



# Ahtna Intertribal Resource Commission

PO Box 613 – Glennallen, Alaska 99588  
Phone: (907) 822-4466 Fax: (907) 822-4406



PC1

[www.ahtnatribal.org](http://www.ahtnatribal.org)  
[connect@ahtnatribal.org](mailto:connect@ahtnatribal.org)

February 27<sup>th</sup>, 2024

The Alaska Board of Game  
P.O. Box 115526  
1255 W. 8<sup>th</sup> Street  
Juneau, AK 99811-5526

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

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 1,000km<sup>2</sup>
  - 2011: 13.0 independent bears per 1,000km<sup>2</sup>
  - 2022: preliminary estimate 8 independent bears per 1,000km<sup>2</sup>
- 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 <sup>a</sup>	-	-	-	-	946
2011	9	814	-	86 (59 "any-bull") <sup>b</sup>	952
2012	19	969	-	98 (73 "any-bull") <sup>b</sup>	720
2013	45	2,066	-	156 (81 "any-bull") <sup>b</sup>	723
2014	43	1,771	281	150 (77 "any-bull") <sup>b</sup>	937
2015	43	1,984	344	171 (92 "any-bull") <sup>b</sup>	1,058
2016	73	3,023	485	201 (114 "any-bull") <sup>b</sup>	1,089
2017	83	3,136	521	188 (102 "any-bull") <sup>b</sup>	1,006
2018	57	2,331	355	155 (92 "any-bull") <sup>b</sup>	801
2019	61	2,143	350	159 (94 "any-bull") <sup>b</sup>	914
2020	45	1,699	350	138 (79 "any-bull") <sup>b</sup>	880
2021	54	1,831	350	130 (84 "any-bull") <sup>b</sup>	839
2022	47	1,703	350	124 (74 "any-bull") <sup>b</sup>	689
2023	46	1,757	350	108 (65 "any-bull")	528*

<sup>a</sup> The community hunt was not offered in regulatory year 2010.

<sup>b</sup> 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.

P.O. Box 240971 ~ Anchorage, AK 99524

Phone: (907) 929-0619

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

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



current licenses but 30% of License/tag revenue	
---	--

**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, 1<sup>st</sup>) 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 ( $7 \pm 11.25$  SE) was on average greater than during the period without the presence of the buffer zone ( $2.6 \pm 4.3$ ). 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*

---



**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 inexperienced 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.

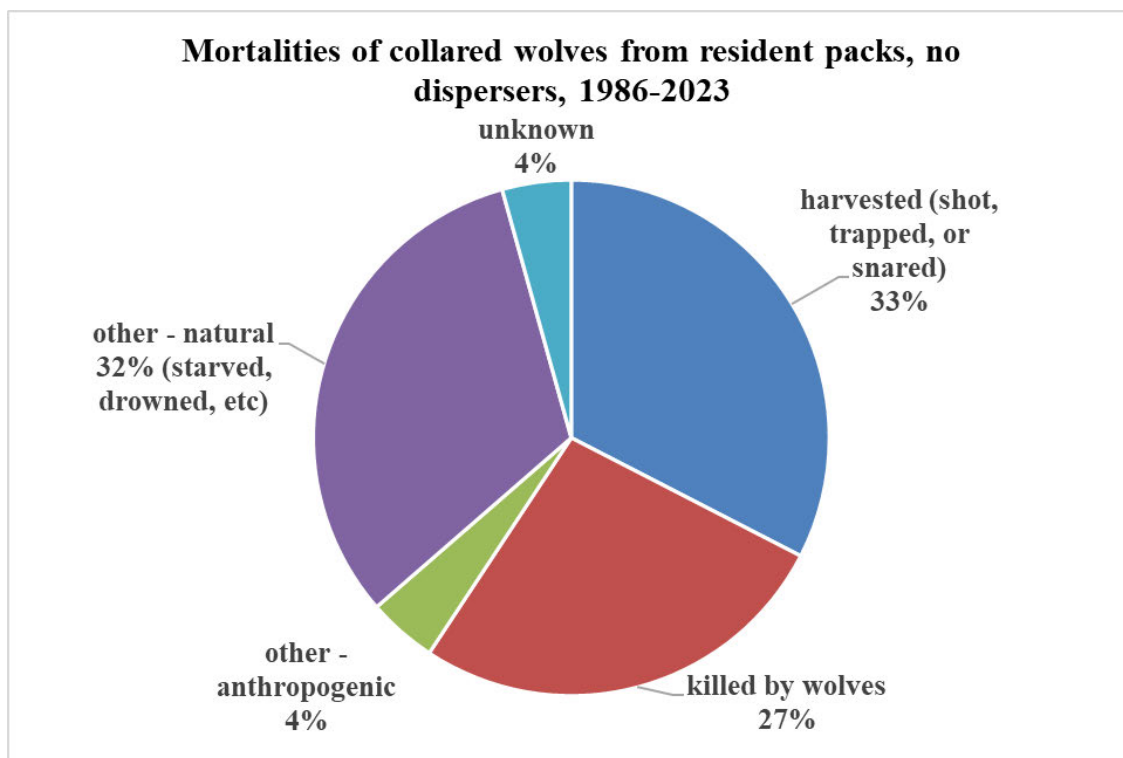
On behalf of our members, DCC has commented over the past two decades on Denali-relevant proposals. We appreciate efforts by the Board of Game to limit motorized hunting in the Yanert and Wood River Valleys, and to limit the impact of bear bait stations on wolves in the Stampede area. The Board of Game, 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:**

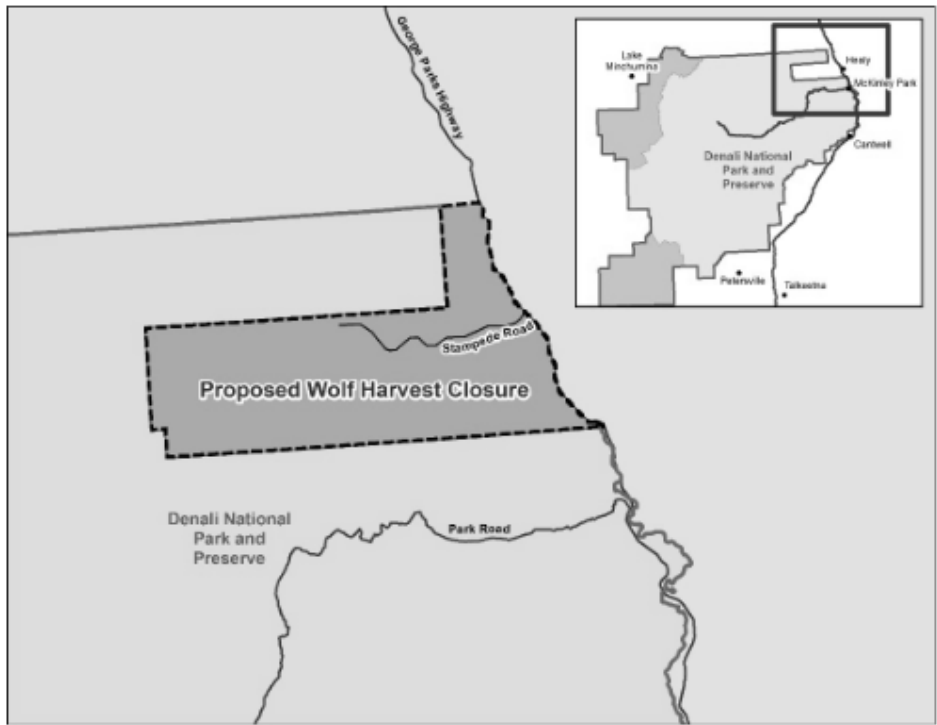
1. **Non-consumptive values, such as wildlife viewing and scientific study, have been recognized as valid and important in Alaska wolf management. They are not “federal values” only, but are a solid part of the state management toolbox. These values are particularly important in the Denali National Park 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*.



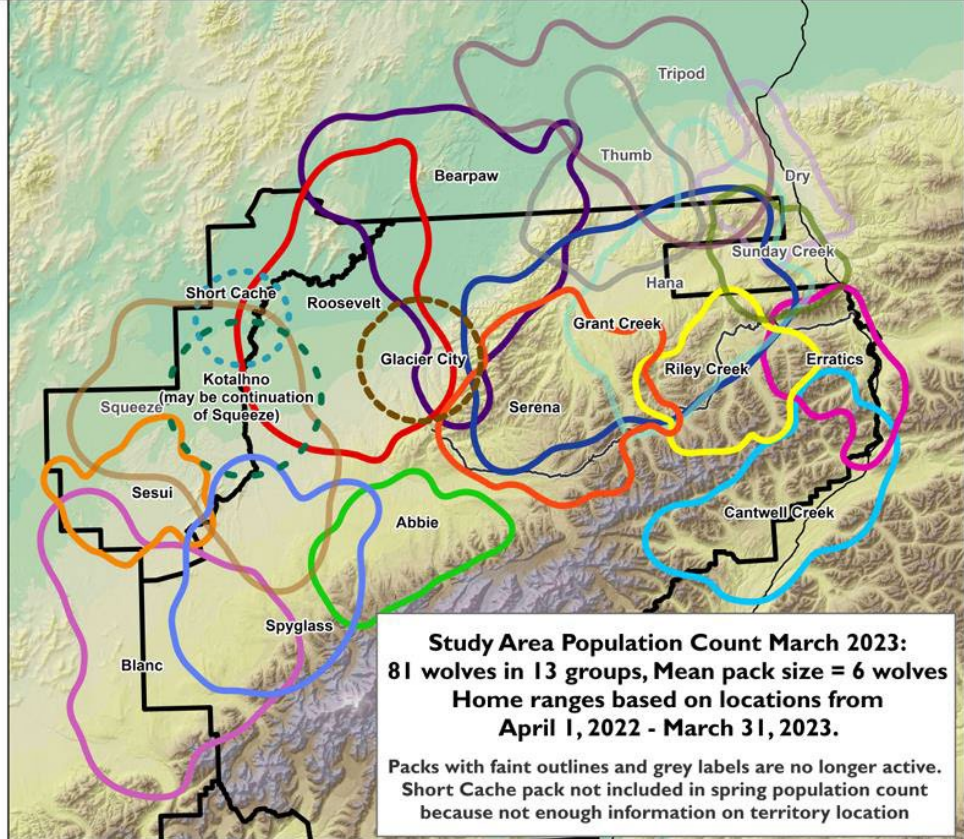
4. We accept that there is not a biological concern for the overall population of wolves in the Denali region. However, the loss of even one wolf has been shown to be disruptive to an entire family group, especially in early spring, after mating and before pups are born. Pack disruption and dissolution 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.”*

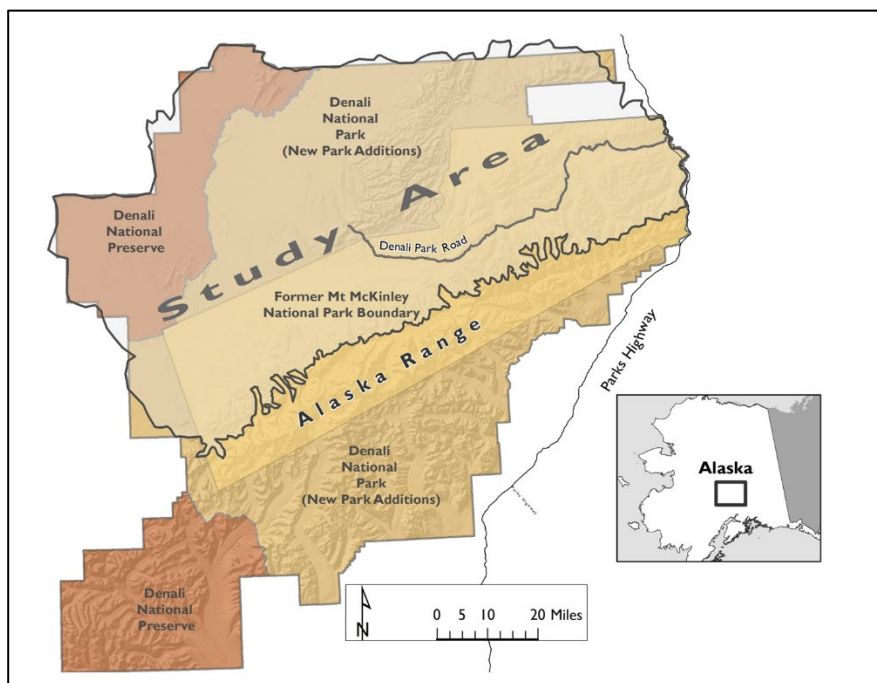
- f. Board of Game Meeting February 2004 – Proposal 156 – this proposal, reflecting opinions from several Advisory Committees, sought to remove all the existing Denali buffer zones. Instead. However, the Board of Game retained the Stampede Townships buffer, west of the Savage River, and amended the Nenana 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 15<sup>th</sup>. 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 30<sup>th</sup>. 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*



PC36

**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*

---