance to travel may be prohibitive for many users.

Increasing the bag limit and removing the bull restriction will increase cow harvest and overall caribou harvest. However, no negative impacts to the Central Arctic Herd (CAH) are expected due to current population levels that are above objectives and can withstand additional harvest. Historically, harvest has shown to have little effect on this caribou population but harvesting a few cows could help slow the growth of this herd.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 154.

Rationale: This proposal would increase harvest opportunity for federally qualified subsistence users under State regulations. There is currently a harvestable surplus of cow caribou available. This proposal would allow the opportunity to harvest those surplus animals and help to slow the growth of this herd.



OSM supports the suggestion in Proposal 155 of allowing ADF&G to implement a “cow quota” in the future if necessary. This would be a safeguard to help prevent the population swings and crashes and subsequent hunting restrictions that occurred in 2016 and 2017.

PROPOSAL 155 - 5 AAC 85.025 Hunting seasons and bag limit for caribou.

Increase resident caribou hunting opportunity in Unit 26B Remainder.

See comments for Proposal 154.

PROPOSAL 157 – 5 AAC 85.050. Hunting seasons and beg limit for muskoxen.

Change the Unit 26A and Unit 26B muskox hunt area boundaries to match federal hunt boundaries and expand the state hunt areas.

NOTE: OSM submitted these same comments on Proposal 35 for the Western Arctic/Western Region meeting.

Current Federal Regulations:

Unit 26A—Muskox

Unit 26A—that portion west of the eastern shore of Admiralty Bay where the Alaktak River enters, following the Alaktak River to 155°00' W longitude south to the Unit 26A border—1 muskox by Federal drawing permit Aug. 1-Mar. 15

Unit 26A remainder and Unit 26B No open season

Is a similar issue being addressed by the Federal Subsistence Board? No. However, the Federal Subsistence Board adopted Proposal WP22-55 in 2022, which established the Federal muskox hunt in the western portion of Unit 26A and associated hunt area boundary.

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional muskox hunting opportunity for federally qualified subsistence users under State regulations. Currently, there is ‘no open season’ for muskox in Unit 26A remainder. This proposal would eliminate the current Unit 26A remainder hunt area by expanding the eastern and western hunt areas, which both have a Tier II muskox hunt. This proposed boundary provides a well-known landscape feature that is easy to identify by users (NSRAC 2021).

This proposal would have minimal impact on the muskox population, which is closely managed under a Tier II permitting system. The muskox population has increased in the western portion of Unit 26A from



253 in 2016 to 455 in 2020 (NSRAC 2021). The muskox population has increased in the eastern portion of Unit 26A and Unit 26B above management objectives (NSRAC 2021), and the State issued RY 2023/24 Tier II permits (TX108) for the first time since 2005 (ADF&G 2023).

Adopting this proposal would align the Federal and State hunt area boundaries for muskox in Unit 26A, which could reduce regulatory complexity and confusion. The Federal Subsistence Board adopted Proposal WP22-55 in 2022, which established the Federal muskox hunt and hunt area boundaries in Unit 26A to accommodate subsistence users. The TX108 hunt area is part of the Federal Unit 26A remainder hunt area. If the Board of Game adopts Proposal 35, OSM strongly encourages the State to identify the expanded TX108 hunt area as Unit 26A remainder to align with the Federal hunt area. If the TX109 hunt area is identified as Unit 26A remainder under State regulations, that would be opposite the Federal hunt area descriptors, which would greatly increase regulatory complexity and confusion.

Federal Position/Recommended Action: The OSM recommendation is **support** Proposal 35.

Rationale: This proposal poses no conservation concerns, would increase opportunity for federally qualified subsistence users, and aligns State and Federal hunt areas. OSM recommends the expanded TX108 hunt area to become Unit 26A remainder (not TX109), so that Federal and State hunt area descriptors match.

Literature Cited

ADF&G. 2023. General Harvest Reports.

<https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvest.lookup&MSG=No%20records%20match%20your%20search%20criteria%2E>. Retrieved: November 2, 2023.

NSRAC. 2021. Transcripts of the North Slope Subsistence Regional Advisory Council proceedings. November 3, 2021. Utqiagvik, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

PROPOSAL 163 - 5 AAC 92.220. Salvage of game meat, furs, and hides.

Align salvage requirements for caribou in Units 25B, 25C, and 25D with Unit 25A to require meat of caribou remain on the bone when harvested prior to October 1.

Current Federal Regulations:

100.26(h) Removing harvest from the field

(4) You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of caribou and moose harvested in Unit 25 until you remove the meat from the field or process it for human consumption.

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal subsistence users/wildlife: It may take longer for federally qualified subsistence users to pack out caribou due to heavier loads and potentially, multiple trips. Warmer temperatures prior to Oct. 1 contribute to meat spoilage. Keeping the meat on the bone reduces spoilage and would make State regulations throughout Unit 25 consistent. Colder temperatures after Oct. 1 reduce the chance of meat spoilage.

There would be no impact on the caribou in Units 25B, 25C and 25D as the animals will have already been harvested. Adopting this proposal would also align State and Federal caribou salvage requirements in Unit 25, reducing regulatory complexity.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 163

Rationale: This proposal would reduce meat spoilage and potential wastage issues. It would also reduce regulatory complexity.

PROPOSAL 168 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the Unit 26B brown bear hunting seasons within the Dalton Highway Corridor Management Area for residents and nonresidents.

Note: These comments only apply to the resident season. OSM has no position on the nonresident season.

Current Federal Regulations:

Unit 26B–Brown Bear

1 bear

Jan. 1 – Dec. 31

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: If adopted, the resident portion of this proposal would provide additional opportunity for Federally qualified subsistence users to harvest brown bears in Unit 26B under State regulations.

From 2014-2018, the brown bear population in Unit 26B was conservatively estimated to be about 333 bears, with 78 of those bears being in the northern portion of Unit 26B and 255 bears in the southern portion (Lenart 2021). The Unit 26B brown bear harvest management objective is to manage for a 3-year mean annual human caused brown bear mortality of $\leq 8\%$ of brown bears being ≥ 2 years old, of which no more than 40% are females (Lenart 2021).

The calculated allowable harvest for brown bears in Unit 26B is approximately 27 bears (8% of 333 bears). From 2010-2018, harvest has ranged from 7-26 brown bears annually, and the maximum sustainable harvest was approached twice since 2010 (**Table 1**, Lenart 2021).



Table 1. Unit 26B brown bear harvest numbers for Alaska residents and the total harvested from 2010-2018 (Lenart 2021).

Year	Alaska Resident	Total
2010	20	26
2011	16	22
2012	15	18
2013	20	22
2014	16	18
2015	20	24
2016	10	12
2017	6	7
2018	12	15

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

Rationale: This proposal would increase opportunity for federally qualified subsistence users, and there is currently no conservation concern for brown bears in Unit 26B. However, it is unknown what the impact of this proposal could be on the Unit 26B brown bear population. Brown bear harvest has ranged widely since 2010, approaching the harvestable surplus in some years, and population estimates are outdated and imprecise. This proposal might result in the annual harvest of brown bears exceeding the harvestable surplus.

Literature cited

Lenart, E. A. 2021. Brown bear management report and plan, Game Management Units 25A, 25B, 25D, 26B, and 26C: Report period 1 July 2014–30 June 2019, and plan period 1 July 2019–30 June 2024. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-17, Juneau, AK.

PROPOSAL 170 – 5 AAC 84.270. Furbearer trapping.

Lengthen the wolverine trapping season in Unit 25A by two weeks to close on April 15.

Current Federal Regulations:

Unit 25–Wolverine Trapping

Unit 25C—No limit

Nov. 1–Mar. 31.

Unit 25, remainder—No limit

Nov. 1–Mar. 31.

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal subsistence users/wildlife:

Extending the wolverine hunting and trapping season will provide federally qualified subsistence users more harvest opportunity under State regulations. Changing weather patterns and late springs have allowed access and reportedly kept fur in prime condition later in the season.

Little is known about the Unit 25A wolverine population as they are difficult to study. Most information regarding wolverines comes from sealing records and the annual trapper questionnaire, which in 2021 had a reporting rate of only 6.7% in Region 3. The relative abundance of wolverines was reported as scarce but with no change in population trend. Using harvest as an index for population, sealing records show harvest has remained stable since RY2016, indicating the wolverine population has also remained stable (Bogle 2022). OSM has some reservations over the possibility of trapping lactating females with kits during April, which could have a disproportionate impact on the wolverine population. Any increases in harvest resulting from this proposal are expected to be small due to the remoteness of Unit 25A and likely low harvest pressure throughout the unit.

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: No conservation concerns appear to exist for the Unit 25 wolverine population as harvest has remained stable. However, an April season could result in higher mortality of females with kits. Also, the additional opportunity to harvest wolverine later in the season under State regulations benefits federally qualified subsistence users.

Literature Cited

Bogle, S. E. 2021. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau.

PROPOSAL 171 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Change all general season harvest ticket hunts to registration permits for moose in Units 20A, 20B, 20C, 20F and 25C.

Current Federal Regulations:

Unit 20—Moose

Unit 20A—1 antlered bull.

Sept. 1–20.

Unit 20B—1 antlered bull

Sept. 1–20.



Unit 20C, that portion within Denali National Park and Preserve west of the Toklat River, excluding lands within Mount McKinley National Park as it existed prior to December 2, 1980—1 antlered bull; however, white-phased or partial albino (more than 50 percent white) moose may not be taken Sept. 1–30.
Nov. 15–Dec. 15.

Unit 20C, remainder—1 antlered bull; however, white-phased or partial albino (more than 50 percent white) moose may not be taken Sept. 1–30.

Unit 20F, that portion within the Dalton Highway Corridor Management Area—1 antlered bull by Federal registration permit only Sept. 1–25

Unit 20F, remainder—1 antlered bull Sept. 1–30.
Dec. 1–10.

Unit 25C—Moose

Unit 25C—1 antlered bull Aug. 20–Sept. 30.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal would increase the regulatory burden on federally qualified subsistence users by requiring them to obtain a registration permit. However, the data provided if this proposal was adopted would be extremely useful in tracking harvest of moose, including determining if overharvest is occurring. This would allow ADF&G to collect more reliable harvest and effort data and help maximize moose hunting opportunity and harvest. This proposal would also allow for increased management flexibility and quicker responses to changing conditions by allowing for more responsive management action via improved harvest monitoring.

However, federally qualified subsistence users could still harvest moose on Federal public lands with only a harvest ticket under Federal regulations if this proposal was adopted. Due to the mix of State and Federal public lands within these units, in order for this proposal to be truly effective, a similar proposal would need to be adopted by the Federal Subsistence Board. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 171

Rationale: This proposal would aid in the conservation and management of a vital subsistence resource while helping to maximize moose hunting opportunity and harvest.



PROPOSAL 182 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the brown/grizzly bear season in Units 20A, 20B, and 25C for residents and nonresidents by two weeks to close on June 15.

Note: These comments only apply to the resident season. OSM has no position on the nonresident season.

Current Federal Regulations:

Unit 20–Brown Bear

Unit 20A—1 bear *Sept. 1 – May 31*

Unit 20 remainder—1 bear *Sept. 1 – May 31*

Unit 25–Brown Bear

Unit 25C—1 bear *Sept. 1 – May 31*

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adopting this proposal would provide additional opportunity for federally qualified subsistence users to harvest brown bears in Units 20A, 20B, and 25C under State regulations. It would also likely increase brown bear harvests in these units, particularly over bait.

Readily available information for brown bears in these subunits is sparse and very outdated. However, in regulatory years (RY) 2009-11, the mountainous portion of Unit 20A with high densities of brown bear well exceeded the human-caused mortality objective of $\leq 8\%$ of the bears ≥ 2 years old, with a human-caused mortality of 16-20% in regulatory years (RY) 2009-11 (Young 2013). The second portion of Unit 20A, referenced as the flats, has low densities of brown bears, and appears to be a location for emigration from the higher density areas (Young 2013). This area has met the human-caused mortality objective of ≤ 3 bears of the bears ≥ 2 years old in RY2009-11 (Young 2013). Overall Unit 20A is exceeding its human caused mortality objective and not meeting the objective for the mean portion of harvest to be $\geq 55\%$ male brown bear (Young 2013).

Unit 20B has objectives for the eastern portion for a 3-year mean human caused mortality of 6 bears ≥ 2 years old (Young 2013). This objective was exceeded in RY 2011-13 with 8 bears ≥ 2 years old. The western portion of Unit 20B has a 3-year mean human caused mortality of ≤ 3 bears that are ≥ 2 years old. This management objective was met in RY2011-2013 with a 3-year mean human caused mortality of 1.7 bears (Young 2013).



Unit 25C has a medium density of brown bears. This area has roads and trails throughout providing easy access for hunters but has maintained brown bear harvest below management objectives. The primary harvest of brown bears in this area is incidental to moose and caribou harvest (Young 2013). This area has been below the human-caused mortality objective of ≤ 6 bears of the bears ≥ 2 years old in RY2009-11 (Young 2013).

Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

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

Rationale: Currently, no conservation concerns exist for brown bears in Units 20A, 20B, and 25C. Based on currently available information, the human caused mortality objectives were being met or exceeded across all three subunits. Increasing the harvest of brown bears in Units 20A, 20B, and 25C may not be sustainable for these brown bear populations. OSM does not have enough current biological or harvest information to effectively evaluate the conservation concerns for and impacts of this proposal on these brown bear populations.

Literature cited

Young Jr., D. D. 2013. Units 20A, 20B, 20C, 20F, and 25C brown bear. Pages 215–232 [In] P. Harper and L. A. McCarthy, editors. Brown bear management report of survey and inventory activities 1 July 2010–30 June 2012. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2013-4, Juneau, AK.

PROPOSAL 183 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the brown/grizzly bear hunting season in Unit 20A by two weeks to close on June 15.

See comment on proposal 182.

PROPOSAL 184 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Lengthen the brown/grizzly bear hunting season in Unit 20A by three weeks to open August 10.

See comment on proposal 182.

PROPOSAL 185 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Extend the brown/grizzly bear hunting season in Unit 20A and Unit 20B remainder to close on June 30, to align with the rest of Unit 20.

See comment on proposal 182.

**PROPOSAL 187 – 5 AAC 84.270. Furbearer trapping.**

Lengthen the wolverine trapping season in Units 20A, 20B, 20D, and 20F by two weeks to align with 20C.

Current Federal Regulations:**Unit 20–Wolverine Trapping**

Wolverine: No limit

Nov. 1–Feb. 28.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Extending the season in Unit 20C, remainder will allow federally qualified subsistence users trapping wolverine under State regulations more harvest opportunity. Changing weather patterns has allowed for more access later in the season and has reportedly kept fur in the prime for longer times.

Little is known about the wolverine population in this region as they are difficult to study. Most information regarding wolverines comes from sealing records and the annual trapper questionnaire, which in 2021 had a reporting rate of only 6.7% in Region 3. The relative abundance of wolverines was reported as scarce but with no change in population trend. Using harvest as an index for population, sealing records show harvest has remained stable since RY2016, indicating the wolverine population has also remained stable (Bogle 2022). As the proponent mentions, much of Unit 20C is comprised of Denali National Park where no trapping occurs under State regulations, and most of the unit is very remote and likely receives little trapping pressure.

Adopting this proposal would misalign State and Federal wolverine trapping season dates in Unit 20C, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: No conservation concerns appear to exist as the wolverine population in Unit 20C has produced stable harvest recently. Also, the additional opportunity to harvest wolverine later in the season under State regulations benefits federally qualified subsistence users.

Literature Cited

Bogle, S. E. 2021. 2020 Alaska trapper report: 1 July 2020–30 June 2021. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-3, Juneau.



PROPOSAL 189 – 5 AAC 92.015. Brown bear tag fee exemptions.

Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.

See comments for Proposal 48.

PROPOSAL 190 – 5 AAC 92. 92.015. Brown bear tag fee exemptions.

Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A.

See comments for Proposal 48.

PROPOSAL 191 – 5 AAC 85.045(4). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 6C.

Current Federal Regulations:

Unit 6C–Moose

Unit 6C–1 antlerless moose by Federal drawing permit (FM0603) Sept. 1- Oct. 31 only. Permits for the portion of the antlerless moose quota not harvested in the Sept. 1 – Oct. 31 hunt may be available for redistribution for a Nov. 1 – Dec. 31 hunt.

Unit 6C–1 bull by Federal drawing permit (FM0601) only. Sept. 1- Dec. 31

In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose may not receive a Federal permit. The annual harvest quota will be announced by the U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits.

Federal public lands are closed to the harvest of moose except by federally qualified users with a Federal permit for Unit 6C moose, Nov. 1 – Dec. 31.

Is a similar issue being addressed by the Federal Subsistence Board? No. However, in April 2024 the Board will consider Wildlife Closure Review WCR24-41, which reviews the closure to moose hunting in Unit 6C on Federal public lands by non-federally qualified users from Nov. 1 – Dec. 31.

Impact to Federal subsistence users/wildlife: The moose population in Unit 6C is cooperatively managed by the U.S. Forest Service (USFS) Cordova Ranger District and ADF&G. The strategies used



are a result of the cooperative moose management plan developed by the Prince William Sound/Copper River Delta AC, ADF&G and local residents. Part of the management plan allocates 75% of bull harvest permits to federally qualified subsistence users and the remaining 25% for people hunting under State regulations, while 100% of the antlerless moose permits are allocated to federally qualified subsistence users (OSM 2020a).

Therefore, this proposal would have a minimal effect on federally qualified subsistence users as they are allocated 100% of the antlerless moose permits under Federal regulations. As ADF&G notes in their proposal, an antlerless moose hunt has not occurred in Unit 6C under State regulations since 1999 (ADF&G 2023). Close coordination between the Federal in-season manager and ADF&G is important if this hunt ever occurs.

The Unit 6C moose population management objective is to maintain a post hunting population of 600-800. The moose population estimate for 2022/23 was 504 (Namitz 2023). This is the first time since 2010/11 that the moose population has been below the management objective.

No impact to the Unit 6C moose population is expected if this proposal is adopted due to the close management of harvest quotas and permits.

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

Rationale: Re-authorizing State antlerless moose seasons in Unit 6C provides management flexibility, although they are unlikely to be held due to current management strategies and harvest allocations.

Literature Cited

ADF&G. 2023. On-Time Public Comments Alaska Board of Game proceedings. March 17-23, 2023. <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=03-17-2023&meeting=kenai>. ADF&G. Juneau, AK.

Namitz, S. 2023. Chugach National Forest District Ranger. Personal communication: email. U.S. Forest Service. Cordova, AK.

OSM. 2020a. Staff analysis WCR20-41. Pages 801-813 *in* Federal Subsistence Board Meeting Materials. April 21-23, 2020. Office of Subsistence Management, USFWS. Anchorage, AK. 1455 pp.



PROPOSAL 192 – 5 AAC 85.045(a)(11). Hunting season and bag limit for moose.

Reauthorize the antlerless moose season in Unit 13A.

Current Federal Regulations:

Unit 13 Remainder–Moose

Unit 13 remainder—1 antlered bull moose by Federal registration (FMI301) only. Aug. 1 – Sept. 20

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: This proposal will provide federally qualified subsistence users continued opportunities to harvest antlerless moose and has long-term benefits for the moose population by maintaining it within management objectives at sustainable levels. The population objectives for moose in Unit 13A is 3,500-4,200, and all of Unit 13 is 17,000-21,400. As of 2019 the moose population in Unit 13 was 18,997 and had been within management objectives since 2007 (OSM 2020b). As mentioned by ADF&G in their proposal, the 2022 moose population estimate for Unit 13A was within management objectives at 3,621 moose.

The antlerless season in Unit 13A provides additional opportunity for federally qualified subsistence users, management flexibility by allowing local managers to respond to changing population and harvest dynamics and is closely managed through draw permit numbers, ensuring sustainable harvests at no more than 1% of the cow population.

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

Rationale: Antlerless moose hunts are an important aspect of moose management in much of Unit 13A and increase hunting opportunity for federally qualified subsistence users. As the number of antlerless moose permits issued in Unit 13A is adjusted annually, accounting for current population metrics, reauthorizing the antlerless hunt poses little threat to the conservation status of this moose population.

Literature Cited

OSM. 2020b. Staff analysis WSA20-03. Office of Subsistence Management, USFWS. Anchorage, AK. 50 pp.



PROPOSAL 193 – 5 AAC 85.045(a)(11). Hunting season and bag limit for moose.

Reauthorize the antlerless moose season in Unit 13C.

Current Federal Regulations:

Unit 13 Remainder–Moose

Unit 13 remainder—1 antlered bull moose by Federal registration (FMI301) only. Aug. 1 – Sept. 20

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal will provide federally qualified subsistence users continued opportunities to harvest antlerless moose and has long-term benefits for the moose population by maintaining it within management objectives at sustainable levels. The population objectives for moose in Unit 13C is 2,000-3,000, and all of Unit 13 is 17,000-21,400. As of 2019 the moose population in Unit 13 was 18,997 and had been within management objectives since 2007 (OSM 2020b). As mentioned by ADF&G in their proposal, the Unit 13C moose population may be approaching carrying capacity, and cow harvest is necessary to help stabilize the population at more productive levels.

The antlerless season in Unit 13C provides additional opportunity for federally qualified subsistence users, management flexibility by allowing local managers to respond to changing population and harvest dynamics and is closely managed through draw permit numbers, ensuring sustainable harvests at no more than 1% of the cow population.

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

Rationale: Antlerless moose hunts are an important aspect of moose management in much of Unit 13C and increase hunting opportunity for federally qualified subsistence users. As the number of antlerless moose permits issued in Unit 13C is adjusted annually, accounting for current population metrics, reauthorizing the antlerless hunt poses little threat to the conservation status of this moose population.

Literature Cited

OSM. 2020b. Staff analysis WSA20-03. Office of Subsistence Management, USFWS. Anchorage, AK. 50 pp.



PROPOSAL 194 – 5 AAC 85.045(a)(11). Hunting season and bag limit for moose.

Reauthorize the antlerless moose season in Unit 13E.

Current Federal Regulations:

Unit 13E–Moose

Unit 13E—1 antlered bull moose by Federal registration permit only; only 1 Aug. 1 – Sept. 20 permit will be issued per household

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: This proposal will provide federally qualified subsistence users continued opportunities to harvest antlerless moose and has long-term benefits for the moose population by maintaining it within management objectives at sustainable levels. The population objectives for moose in Unit 13E is 5,000-6,000, and all of Unit 13 is 17,000-21,400. As of 2019 the moose population in Unit 13 was 18,997 and had been within management objectives since 2007 (OSM 2020b). As mentioned by ADF&G in their proposal, moose abundance in Unit 13E exceed objectives, and cow harvest is necessary to help stabilize the population at more productive levels.

The antlerless season in Unit 13E provides additional opportunity for federally qualified subsistence users, management flexibility by allowing local managers to respond to changing population and harvest dynamics and is closely managed through draw permit numbers, ensuring sustainable harvests at no more than 1% of the cow population.

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

Rationale: Antlerless moose hunts are an important aspect of moose management in much of Unit 13E and increase hunting opportunity for federally qualified subsistence users. As the number of antlerless moose permits issued in Unit 13C is adjusted annually, accounting for current population metrics, reauthorizing the antlerless hunt poses little threat to the conservation status of this moose population.

Literature Cited

OSM. 2020b. Staff analysis WSA20-03. Office of Subsistence Management, USFWS. Anchorage, AK. 50 pp



PROPOSAL 197 – 5 AAC 85.045(5). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C.

NOTE: These comments only apply to Unit 7.

Current Federal Regulations:

Unit 7—Moose

Unit 7, that portion draining into Kings Bay - Federal public lands are closed to the taking of moose except by residents of Chenega Bay and Tatitlek *No open season*

Unit 7, remainder—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only *Aug. 20 - Sep. 25*

Unit 14—Moose

No Federal regulations. *No Federal open season.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal will provide federally qualified subsistence users continued opportunities to harvest antlerless moose under State regulations and has long-term benefits for the moose population. In the Twentymile/Portage/Placer drainages, where the moose population greatly fluctuates in tandem with the weather and winter severity, antlerless hunts provide a management tool to maintain the population within desired levels. Population metrics associated with these moose have shown increases over the last several years. Because the number of antlerless permits issued for the Twentymile/Portage/Placer hunt is adjusted annually, accounting for current population metrics, there are no conservation concerns.

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

Rationale: Federally qualified subsistence users benefit from the additional opportunity of State managed antlerless moose hunts. Additionally, these hunts are an important management tool to keep the moose population within management objectives.

**PROPOSAL 199 – 5 AAC 85.045(13). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 15C.

Current Federal Regulations:**Unit 15 – Moose**

Units 15A remainder, 15B, and 15C - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only Aug. 20-Sept. 25.

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

Unit 15C - 1 cow by Federal registration permit only Aug. 20-Sept. 25.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users can already harvest cow moose with a Federal subsistence registration permit on Federal public lands during the fall in Unit 15C, although Federal public lands only comprise 28% of Unit 15C and habitat can be a limiting factor during winters with deep snow accumulations. Reauthorizing the antlerless moose season in this subunit would provide additional opportunity for Federally qualified subsistence users who can receive a State AM550 or DM549 permit to harvest an antlerless moose on State managed lands.

Antlerless moose harvest is limited by annual quotas and the number of permits available. According to ADF&G estimates, the moose population in Unit 15C is stable and within management objectives (Herreman 2022) and the moose population can withstand restricted cow harvest. Because there are such high densities of moose in the area, large snow events may concentrate moose on or near human habitats and roadways, creating negative interactions with humans. Having the flexibility to manage this moose population via drawing permit and targeted hunts allows ADF&G to maintain the moose population at sustainable levels.

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

Rationale: Federally qualified subsistence users benefit from the additional opportunity of State managed antlerless moose hunts. These hunts allow take of a limited number of cows in specific areas to keep the population within management objectives. Reauthorizing the State antlerless season will also maintain management flexibility within the unit, mitigating moose-vehicle collisions and other negative moose-human interactions.



Literature Cited

Herreman, J. 2022. Moose management report and plan, Game Management Unit 15: Report period 1 July 2015-30 June 2020, and plan period 1 July 2020-30 June 2025. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2022-24, Juneau, AK.

PROPOSAL 200 – 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 17A.

Current Federal Regulations:

Unit 17A–Moose

Unit 17A—1 bull by State registration permit. Aug. 25 – Sept. 25
OR

1 antlerless moose by State registration permit Aug. 25 – Sept. 25
OR

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

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose and has long-term benefits for the moose population by maintaining it within management objectives at sustainable levels. The antlerless hunt in the fall and winter helps to limit the Unit 17A moose population growth and allows hunters to harvest surplus animals.

An antlerless season was opened in December 2013 in support of the Unit 17A Moose Management Plan. Under the plan, an antlerless moose hunt can be offered when the moose population is increasing, and the population reaches a minimum of 600 moose, while a two moose harvest limit is permitted when the population exceeds 1,200 moose. In March of 2017, the Unit 17A moose population estimate was 2,369 ± 564 and growing (OSM 2020c). While the 2017 population estimates are outdated, ADF&G attests in their proposal that the Unit 17A moose population is growing and can sustain additional harvest.

The antlerless season in Unit 17A provides additional opportunity for Federally qualified subsistence users, management flexibility by allowing local managers to respond to changing population and harvest dynamics and is closely managed through quotas (OSM 2020c).



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

Rationale: Antlerless moose hunts are an important aspect of moose management in much of Unit 17A and increase hunting opportunity for Federally qualified subsistence users. No conservation concerns exist as the antlerless season is in-line with the Unit 17A Moose Management Plan.

Literature Cited

OSM. 2020c. Staff analysis WP20-28/29. Pages 416-429 in Federal Subsistence Board Meeting Materials. April 21-23, 2020. Office of Subsistence Management, USFWS. Anchorage, AK. 1455 pp

PROPOSAL 207 – 5 AAC 92.990(30). Definitions.

Repeal the age criteria for full-curl horn rams for Dall sheep hunts in Interior and Eastern Arctic Region Units.

Current Federal Regulations:

§100.25(a) Definitions:

Full curl horn means the horn of a Dall sheep ram; the tip of which has grown through 360 degrees of a circle described by the outer surface of the horn, as viewed from the side, or that both horns are broken, or that the sheep is at least 8 years of age as determined by horn growth annuli.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may harvest a full curl ram judged by any of three different methods; measuring the curl, if both horn tips are broken, and by counting annuli under Federal regulations. If this proposal is adopted, counting of horn annuli would be eliminated as a method for determining full-curl rams in Units 12, 19, 20, 24, 25, 26B and 26C under State regulations. Removing one method of determining a legal ram under a full-curl harvest limit might require additional time observing rams before harvesting, but it should not substantially impact federally qualified subsistence users' opportunity to harvest sheep under State regulations.

Sub-legal harvest of sheep has been noted during the sealing process and reported by three ADF&G offices during the 2022 season. A total of 26 out of 315 harvested sheep reported, or 8.2%, were declared sublegal during the 2022 season. This is up from the 3-4% estimated annual sublegal harvest from the 2015-2019 sheep seasons. Anecdotally reported at the time of sealing, the most common mistake leading to sublegal harvest was attributed to hunters aging sheep by annuli, of which 42% were hunters using the services of a guide (ADF&G 2022). Aging of sheep in the field, at a distance is extremely difficult and ADF&G recommends to hunters not to use this method for determining legality of a ram in their publication, *Dall Sheep Hunting: Full-curl identification guide* (Taras 2016).



Adopting this proposal would misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open Federal wildlife proposal window in early 2025.

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

Rationale: Adopting this proposal would remove a difficult method of aging sheep in the field. All users would still be able to identify full-curl rams for harvest by either of the two remaining methods. Given the current declines in sheep populations and relatively high rate of sublegal rams harvested in 2022, removing this method would benefit sheep by helping to keep sublegal rams in the population to bolster productivity and aid in recovery of sheep populations.

OSM supports removing this method of aging sheep on a Statewide basis but recognizes that would require a follow-up proposal during the next Statewide regulatory cycle. However, given the current declines of sheep populations statewide, but particularly in Units 19C and in the Central Brooks Range, OSM urges the Board of Game to remove this method on a regional basis until it can be addressed on a Statewide level.

Literature Cited

Alaska Department of Fish and Game. 2022. Board of Game Sheep Informational Meeting Presentation. Alaska Department of Fish and Game, Division of Wildlife Conservation.

Taras, M. 2016. Dall sheep hunting: Full-curl identification guide. 2017. Alaska Department of Fish and Game, Division of Wildlife Conservation, Fairbanks.

PROPOSAL 208 - 5 AAC 85.045. Hunting seasons and bag limits for moose.

Lengthen the RM682 moose hunting season in Unit 19E by five days.

Current Federal Regulations:

Unit 19A—Moose

Unit 19A, north of the Kuskokwim River, upstream from but excluding the George River drainage, and south of the Kuskokwim River upstream from and including the Downey Creek drainage, not including the Lime Village Management Area—1 antlered bull by State registration permit available in Sleetmute and Stoney River on July 24. Permits issued on a first come, first served basis (number of permits to be announced annually). Sept. 1-5.

Is a similar issue being addressed by the Federal Subsistence Board? No. However, Wildlife Proposal WP24-24 requests dividing Unit 19A into two subunits (Units 19A and 19E) to align with State subunit boundaries.



Impact to Federal subsistence users/wildlife: Adopting this proposal would provide an additional five days of harvest opportunity under State regulations, which would increase harvest opportunities for federally qualified subsistence users. Allowing proxy hunting would also benefit federally qualified subsistence users, supporting sharing networks.

The additional harvest opportunity could also increase pressure on the moose population, hampering further growth. However, this moose population has steadily increased since 2004 and permit numbers can be adjusted annually to help keep harvest within sustainable levels. The bull:cow ratios have also been high since 2018 (40-63 bulls:100 cows), indicating surplus bulls are available for harvest (ADF&G 2023).

Adopting this proposal would misalign State and Federal seasons, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in early 2025.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 208.

Rationale: This proposal would increase hunting opportunity for users and the moose population has continued to increase since limited hunting was opened in 2019. Permit numbers can be annually adjusted to address potential conservation concerns.

Literature Cited

ADF&G. 2023. Annual Report to the Alaska Board of Game on Intensive Management for Moose with Wolf, Black Bear, and Grizzly Bear Predation Control in Game Management Unit 19E. Alaska Department of Fish and Game. Division of Wildlife Conservation. February 2023.
https://www.adfg.alaska.gov/static/research/programs/intensivemanagement/pdfs/2023_gmu_19e_intensive_management_annual_report.pdf Accessed January 24, 2024.



PC85

Name: Rebecca OHara

Community of Residence: Anchorage, Alaska

Comment:

I wholeheartedly and enthusiastically support Proposal 186. As a frequent visitor to Denali National Park for almost 50 years I concur that wildlife viewing is a highlight of visiting the park. I can also state that in the past 30 or so years wolves are very rarely sighted, if ever, especially near the front end of the park. In my earlier visits to the park it was not uncommon to see wolves, even from the road on the bus. This area is one small part of Alaska that is worth preserving from hunting and trapping.

Proposal 186: Support



PC86

Name: Steven O'Hara

Community of Residence: Anchorage, Alaska

Comment:

I support proposal 186. The wolves of Denali enrich the lives of the American people. It is in the national interest to preserve the wolves of Denali. It is in the national interest to preserve opportunities for the maximum number of Americans to view wolves in Denali National Park and Preserve. Nearly 600,000 visitors to the park in 2016 translates into a high probability that millions of Americans will visit the park over the coming years. Yet the likelihood that these millions of Americans will see a wolf in the park has become insignificant. In my personal experience, I have not seen a wolf in Denali for many years now, whereas in the past I saw wolves not very far into the park. I was riding a park bus when I saw the wolves. However, this has all changed, which is one of the many reasons I support proposal 186.

Proposal 186: Support



PC87

Name: Christina Owen

Community of Residence: North Pole

Comment:

Ladies and Gentlemen, let's refocus our attention on the core issues driving the impact on sheep, and more critically, consider who truly benefits from these proposed changes. Firstly, it's essential to recognize that hunters constitute only a marginal fraction of sheep harvests. Alaska needs to acknowledge that the predominant factors contributing to mature ram deaths are weather-related and predator kills. While we may not have control over the weather, empowering

guides to manage their respective areas can effectively mitigate predator threats, such as wolves and bears.

Secondly, let's scrutinize Proposal 45, revealing a self-serving agenda that prioritizes personal interests over the well-being of the sheep population. The proposition to restrict Alaska residents to one harvest ticket every four years is not only deeply troubling but also presents a stark contrast to the individuals who put forth this proposal—affording them the freedom to guide and harvest as many sheep as their bookings allow. This discrepancy raises concerns about the fairness and equity of the proposed measures.

Proposal 43: Oppose

Proposal 44: Oppose

Proposal 45: Oppose



PC88

Name: Connor Owen

Community of Residence: North Pole Alaska

Comment:

Ladies and Gentlemen, let's refocus our attention on the core issues driving the impact on sheep, and more critically, consider who truly benefits from these proposed changes. Firstly, it's essential to recognize that hunters constitute only a marginal fraction of sheep harvests. Alaska needs to acknowledge that the predominant factors contributing to mature ram deaths are weather-related and predator kills. While we may not have control over the weather, empowering guides to manage their respective areas can effectively mitigate predator threats, such as wolves and bears.

Secondly, let's scrutinize Proposal 45, revealing a self-serving agenda that prioritizes personal interests over the well-being of the sheep population. The proposition to restrict Alaska residents to one harvest ticket every four years is not only deeply troubling but also presents a stark contrast to the individuals who put forth this proposal—affording them the freedom to guide and harvest as many sheep as their bookings allow. This discrepancy raises concerns about the fairness and equity of the proposed measures.

Proposal 43: Oppose

Proposal 44: Oppose

Proposal 45: Oppose



PC89

Name: Spencer Pape

Community of Residence: Wasilla, Alaska

Comment:

To the Board of Game,

Proposal 44 & 45. I am in support of making the bag limit for both residents and nonresidents to 1 full curl ram every 4 years will be instrumental in preserving and strengthening Dall sheep and lesson the overall hunting pressure on Dall sheep. Similar to the 1 brown bear every 4 years on the Alaska peninsula and Kodiak. One might argue taking a ram every year is necessary to provide food on the table. However, based on the States overall success rate of under 25% per year. The chances of a successful harvest is already 1 in every 4 years.

Proposal 64. I am in full support of of turning the RM653 moose registration hunt within 19C into a draw area for all users. With 100 tags to residents, 14 to unguided nonresidents and 6 to guide required nonresidents. The ease of access within the area(large airstrip and ATV trails) and the way moose migrate through make it impossible to achieve the harvest goal of 70 bull moose (department biologist recommendation) a year. The registration hunt has been in place for the past 4 seasons and every year the overall harvest has been 15 to 20% above it's goal of 70 bull moose. The Board approved the proposal to make the RM653 area a draw for up to 20 nonresident tags at the meeting in Soldotna last spring. I recommend taking that proposal a step forward and making a percentage of those nonresident tags guide required. Similar to DM811, 819, 823,825 and 839 in Unit 21. The 2023 RM653 season recorded 96 bull moose taken, 16 of which were sublegal. This sublegal take is 2 to3 times the historical take for the area. By making a percentage of the tags guide required will help curb the sublegal take. Unit 19C has a deep rooted history of big game guiding. Within that, guide use area 19-09 is 75% comprised of the RM653 hunt area and private lands. I myself am a big game guide and guiding in 19-09 for the past 13 years and currently hold a guide concession on the private land within. With the closure of nonresident sheep hunting and the RM653 moose registration hunt going to a draw for nonresidents, it has destroyed the lively hood of myself and other guides that operate in the area.

Proposal 78. I support reopening a nonresident Dall sheep season in 19C. The department and studies have proved that harvesting full curl or larger Dall rams does not effect the overall population. Limiting user groups will not bring the Dall sheep population back up or any other ungulate species. Mild winter conditions, habitat improvements and predator control is key and has been proven to increase ungulate populations.

Proposal 96. I support the proposal to lengthen the grizzly bear season in unit 19C. I have witnessed a steady increase in grizzly bear population in 19-09 over the past 5 years. This increase has been detrimental to the ungulate calf survival rates within the area. Extending the season will give all user groups the liberty to harvest a grizzly while hunting for other species and decrease any defense of life or property take.

Proposal 101. I support the proposal to allow the taking of a grizzly bear over bait in the spring. Harvesting of black bears over bait is already permitted. By allowing the take of grizzly during the same period will decrease any illegal take, help maintain a healthy bear population and decrease bear predation on ungulates.

Thank you for your time, consideration of my proposals and dedication to the State of Alaska.

Proposal 44: Support
Proposal 45: Support
Proposal 48: Support
Proposal 50: Support
Proposal 52: Support
Proposal 55: Support
Proposal 57: Support
Proposal 58: Support
Proposal 60: Support
Proposal 61: Support
Proposal 62: Support
Proposal 63: Oppose
Proposal 64: Support
Proposal 65: Support
Proposal 73: Support

Proposal 76: Support
Proposal 77: Support
Proposal 78: Support
Proposal 79: Support
Proposal 80: Support
Proposal 81: Support
Proposal 82: Oppose
Proposal 83: Oppose
Proposal 84: Support
Proposal 85: Oppose
Proposal 86: Oppose
Proposal 87: Support
Proposal 88: Oppose
Proposal 91: Support
Proposal 92: Oppose

Proposal 93: Support
Proposal 94: Support
Proposal 95: Support
Proposal 96: Support
Proposal 97: Support with Amendment
Proposal 98: Support
Proposal 99: Support
Proposal 101: Support
Proposal 102: Oppose
Proposal 108: Support
Proposal 109: Support
Proposal 116: Support
Proposal 122: Support
Proposal 123: Support



PC90

Name: Shaun Patterson

Community of Residence: Fairbanks, Alaska

Comment:

I support proposal 176 that will change the regulations for out of state hunters. The Salcha River valley has seen increased pressure over the last number of years and a tightening of regulations on out of state hunters will help ease that.

Proposal 176: Support



PC91

Name: Richard Piliero

Community of Residence: Vermont

Comment:

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed

information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.



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**Resident Hunters of Alaska (RHAK)
Comments to Alaska Board of Game
Region III Interior & Eastern Arctic Meeting
March 15 – 22, 2024**

Proposals we support: 82, 89, 90, 93-99, 101, 105, 106, 112, 120-121, 130, 135, 136, 144, 155, 158, 167, 169, 176, 180-185.

Proposals we oppose: 43-46, 76-81, 83-88, 91, 92, 111, 117-119, 131-134, 142, 154, 159-162, 172, 177, 186.

General Comments on Proposals

Nonresident Sheep Hunting Opportunities in Region III

RHAK’s position is that all nonresident sheep hunting in Region III should be limited via draw-only permits with a limited allocation. See our *Proposals 82, 144, & 181* that ask for these limits on nonresident sheep hunters in Units 19C, 24A & 26B, and 20A.

The Board of Game advocated for – and the state spent several hundred thousand dollars on – a previous Sheep Working Group and the Brinkman sheep survey, which reached consensus on these two recommendations to the board:

1. All nonresident sheep hunting should be limited
2. Resident sheep hunters should have a sheep hunting priority

RHAK’s position mirrors the consensus of the former Sheep Working Group and Brinkman survey.

Crowding and Conflicts among Sheep Hunters and Guides on State Lands

In 2008, the guide industry, represented by the Alaska Professional Hunters Association (APHA), made this statement: *“Currently, overcrowding of guides on State lands combined with decreasing wildlife populations is stimulating social disorder between hunter user groups and biological harm to our wildlife, which leads to establishment of the restrictive drawing permit hunts.”*

This statement came with a request to Governor Palin for \$200,000 for initial funding to work on a Guide Concession Program (GCP) that would limit guides on state lands. This solution would come with “exclusive” concessions for individual guides and was much



preferable to the guide industry than nonresident sheep hunters – their clients – being limited via draw-only hunt opportunities.

The Board of Game (BOG) fully agreed with APHA that the known problems surrounding sheep hunting on state lands were being caused by “too many guides.” Even the Big Game Commercial Services Board (BGCSB) – the body that regulates guides – said the problems were being caused by “too many guides.” And both boards, instead of using their authority to limit the number of hunters (BOG), or guides (BGCSB), said the GCP was the only solution to the known problems.

More than a million dollars was spent on a proposed GCP under the authority of the Department of Natural Resources. The state even paid for a meeting in the lower-48 for nonresident guides. But after all that money spent, and legislation introduced to authorize such a program, the legislature wanted nothing to do with approving something that was legally questionable and came with a million-dollar fiscal note to get it started. Yet the BOG and the BGCSB are still saying that a GCP is the only way to fix the known problems.

Let’s be clear: the problem was never “too many guides.” The problem is too many nonresident sheep hunters *who are required to hire a guide* being given unlimited sheep hunting opportunity by the Board of Game. The Board of Game has the authority to limit nonresident sheep hunters; they don’t have to propose new legislation to do so or spend a million dollars to figure out a solution.

Economic Considerations

Every cycle that RHAK has proposed limits on nonresident sheep hunters, the guide industry and the Board of Game have opined that we could not afford to lose the funding brought in by those nonresident sheep hunters to the Department from the sale of hunting licenses, tags, and matching federal funds. This rationale was another one of the stated reasons the board chose not to pass any of our RHAK proposals to limit nonresident sheep hunters.

At the same time, the guide industry and the Board of Game have stuck with the proposed Guide Concession Program as the only solution to the known problems addressed by APHA in 2008, which if enacted is supposed to strictly *limit* guides on state lands.

Yet, at no time has the guide industry or the Board of Game expressed any economic concerns whatsoever over a concession program on state lands that would limit guides, thereby reducing the number of their nonresident sheep-hunting clients. ***Fewer guides = fewer nonresident sheep hunters = fewer dollars going to the Department.***

Again, the problem was never too many guides; it is too many nonresident sheep hunters who are required to hire a guide being given unlimited sheep hunting opportunity by the BOG.

Reductions to Resident Sheep Hunting Opportunities

There are several proposals to reduce resident sheep hunting opportunities. We don’t support any reduction in resident sheep hunting opportunities due to conservation or other concerns unless and until the nonresident component is addressed first.



The board needs to be truthful about the current nonresident one-sheep-every-four-years regulation; ***that regulation does absolutely nothing to reduce the number of nonresident sheep hunters.*** The worldwide demand to hunt Dall sheep far exceeds the number of Dall sheep hunting opportunities guides can provide in Alaska and Canada.

Before any resident general sheep hunting opportunities can be reduced, nonresident general sheep hunting opportunity should be eliminated.

State Management Authority of our Wildlife Resources

RHAK was founded in 2016 and our mission is tied to Article 8 of our state constitution that holds our wildlife as a public trust for the common use of Alaskans. We do not want to voluntarily cede any of the authority to manage and allocate our wildlife to the federal government on any lands within the state.

However, within the Arctic National Wildlife Refuge (ANWR), where guides have exclusive concession areas, the Board of Game allows federal managers to dictate how many sheep can be taken by guided hunters within each concession area.

The way it works, a guide who applies for a concession area submits a prospectus that outlines how many sheep hunting clients he or she intends to take on, and the maximum number of sheep they may harvest. If federal managers approve, a contract is signed, that typically lasts for ten years. Federal managers are essentially allocating our sheep resource to the guides with exclusive concessions within ANWR.

What is odd is that this isn't the norm for other federal Refuge lands where guides have exclusive concessions. On those other Refuge lands, the Board of Game allocates our wildlife via draw hunts that apply to each concession area. The board doesn't let the feds determine allocations. This is the emphasis of our *Proposal 158*, which asks the board to take over the allocation of our sheep resource to guides within ANWR.

The Board of Game should put all nonresident guided sheep hunters within ANWR on draw-only hunts with a limited up-to allocation for each concession area that has sheep. The up-to number of permits can be equal to the number of sheep guided hunters are currently allowed to harvest under the guide's prospectus and contract, so that it doesn't take away any of the existing federal allocations. Then, if/when there are sheep conservation concerns, the Board of Game can make adjustments if needed to the number of permits available.

This is how it works on most all other federal Refuge lands. We see no reason why the board has allowed the feds to allocate our sheep resource to guided hunters on federal lands within ANWR, instead of that being under state management authority.

Fortymile Caribou Herd Declines & Issues

The Fortymile caribou herd has declined, and there appears to be range/habitat issues preventing a rebound of the population. With the closure of Nelchina caribou hunting due to that herd's declines, the Fortymile caribou hunt is one of the last road-accessible caribou hunts in the state that provides opportunity for residents to put food in their freezers.



The Fortymile caribou herd is an Intensive Management population recognized as important for providing food for Alaskans, with a population objective of 50,000 – 100,000 animals, and a harvest objective of 1,000 – 15,000 animals. We are well under the population objective and are not meeting the harvest objective.

In 2023, nonresident caribou hunters took 22% of the fall Fortymile caribou harvest of a declining population that is ostensibly managed to provide food for Alaskans. In looking at the harvest data, the majority of the nonresident harvest occurs along the road system, but a good chunk also comes from Zone 2 which is a fly-in only area. With the Fortymile caribou herd in trouble, we don't believe there should be any nonresident hunting allowed. But we wanted to offer a compromise that is amenable to transporters, which is the intent of our *Proposal 112*.

Proposal 112 asks to eliminate all nonresident Fortymile caribou hunting opportunities in the road accessible Zones 1, 3, & 4, but leave that opportunity open in Zone 2. This would still allow plenty of nonresident opportunity for the fly-in area, not take away from transporters who fly nonresident hunters into Zone 2 and allow for more resident harvest along the road system, where most residents hunt.

Antlerless and Any-Bull Moose Hunts

Cow hunts and any-bull hunts are coveted by Alaskans for the opportunity they provide to put food in the freezer. We don't believe that these types of hunts should be open to nonresidents.

In Unit 20B, within the Creamer's Field Refuge, and the remainder of Unit 20B within the Fairbanks management area, we allow nonresidents to participate in cow and any-bull weapons-restricted hunts. In Unit 20B drainage of the middle fork of the Chena River, and Unit 20 drainage of the Salcha River upstream from and including Goose Creek, we allow nonresidents to participate in any-bull hunts.

RHAK *Proposal 176* addresses these issues. We ask that all nonresident any-bull hunts in portions of Unit 20B on the Chena River and Salcha River upstream from and including Goose Creek revert to the same 50"/4 brow tine bag limit restrictions for nonresidents in other parts of those units.

The Creamer's Field Refuge and Fairbanks Management area weapons-restricted hunts are antlerless and any-bull hunts. These hunts really are meant for Alaskans to provide extra opportunity and prevent vehicle collisions with moose along the road system. We don't believe nonresidents should be allowed to participate in these moose hunts.

Again, antlerless/cow hunts and any-bull hunts are there to provide more opportunity for Alaskans to put food in their freezers. These types of hunts should not allow opportunity for nonresidents.



Draw Permits

Wherever we have draw permits, that means there isn't enough of that game population to provide general hunting opportunities for everyone.

We believe that residents should have an opportunity to participate in every single draw hunt opportunity in the state. But that isn't happening. So, where we do have existing draw hunts that separate out resident and nonresident hunting opportunities, our position is that nonresidents should never receive more than 10 percent of the total number of permits available.

This is the intent of our *Proposal 180*, to institute a 90/10 percent resident/nonresident permit allocation for the DC 827 caribou draw permit.

Liberalized Bear Seasons and Expanding Bear Hunting Opportunities

There are many proposals to increase the brown bear seasons in Region III. RHAK supports increased opportunity to hunt brown and black bears, as long as the Department has no conservation concerns with any subsequent increased harvest of bears.

Intensive Management Programs

RHAK supports Intensive Management predator reduction efforts to increase low moose and caribou populations that are grounded in science and efficacy.

Archery-only Hunts

RHAK opposes new special opportunity archery-only hunts unless weapons restrictions are necessary due to proximity to roads, public trails, and in urban areas. Bowhunters have plenty of opportunities already during general season hunts and existing archery-only hunts.

We should not use archery-only hunts as a way of reducing harvests for low or declining game populations due to the lower success rates of bowhunters. If there are concerns of overharvests, hunts should be draw or registration hunts with a quota and available to all hunters.

Thank you to Board members for your service and taking the time to read our comments,

Mark Richards
Executive Director Resident Hunters of Alaska (RHAK)



PC93

Name: Mark Rowenhorst

Community of Residence: Fairbanks

Comment:

Proposal 130: Oppose

This non-resident permit allocation has allowed guides some level of assurance that non-resident clients have a good chance of getting permits. Without this allocation there is no incentive for a sheep guide to use up one of their 3 Guide Use

Areas in one of the two GUA's represented in the DCUA. I think this is an important NR opportunity to maintain as it has allowed a few guides like myself to disperse guided sheep hunting pressure across more of the huntable sheep populations in the state.

As of right now there are 3 registered guides offering sheep hunts in the DCUA spread across 2 Guide Use Areas, whereas in the remainder of the central Alaska range in Unit 20A there are somewhere between 15-25 registered guides hunting sheep in 2 Guide Use Areas.

I also value my hunting rights in other states, and I believe that allocating 10% of permits to NR's is very modest and fair to the resident population.

Proposal 130: Oppose



PC94

Name: Donald Ruhoff

Community of Residence: Willow, Alaska

Comment:

My proposal 65 I would like to withdraw shorting the season. Now that have 20 non-resident draw permit in place. Let's see how it works going forward.

Sorry it for proposal 63 not 65 to withdraw shorting the season. Now that we have a non-resident 20 permit in place for 2024 and see how this works going forward. Thanks Don and Karla.

Brown bear unit 19C. Set place non-resident can hunt brown bear with out a license guide but need to be

accompanied by other licensed hunter. Must use a 300 caliber rifle or larger. If were going to try to keep this

predator control under control. I been hunting 19c for 34 years and there is a lot more brown bears then

ever before. That goes for wolves and black bears too. There been lots changes over the years to save the

moose. Shortening the season. Antler restrictions. This year non- resident draw permit.

Proposal 63: Support with Amendment

Proposal 65: Support with Amendment

Brown bear unit 19C. Set place non-resident can hunt brown bear with out a license guide but need to be accompanied by other licensed hunter. Must use a 300 caliber rifle or larger. If were going to try to keep this predator control under control. I been hunting 19c for 34 years and there is a lot more brown bears then ever before. That goes for wolves and black bears too. There been lots changes over the years to save the moose. Shortening the season. Antler restrictions. This year non- resident draw permit.



PC95

Name: Jim Sackett

Community of Residence: Fairbanks

Comment:

Regarding proposal 171, harvest reports are already required with general tags, adding additional paperwork is unnecessary.

Regarding proposal 177, increased hunting opportunity is always a good idea. I would add via amendment that crossbows be allowed during this increased archery opportunity. 37 states allow

the use of crossbow during archery season for residents over 60, Alaska should be also be allowing this.

Regarding proposal 179, the season should be September 1-25, not just a shifting of the two week season currently available.

Proposal 48: Support
Proposal 171: Oppose
Proposal 174: Support
Proposal 175: Support

*Proposal 177: Support with
Amendment*
Proposal 182: Support
Proposal 183: Support

Proposal 184: Support
Proposal 185: Support
Proposal 186: Oppose



PC96

Name: Jim Sampson

Community of Residence: Fairbanks, Alaska

Comment:

I would like to go on record in support of Proposal 176 which would limit non-resident hunters to a 50+ or 4 brow tine moose on the Salcha River, including above Goose Creek. We are seeing tremendous pressure on the Salcha river by non-resident hunters, especially above Goose Creek. In just the last four to five years, we have seen these non-resident hunting groups (many boats carrying four hunters) expand to dominate hunting in the upper Salcha above Goose Creek leaving few opportunities for Alaska resident hunters.

Thank you for your consideration.

Proposal 176: Support



PC97

Name: John Sauer

Community of Residence: Fairbanks, Alaska

Comment:

I strongly oppose proposals 43, 44, 45, 46. Harvesting legal rams has no impact on population recovery and reducing resident harvest through these restrictions is strictly a loss of opportunity for residents, benefiting guides and outfitter operations. The population of sheep is very dependent on the winter conditions. So by restricting the opportunity for residents to hunt based off the fact that we are the reason the population is down, only benefits guides and outfitters by keeping resident hunters out of there guiding area.

Proposal 43: Oppose
Proposal 44: Oppose

Proposal 45: Oppose
Proposal 46: Oppose



PC98

Name: Linda Shaw

Community of Residence: Juneau, Alaska

Comment:

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem. These non-consumptive values of wolves enrich the State of Alaska in multiple ways. It is short sighted and archaic to continue to degrade the ecosystem and values of Denali National Park, a jewel of the United States and a place that Alaska should be proud of, protect and conserve.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.



PC99

3/1/2024

Alaska Board of Game

RE: Proposals for Region III Board of Game meeting in Fairbanks, AK in March 2024

Proposals 186, 183-185, 60-62:

Comments by: **Paul Shearer**

[REDACTED], Healy AK [REDACTED] ([REDACTED], [REDACTED], Healy AK [REDACTED])

The purpose of this letter is to provide public comment on the following Proposals

PROPOSAL 186

5 AAC 92.510. Areas closed to hunting.

5 AAC 92.550. Areas closed to trapping.

I support this Proposal 186 and I agree the above areas should be closed to wolf hunting and trapping.

I have a residence in Healy, Alaska, that I built in 1980 and I have been a part time resident in Healy for forty four years (1980-2024). I have also lived in New Jersey and Oregon, but spend on increasing amount of my time living at my Healy residence each year.

I have over the last 44 years traveled up the Stampede road to look for wolves and bear and have taken other visiting guests up the Stampede with the same interest in wildlife viewing and the hopes of seeing wolves in the wild. The wolf sightings have been rare, but I would say that I may have seen more wolves (and tracks) the first 20 years out the stampede (1980-2000) then in the more recent 24 years (2000-2024). However we still see wolf tracks out the Stampede road and when hiking past the end of the road so I know there is wolf presence in the Stampede corridor in recent years.

The Proposal 186 closure to wolf hunting and trapping would give more opportunity for Healy residents and their guest visitors to see wolves out the Stampede, which is a much closer area to visit from Healy than traveling the 17 miles to the Denali National Park entrance and having to travel 30+ miles on the Park Road by bus before reaching good habitat for viewing wolves. I have spoken to my neighbors in Healy who are hunters and the primary game they hunt is moose and none of my neighbor hunters have shown an interest in hunting wolves and none have expressed an opinion that wolves need to be controlled in the Healy area to improve the moose hunting for local residents.

I also own land in Kantishna within the interior of Denali National Park. I have traveled extensively in that area of Denali Park and had many opportunities for viewing wolves in Kantishna both near my property (mining claims) and along the Park Road and the Alaska State Road in downtown Kantishna. It is my understanding that the Grant Creek wolf pack can extend all the way from the Stampede corridor (areas covered by Proposal 186) and out to Moose Creek in the Kantishna Hills. Therefore the closures proposed by Proposal 186 could also increase the potential for viewing wolves in Kantishna. Currently there are three active lodges in Kantishna and all of them take guests hiking and wildlife viewing to see



PC100

Name: Bill Sherwonit

Community of Residence: Anchorage, Alaska

Comment:

PROPOSAL 186

I am a long-time Alaskan and resident of Anchorage writing in SUPPORT of PROPOSAL 186, which proposes that protections for wolves be reinstated on state lands in what's known as the Stampede Corridor, just outside Denali National Park, in an area that once was part of a protective "buffer" area set aside by the Alaska Board of Game (BOG) to protect wolves that venture outside the national park in pursuit of prey.

I'm among the Alaskans who believe that the BOG should honor its mandate to manage wildlife for ALL Alaskans. And many of us believe that this proposal is a reasonable request to protect wolves that leave the national park in winter during their search for food, and it will protect them during the critical time (from February until summer) when the wolves are breeding, forming family groups, and establishing territories, and the loss of a breeding wolf is most harmful to a family group/pack.

As the board is well aware, its mandate is to provide for both consumptive and non-consumptive "uses" of wildlife, including wildlife viewing, photography, and the enjoyment and appreciation of living animals in their natural habitat. There's abundant evidence that over the years, many of the wolves killed by hunters and trappers on state lands adjacent to Denali National Park are also wolves that are highly valued for their presence inside the national park, including for scientific research, and that the killing of breeding wolves on those state lands has greatly harmed the families of wolves (or packs) that spend most of their lives inside the park and which are greatly valued by park visitors, including many Alaskans.

Members of the BOG are also well aware of the issues here, so I won't repeat the many arguments in support of Proposal 186 that other Alaskans are presenting to you. I simply ask the board to take an action that would help to prevent the death of breeding wolves and disruption of families/packs in late winter and spring.

I thank you for considering my comments, and those of many other Alaskans who are asking the BOG to take a reasonable action that is long overdue and recognize the value of wolves not only to a small number of trappers and hunters, but to others who prefer to experience them alive.

Bill Sherwonit

Anchorage, Alaska

Proposal 186: Support



PC101

Name: Mike Shields

Community of Residence: Henderson Ky 42420

Comment:

Hello, I am in favor of supporting 186. Wolves/carnivores are a vital part of a healthy eco-system. All carnivores need to be protected under the endangered species act.



PC102

Name: James Shirk

Community of Residence: Seward Alaska

Comment:

Concerning proposal 138 I am in favor of this proposal. I have hunted that area since the early seventies and have seen an increase in moose and bison kills from bears and wolves. I have a hunting cabin between Delta Junction and Tok that I spend 4 months at in the fall and spring. After that bad winter there was a significant decrease in bison and moose in this area. Late last fall I saw more bear and wolf sign than moose or bison and I think this proposal will help increase the population for moose and bison.

Proposal 138: Support



PC103

Name: Pixie Siebe

Community of Residence: Anchorage

Comment:

I strongly support proposal 186. I love watching wolves in Yellowstone. I make biannual trips there, spend my money to watch wolves. Millions of other visitors also support the wolf tourism industry. Alaska is losing out by having a reduced wolf population due to the few weeks that the wolves venture into the Stampede area where they are not protected. A few trappers can remove all or parts of a pack, and completely disrupt the life cycles of what are essentially Denali wolves.

Please close this area to wolf trapping. Please pass proposal 186.

Proposal 186: Support



PC104

Members of the Alaska Board of Game:

I am writing this letter to voice my support for Proposal 176, adjusting the moose bag limits for non-resident hunters. As a resident hunter in Alaska, and specifically in the Salcha River drainage, I believe that this modification serves the best interests of all user groups of this area. Unlike non-resident hunters whose primary goal of hunting in Alaska is obtaining a trophy, resident hunters rely on moose hunting opportunities to supplement their freezers and reduce reliance on outside sourced meats. Modifying non-resident hunting regulation in the upper Salcha River brings them in line with non-resident hunter guidelines in other areas. Improvements in transportation have made an area that once had limited hunter numbers more accessible and enticing to out-of-state hunters. A hunting zone that was once protected by its remote and difficult access now requires regulatory controls to maintain a balance and prevent overuse by non-resident hunters taking advantage of the areas current any bull bag limit. Thank you for your efforts and your attention to this matter and I again respectfully request your support for Proposal 176.

Respectfully submitted,

Matt Soden



Name: Jeffrey Sperry

Community of Residence: Eagle River

Comment:

Proposal 43 - I am opposed. According to the proposal 76% of the hunters already do not hunt every year. Additionally, data will show that not all of the legal rams are killed every year.

Proposal 44 - I am opposed. Science will show that the decrease in sheep populations is due to weather and predators. Decreasing the opportunity for people to spend time in the field hunting will not increase the sheep populations significantly. We should allow hunters into the field as much as possible. The full curl regulations provide for harvest of only the older, mature rams.

Proposal 45 - I am opposed. The decrease in sheep populations is due primarily to weather events and not harvest from hunters. We should continue to allow hunters into the field as much as possible. The full curl regulations provide for harvest of only the older, mature rams. Decreasing the number of hunters in the field will not significantly increase the sheep population.

Proposal 46 - I am opposed. Limiting sheep hunters to a drawing permit system will not significantly increase the ram population. Currently not all of the legal rams are not killed during the hunting season. Every year there is evidence of rams harvested that would have been legal to harvest the year before. We should be promoting getting as many hunters into the field as possible so that people have an opportunity to go hunting.

Proposal 47: I am opposed. Bison permits should not be allowed to proxy. I believe these permits should go to people who can actually do the hunt.

Proposal 118 - I am opposed. There is no need to create a separate archery only hunt in the Tok Management area. There are few permits for this area, the area is large and there should be no problem being able to hunt without pressure from other hunters.

Proposal 119- I am opposed. This proposal will not significantly increase the ram population. The Full Curl management allows only harvest for older, mature rams. Following this management plan still allows sufficient rams for breeding.

Proposal 120 - I support this proposal. There are abundant grizzly bears in this area, increasing the bag limit to two will not have any detrimental effect on the population.

Thank you for the opportunity to comment on these proposals.

*Proposal 43: Oppose
Proposal 44: Oppose
Proposal 45: Oppose*

*Proposal 46: Oppose
Proposal 47: Oppose
Proposal 118: Oppose*

Proposal 119: Support



Comments submitted 9/29/23 before portal was open.

Proposal 43: I am opposed to this proposal. I believe that before changing to a permit system that affects Alaska hunters that the nonresident and youth hunts should be eliminated. Elimination of nonresidents hunting should be the first step prior to putting restrictions on residents. Some registration hunts in Alaska have a limited number of permits, which if that occurred would also put further restrictions on Alaska residents.

Proposal 44: I am opposed. Prior to putting restrictions on resident hunters the nonresidents should be excluded from hunting in these areas. Additionally, if there is concern about increased sub legal harvest I would suggest increasing the penalty for taking a sublegal sheep.

Proposal 45: I am opposed. Again, before putting restrictions on Alaska residents I believe we should eliminate nonresident hunting in these areas.

Proposal 46: I am opposed. Before putting restrictions on Alaska residents I believe we should eliminate nonresident hunting in these units.

Proposal 47: I am opposed. The bison hunts are a special type of hunt and I do not believe that a proxy should be allowed. It is difficult to draw a permit for this hunt, so I believe the permits should go to people who will actually participate in the hunt.

Thank you for allowing me the opportunity to provide my opinions on these proposals.

Jeffrey Sperry
Eagle River, Alaska



PC106

Name: Hunter Stier

Community of Residence: Belgrade, Montana

Comment:

Hunter Stier

Proposal 130: Oppose

Reasoning: I am excited about the opportunity to hunt sheep in the Delta Controlled Use area. I have joined friends on adjacent unit hunts and would welcome the continued opportunity to hunt the area. Alaska is relatively generous to non-residents and I am very thankful for some reasonable amount of continued non resident allocations.

Proposal 181: Oppose

Reasoning: Sheep harvest is adequately managed by selective harvest regulations. I have hunted in 20 with friends and did not observe any amount of competition or hunter crowding that would make me desire a limited quota on tags. Contrarily, we have observed numerous 7+ year old rams.

Proposal 131: Support

Reasoning: I support and am grateful for the maintained non resident opportunity here and would welcome the division of hunters into the early and late seasons.

Proposal 130: Oppose

Proposal 131: Support

Proposal 181: Oppose



PC107

Name: Pauline Strong

Community of Residence: Juneau, AK

Comment:

My name is Pauline N. Strong. I live in Juneau, AK. I support Proposal 186. This closes an area to taking of wolves that was closed in the past. The map shows that this area is easily accessed by wolves from Denali National Park, as it is bounded on three sides by the park. Having this area open to taking of wolves therefore does serious harm to pack structure and activity in the park. I ask that you approve this proposal.

Proposal 186: Support



PC108

Name: Brandon Summitt

Community of Residence: Wasilla AK

Comment:

Proposals 43, 44, 45, 46. My name is Brandon and i am a resident of Wasilla, and an aspiring sheep hunter, though I have never killed a sheep. I strongly disagree with these proposals. They seem to all be submitted by guides. Most of the sheep that get killed are killed by guided nonresidents. Resident hunters kill a relatively small proportion. It makes no sense to restrict resident hunters. The state of alaska should give resident hunters priority. If any sheep restrictions are made, just make all sheep tags draw only for all nonresidents! Thank you for allowing me to voice my opinion on the matter.

Proposal 43: Oppose

Proposal 45: Oppose

Proposal 44: Oppose

Proposal 46: Oppose



PC109

Name: Clint Talbott

Community of Residence: Nederland, Colorado

Comment:

I backpack frequently in Alaska and love its national parks, wildlife refuges and other wild lands. I appreciate wild places for their intrinsic value and for their importance to the ecosystem.

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 186: Support

2023-2024 Proposed Changes to Hunting and Trapping Regulations
Interior and Eastern Arctic Region

Tanana Chiefs Conference Comments

Dena' Nena' Henash (dba Tanana Chiefs Conference; TCC) is a consortium of 37 federally recognized tribes based in Fairbanks, Alaska and serving more than 18,000 tribal citizens and residents of Interior Alaska. Tanana Chiefs Conference serves its member Tribes in providing a unified voice in advancing the sovereign rights of tribal governments through the promotion of physical and mental wellness, education, socio-economic development, and protection of tribal cultures and ways of life of the Interior Alaska Native peoples.

TCC provides the following comments on Interior Region Alaska Board of Game regulatory change proposals.

Regionwide & Multiple Units

PROPOSAL 43

Change all general season sheep harvest tickets in Units 12, 19, 20, 21, 24, 25, 26B, and 26C to registration permits, and allow hunters to obtain a registration permit once every two years.

PROPOSAL 44

Reduce the sheep bag limit for resident hunters in Units 12, 19, 20, 24, 25, 26B and 26C to one ram with full-curl horn or larger every two regulatory years.

PROPOSAL 45

Reduce the Unit 12, 19, 20, 24, 25, 26B, and 26C sheep bag limit for residents to one ram with full-curl horn or larger every four regulatory years.

PROPOSAL 46

Change all sheep hunting in Units 12, 19, and 20 to drawing permit only for residents and nonresidents, with a set allocation of permits between user groups.

Comments:

TCC opposes any change in regulation that directly or indirectly restricts subsistence opportunities. The Unit 19C winter hunt is a subsistence hunt and drawing permits do not provide reasonable opportunity for subsistence uses. Requests to change harvest ticket hunts to registration permit hunts represent a restriction to subsistence opportunities. Reasonable opportunities for subsistence uses should be annual and not limited to every two or four years in order to be consistent with Boards of fisheries and game subsistence procedures, "a pattern of taking or use recurring in specific seasons of each year" (5 AAC 99.010(b)(2))." Additionally this proposal would change the three-quarter curl bag limit for the winter subsistence hunt in Unit 19C and portions of units 24B and 25A, for example, to a more restrictive bag limit inconsistent with customary and traditional uses outlined in the associated customary and traditional use worksheets developed by ADF&G that informed the board in developing existing regulations to provide reasonable opportunities for subsistence uses pursuant to AS 16.05.258.

PROPOSAL 48

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska.



Comments:

TCC supports the exemption for resident tag fees for grizzly/brown bears because it eliminates the financial burden on subsistence hunters to take brown bears in solidarity with the GASH AC, among others.

PROPOSAL 50

Lengthen the marten trapping season in Units 12, 19, 20, 21, 24 and 25 by two weeks to end March 15.

Comments:

TCC supports Proposal 50. The department does not have a conservation concern regarding this proposal, because there aren't as many trappers as there used to be. We are aware of some local concerns for fur quality with an extended spring season; however, trappers targeting other furbearers and fur animals until March 15, would be able to legally retain marten caught incidentally.

PROPOSAL 51

Align muskrat trapping seasons with beaver trapping seasons in Units 19, 20 (except 20E), 21, 24, 25, 26B, and 26C to allow for simultaneous open water trapping of both species in the fall, winter, and spring. If this proposal were adopted as written, muskrat season would be Sept 15-June 10 in units 20A, 20C, and 20F and Sept 1-June 10 in units 19, 21, 24, and 25. The muskrat season in units 12 and 20E would remain Sept 20-June 10. However, the muskrat season in units 20B remainder and 20D would be changed from Nov 1-June 10 to Sept 25-May 31.

Comments:

TCC supports Proposal 51 because the department does not have conservation concerns associated with this season alignment and it would provide increased subsistence trapping opportunities for muskrat and more trapping efficiency. Amendment of the Proposal 51 to align Unit 20B remainder and Unit 20D muskrat season with neighboring subunits to be Sept 15-Jun 10 would reduce regulatory confusion.

PROPOSAL 52

Allow the use of night vision goggles and forward-looking infrared devices for taking furbearers with a trapping license in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

Comments:

TCC opposes Proposal 52 because of the likelihood of abuse that would result in the allowance of these new technologies. Because individuals purchasing a trapping license may also use a firearm to take furbearers, adoption of this proposal would likely result in a lack of fair chase. Indigenous people have been trapping in low light conditions for centuries. Allowance of night vision goggles and forward-looking infrared devices could pose conservation concerns.

McGrath Area - Units 19, 21A and 21E

PROPOSAL 60

Allow aerial wolf control in a portion of Unit 19C.

PROPOSAL 61

Allow the take of wolves in Unit 19C the same day a person has been airborne and create an Intensive Management Plan for Unit 19C.



PROPOSAL 62

Establish an Intensive Management program for Unit 19C.

Comments:

TCC supports the development of a predator control implementation plan to support Unit 19C moose as an intensively managed species providing high levels of human consumption. Such efforts may also benefit Dall sheep population recovery. As part of an intensive management program, TCC supports Proposals 60, 61, and 62.

PROPOSAL 63

Change the Unit 19C registration permit moose hunt RM653, to a drawing permit for nonresidents, issue up to 20 permits, and shorten the season to September 8-17.

Comments:

TCC supports limits on non-resident hunting to ensure opportunity for residents and ensure subsistence needs can be met.

PROPOSAL 64

Change the Unit 19C moose hunts to a drawing hunt for both residents and nonresidents, and specify the number of permits available for residents, guided nonresidents, and nonguided nonresidents.

Comments:

The board determined that moose in Unit 19C are associated with a positive finding for customary and traditional uses. Since drawing permits do not provide reasonable opportunities for subsistence uses, TCC can only support Proposal 64, if it were amended to only apply to nonresidents. Otherwise, TCC strongly opposes this proposal because subsistence uses would be eliminated contrary to AS 16.05.258 the state subsistence statute.

PROPOSAL 65

Reauthorize the Unit 19D Intensive Management Plan.

Comments:

TCC supports the reauthorization of the Unit 19D Intensive Management plan to provide high levels of human consumption of moose due to their significant contribution to the subsistence economy and tribal ways of life among upper Kuskokwim communities, where based upon comprehensive subsistence research conducted by ADF&G between 1984 and 2011, large land mammals - predominantly moose - contribute 47% of the total communities' harvests of wild foods. The second and third most important species, based upon edible pounds, is Chinook salmon at 14% and chum salmon at 13% of total fish and wildlife harvests. The absence of caribou and the collapse of Chinook and chum salmon returns and the resulting harvest restrictions bring additional dependence and reliance on the Unit 19 moose populations.

PROPOSAL 66

Modify the moose hunting season dates and permit requirements in Unit 19D.

Comments:

This proposal is difficult to understand given that it was not written using conventional approaches to proposing regulatory change by identifying new text in bold underline and proposed regulatory language



to be eliminated in bracketed capital letters. However, in general, TCC supports the expansion of subsistence moose hunting opportunities in Unit 19D by extending the fall seasons by 5 to 10 days (Sept 1-30). However, those harvest ticket hunts that would become registration hunts would represent a restriction to subsistence opportunity, although registration permits tend to result in more complete harvest data provided to the Area Biologist, which improves management decision-making. The absence of staff comments less than 24 hours before the written comment deadline so that we might have the actual proposed changes clarified challenges TCC to make an informed recommendation.

Changing antlerless moose hunts from a registration permit hunt to a drawing hunt would mean that the most liberal moose hunting opportunities provided in Unit 19D would no longer provide reasonable opportunities to take antlerless moose for subsistence uses given that drawing permits cannot provide reasonable opportunity for subsistence uses.

As a result, TCC hesitantly supports this proposal, but only with an amendment to keep the antlerless moose hunts registration permit hunts.

PROPOSAL 68

Allow moose registration permit RM682 to be obtained online.

Comments:

TCC opposes Proposal 68 because the board adopted the current restriction on permit availability to ensure reasonable opportunities for customary and traditional subsistence uses pursuant to AS16.05.258(f). This conservatively managed hunt was created following a 13 year hunt closure. TCC stands with Stony Holitna AC and the GASH AC in opposing this proposal to ensure restrictions remain in place to maintain the integrity of this subsistence moose hunt.

PROPOSAL 69

Allow hunters that hold registration moose permit RM682 in Unit 19 to be eligible to hold other moose permits in the Kuskokwim River drainage.

Comment:

TCC opposes proposal 69, because the Unit 19D intensive management program and the limitations associated with the RM682 hunt were designed to provide reasonable opportunities for subsistence uses of moose by Alaska residents in the local area. Reauthorization of the Unit 19D intensive management plan in Proposal 65 indicates that available harvestable surpluses of moose in the area are insufficient to repeal these regulatory restrictions to support reasonable opportunities for customary and traditional uses. Alaska residents who can afford to travel far downriver to participate in other moose hunting opportunities should do so and forgo obtaining a RM682 permit.

PROPOSAL 73

Reauthorize the Intensive Management Plan for Unit 21E for six years.

Comment:

TCC supports proposal 73 in solidarity with the GASH AC. The Intensive Management Plan for wolves has long been on the books, but the department has yet to utilize the management tool because moose counts haven't warranted predator control. With an expiration date of June 30, 2024, GASH AC would like to see the management tool remain as a management tool option for another 6 years.

PROPOSAL 76



Reopen all Unit 19C sheep hunts.

PROPOSAL 77

Reopen Unit 19C to sheep hunting.

PROPOSAL 78

Reauthorize nonresident Dall sheep hunting in Unit 19C.

PROPOSAL 79

Reopen Unit 19C to nonresident sheep hunters.

PROPOSAL 80

Reopen sheep hunting in Unit 19C to nonresidents.

PROPOSAL 81

Reestablish seasons and bag limits for sheep hunting in Unit 19C.

PROPOSAL 82

Change nonresident sheep hunting in Unit 19C.

PROPOSAL 83

Reopen sheep hunting in Unit 19C to nonresidents, by bow and arrow only.

Comment:

TCC opposes proposals 76-83, which would reopen nonresident Dall sheep hunts in Unit 19C due to ongoing conservation concerns and previous restrictions to the winter subsistence hunt. Dall sheep are associated with customary and traditional uses, as determined by the board, and when there is an insufficient harvestable surplus to support all uses, nonsubsistence uses are the first to be eliminated pursuant to AS 16.05.258. Past closures of the subsistence hunt while sports hunting was allowed to continue is contrary to the subsistence priority statute.

PROPOSAL 84

Change the sheep bag limit in Unit 19C for resident hunters to one ram with full-curl horn or larger every two regulatory years.

Comment:

TCC opposes Proposal 84 because changing the bag limit would represent a restriction on reasonable opportunities for subsistence uses of Dall sheep in Unit 19C. Reasonable opportunities for subsistence uses should be annual and not limited to every two years in order to be consistent with Boards of fisheries and game subsistence procedures, "a pattern of taking or use recurring in specific seasons of each year" (5 AAC 99.010(b)(2))." Additionally this proposal would change the three-quarter curl bag limit for the winter subsistence hunt in Unit 19C to a more restrictive bag limit inconsistent with customary and traditional uses outlined in the associated customary and traditional use worksheets developed by ADF&G, which the board used to develop the existing regulations to provide reasonable opportunities for subsistence uses pursuant to AS 16.05.258.

PROPOSAL 85

Set the sheep bag limit in Unit 19C for resident hunters based on the age of the ram harvested, for six to eight year old rams.



PROPOSAL 86

Set the sheep bag limit in Unit 19C for resident hunters based on the age of the ram harvested, for six to ten year old rams.

PROPOSAL 87

Shorten the sheep hunting season in Unit 19C for residents and open a season for nonresidents in Unit 19C.

PROPOSAL 88

Change all sheep hunting in Unit 19C to archery only, and require future nonresident sheep hunting in Unit 19C to be by bow and arrow only.

Comment:

TCC opposes proposals 85-88 due to ongoing Dall sheep conservation concerns. Sheep are a subsistence resource and when harvestable surpluses are insufficient to provide for all uses, the subsistence law requires nonsubsistence be eliminated.

PROPOSAL 89

Reopen the subsistence winter sheep hunts in Unit 19C.

PROPOSAL 90

Reopen the late season resident only subsistence sheep registration hunt RS380 in Unit 19C.

Comment:

TCC supports the intent of proposals 89 and 90 that call for the reopening of the winter subsistence hunt in Unit 19C in order to fulfill the board's obligations to provide reasonable opportunities for subsistence uses. Dall sheep are associated with customary and traditional uses, as determined by the board, and when there is an insufficient harvestable surplus to support all uses, nonsubsistence uses are the first to be eliminated pursuant to AS 16.05.258. Past closures of the subsistence hunt while sports hunting was allowed to continue is contrary to the subsistence priority statute.

PROPOSAL 91

Modify sheep hunting opportunity in Unit 19C or other subunits in the western Alaska Range by implementing a sheep management plan.

Comments:

TCC suggests the board take no action on Proposal 91 because the public should be able to review the management plan prior to it being adopted.

PROPOSAL 93

Lengthen the resident and nonresident brown/grizzly bear season in Unit 19C by opening the season on August 10.

Comments:

TCC supports Proposal 93 because the department has no biological conservation concerns and it would increase harvest opportunities.

PROPOSAL 104

Remove the requirement for a general season black bear harvest ticket in Unit 19D.



Comment:

TCC supports Proposal 104 because it removes an unnecessary burden from hunters and the board has already made an amount necessary for subsistence finding for black bears in this area. The department has no conservation concerns regarding black bears in Unit 19D because of the low number of black bears harvested. For these reasons, TCC supports the proposal.

Tok Area - Units 12 and 20E

PROPOSAL 108

Reactivate wolf control in a portion of Units 12, 20D, and 20E to benefit moose.

Comment:

TCC supports Proposal 108 to reactivate the intensive management program in Units 12, 20D, and 20E to benefit moose and to maintain this management tool in regulation.

PROPOSAL 110

Reauthorize the antlerless moose seasons in Unit 20E.

Comment:

TCC opposes the reauthorization of the antlerless moose hunt in Unit 20E in solidarity with the Eagle AC and the Tanana/Rampart/Manly AC.

PROPOSAL 111

Add an archery only, five-day moose season for residents and nonresidents in Unit 12.

Comment:

TCC opposes Proposal 111 because archery hunters and hunting during the regular season. TCC generally does not support special seasons for weapon-restricted hunts.

PROPOSAL 112

Limit nonresident hunting of the Fortymile caribou herd.

Comment:

TCC supports Proposal 112 in solidarity with the Resident Hunters of Alaska. TCC understands that 20-22% of the total take of Fortymile caribou is by nonresidents. Because of the conservation concerns associated with this caribou herd and the dramatic purposefully reduction of the size of the herd, TCC supports the limitation of nonresident hunting opportunities to only Zone 2, which is difficult to access and is principally accessed by aircraft, because it maintains limited nonsubsistence uses but serves to prioritize customary and traditional uses of Fortymile caribou by Alaska residents.

PROPOSAL 113

Close caribou hunting within 1/4 mile or 100 yards of the Steese Highway above tree line on Eagle and Twelvemile summits in Unit 20.

Comment:

TCC supports Proposal 113 to assist with better hunt management, mitigate past abuses, wanton waste, and excessive habitat damage. While hunting along the highway corridor provides efficient access, the conservation concerns associated with flock shooting and poor hunter behavior documented throughout the range of the Fortymile caribou herd range since the 1950s necessitates passage of this proposal.



PROPOSAL 114

Allow proxy hunting for caribou in Units 20B, 20D, 20E, 20F, and 24C registration hunts.

Comment:

TCC opposed Proposal 114 because proxy hunting of caribou in these areas had previously been abused by excessive harvest effort by hunters soliciting extra permits by visiting Pioneer homes to increase the hunters opportunities to harvest trophy animals. Proxy hunting also encouraged flock shooting and contributed to wanton waste. The proxy hunting prohibition was put in place as a tool to ensure reasonable opportunities for subsistence uses could be provided without posing conservation problems and abuse of the intent of proxy hunting.

PROPOSAL 122

Lengthen the wolf hunting season in Units 12 and 20E by approximately six weeks to end on June 15.

PROPOSAL 123

Lengthen the wolf hunting season by approximately six weeks.

Comment:

TCC opposes proposals 122 and 123 because their adoption would extend the hunting season to overlap the period during which wolves give birth to pups. Passage of this proposal would result in orphaning wolf pups, which would further mobilize animal rights organizations' membership drives and fundraising activities. Adoption of these proposals would serve to rally opposition to existing and future intensive management programs as well as customary and traditional uses of wolves and other predators. Wolves are a critical part of ecosystems and provide valuable sources of traditional materials for clothing and handicrafts as well as sources of cash. Wolf harvests should be allowed only during times when fur quality is prime or under controlled, sustainable intensive management programs.

PROPOSAL 124

Lengthen the marten trapping season in Units 20E and 25B by two weeks to close March 15 instead of the last day of February.

Comments:

TCC supports Proposal 124 in solidarity with the Eagle AC whose membership is most familiar with the area and fur quality. Lengthening the season to March 15 would not extend the trapping season to the period where marten give birth later in the spring.

Delta Junction Area - Unit 20D

PROPOSAL 134

Change the time frame for which a person can be awarded Mt. Harper sheep drawing permit DS206 in Units 20E and 20D, to one permit every four regulatory years or once per lifetime.

Comments:

TCC urges the board to take no action on Proposal 134 based upon comments on Proposal 135 and until such time that the requirements of AS 16.05.258 have been met.

PROPOSAL 135

Close Mount Harper sheep drawing hunt DS206 to nonresidents in Units 20D and 20E.



Comments:

TCC supports Proposal 135 to prioritize resident sheep hunting opportunities. TCC also calls upon the board to determine whether Dall sheep outside the Tok Management Area and Delta Management Area are associated with customary and traditional uses pursuant to AS 16.05.258. TCC knows that Dall sheep have a long history of customary and traditional harvest and use within the traditional territories of the Upper Tanana Tribes and that of the Native Village of Eagle based upon contemporary uses and oral traditions of the Upper Tanana people. If the board determines that Dall sheep have a positive customary and traditional use finding, then the law requires establishing regulations that provide reasonable opportunities for subsistence uses. The current drawing permit hunt for Alaska residents does not provide reasonable opportunities.

Galena Area - Units 21B, C, D & 24

PROPOSAL 139

Reduce the bag limit for taking caribou in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D and 26A to four caribou per year, only one of which may be a cow.

Comments:

TCC supports Proposal 139, as amended by RC021 during the Region V meeting in Kotzebue, to establish an annual bag limit of 15 caribou per year, only one of which may be a cow.

PROPOSAL 140

Close nonresident caribou hunting in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A.

Comments:

TCC supports Proposal 140 to prioritize customary and traditional subsistence uses pursuant to AS 16.05.258 and for conservation purposes given the ongoing challenges facing the Western Arctic caribou herd. TCC understands that the board already voted down this proposal during the Region V meeting in Kotzebue through their action on Proposal 3. TCC objects to the continuation of nonresident hunting while dramatically reducing the Alaska resident subsistence bag limit from 5 caribou per day to a total of 15 caribou per year, only one of which may be a cow. More than 533 hunters would have to take 15 caribou each to come close to harvests within the amount necessary for subsistence finding. TCC contends that this restriction of subsistence opportunity is excessive given that an annual bag limit will now be equivalent to the daily bag limit of only 3 days under previous regulations. This violates the intent and principles outlined in the state subsistence statute.

PROPOSAL 142

Change sheep hunting in portions of Units 24A and 25A to archery only.

Comments:

TCC opposes Proposal 142 due to ongoing conservation concerns associated with Dall sheep throughout this area.

PROPOSAL 144

Allow nonresident sheep hunting by drawing permit only in portions of Units 24A and 26B and reduce the nonresident season.

Comments:

TCC supports the intent of the proposal in solidarity with the Resident Hunters of Alaska, but opposes any reinstatement of nonresident hunting opportunities until such time that reasonable opportunities for subsistence uses of Dall sheep can be provided. Nonresidents harvested approximately 42% of the total harvest prior to the closure of this area to sheep hunting to rebuild the population.

PROPOSAL 149

Lengthen the wolf trapping season in Units 24 and the remainder of 25 by one month, to open October 1 instead of November 1.

PROPOSAL 150

Lengthen the wolf hunting season in Units 24 and 25 from Aug 1-April 30 to Aug 1-June 15.

PROPOSAL 151

Increase the hunting season for wolves in Units 24 and 25 from Aug 1-April 30 to Aug 1-June 30.

Comments:

TCC opposes proposals 149, 150, and 151 in solidarity with the Koyukuk River AC because their adoption would extend the hunting season to either be too early in the fall to provide quality fur or overlap the period during which wolves give birth to pups. Passage of this proposal would result in orphaning wolf pups, which would further mobilize animal rights organizations' membership drives and fundraising activities. Adoption of these proposals would serve to rally opposition to existing and future intensive management programs as well as customary and traditional uses of wolves and other predators. Wolves are a critical part of ecosystems and provide valuable sources of traditional materials for clothing and handicrafts as well as sources of cash. Wolf harvests should be allowed only during times when fur quality is prime or under controlled, sustainable intensive management programs.

PROPOSAL 152

Increase the resident bag limit for brown bear in Units 24C and 24D, and open a fall bait season in Units 21B and 24B.

Comments:

TCC supports Proposal 152 in solidarity with the Koyukuk River AC. TCC has some concern about opening brown bear baiting during the fall season during moose hunting because of the potential for inadvertent human-bear encounters.

PROPOSAL 153

Lengthen the wolverine hunting and trapping seasons in Unit 21 by one month to end on April 30.

Comments:

TCC supports Proposal 153 in solidarity with the Middle Yukon and Koyukuk River fish and game advisory committees who know this area best.

Northeast Alaska Area - Units 25A, B, D, 26B & C

PROPOSAL 154

Change the bag limit for caribou in the Remainder of Unit 26B from 4 bull caribou to 5 caribou for residents and 1 bull caribou to 2 bulls for nonresidents.

Comments:



TCC opposes the increase of the nonresident caribou bag limit because of widespread caribou declines and the fact that many Alaska residents will seek out subsistence caribou hunting opportunities in this area due to the caribou hunting closures and restrictions throughout the state. TCC supports the liberalization of the resident caribou bag limit proposed here and in Proposal 155.

PROPOSAL 155

Increase resident caribou hunting opportunity in Unit 26B Remainder from 4 caribou bulls to 5 caribou.

Comments:

TCC supports Proposal 155, as amended by Koyukuk River AC to be 5 bull caribou and 1 cow caribou, which can only be taken between Oct 1-April 30.

PROPOSAL 156

Change the nonresident caribou hunt in Unit 26B Remainder to a drawing hunt or registration hunt with a limited number of permits available.

Comments:

TCC supports Proposal 156 in solidarity with the Koyukuk River AC. Adoption of this proposal would reduce nonresident hunting pressure on one of the few caribou herds that remain stable in Alaska. Due to caribou hunting closures and restrictions elsewhere in Alaska along the road system, TCC expects much more Alaska residents traveling up the Dalton Highway to participate in this hunt. Reduction of nonresident hunting opportunities will ensure priority Alaskan resident subsistence uses.

PROPOSAL 159

Open a resident only archery only hunt for sheep in the Eastern Brooks Range Management Area with aircraft restrictions, and modify the existing youth hunt in the same area.

PROPOSAL 160

Change sheep hunting in a portion of the Arctic National Wildlife Refuge to archery only.

PROPOSAL 161

Change sheep hunting in a portion of the Arctic National Wildlife Refuge to archery only.

PROPOSAL 162

Change sheep hunting in a portion of the Arctic National Wildlife Refuge to archery only.

Comments:

TCC opposes proposals 159-162 due to general opposition to weapons-restricted-only hunts. Dall sheep in this area are associated with customary and traditional subsistence uses and restricting the hunts to only archery would represent a dramatic and unnecessary reduction in reasonable opportunities for subsistence uses.

PROPOSAL 163

Align salvage requirements for caribou in Units 25B, 25C, and 25D with Unit 25A to require meat of caribou remain on the bone when harvested prior to October 1.

Comments:

TCC supports Proposal 163 that would establish a meat-on-the-bone regulatory salvage requirement. This proposal would result in better meat care, reduce wanton waste, and ensure that caribou bones are salvaged as a valuable subsistence resource used for soup and marrow.



PROPOSAL 164

Require the liver, heart, and tongue of moose and caribou harvested in Units 25 to be salvaged.

Comments:

TCC supports Proposal 164, which seeks to expand salvage requirements for moose and caribou harvested in Unit 25. This proposal represents a crucial step towards reducing wanton waste, promoting responsible hunting practices, and honoring Alaska Native values of utilizing every part of the animal. The current requirement for salvaging caribou and moose liver and heart already reflects the importance of maximizing the use of harvested animals as required for some community subsistence harvests (e.g., 5 AAC 92.074(d)). However, Proposal 164 aims to further align regulations with these values by expanding salvage requirements to include the tongue and applying this regulation to Unit 25, where seven Alaska Native villages reside.

By expanding salvage requirements to encompass additional organs and applying these standards to Unit 25, Proposal 164 not only reinforces the importance of respecting the animals taken but also acknowledges the deep cultural significance of utilizing every part of the animal within Alaska Native communities.

TCC believes that Proposal 164 reflects an important step towards promoting sustainable hunting practices, reducing wanton waste, and preserving Alaska Native hunting traditions and heritage consistent with AS 16.05.255(a)(13). We stand in support of this proposal, recognizing its alignment with both ethical hunting principles and cultural values.

PROPOSAL 165

Create an intensive management plan for reducing wolves in Unit 25D to support high levels of human consumption.

Comments:

TCC supports Proposal 165. We recognize the urgent need outlined by the Yukon Flats AC to address the significant challenges facing Unit 25D moose populations. The plight of this unit, with some of the lowest moose densities in the state, directly impacts the ability of Unit 25D residents to meet their subsistence needs. Seven villages rely on moose meat as their primary food source, especially in light of consecutive years of subsistence salmon fishing closures. Unit 25D has a positive customary and traditional use determination for moose with an Amount Reasonably Necessary for Subsistence (ANS) finding of 50-70 moose in Unit 25D-West and 150-250 in Unit 25D-East (5 AAC 99.025).

The increasing pressures by wolves and bears in Unit 25D on low density moose populations in light of the salmon collapse pose serious threats not only to the moose population but Alaskan residents' food security and particularly those of Unit 25D communities. The current situation, with wolf packs expanding and predation on moose calves by bears intensifying, demands immediate attention.

TCC supports Proposal 165's call for more tools in the toolbox to address the escalating challenges faced by Unit 25D residents and moose populations. By implementing measures to reduce the number of wolves and bears, we can work towards rebuilding the moose population to a more sustainable level and safeguarding the subsistence livelihoods of local communities and other Alaskan residents.

PROPOSAL 170

Lengthen the wolverine trapping season in Unit 25A by two weeks to close on April 15.

Comments:

TCC supports Proposal 170 that would increase the trapping season for wolverine.



Fairbanks Area - Units 20A, B, C, F & 25C

PROPOSAL 171

Change all general season harvest ticket hunts to registration permits for moose in Units 20A, 20B, 20C, 20F and 25C.

Comments:

TCC supports Proposal 171, which would change all general season harvest ticket hunts to registration permits for moose in Units 20A, 20B, 20C, 20F, and 25C. While historically, Tanana Chiefs Conference has been cautious about such changes due to concerns about the burden on hunters and the potential impact on subsistence harvesters of the failure to report list, we recognize the significant benefits that this proposal offers. TCC stands in solidarity with the Tanana/Rampart/Manley AC and Minto-Nenana AC in supporting this proposal, which would result in more complete harvest data to better inform the department's management decisions and improve moose population estimates.

PROPOSAL 172

Create a muzzleloader only moose hunt for residents and nonresidents in Unit 20A.

Comments:

TCC opposes the restricted hunt suggested in Proposal 172. We believe that additional hunting opportunities should be accessible to everyone, ensuring fair and equitable distribution of resources. Muzzleloader hunters can hunt during the general moose hunting season.

PROPOSAL 173

Reauthorize the antlerless moose seasons in Unit 20A.

Comments:

TCC opposes Proposal 173 in solidarity with the Tanana/Rampart/Manley and Minto-Nenana fish and game advisory committees. Department staff regularly express concerns about moose harvests for certain religious ceremonies including Alaska Native funeral and memorial potlatches. Previous closures of ceremonial hunting opportunities due to lack of harvestable surpluses for antlerless moose demand that TCC oppose antlerless reauthorizations in units surrounding the greater Fairbanks area.

PROPOSAL 174

Change the boundary of the Wood River Controlled Use Area in Unit 20A.

PROPOSAL 175

Change the boundary of the Wood River Controlled Use Area in Unit 20A.

Comments:

TCC opposes Proposals 174 and 175, which seek to alter the boundaries of the Wood River Controlled Use Area in Unit 20A. We stand united with the Minto-Nenana AC's opposition to these boundary changes.

The rationale behind both of these proposals is insufficient. Proposing regulatory changes because an influential hunter was cited for violating the controlled use area motorized vehicle prohibitions is insufficient to alter a longstanding regulation. Hunters must exercise due diligence to ensure they remain in compliance with regulations and mindfully navigate motorized vehicles to remain outside prohibited



areas. It is the responsibility of motorized hunters to ensure safe and legal travel through the unit, without necessitating alterations to established boundaries.

PROPOSAL 176

Reduce the nonresident moose bag limit in portions of Unit 20B, and eliminate nonresident moose hunting opportunities in portions of Unit 20B.

Comments:

TCC supports Proposal 176 in solidarity with the Resident Hunters of Alaska. TCC supports restricting nonresident moose hunters in that portion of Unit 20B, the drainage of the Middle Fork of the Chena River as well as that Unit 20B, that portion of the Salcha river drainage upstream from and including Goose Creek from an any bull hunt to a bull with 50-inch antlers with four or more brow tines on at least one side.

TCC also supports restricting nonresident moose hunters within the Creamer's Field Migratory Waterfowl Refuge of Unit 20B and the Unit 20B Remainder of the Fairbanks Management Area from an any bull hunt to a bull with 50-inch antlers with four or more brow tines on at least one side.

TCC also supports eliminating nonresident moose hunting opportunity to take an antlerless moose due to previous closures to ceremonial moose hunting opportunities of antlerless moose due to insufficient harvestable surpluses of cow moose in Unit 20B.

The Department's objective for Unit 20B is to maintain a moose population of 12,000-15,000, yet initial 2023 counts estimate only 7,846 moose. TCC believes the population could benefit from a reduction of hunters, and this proposal aligns with conservation efforts to support a rebound in the moose population.

PROPOSAL 177

Extend the current moose season in Unit 20B Remainder by five days for certified bowhunters only.

Comments:

TCC opposes Proposal 177, which seeks to extend the moose hunting season in Unit 20B Remainder by five days exclusively for bowhunters. Unit 20B already faces considerable pressure with over 3,000 hunters annually, creating competition between hunters and local communities for harvest opportunities. Extending the season for bowhunters only creates an inequitable situation, granting additional opportunities to a limited group while excluding others. This selective extension risks further strain on the moose population in Unit 20B without offering fair access to all hunters.

TCC believes that additional hunting opportunities should be accessible to everyone, ensuring fair and equitable distribution of resources.

PROPOSAL 178

Reauthorize the antlerless moose seasons in Unit 20B.

Comments:

TCC opposes the reauthorization of antlerless moose hunts in those portions of Unit 20B outside the Fairbanks Management Area due to previous instances where ceremonial uses of cow moose were prohibited. TCC also opposes this proposal in solidarity with the Minto-Nenana fish and game advisory committee. While we recognize and appreciate the department's promise that antlerless moose hunts will only be opened within the Fairbanks Management Area to reduce moose-vehicle collisions, TCC remains cautious about keeping all of the other Unit 20B antlerless hunts in regulation given the consecutive years of hard winters, which have dramatically reduced the moose population below population objectives.

Antlerless moose hunts continued to be offered by the department even after the population fell below the

Intensive Management population objective. Department statements that these antlerless hunts would be difficult to restore in regulation is without merit given the longstanding support of antlerless hunts during the past two decades or more.

PROPOSAL 179

Shift the moose season dates in Unit 20B to Sept 15-30.

Comments:

TCC opposes Proposal 179 which would shift the moose season dates in Unit 20B. Extending the moose season in Unit 20B would make it the only management unit on the road system with a moose season extending until September 30th. Unit 20B, with an average of 3,000 hunters per season, already experiences extreme hunting pressures, particularly from locals residing in densely populated areas like Fairbanks and North Pole.

The accessibility of hunting grounds within Unit 20B via the road system exacerbates the competition. Changing the season dates would inevitably lead to a surge of hunters in this already heavily hunted area. Such an influx could greatly impact not only the local moose population, but also add to the challenges by Minto and Nenana in meeting their subsistence needs for moose.

PROPOSAL 182

Lengthen the brown/grizzly bear season in Units 20A, 20B, and 25C for residents and nonresidents by two weeks to close on June 15.

Comments:

TCC supports Proposal 182 to extend the brown bear season by 15 days, because it enhances hunting opportunities and the department has indicated there are no biological concerns with this proposal. Grizzly/brown bears have been recognized with a positive customary and traditional use determination in Units 20A and 20B outside the boundaries of the Fairbanks Nonsubsistence Area, with an amount reasonably necessary for subsistence of 1–3 brown bears (5 AAC 99.025(3)). TCC stands in solidarity with Tanana/Rampart/Manley AC and Fairbanks AC in their support of Proposal 182.

PROPOSAL 183

Lengthen the brown/grizzly bear hunting season in Unit 20A by two weeks to close on June 15.

PROPOSAL 184

Lengthen the brown bear hunting season in Unit 20A by three weeks.

PROPOSAL 185

Extend the brown/grizzly bear hunting season in Unit 20A and Unit 20B Remainder to close on June 30, to align with the rest of Unit 20.

Comments:

TCC recommends the board take no action on Proposal 183, 184, and 185 based on support for Proposal 182.

PROPOSAL 187

Lengthen the wolverine trapping season in Units 20A, 20B, 20D, and 20F by two weeks to align with 20C.

Comments:

TCC supports extending the wolverine trapping season later into the spring because it increases subsistence trapping opportunities.

Additional Proposals

PROPOSAL 192

Reauthorize the antlerless moose seasons in Unit 13A

PROPOSAL 193

Reauthorize the antlerless moose seasons in Unit 13C

PROPOSAL 194

Reauthorize the antlerless moose seasons in Unit 13E

Comments:

TCC opposes Proposal 192, Proposal 193, and Proposal 194 in solidarity with the Ahtna Intertribal Resource Commission and its 8 member Ahtna Tribes, Ahtna, Inc., and Chitina Native Corporation. Unit 13 moose populations are under stress and calf:cow ratios are below management objectives. Further reducing the moose cow population would compromise moose population recovery. Antlerless moose hunts should not be reauthorized because of poor calf recruitment.

PROPOSAL 210

Change the subunit boundaries of Units 20A and 20C to the current river channel.

Comments:

TCC opposes Proposal 210. The proposed boundary change, which would reclassify a portion of Unit 20A as 20C and would therefore prohibit the take of cow moose for certain religious ceremonies such as funeral and memorial potlatches. Currently, within Unit 20A, individuals have the opportunity to harvest either a cow or bull moose for potlatch ceremonies. However, in Unit 20C, the department has prohibited the take of cow moose for ceremonial purposes. Adoption of this proposal would unnecessarily restrict the constitutionally protected right to take moose out of season for Alaska Native funeral ceremonies as provided for in 5 AAC 92.017 and 5 AAC 92.019.

Sincerely,

TANANA CHIEFS CONFERENCE



Brian Ridley
Chief and Chairman



Kneeland Taylor's Comments re Interior and Eastern Arctic for March, 2024 meeting of the Board of Game.

- Proposal 46. Support with Amendment. Sheep populations throughout most of the State are declining rapidly. I am a mountain climber and seeing these animals high up in the mountains is a wonderful part of mountaineering. It is time for the Department to give out a limited number of permits in all areas where sheep are found, and allow permit holders to take any male; thus taking the pressure off the dominant full curl males, and the resulting disruption of sheep intra-family dynamics. The hunting of only full curl rams is not working to conserve Alaska's sheep populations. The numbers show that. Accordingly the FC management approach should be abandoned, if not throughout Alaska, at least in some GMU's as an experiment. Regarding allocation between residents and non-residents, the number of permits should be divided between non residents and residents in order to allow commercial guides, and their employees, assistants, transporters and others to continue their lifestyles, while ensuring that Alaska residents get a large share. The number of permits should be carefully limited and controlled to avoid over-hunting, and wounding of sheep. Alternatively, all hunting should be closed in some parts of the state, for as long as it takes for sheep populations to recover. The Department needs to do something significant to stop the decline of sheep in Alaska to point where only isolated bands of a few sheep survive. Proposal 46 could provide a framework for conservation.
- Proposal 50. Oppose. The marten trapping season should not be extended past February 28 which is the current date to close the season. Marten are denning in early March.
- Proposal 52. Oppose. Infrared and night vision goggles give hunters an unfair advantage over our wildlife, and make a mockery of Alaska's traditions.



Proposal 55. Oppose unless statute is complied with. This proposal would have the Board establish a positive finding for intensive management (IM) of moose in GMU 19C. For IM to be implemented, AS 16.05.255(e) requires positive findings based on evidence provided by Department biologists of unmet population and human harvest goals, and the likelihood that means adopted in an IM program will assist in meeting the population and human harvest goals. If the statute is complied with in good faith, then the undersigned does not oppose this proposal, but the mere existence of a moose hunt in GMU 19C is insufficient grounds for authorizing intensive management, and the BOG's history of ignoring the evidence provided by Department biologists suggests that the statute will not be complied with.

Proposal 57 Oppose. This proposal if adopted would authorize a new IM program, including aerial taking of both wolves and bears in Unit 19E, and continue IM, including the aerial taking, and same day airborne taking, of both wolves and bears in Unit 19D-East Predation Control Area. Allegedly to benefit moose. Because of the aerial taking (and same day airborne taking) authorized, the proposal if adopted, would violate the provisions of AS 16.05.783(a). Additionally, same day airborne taking of wolves and bears is a kind of sport hunting for some hunters, and is prohibited by 50 CFR Chapter 1, Subchapter B, Section 19.31(a). Members of the Board of Game are reminded that Alaska's voters in 1996 approved a ballot initiative prohibiting aerial and same day airborne taking of wolves unless specified conditions were met; and that the statute has been codified as AS 16.05.783(a). Although amended since 1996, the statute continues to prohibit the taking of wolves from an aircraft, or by a person the same day the person is airborne, unless specified conditions are met. The conditions are as follows:

A. Aerial predator control must be part of an approved Intensive Game Management Program approved pursuant to another statute, namely AS 16.05.255(e).



B. If aerial and same day airborne predator control is to be part of an IM program, then there must be evidence provided by Department biologists that population and human harvest goals are currently unmet, that predation is a significant factor affecting population of the prey species, and that predator control is likely to help achieve population and human harvest goals. Wishes and anecdotal evidence by members of the public is insufficient to meet this condition.

The Board of Game should comply with the AS 16.05.783(a) Many of the IM proposals for the Interior and Arctic appear to ask the Board of Game to ignore, or violate, AS 16.05.783(a). Intensive Game Management programs should not be approved unless the current circumstances indicate that population and human harvest goals are not being met. Current does not mean 10 or 20 years ago. It means in the last year or two, or as reliably forecast by Department biologists. If population and human harvest levels are currently within the Department's goals, then IM should not be approved. In other words, re-authorization of inactive plans violates AS 16.05.255(e). If aerial or same day airborne predator control is to be part of an IM program, then duration should be one hunting season, i.e. fall through spring. That's all the time necessary to remove a large number of predators.

Most importantly, with only a few exceptions, aggressive predator control has been ineffective in terms of increasing populations of prey species and human harvest of caribou, moose, and sheep. Adoption of this proposal (and others) without appropriate findings of unmet population and harvest goals would violate the mandate of Article VIII, Section 4 of the Alaska Constitution requiring that agencies take a hard look at circumstances before adopting regulations concerning wildlife.

Finally, all inactive IM programs, if adopted, should be amended to provide for prior public notice of the commencement of predator control activities.

Proposal 58. Oppose. This proposal would have the Board authorize a Unit



19A predation control areas. See my comments opposing Proposal 57 above.

- Proposal 60. Oppose. This proposal would have the Board allow aerial wolf control in a portion of Unit 19C. Adoption would violate AS 1605.255(e) and AS 16.05.783(a). See also my comments opposing Proposal 57 above.
- Proposal 61. Oppose. This proposal would have the Board adopt an IM plan and authorize same day airborne taking of wolves. See my comments opposing Proposals 57 and 60 above.
- Proposal 62. Oppose. This proposal would have the Board adopt a predator management proposal for Unit 19C. See my comments opposing Proposals 57 and 60 above.
- Proposal 65. Oppose. This proposal would have the Board “reauthorize” the Unit 19D Management Plan. However, the express language of the proposal indicates that the Unit 19D Management Plan expired by its own terms. Thus, the proposal asks for a new Intensive Management Plan. Adoption would violate AS 1605.255(e) and AS 16.05.783(a) since the specified conditions required by those two statutes are currently unmet. There is no statutory authority for intensive game management or aerial predatory control unless specified conditions are found to be met, by the Board of Game, in good faith, based on evidence. Besides violating the statutes, there is an abundance of peer reviewed literature demonstrating that predator control is effective only in limited, rare circumstances, over a short period of time. Adoption of this proposal would violate the mandate of Article VIII, Section 4 that agencies take a hard look at circumstances before adopting regulations concerning wildlife. See also my comments opposing Proposals 57 and 60 above.
- Proposal 73. Oppose. This proposal would have the Board “reauthorize” the Unit 21E IM plan. See my comments opposing Proposals 57 and 60 above.
- Proposal 76. Oppose. This proposal would have the Board open all sheep



hunts in Unit 19C. See my comments regarding Proposal 46. We need to give the sheep a break and allow them to recover.

- Proposal 78. Oppose. This proposal would have the Board reauthorize non-resident sheep hunting in Unit 19C. See my comments regarding Proposal 46.
- Proposal 79. Oppose. This proposal would reopen Unit 19C to non resident sheep hunters. See my comments regarding proposal 46.
- Proposal 108. Oppose. This proposal would have the Board reactivate wolf control in Units 12, 20D, and 20E. See my comments regarding Proposals 57 and 60 above.
- Proposal 109. Oppose. This proposal would have the Board authorize same day airborne hunting in Unit 12. Adoption would violate AS 16.05.783(a), and hard look rule mandated by Article VIII, Section 4 of the Alaska Constitution. See my comments regarding proposals 57 and 60 above.
- Proposal 115. Support. This proposal would have the Board require hunters taking Forty Mile caribou to gut their animals in the field, and not on the highway, or immediately next to the highway. Local residents should be given respect in requesting common courtesy from hunters.
- Proposal 116. Oppose. This proposal would have the Board authorize aerial shooting of wolves without adopting an IM plan. Adoption would violate AS 16.05.783(a). See my comments opposing Proposal 57.
- Proposal 122. Oppose. This proposal would authorize wolf hunting during the denning season, which is inhumane.
- Proposal 123. Oppose. This proposal would extend the wolf hunting season by six weeks through June 15, and thus during the denning season, which is inhumane. See my comments opposing Proposal 122.
- Proposal 142. Support. If adopted this proposal would close rifle sheep



hunting in the Dalton Highway corridor, and allow only bow hunting, and hopefully give sheep a break from over-hunting.

- Proposal 143. Support. This proposal would eliminate the extended sheep hunting season in the Dalton Highway Corridor and give sheep a break. Sheep need to be conserved for future generations, and this proposal if adopted would give them a break in the Dalton Corridor.
- Proposal 146. Oppose. See my comments opposing Proposal 57.
- Proposal 147. Oppose. See my comments opposing Proposal 57.
- Proposal 148. Oppose. See my comments opposing Proposal 57.
- Proposal 150. Oppose. This proposal if adopted would allow wolf hunting during the denning season which is inhumane.
- Proposal 151. Oppose. This proposal if adopted would allow wolf hunting during the denning season which is inhumane.
- Proposal 153. Oppose. This proposal if adopted would extend the hunting and trapping season for wolverine to April 30, and thus allow wolverine hunting and trapping during the denning season which raises biological concerns for this rare species, and is inhumane.
- Proposal 165. Oppose. See comments opposing Proposal 57.
- Proposal 166. Oppose. This proposal would authorize the use of bucket snares in trapping bears in Unit 25D. The practice is inhumane and a betrayal of Alaska's fair chase ethics.
- Proposal 168. Oppose. This proposal would extend the brown bear season in the Dalton Hwy. corridor to June 15 which is during the denning season and inhumane.
- Proposal 170. Oppose. This proposal if adopted would extend the trapping season for wolverine to April 15, and thus allow wolverine hunting and trapping during the denning season which raises



biological concerns for this rare species, and is inhumane.

- Proposal 181. Support. This proposal would reduce the non-resident take of full curl rams in Unit 20A, and potentially reduce the number of sheep taken by hunters. It is time to cut back sharply on the number of sheep harvested so as to conserve these marvelous animals in our state for future generations of Alaskans, including non-consumptive users. See my comments regarding Proposal 46.
- Proposal 186. Support. This proposal if adopted would provide a buffer area in the Stampede corridor just north of the Denali National Park where wolf trapping and hunting would be prohibited. Approximately 250,000 people ride tour buses on the Park Road every year looking to see wildlife. Many of those people are Alaskans. Wolves are one of the “mega-fauna” people want to see. In past years when there was a buffer, and more than 40% of the people on those buses got to see wolves, but after the Board eliminated the buffer the percentage has dropped to a range of 1% to 21%. It is a gross mis-allocation of this publicly owned resource to allow a handful of trappers to appropriate this resource to their personal gain. Article VIII, Section 3 of the Alaska Constitution provides for the common use of our wildlife, and it is time for a change benefitting the vast majority of Alaskans who would prefer to view wolves in this tiny piece of land. Resistance to a buffer is simply a matter of hunters and trappers being stubborn, and provides a “poster child” for Alaska’s mismanagement of its wildlife. If the Board wants to limit what it refers to as “Federal overreach” then it needs to approve a buffer in the Stampede Road area.
- Proposal 187. Oppose. This proposal would have the Board extend the wolverine trapping season in Units 20A, 20B, 20D, and 20F by two weeks to align with the season in Unit 20C. The wolverine trapping season should not be extended into the denning season. Instead, the trapping season for all of these units should be shortened to end on February 28. Wolverine are a rare species and trapping them during the denning season is inhumane.



- Proposal 189. Oppose. Tag fees aid the Department in monitoring the hunt, and provide income to the Department, and should not be waived in Unit 16A for no reason other than politics.
- Proposal 196. Oppose. This proposal would authorize an antlerless moose hunt in GMU 14C. Hunting in the Anchorage Bowl and other heavily populated parts of GMU 14C should be decreased, or eliminated (with the exception in cases of the defense of life or property). Most residents of the Municipality enjoy the presence of moose in their neighborhoods, and hunting moose in subdivisions and heavily visited public parks endangers our residents and visitors. I do not oppose antlerless moose hunts in the Twentymile/Placer hunt area since it is relatively unpopulated.



PC112

Name: Elena Tillman

Community of Residence: East Greenwich RI

Comment:

My name is Elena Tillman, I am an avid outdoorsman, wildlife photographer, lover of Denali, and have immense respect for our wolves that exist on our public lands.

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.

Proposal 106: Oppose

Proposal 186: Support



PC113

Name: Elizabeth Turgeon

Community of Residence: Bradford, VT

Comment:

My name is Elizabeth Turgeon. I reside in Bradford Vermont and support the National park service proposal 186. I have left more comments below. Thank you.

I support the National Park Service Proposal 186. This proposal will provide protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I hope you will approve Proposal 186.



PC114

Organization: robert valarcher photographie

Name: Robert Valarcher

Community of Residence: paris france

Comment:

I , robert valarcher , very strongly support the proposal to reinstate wolf protection in the stampede corridor ,wolves are the emblem of alaska wilderness , protect them every where you could !!!

robert valarcher



Proposal 43- I OPPOSE proposal 43. The proposal will only add pressure to other areas and further concentrate hunters doing exactly the opposite of what is intended. Sheep populations are lower and there are less full curl rams available for harvest but Full Curl management ensures and has proven in past declines to be a successful management tool to allow for the recovery of sheep populations while still providing hunter opportunity.

Proposal 44- I OPPOSE proposal 44. The proposal will only add pressure to other areas and further concentrate hunters doing exactly the opposite of what is intended. Sheep populations are lower and there are less full curl rams available for harvest but Full Curl management ensures and has proven in past declines to be a successful management tool to allow for the recovery of sheep populations while still providing hunter opportunity.

Proposal 45- I OPPOSE proposal 45. The proposal will only add pressure to other areas and further concentrate hunters doing exactly the opposite of what is intended. Sheep populations are lower and there are less full curl rams available for harvest but Full Curl management ensures and has proven in past declines to be a successful management tool to allow for the recovery of sheep populations while still providing hunter opportunity.

Proposal 46- I OPPOSE proposal 46. Full Curl management is self-limiting by nature and these areas are no easily accessible like some draw only area in the state. There is no biological concern in these areas to warrant a drawing hunt.

Proposal 47- I OPPOSE proposal 47. Drawing a Bison tag is hard enough. Allowing for proxy take just adds more applicants into the pool for someone that cannot go on the hunt but could proxy someone who also already applied.

Proposal 48- I SUPPORT proposal 48.

Proposal 49- I SUPPORT proposal 49.

Proposal 50- I SUPPORT proposal 50.

Proposal 51- I SUPPORT proposal 51.

Proposal 52- I OPPOSE proposal 52.

Proposal 53- I OPPOSE proposal 53.

Proposal 54- I OPPOSE proposal 54.

Proposal 55- I OPPOSE proposal 55.

Proposal 56- I SUPPORT proposal 56.

Proposal 57- I SUPPORT proposal 57.



Proposal 58- I SUPPORT proposal 58.

Proposal 59- I SUPPORT proposal 59.

Proposal 60- I SUPPORT proposal 60. Predator control is one of the few things we have control over. With the closure to sheep hunting in 19C efforts should be made to reduce predation on sheep in this area.

Proposal 61- I SUPPORT proposal 61.

Proposal 62- I SUPPORT proposal 62.

Proposal 63- I SUPPORT proposal 63.

Proposal 64- I OPPOSE proposal 64. Resident hunting should not be limited at this time. Nearly half of the moose hunters are non-residents currently.

Proposal 65- I SUPPORT proposal 65.

Proposal 66- I OPPOSE proposal 66.

Proposal 67- I SUPPORT proposal 67.

Proposal 68- I SUPPORT proposal 68.

Proposal 69- I SUPPORT proposal 69.

Proposal 70- I OPPOSE proposal 70.

Proposal 71- I SUPPORT proposal 71.

Proposal 72- I SUPPORT proposal 72.

Proposal 73- I SUPPORT proposal 73.

Proposal 74- I OPPOSE proposal 74.

Proposal 75- I SUPPORT proposal 75.

Proposal 76- I SUPPORT proposal 76 if non-resident hunting is re-opened under a draw quota for non-residents. The amount of state land in 19C and the amount of outfitter activity makes for unique circumstances that warrant a different approach.



Proposal 77- I SUPPORT proposal 77 if non-resident hunting is re-opened under a draw quota for non-residents. The amount of state land in 19C and the amount of outfitter activity makes for unique circumstances that warrant a different approach.

Proposal 78- I SUPPORT proposal 78 if non-resident hunting is re-opened under a draw quota for non-residents. The amount of state land in 19C and the amount of outfitter activity makes for unique circumstances that warrant a different approach.

Proposal 79- I SUPPORT proposal 79 if non-resident hunting is re-opened under a draw quota for non-residents. The amount of state land in 19C and the amount of outfitter activity makes for unique circumstances that warrant a different approach.

Proposal 80- I SUPPORT proposal 80 if non-resident hunting is re-opened under a draw quota for non-residents. The amount of state land in 19C and the amount of outfitter activity makes for unique circumstances that warrant a different approach.

Proposal 81- I SUPPORT proposal 81 if non-resident hunting is re-opened under a draw quota for non-residents. The amount of state land in 19C and the amount of outfitter activity makes for unique circumstances that warrant a different approach.

Proposal 82- I SUPPORT proposal 82.

Proposal 83- I SUPPORT proposal 83. If non-resident harvest is limited to Archery only I would see no reason for it to be a draw as harvest will be limited by the low success of Archery equipment.

Proposal 84- I OPPOSE proposal 84- The lions share of harvest in 19C has always been by guided non-resident hunters. Residents should not be limited in an area where the majority of take is by non-residents.

Proposal 85- I OPPOSE proposal 85.

Proposal 86- I OPPOSE proposal 86.

Proposal 87- I OPPOSE proposal 87.

Proposal 88- I SUPPORT proposal 88. Making 19C Archery Only for Residents and non-residents would allow harvest ticket sheep hunting opportunity for both residents and non-residents with very limited harvest due to the difficulty of archery sheep hunting.

Proposal 89- I OPPOSE proposal 89.

Proposal 90- I OPPOSE proposal 90.



Proposal 91- I OPPOSE proposal 91.

Proposal 93- I SUPPORT proposal 93.

Proposal 94- I SUPPORT proposal 94.

Proposal 95- I SUPPORT proposal 95.

Proposal 96- I SUPPORT proposal 96.

Proposal 97- I SUPPORT proposal 97.

Proposal 98- I Support Proposal 98.

Proposal 99- I SUPPORT proposal 99.

Proposal 100- I SUPPORT proposal 100.

Proposal 101- I SUPPPORT proposal 101.

Proposal 102- I SUPPORT proposal 102.

Proposal 103- I SUPPORT proposal 103.

Proposal 104- I SUPPORT proposal 104.

Proposal 105- I SUPPORT proposal 105.

Proposal 106- I SUPPORT proposal 106.

Proposal 107- I SUPPORT proposal 107.

Proposal 108- I SUPPORT proposal 108.

Proposal 109- I SUPPORT proposal 109.

Proposal 110- I SUPPORT proposal 110.

Proposal 111- I SUPPORT proposal 111. Adding Archery only seasons provides a lot of added hunter opportunity while adding very minimal extra harvest.

Proposal 112- I SUPPORT proposal 112.

Proposal 113- I OPPOSE proposal 113.



Proposal 114- I OPPOSE proposal 114.

Proposal 115- I OPPOSE proposal 115.

Proposal 116- I SUPPORT proposal 116.

Proposal 117- I SUPPORT proposal 117.

Proposal 118- I SUPPORT proposal 118. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.

Proposal 119- I OPPOSE proposal 119.

Proposal 120- I SUPPORT proposal 120.

Proposal 121- I SUPPORT proposal 121.

Proposal 122- I SUPPORT proposal 122.

Proposal 123- I SUPPORT proposal 123.

Proposal 124- I SUPPORT proposal 124.

Proposal 125- I OPPOSE proposal 125.

Proposal 126- I SUPPORT proposal 126.

Proposal 127- I OPPOSE proposal 127.

Proposal 128- I OPPOSE proposal 128.

Proposal 129- I OPPOSE proposal 129.

Proposal 130- I OPPOSE Proposal 130. Non- residents should get no more than 10% allocation of the drawing permits.

Proposal 131- I OPPOSE proposal 131. Non-residents should be allowed an allocation in the draw up to 10% of the available permits but should not be guaranteed these permit allocations.



Proposal 132- I SUPPORT proposal 132. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.

Proposal 133- I SUPPORT proposal 133. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.

Proposal 134- I OPPOSE proposal 134.

Proposal 135- I SUPPORT proposal 135. Non-residents should be limited to up to 10% of the available draw permits. DS206 only has 2 permits therefore there should not be a non-resident tag available to be drawn.

Proposal 136- I SUPPORT proposal 136.

Proposal 137- I SUPPORT proposal 137.

Proposal 138- I SUPPORT proposal 138.

Proposal 139- I OPPOSE proposal 139. Units 24B,C,D have very little WAC harvest.

Proposal 140- I OPPOSE proposal 140. Units 24B,C,D have very little WAC harvest and non-residents only kill bulls. Non-resident harvest is not the issue. The issue is subsistence hunters killing thousands of cow caribou when the WAC is in continued decline.

Proposal 141- I SUPPORT proposal 141. The youth season is not needed. It is a loophole for arial scouting. The general sheep season is 42 days and any weapon. There is plenty of opportunity for youth to hunt sheep during the general season dates.

Proposal 142- I SUPPORT proposal 142. The current 5 mile Archery Only corridor for sheep hunting is too small. 5 miles is not far and many rifle hunters walk 5 miles in and pressure rams away from the corridor into the rifle area where they are eventually harvested by rifle. This is currently the ONLY archery only Harvest Ticket sheep hunt in the state and it is closed by WSA. Extending the 5 mile corridor to 15 miles would greatly reduce harvest but continue to offer opportunity for any hunter who wishes to hunt with a bow and arrow.

Proposal 143- I OPPOSE proposal 143. This area is already closed by WSA. Additionally Archery harvest in this area is very minimal at only 1-3 rams per year on average. There is no justification for reducing hunting dates or archery only sheep hunting in this area.



Proposal 144- I OPPOSE proposal 144.

Proposal 145- I SUPPORT proposal 145.

Proposal 146- I SUPPORT proposal 146.

Proposal 147- I SUPPORT proposal 147.

Proposal 148- I SUPPORT proposal 148.

Proposal 149- I SUPPORT proposal 149.

Proposal 150- I SUPPORT proposal 150.

Proposal 151- I SUPPORT proposal 151.

Proposal 152- I SUPPORT proposal 152.

Proposal 153- I OPPOSE proposal 153.

Proposal 154- I OPPOSE proposal 154. Non-resident hunting pressure on the Haul Road is already extremely high and is getting to the point the hunting experience is quite poor. Allowing an extra tag inside the corridor will further this problem.

Proposal 155- I SUPPORT proposal 155.

Proposal 156- I OPPOSE proposal 156.

Proposal 157- I SUPPORT proposal 157.

Proposal 158- I OPPOSE proposal 158.

Proposal 159- I SUPPORT proposal 159. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.

Proposal 160- I SUPPORT proposal 160. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.



Proposal 161- I SUPPORT proposal 161. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.

Proposal 162- I SUPPORT proposal 162. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.

Proposal 163- I OPPOSE proposal 163.

Proposal 164- I OPPOSE proposal 164.

Proposal 165- I SUPPORT proposal 165.

Proposal 166- I OPPOSE proposal 166.

Proposal 167- I SUPPORT proposal 167.

Proposal 168- I SUPPORT proposal 168. I authored this proposal and support the extension of the Spring season and Fall season both within the DHCMA and in 26B Remainder. Brown bear populations are abundant and harvest is low. Additional brown bear harvest will help ungulate predation.

Proposal 169- I SUPPORT proposal 169.

Proposal 170- I OPPOSE proposal 170.

Proposal 171- I SUPPORT proposal 171.

Proposal 172- I OPPOSE proposal 172.

Proposal 173- I SUPPORT proposal 173.

Proposal 174- I SUPPORT proposal 174.

Proposal 175- I SUPPORT proposal 175.

Proposal 176- I SUPPORT proposal 176.



Proposal 177- I SUPPORT proposal 177. Adding Archery only seasons provides a lot of added hunter opportunity while adding very minimal extra harvest.

Proposal 178- I SUPPORT proposal 178.

Proposal 179- I OPPOSE proposal 179.

Proposal 180- I SUPPORT proposal 180. All non-resident draw permits should be on a 90/10 allocation where UP TO 10% of the permits MAY be awarded to non-residents but are not guaranteed.

Proposal 181- I SUPPORT proposal 181.

Proposal 182- I SUPPORT proposal 182.

Proposal 183- I SUPPORT proposal 183.

Proposal 184- I SUPPORT proposal 184.

Proposal 185- I SUPPORT proposal 185.

Proposal 186- I OPPOSE proposal 186. The park is already closed to hunting by Alaskans of over 4.7 Million Acres but that is not enough for them! The Federal overreach is beyond criminal and not welcome by Alaskans.

Proposal 187- I OPPOSE proposal 187.

Proposal 188- I SUPPORT proposal 188.

Proposal 189- I SUPPORT proposal 189.

Proposal 190- I SUPPORT proposal 190.

Proposal 191- I SUPPORT proposal 191.

Proposal 192- I SUPPORT proposal 192.

Proposal 193- I SUPPORT proposal 193.

Proposal 194- I SUPPORT proposal 194.

Proposal 195- I SUPPORT proposal 195.

Proposal 196- I SUPPORT proposal 196.



Proposal 197- I SUPPORT proposal 197.

Proposal 198- I SUPPORT proposal 198.

Proposal 199- I SUPPORT proposal 199.

Proposal 200- I SUPPORT proposal 200.

Proposal 207- I OPPOSE proposal 207. This proposal is not supported by any data what so ever. Rams are killed every year that are 5-7 and Full Curl.... What is the biological difference between those rams and rams that end up being killed on age and fall short of 8 years old as sub legal rams? Also there are many old rams on the mountain that are 10+ years old, not broomed and will never be full curl... The current definition of a full curl ram was very well thought out and the department has done a great job on providing educational material to hunters to determine if rams are legal. Hunters should bear more responsibility for shooting sub legal rams. Outfitters and guides should be held to an even higher standard!

Proposal 210- I SUPPORT proposal 210.

Proposal 211- I SUPPORT proposal 211.

Craig Van Arsdale
Soldotna,AK



PC116

Name: Nancy and James VanPelt

Community of Residence: Orlando, FL

Comment:

Imagine the first time you come to Alaska, riding the green transit bus in Denali National Park.... Suddenly a magnificent wolf comes walking next to the road... the entire bus full of people are in awe! Then find out close by is a section of land, surrounded by the Park on 3 sides, is a wolf killing zone. This needs to stop! Having the Stampede area open for killing wolves only benefits a very few people.... While thousands are being deprived of the chance to see them . Close this area for hunting and trapping! There is no scientific reason to continue this practice . As being yearly visitors we feel our voice should be heard ...and speaking for many others on that bus and many others who want the potential to see and hear them again. Nancy and James (Jim) VanPelt

Proposal 186: Support



PC117

Organization: Midnight Sun Safaris

Name: Parker Wallace

Community of Residence: Healy

Comment:

I am commenting on behalf of proposal 52, I believe this proposal is instrumental in aiding the effectiveness of predator control on the ground. I have in my lifetime observed our predator species, in particular wolves, become increasingly advanced at avoiding humans, be it individual or trap. I am not alone in this observation, I know there are many who agree with what I've seen. Predator management from a ground level is largely ineffective, the use of NV and forward facing IR technology are instrumental in successful predator management conducted by the individual. It won't solve the problem, the state needs to be more hands on, but it's a step in the right direction and it can't hurt. Predator management in our state is a huge issue, and although it won't be a solution (wider spread aerial control is the best solution) it will only aid in success and contribution by the public and individuals who hold this resource in such high regard.

Thank you for your time,

Parker Wallace

Proposal 43: Oppose
Proposal 44: Oppose

Proposal 45: Oppose
Proposal 46: Oppose

Proposal 47: Oppose
Proposal 52: Support



2-26-24

Protect Denali's Wolves in The Wolf Townships Support Proposal 186 - Written Testimony

I am a long term Alaskan who has worked in Denali National Park for the past 36 years; 33.5 as a Tundra Wilderness Tour (TWT) Guide and Transportation System driver.

Furthermore, from 1991 to 2009, I had worked on a part time professional basis as a nature photographer with representation by Alaska Stock Images who was later bought by Design Pics.

While the BOG may only concern itself with populations of animals, we in Denali never see entire populations of wildlife. What we see are the representatives of those populations: the individuals, family groups, small herds and flocks of wildlife that visitors from all over the world, (including Alaskans) visit Denali to see and enjoy.

Consequently, they have great value to the 600,000+ visitors to Denali each year.

As a TWT guide, I take up to 52 visitors (including Alaskans) into the park and give them a guided tour that includes wolves and other wildlife. Conservatively, I have taken over a 100,000 visitors into Denali during my career.

During this time, I can easily state that when visitors see and enjoy wolves, that the excitement level skyrockets. In fact, I have been told on many occasions prior to 2012 that wolves are what made a visitor's trip to Alaska.

Quoting from an economic study on Denali's wolves titled: **Economic Values of Wolves in Denali National Park and Preserve** (DNPP) - See: <https://static1.squarespace.com/static/5bc75d83e4afe931ade4f0d8/t/5c04334a70a6ad0f6bac84f5/1543779153926/Loomis-Economic-Values-of-Wolves-in-Denali-NPP-Final-3-30-2016.pdf>



“In 1997, non-resident visitors who came to Alaska primarily to view wildlife had average expenditures of \$6,000 per trip.”

“From economic valuation questions found in Alaska wildlife viewing literature, it can be inferred that a non-resident visitor may have an additional value in the range of \$200-\$300 per wildlife viewing trip to Alaska if a wolf is seen on their trip.”

“Qualitative content analysis of structured interview material with these same surveyed visitors yields a primary theme of dissatisfaction of not seeing wolves.” **End Quotes**

Declines in Wolf Viewing

Prior to 1995, 2005, and 2012, Headquarters, East Fork and Grant Creek wolf family groups were especially notable. Headquarter’s territory included the first 14.5 miles of the park road which allowed visitors the opportunity to view them without taking any kind of a bus into the park.

The trapping caused deaths of breeding females in each of the above wolf family groups in the above years, disrupted travel, use of territory, hunting, rendezvous and den site locations within these family groups, or in Headquarters case, lead to their complete disintegration.

All previous wolf family groups (Savage River, Headquarters, Sanctuary, Mt. Margaret, Nenana River, Riley Creek and East Fork (Toklat) that have moved into the far eastern portion of the Denali have suffered trapping/hunting caused deaths. In most of these, hunting/trapping was either a contributory or primary cause of their disintegration.

In all of these cases (and more) not only have the wolves been negatively impacted but so too has visitor viewing.



From 2004 to 2012, Grant Creek denned west of the Toklat River, a quarter mile away from the park road with two off years. This provided visitors unparalleled opportunities to view wolves and their pups with high quality sightings being common. Wolf viewing would reach its peak in 2010, when 45% of visitors saw wolves, primarily due to Grant Creek.

In 2012, the breeding female of Grant Creek was baited and killed outside the park by a local trapper.

Within one year, this led to a serious decline in Grant Creek from 15 wolves to 3. Additionally, it created massive behavioral disruptions to travel, territory, hunting, rendezvous and den site selection and caused visitor viewing to plummet to 4% from its high of 45% in 2010.

What this points out is that wolves are not expendable biological cogs that replicate the behaviors of previous wolf family groups. Each individual and family group is unique in its behaviors and whether they will be viewed by park visitors or not.

Over the past three seasons, I and my passengers had 0 sightings for 2021, 2 sightings for 2022 and 3 sightings for 2023.

This is not an isolated case of one Denali Tour Guide/Driver.

In 2019, I conducted mid-season and end of season sighting surveys of wolves among my fellow drivers and of the 68 Denali drivers who responded, there were only 27 sightings involving 32 wolves over the course of a 135 days (April 27 - September 8, 2019).

NPS would later establish that in 2019 and 2022, wolf viewing declined to its all time low of 1%. This is the reality of the state's policy's is that visitors and residents are being denied a truly rare and unique experience as not only wolves are being eliminated/disrupted but so to is wolf viewing in Denali National Park.



All Alaskans and visitors should have a realistic opportunity to experience Denali's Big Five (moose, caribou, Dall Sheep, grizzly bears and wolves). Targeting and killing Denali's wolves in The Wolf Townships significantly impacts wolf viewing in the park. It further degrades and cheapens the experience for Alaska visitors/residents and denies them that rare experience.

Wolf viewing isn't based on the numbers of wolves, but on the behaviors that individual wolves and family groups adopt such as: travel and hunting near or on the park road. Far more rare, is the establishment of rendezvous sites and the ultra rare den site near the park road; with den sites being the ultimate gold standard for viewing.

The targeting, trapping and killing of Denali's wolves within The Wolf Townships has repeatedly disrupted wolf family group dynamics impacting not only the wolves themselves but the viewing of wolves for up to 600,000+ visitors per year.

The above demonstrates the fragility of wolf family structure and the behaviors that allow for visitor viewing. These examples and more point out that one knowledgeable trapper can destructively impact the social structure of Denali wolf family groups and visitor viewing of wolves.....for years.

NPS Study

In January of 2023, NPS released a study on the impacts of human caused mortality to wolf family groups titled: **Human-caused mortality triggers pack instability in gray wolves** -

See: https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/fee.2597?fbclid=IwAR0rslfL9Cfm_fb6mNmE2T24LpP_BWFmQuk3QSud4ImtdLcARHNGT3-4uJ.

This study included: Denali, Yellowstone, Grand Teton, Voyageurs National Parks and Yukon Charley Rivers National Preserve.



The conclusions of this study support my testimony. Even the death of a single wolf (depending on which one) can have significant implications for wolf family structure, behaviors and/or whether they disintegrate as a family unit or not.

How the State Treats Wolves

The state typically treats wolves in its management as expendable, biological cogs while ignoring fundamental wolf family structure, behavior, and significant ecosystem and economic benefits. And in Denali's case, the state further ignores the devastating impacts to visitor viewing.

No place in Alaska, is a family group of wolves granted full protection throughout their territory. Even in Denali's 6.2 million acres, wolves are only protected in the 2 million acres of Denali's original park; not the 4 million acres of Preserve and New Additions.

In these areas, bag limits for trapping is unlimited and hunting begins on either August 1st or 10th (depending on the Game Management Unit - GMU) when wolf pups are using rendezvous sites and are highly dependent on the adults.

According to the Alaska Conservation Alliance and Ecotrust, wolves are only protected in 2.4% of Alaska leaving 97.6% open to wolf killing. Where is the balance in this type of biased management?

The Wolf Townships have been recognized for decades as critical winter habitat for Denali's caribou herd and wolves. Yet, while the caribou herd have enjoyed protection since 1972; the wolves have not. Why the double standard in wildlife management between these two species both of which spend most of their time within the park?

The Contempt by Extremist Trappers/Hunters for Visitors

The contempt by extremist trappers/hunters for Denali visitors, the tourism industry and all non consumptive users is best illustrated by quoting the trapper responsible for the death of Grant Creek's breeding female in 2012.



Quoting from the National Geographic article: **How Can Six Million Acres in Denali Still Not Be Enough?**

“That was the third time I ruined millions of people’s Denali National Park viewing experience,” Wallace quips.

The cascading and rippling impacts of the killing of this breeding female destroyed the best wolf viewing in my 36 years in Denali. And furthermore, it denied in the words of the above trapper “millions of people’s” unique and unforgettable wolf viewing experience; which included pups.

How does the desires of the above trapper as well as a handful of others outweigh the desires of “in the words of the above trapper;” “millions of people’s” who wish to see wolves?

Wolves are the number 1 wildlife draw in Yellowstone and bring in \$83 million dollars into the local economies. They further provide many direct and indirect jobs and are a significant economic benefit to Yellowstone’s tourism economy and consequently, to businesses and employees in Montana, Wyoming and Idaho.

A similar, positive economic effect on a lower scale could be achieved in Denali if and only if wolves are protected within The Wolf Townships. This would allow for wolf family group structure continuity (as best as possible) and help set the stage for realistic visitor viewing.

Quite simply the state’s policies have undermined and sabotaged wolf viewing in Denali to such a degree that the odds of visitors seeing and experiencing wolves is “almost nonexistent”.

While wolf viewing cannot be guaranteed, the stage can be set for its realistic possibility if wolves are fully protected in their critical habitats that are adjacent to Denali National Park.



No Government Overreach for Proposal 186:

Whenever a proposal is made to actually protect wildlife, especially wolves and/or grizzlies, the howling, caterwauling and whining begins over government overreach.

Proposal 186 isn't a case of Federal overreach on state lands; it is a proposal not a takeover. In past years, the Fairbanks North Star Borough (2016) as well as opinion polls by Remington Research Group in 2018, show overwhelming public support for the establishment of a protective buffer to protect the park's wolves, grizzlies and wolverines.

It is the vocal minority of howling extremists in the hunting/trapping community that are opposed to such a proposal.

Alaska wildlife is supposed to be managed for all Alaskans; including non consumptive users who wish to view, photograph, video and enjoy living wildlife.

The only places in Alaska where wolves enjoy complete protection is the original National Parks of Denali and Glacier Bay and the original National Monument/Park of Katmai. This being the case, they are not protected throughout their entire territories.

Consequently, I am currently on my sixth trip to Yellowstone in 2 1/2 years specifically to look for, observe and photo/video wolves. And even though, this trip has not been successful to the extent that I would like, at least I have the opportunity to view wolves while here. The same cannot be said for Denali. A one to six percent viewing possibility of seeing wolves in Denali is not a realistic opportunity but a spin of the roulette wheel.

Protecting Denali's wolves in The Wolf Townships will help set the stage for the visitor viewing of wolves for Alaskans and all visitors. It will further encourage these visitors to spend their hard earned cash in Healy and other Alaskan locations as opposed to Gardiner, Montana and locations in the Lower 48.



I urge you to support Proposal 186 in it's entirety and on a year round basis.

Wolf Control Proposals for GMU 19c

Am Opposed to the following proposals: 60, 61, 62, 65,

Sheep Proposals for GMU 19c

Am Opposed to the following proposals: 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 89, 90, 91

Support Proposal 92

Grizzly Bear Proposals for GMU 19c, 19e, 19b, 19d, 21a, 21e

Am Opposed to the following proposals: 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107

Tok Area Proposals for GMU 12, 20d, 20e, 24

Am Opposed to the following proposals: 108, 109, 120, 121, 122, 123, 136, 137, 138, 146, 147, 148, 149, 150, 151, 152, 153

Proposals for Units 20A, B, C, F, 25a 25c

Am Opposed to the following proposals: 166, 167, 168, 169, 170, 182, 183, 184, 185, 187



Notes on Opposing the Above Proposals

None of the Dall Sheep proposals mention human caused climate change impacts (heavy snowfall and/or icy winters) and their duration on sheep populations. It should be expected that as long as human beings continue to burn fossil fuels that climate change impacts will worsen for Dall Sheep and other species; including caribou.

Sheep populations are declining statewide, yet the following sheep proposals allow for expanded sheep hunting by resident and non resident hunters. This contradicts attempting to maintain and/or increase sheep populations and no amount of wolf control will alleviate the problem for sheep when it is a human caused, climate change issue. Consequently, Proposals 60, 61, 62 & 65 will only squander limited state resources.

Furthermore, no ADF&G studies of ungulate, sheep, wolf or grizzly/black bear populations are cited in any of these proposals. Nor, are any formal vegetation studies on lichen, mosses and willows mentioned to determine habitat condition.

It should be expected that as willows expand into areas of lichen and mosses that these important food sources for caribou will decline in time.

Habitat/vegetation quality is directly related to carrying capacity of the ecosystem for ungulates.

For proposal 65, ADF&G fails to give any reason to continue Intensive Management, or it's current state of effectiveness, or its current cost or future, expected costs.

Furthermore, no numbers of ungulates or predators are given or population goals to be reached.

Quite simply, no justifications based on rigorous scientific study is given for any of these proposals. The above proposals for intensive management and wolf control if approved, would continue to pour limited state resources into the "Black Hole" of wasteful spending.



Opposing all Expanded Grizzly Bear Hunting/Baiting Proposals

Grizzlies have the lowest reproductive rate of any North American mammal, consequently, their management must be scientifically based with comprehensive studies conducted beforehand.

No scientific justification for these proposals is given to justify expanding hunting seasons. No studies on the grizzly bear population is given, no population dynamics (ratios of males, females, subadults & cubs) is given, no natural mortality is established for cubs in GMU 19c (or other GMU's), or whether the population is increasing, stable or decreasing.

Furthermore, this GMU is adjacent to the southwest corner of Denali National Park/Preserve, meaning National Park/Preserve bears could be targeted and killed which is unacceptable.

Bear baiting is one of the most unethical practices to hunt grizzly or black bears. In addition to its unethical nature, it also carries with it the strong possibility of creating human food habituated bears.

Food habituation by grizzly bears has been well documented going all the way back at least to the 1967 bear attacks on two different women in two different areas of Glacier National Park, Montana by two different grizzly "dump" bears.

Grizzlies have the capability of creating indirect food association (no people present) through the presence of human scent on human food items or garbage. This has lead to human injuries and in rare cases, predatory behavior by grizzlies that has resulted in the deaths of people.

Bear bait stations are miniature dumps created by hunters. Since not every bear is killed at these bait stations, the possibility of hunters creating problem bears for others is a very real possibility.

Additionally, female bears with cubs who visit bait stations teach their cubs this association.



Lastly, it makes absolutely no sense to encourage the public to keep a clean camp, to never feed bears, to not put bird seed out in spring, summer and fall, to put trash cans out for pickup on the day of pickup, to clean fish by streams, to use bear proof food containers, food lockers, garbage cans for campers, backpackers, etc and then have hunters put out human food, grease and/or dog food in creating these bait stations.

Quite simply, bear baiting should be banned in Alaska; not expanded.

Sincerely,

Bill Watkins

References:

Economic Values of Wolves in Denali National Park and Preserve (DNPP)

<https://static1.squarespace.com/static/5bc75d83e4afe931ade4f0d8/t/5c04334a70a6ad0f6bac84f5/1543779153926/Loomis-Economic-Values-of-Wolves-in-Denali-NPP-Final-3-30-2016.pdf>

Human-caused mortality triggers pack instability in gray wolves

<https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/fee.2597?fbclid=IwAR0oca4a4yJT1rEq2renovZ4f8tUCchRbcV8R7Fhzm96zsJQCQ10uLsgE6k>



The Wolf Connection Podcast with Kira Cassidy on NPS Study: Human-caused mortality triggers pack instability in gray wolves

https://thewolfconnection.buzzsprout.com/1081496/12224184-episode-111-kira-cassidy-human-caused-mortality-triggers-wolf-pack-instability?fbclid=IwAR2LbfioqJNnXr-CldgrmpCk0JrCogkKnaTI4biUXocbsF_F0fNjDVViz-E

Trapper lures wolves from Denali, kills 2; pack's future in doubt

<https://www.latimes.com/nation/la-xpm-2012-may-21-la-na-nn-denali-wolf-20120521-story.html>

Battle over wolf hunting on Denali boundary continues

https://www.newsminer.com/features/outdoors/battle-over-wolf-hunting-on-denali-boundary-continues/article_25332818-b74c-11e9-9f0a-d71e8965fe25.html

Looking to see a wolf at Denali? A grassroots bus-driver survey puts the odds at 'not-quite nonexistent'

<https://www.adn.com/alaska-news/science/2019/07/29/looking-to-see-a-wolf-at-denali-a-grassroots-bus-driver-survey-puts-the-odds-at-not-quite-nonexistent/>

New Denali wolf study omits the full story

<https://www.adn.com/commentary/article/new-denali-wolf-study-omits-full-story/2016/05/04/>

How Can Six Million Acres at Denali Still not be Enough?

<https://www.nationalgeographic.com/magazine/article/denali-national-park-alaska>



NPS Wolf Sighting Index

<https://www.nps.gov/dena/learn/nature/wolf-sighting-index.htm>

NPS - 2022 Annual Wolf Report

<https://irma.nps.gov/DataStore/DownloadFile/689410> -

Quoting from Under Summary - Page 7 - A index of wolf viewing for the eastern portion of the road (to East Fork) was 0.01 in 2022.; only one data collection trip out of 91 observed a wolf in 2022.

No wolf sighting data is available for 2020 & 2021 due to Covid

Denali Wolves on FB - Educational/Advocacy Group

<https://www.facebook.com/groups/denaliwolves>

Denali Wolves & The Wolf Townships - Explanatory Video

<https://www.youtube.com/watch?v=q2Xi--9fuDw&t=913s>

Denali Wolf Time Capsule Photos - Prior to 2009

<https://billwatkins.photography/portfolio/denali-wolves>

More film images prior to 2009, will be scanned and added at a later date.

Bill Watkins
Denali Park, Alaska



PC119

Name: Bob and Karen Watson

Community of Residence: North Liberty, Indiana

Comment:

My wife and I hardly support Proposal 186 relating to the closure of a small piece of state land from hunting and trapping of Wolves. We have been coming to Alaska, and particularly Denali, since the early 1980's to view wolves in their natural habitat. This small amount of land should support the overall spirit of the area, not hinder it. It doesn't seem right that a wolf could be hunted or trapped just because it went slightly off National Park land. They don't know what land they're on. It's different if they wander miles and miles away, but to just cross this small state land area shouldn't be a death sentence. Thank you for your consideration. / Bob and Karen Watson 2-12-2024

Proposal 186: Support



PC120

Name: Kate Weber

Community of Residence: Healy , Alaska,

Comment:

I support proposal 186 to limit the wolf trapping that allows the wolf families to walk right into a trap at Unit20 C. I am concerned as an Alaskan and Healy community resident for any kind of Denali Nat Park tourism.

How can we say we are any kind of eco system at all of plants and animals when individuals bring in more and more trailers, 4 wheelers, guns , traps and then I see these hides either on some wall in the Healy community that connects to Denali National Park , via Unit 20C or in a National Geographic from Stampede .

What do the tourists from all over the world think of the pure selfishness of one person killing animals for their own profit in a heavy tourist area as the wolf townships are . These are places full of too many dogs already and children and working families all walking out on Dry Creek that one can walk or ski or snowshoe right up past the historic bluff into Stampede into Denali National park and view the wolf . This is right where Unit 20 C connects to Healy .

Photographers love the wildlife that has been there in the days of Murie and Haber who did enormous research of wolf communities . Are we pursuing just eliminating wild life for the tourist and calling that eco tourism ? I strongly believe that this proposal 186 will bring tons of benefit to the wolf townships that are right next to the Denali National Park . I doubt the safety of trapping in hiking and skiing areas not to mention the safety of the children and the tourists themselves . Already a bus trip out the Denali road has very few animals at all anymore to view or photograph . I have skied past a wolf but that was in the 70s . I have observed wolves

walking the " wrong way " in the 2020 s towards their own deaths and demise of their wolf communities right out of Unit 20 C into a trap for someone's personal gain. There is a lot of hunting and trapping area in Alaska . It is a huge state . People now have trailers, 4 wheelers, snow machines . They bring these in to the area but do not own land there to be trapping and hunting in residential areas. This is becoming a leisure sport , but it is eliminating the very thing a tourist photographer or animal plant lover would spend all the money it takes now to come to the Denali Park and stay in the wolf townships . Do they come to see animals or trap remains and ruined tundra and worse air ?

Proposal 186: Support



PC121

Name: Charmi Weker

Community of Residence: Anderson, Alaska

Comment:

I am supporting Proposal 186

Proposal 43: Support

Proposal 186: Support



PC122

Name: Stephen Wenzlick

Community of Residence: North Pole Alaska

Comment:

I am in support of proposal 176 on the salcha river and unit 20b to stop nonresidents from being able to have a anybull tag. Since I was a kid my family has owned a common the slash and we have seen a major decline in the moose population. Thanks Stephen

Proposal 176: Support



PC123

Name: April Woods

Community of Residence: Anchorage, AK

Comment:

Over many years I have watched our animal numbers decrease as our government fails to protect them. Alaska's Board of Game has proven by our wildlife numbers that they do NOT protect wildlife, they kill and they sell hunting licenses. This major conflict of issue has to be addressed,

if we continue on this course, all will go extinct. You can't put money on one side and wildlife on the other and expect wildlife to have a chance, not in this world.

I support the National Park Service Proposal 186. This proposal will provide well-needed protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem. And every time I go to Denali National Park I come home without seeing wolves. Wildlife sight seers are left empty handed again and again because our system does not protect wolves and all wildlife, it capitalizes on their death.

The Alaska-Federal relationship is important to many Alaskans - for the good that can come from cooperative management strategies. The Board of Game has approved requests for wolf protections in this area before, and can certainly do so again. I demand that you approve Proposal 186.

Proposal 186: Support



PC124

Organization: The village of Tanana

Name: Trenton Woods

Community of Residence: Fairbanks, Alaska

Comment:

Being an Alaska native from Tanana, I feel that the use of thermal technology is beneficial to my people to reduce predator population because we live off moose and caribou. The wolves have adapted and so should we. I am also a Alaskan big game hunting guide who spends 9 months a year out in the wilderness and sees the destruction wolves put on our state.

Proposal 52: Support



Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

September 29, 2023

Jerry Burnett, Chair
Alaska Board of Game
ADF&G Boards Support Section
ATTN: Board of Game Comments
P.O. Box 115526 | Juneau , AK 99811-5526
(Submitted electronically via www.boardofgame.adfg.alaska.gov)

Subject: Comments on proposals for 2024 Interior and Eastern Arctic Region meeting

Dear Mr. Burnett:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on September 27 and 28, 2023. The commission is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. At this meeting, the SRC reviewed several proposals to the Alaska Board of Game for Unit 12 that will be considered during the 2024 Interior and Eastern Arctic Region meeting and would like to provide the following comments.

Proposal 52: Allow the use of night vision goggles and forward-looking infrared devices for taking furbearers with a trapping license in Units 12, 19, 20, 21, 24, 25, 26B, and 26C. The Wrangell-St. Elias National Park Subsistence Resource Commission supported Proposal 52. An authorization to use night vision goggles would provide the opportunity to hunt predators at night.

Proposal 111: Add an archery only, five-day moose season for residents and nonresidents in Unit 12. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 111. Concerns about this proposal included extending the season into a period of time when the animals are more susceptible to harvest along with the potential to wound rather than kill an animal. Archery doesn't guarantee a kill.

Proposals 120 and 121: Increase the brown/grizzly bear bag limit for residents in a portion of Unit 12. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposals 120 and 121 with modification to include all of Unit 12. There is no shortage of bears in Unit 12. Ad adoption of the proposal would provide additional harvest opportunity.

Chair: Susan L. Entsminger; Members: Mike Cronk, Daryl James, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, Daniel E. Stevens, and Gloria Stickwan



Proposals 122 and 123: Lengthen the wolf hunting season in Units 12 and 20E. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposals 122 and 123. Adoption of the proposal will provide additional opportunity to harvest wolves. For example, people who bait bears could harvest wolves that come into their bait stations. It was also noted that the fur quality of wolves is still good in June.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Susan L. Entsminger".

Susan L. Entsminger
Chair

cc: Superintendent, Wrangell-St. Elias National Park and Preserve



PC126

Name: Mary Zalar

Community of Residence: Fairbanks, AK

Comment:

I write in support of Proposal 186. I urge the Board to adopt proposal 186 and restore the prohibition on the harvest of wolves in a portion of Unit 20C (areas as specified in the proposal). Protecting wolves that spend time in Denali National Park benefits the people of Alaska and visitors who in turn contribute to local economies and the tourism industry. Visitors to Denali Park LOVE seeing wolves. There are thousands of visitors to Denali Park annually--many of whom are residents of Alaska. Wildlife resources (in this case wolves) should be managed for the maximum benefit of Alaska's people. The prohibition of the harvest of wolves in this relatively small area may displace a very few trappers. However, many, many people could benefit as wolves in this protected area are likely to spend time in Denali Park. Please prohibit harvest of wolves in this area, and pass Proposal 186.

Proposal 186: Support
