



PC101

Name: Mike Shields

Community of Residence: Henderson Ky 42420

Comment:

Hello, I am in favor of supporting 186. Wolves/carnivores are a vital part of a healthy eco-system. All carnivores need to be protected under the endangered species act.



PC102

Name: James Shirk

Community of Residence: Seward Alaska

Comment:

Concerning proposal 138 I am in favor of this proposal. I have hunted that area since the early seventies and have seen an increase in moose and bison kills from bears and wolves. I have a hunting cabin between Delta Junction and Tok that I spend 4 months at in the fall and spring. After that bad winter there was a significant decrease in bison and moose in this area. Late last fall I saw more bear and wolf sign than moose or bison and I think this proposal will help increase the population for moose and bison.

Proposal 138: Support



PC103

Name: Pixie Siebe

Community of Residence: Anchorage

Comment:

I strongly support proposal 186. I love watching wolves in Yellowstone. I make biannual trips there, spend my money to watch wolves. Millions of other visitors also support the wolf tourism industry. Alaska is losing out by having a reduced wolf population due to the few weeks that the wolves venture into the Stampede area where they are not protected. A few trappers can remove all or parts of a pack, and completely disrupt the life cycles of what are essentially Denali wolves.

Please close this area to wolf trapping. Please pass proposal 186.

Proposal 186: Support



PC104

Members of the Alaska Board of Game:

I am writing this letter to voice my support for Proposal 176, adjusting the moose bag limits for non-resident hunters. As a resident hunter in Alaska, and specifically in the Salcha River drainage, I believe that this modification serves the best interests of all user groups of this area. Unlike non-resident hunters whose primary goal of hunting in Alaska is obtaining a trophy, resident hunters rely on moose hunting opportunities to supplement their freezers and reduce reliance on outside sourced meats. Modifying non-resident hunting regulation in the upper Salcha River brings them in line with non-resident hunter guidelines in other areas. Improvements in transportation have made an area that once had limited hunter numbers more accessible and enticing to out-of-state hunters. A hunting zone that was once protected by its remote and difficult access now requires regulatory controls to maintain a balance and prevent overuse by non-resident hunters taking advantage of the areas current any bull bag limit. Thank you for your efforts and your attention to this matter and I again respectfully request your support for Proposal 176.

Respectfully submitted,

Matt Soden



Name: Jeffrey Sperry

Community of Residence: Eagle River

Comment:

Proposal 43 - I am opposed. According to the proposal 76% of the hunters already do not hunt every year. Additionally, data will show that not all of the legal rams are killed every year.

Proposal 44 - I am opposed. Science will show that the decrease in sheep populations is due to weather and predators. Decreasing the opportunity for people to spend time in the field hunting will not increase the sheep populations significantly. We should allow hunters into the field as much as possible. The full curl regulations provide for harvest of only the older, mature rams.

Proposal 45 - I am opposed. The decrease in sheep populations is due primarily to weather events and not harvest from hunters. We should continue to allow hunters into the field as much as possible. The full curl regulations provide for harvest of only the older, mature rams. Decreasing the number of hunters in the field will not significantly increase the sheep population.

Proposal 46 - I am opposed. Limiting sheep hunters to a drawing permit system will not significantly increase the ram population. Currently not all of the legal rams are not killed during the hunting season. Every year there is evidence of rams harvested that would have been legal to harvest the year before. We should be promoting getting as many hunters into the field as possible so that people have an opportunity to go hunting.

Proposal 47: I am opposed. Bison permits should not be allowed to proxy. I believe these permits should go to people who can actually do the hunt.

Proposal 118 - I am opposed. There is no need to create a separate archery only hunt in the Tok Management area. There are few permits for this area, the area is large and there should be no problem being able to hunt without pressure from other hunters.

Proposal 119- I am opposed. This proposal will not significantly increase the ram population. The Full Curl management allows only harvest for older, mature rams. Following this management plan still allows sufficient rams for breeding.

Proposal 120 - I support this proposal. There are abundant grizzly bears in this area, increasing the bag limit to two will not have any detrimental effect on the population.

Thank you for the opportunity to comment on these proposals.

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

*Proposal 46: Oppose
Proposal 47: Oppose
Proposal 118: Oppose*

Proposal 119: Support



Comments submitted 9/29/23 before portal was open.

Proposal 43: I am opposed to this proposal. I believe that before changing to a permit system that affects Alaska hunters that the nonresident and youth hunts should be eliminated. Elimination of nonresidents hunting should be the first step prior to putting restrictions on residents. Some registration hunts in Alaska have a limited number of permits, which if that occurred would also put further restrictions on Alaska residents.

Proposal 44: I am opposed. Prior to putting restrictions on resident hunters the nonresidents should be excluded from hunting in these areas. Additionally, if there is concern about increased sub legal harvest I would suggest increasing the penalty for taking a sublegal sheep.

Proposal 45: I am opposed. Again, before putting restrictions on Alaska residents I believe we should eliminate nonresident hunting in these areas.

Proposal 46: I am opposed. Before putting restrictions on Alaska residents I believe we should eliminate nonresident hunting in these units.

Proposal 47: I am opposed. The bison hunts are a special type of hunt and I do not believe that a proxy should be allowed. It is difficult to draw a permit for this hunt, so I believe the permits should go to people who will actually participate in the hunt.

Thank you for allowing me the opportunity to provide my opinions on these proposals.

Jeffrey Sperry
Eagle River, Alaska



PC106

Name: Hunter Stier

Community of Residence: Belgrade, Montana

Comment:

Hunter Stier

Proposal 130: Oppose

Reasoning: I am excited about the opportunity to hunt sheep in the Delta Controlled Use area. I have joined friends on adjacent unit hunts and would welcome the continued opportunity to hunt the area. Alaska is relatively generous to non-residents and I am very thankful for some reasonable amount of continued non resident allocations.

Proposal 181: Oppose

Reasoning: Sheep harvest is adequately managed by selective harvest regulations. I have hunted in 20 with friends and did not observe any amount of competition or hunter crowding that would make me desire a limited quota on tags. Contrarily, we have observed numerous 7+ year old rams.

Proposal 131: Support

Reasoning: I support and am grateful for the maintained non resident opportunity here and would welcome the division of hunters into the early and late seasons.

Proposal 130: Oppose

Proposal 131: Support

Proposal 181: Oppose



PC107

Name: Pauline Strong

Community of Residence: Juneau, AK

Comment:

My name is Pauline N. Strong. I live in Juneau, AK. I support Proposal 186. This closes an area to taking of wolves that was closed in the past. The map shows that this area is easily accessed by wolves from Denali National Park, as it is bounded on three sides by the park. Having this area open to taking of wolves therefore does serious harm to pack structure and activity in the park. I ask that you approve this proposal.

Proposal 186: Support



PC108

Name: Brandon Summitt

Community of Residence: Wasilla AK

Comment:

Proposals 43, 44, 45, 46. My name is Brandon and i am a resident of Wasilla, and an aspiring sheep hunter, though I have never killed a sheep. I strongly disagree with these proposals. They seem to all be submitted by guides. Most of the sheep that get killed are killed by guided nonresidents. Resident hunters kill a relatively small proportion. It makes no sense to restrict resident hunters. The state of alaska should give resident hunters priority. If any sheep restrictions are made, just make all sheep tags draw only for all nonresidents! Thank you for allowing me to voice my opinion on the matter.

Proposal 43: Oppose

Proposal 45: Oppose

Proposal 44: Oppose

Proposal 46: Oppose



PC109

Name: Clint Talbott

Community of Residence: Nederland, Colorado

Comment:

I backpack frequently in Alaska and love its national parks, wildlife refuges and other wild lands. I appreciate wild places for their intrinsic value and for their importance to the ecosystem.

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

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

Proposal 186: Support

2023-2024 Proposed Changes to Hunting and Trapping Regulations
Interior and Eastern Arctic Region

Tanana Chiefs Conference Comments

Dena' Nena' Henash (dba Tanana Chiefs Conference; TCC) is a consortium of 37 federally recognized tribes based in Fairbanks, Alaska and serving more than 18,000 tribal citizens and residents of Interior Alaska. Tanana Chiefs Conference serves its member Tribes in providing a unified voice in advancing the sovereign rights of tribal governments through the promotion of physical and mental wellness, education, socio-economic development, and protection of tribal cultures and ways of life of the Interior Alaska Native peoples.

TCC provides the following comments on Interior Region Alaska Board of Game regulatory change proposals.

Regionwide & Multiple Units

PROPOSAL 43

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

PROPOSAL 44

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

PROPOSAL 45

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

PROPOSAL 46

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

Comments:

TCC opposes any change in regulation that directly or indirectly restricts subsistence opportunities. The Unit 19C winter hunt is a subsistence hunt and drawing permits do not provide reasonable opportunity for subsistence uses. Requests to change harvest ticket hunts to registration permit hunts represent a restriction to subsistence opportunities. Reasonable opportunities for subsistence uses should be annual and not limited to every two or four years in order to be consistent with Boards of fisheries and game subsistence procedures, "a pattern of taking or use recurring in specific seasons of each year" (5 AAC 99.010(b)(2))." Additionally this proposal would change the three-quarter curl bag limit for the winter subsistence hunt in Unit 19C and portions of units 24B and 25A, for example, to a more restrictive bag limit inconsistent with customary and traditional uses outlined in the associated customary and traditional use worksheets developed by ADF&G that informed the board in developing existing regulations to provide reasonable opportunities for subsistence uses pursuant to AS 16.05.258.

PROPOSAL 48

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



Comments:

TCC supports the exemption for resident tag fees for grizzly/brown bears because it eliminates the financial burden on subsistence hunters to take brown bears in solidarity with the GASH AC, among others.

PROPOSAL 50

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

Comments:

TCC supports Proposal 50. The department does not have a conservation concern regarding this proposal, because there aren't as many trappers as there used to be. We are aware of some local concerns for fur quality with an extended spring season; however, trappers targeting other furbearers and fur animals until March 15, would be able to legally retain marten caught incidentally.

PROPOSAL 51

Align muskrat trapping seasons with beaver trapping seasons in Units 19, 20 (except 20E), 21, 24, 25, 26B, and 26C to allow for simultaneous open water trapping of both species in the fall, winter, and spring. If this proposal were adopted as written, muskrat season would be Sept 15-June 10 in units 20A, 20C, and 20F and Sept 1-June 10 in units 19, 21, 24, and 25. The muskrat season in units 12 and 20E would remain Sept 20-June 10. However, the muskrat season in units 20B remainder and 20D would be changed from Nov 1-June 10 to Sept 25-May 31.

Comments:

TCC supports Proposal 51 because the department does not have conservation concerns associated with this season alignment and it would provide increased subsistence trapping opportunities for muskrat and more trapping efficiency. Amendment of the Proposal 51 to align Unit 20B remainder and Unit 20D muskrat season with neighboring subunits to be Sept 15-Jun 10 would reduce regulatory confusion.

PROPOSAL 52

Allow the use of night vision goggles and forward-looking infrared devices for taking furbearers with a trapping license in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

Comments:

TCC opposes Proposal 52 because of the likelihood of abuse that would result in the allowance of these new technologies. Because individuals purchasing a trapping license may also use a firearm to take furbearers, adoption of this proposal would likely result in a lack of fair chase. Indigenous people have been trapping in low light conditions for centuries. Allowance of night vision goggles and forward-looking infrared devices could pose conservation concerns.

McGrath Area - Units 19, 21A and 21E

PROPOSAL 60

Allow aerial wolf control in a portion of Unit 19C.

PROPOSAL 61

Allow the take of wolves in Unit 19C the same day a person has been airborne and create an Intensive Management Plan for Unit 19C.



PROPOSAL 62

Establish an Intensive Management program for Unit 19C.

Comments:

TCC supports the development of a predator control implementation plan to support Unit 19C moose as an intensively managed species providing high levels of human consumption. Such efforts may also benefit Dall sheep population recovery. As part of an intensive management program, TCC supports Proposals 60, 61, and 62.

PROPOSAL 63

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

Comments:

TCC supports limits on non-resident hunting to ensure opportunity for residents and ensure subsistence needs can be met.

PROPOSAL 64

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

Comments:

The board determined that moose in Unit 19C are associated with a positive finding for customary and traditional uses. Since drawing permits do not provide reasonable opportunities for subsistence uses, TCC can only support Proposal 64, if it were amended to only apply to nonresidents. Otherwise, TCC strongly opposes this proposal because subsistence uses would be eliminated contrary to AS 16.05.258 the state subsistence statute.

PROPOSAL 65

Reauthorize the Unit 19D Intensive Management Plan.

Comments:

TCC supports the reauthorization of the Unit 19D Intensive Management plan to provide high levels of human consumption of moose due to their significant contribution to the subsistence economy and tribal ways of life among upper Kuskokwim communities, where based upon comprehensive subsistence research conducted by ADF&G between 1984 and 2011, large land mammals - predominantly moose - contribute 47% of the total communities' harvests of wild foods. The second and third most important species, based upon edible pounds, is Chinook salmon at 14% and chum salmon at 13% of total fish and wildlife harvests. The absence of caribou and the collapse of Chinook and chum salmon returns and the resulting harvest restrictions bring additional dependence and reliance on the Unit 19 moose populations.

PROPOSAL 66

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

Comments:

This proposal is difficult to understand given that it was not written using conventional approaches to proposing regulatory change by identifying new text in bold underline and proposed regulatory language



to be eliminated in bracketed capital letters. However, in general, TCC supports the expansion of subsistence moose hunting opportunities in Unit 19D by extending the fall seasons by 5 to 10 days (Sept 1-30). However, those harvest ticket hunts that would become registration hunts would represent a restriction to subsistence opportunity, although registration permits tend to result in more complete harvest data provided to the Area Biologist, which improves management decision-making. The absence of staff comments less than 24 hours before the written comment deadline so that we might have the actual proposed changes clarified challenges TCC to make an informed recommendation.

Changing antlerless moose hunts from a registration permit hunt to a drawing hunt would mean that the most liberal moose hunting opportunities provided in Unit 19D would no longer provide reasonable opportunities to take antlerless moose for subsistence uses given that drawing permits cannot provide reasonable opportunity for subsistence uses.

As a result, TCC hesitantly supports this proposal, but only with an amendment to keep the antlerless moose hunts registration permit hunts.

PROPOSAL 68

Allow moose registration permit RM682 to be obtained online.

Comments:

TCC opposes Proposal 68 because the board adopted the current restriction on permit availability to ensure reasonable opportunities for customary and traditional subsistence uses pursuant to AS16.05.258(f). This conservatively managed hunt was created following a 13 year hunt closure. TCC stands with Stony Holitna AC and the GASH AC in opposing this proposal to ensure restrictions remain in place to maintain the integrity of this subsistence moose hunt.

PROPOSAL 69

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

Comment:

TCC opposes proposal 69, because the Unit 19D intensive management program and the limitations associated with the RM682 hunt were designed to provide reasonable opportunities for subsistence uses of moose by Alaska residents in the local area. Reauthorization of the Unit 19D intensive management plan in Proposal 65 indicates that available harvestable surpluses of moose in the area are insufficient to repeal these regulatory restrictions to support reasonable opportunities for customary and traditional uses. Alaska residents who can afford to travel far downriver to participate in other moose hunting opportunities should do so and forgo obtaining a RM682 permit.

PROPOSAL 73

Reauthorize the Intensive Management Plan for Unit 21E for six years.

Comment:

TCC supports proposal 73 in solidarity with the GASH AC. The Intensive Management Plan for wolves has long been on the books, but the department has yet to utilize the management tool because moose counts haven't warranted predator control. With an expiration date of June 30, 2024, GASH AC would like to see the management tool remain as a management tool option for another 6 years.

PROPOSAL 76



Reopen all Unit 19C sheep hunts.

PROPOSAL 77

Reopen Unit 19C to sheep hunting.

PROPOSAL 78

Reauthorize nonresident Dall sheep hunting in Unit 19C.

PROPOSAL 79

Reopen Unit 19C to nonresident sheep hunters.

PROPOSAL 80

Reopen sheep hunting in Unit 19C to nonresidents.

PROPOSAL 81

Reestablish seasons and bag limits for sheep hunting in Unit 19C.

PROPOSAL 82

Change nonresident sheep hunting in Unit 19C.

PROPOSAL 83

Reopen sheep hunting in Unit 19C to nonresidents, by bow and arrow only.

Comment:

TCC opposes proposals 76-83, which would reopen nonresident Dall sheep hunts in Unit 19C due to ongoing conservation concerns and previous restrictions to the winter subsistence hunt. Dall sheep are associated with customary and traditional uses, as determined by the board, and when there is an insufficient harvestable surplus to support all uses, nonsubsistence uses are the first to be eliminated pursuant to AS 16.05.258. Past closures of the subsistence hunt while sports hunting was allowed to continue is contrary to the subsistence priority statute.

PROPOSAL 84

Change the sheep bag limit in Unit 19C for resident hunters to one ram with full-curl horn or larger every two regulatory years.

Comment:

TCC opposes Proposal 84 because changing the bag limit would represent a restriction on reasonable opportunities for subsistence uses of Dall sheep in Unit 19C. Reasonable opportunities for subsistence uses should be annual and not limited to every two years in order to be consistent with Boards of fisheries and game subsistence procedures, "a pattern of taking or use recurring in specific seasons of each year" (5 AAC 99.010(b)(2)). Additionally this proposal would change the three-quarter curl bag limit for the winter subsistence hunt in Unit 19C to a more restrictive bag limit inconsistent with customary and traditional uses outlined in the associated customary and traditional use worksheets developed by ADF&G, which the board used to develop the existing regulations to provide reasonable opportunities for subsistence uses pursuant to AS 16.05.258.

PROPOSAL 85

Set the sheep bag limit in Unit 19C for resident hunters based on the age of the ram harvested, for six to eight year old rams.



PROPOSAL 86

Set the sheep bag limit in Unit 19C for resident hunters based on the age of the ram harvested, for six to ten year old rams.

PROPOSAL 87

Shorten the sheep hunting season in Unit 19C for residents and open a season for nonresidents in Unit 19C.

PROPOSAL 88

Change all sheep hunting in Unit 19C to archery only, and require future nonresident sheep hunting in Unit 19C to be by bow and arrow only.

Comment:

TCC opposes proposals 85-88 due to ongoing Dall sheep conservation concerns. Sheep are a subsistence resource and when harvestable surpluses are insufficient to provide for all uses, the subsistence law requires nonsubsistence be eliminated.

PROPOSAL 89

Reopen the subsistence winter sheep hunts in Unit 19C.

PROPOSAL 90

Reopen the late season resident only subsistence sheep registration hunt RS380 in Unit 19C.

Comment:

TCC supports the intent of proposals 89 and 90 that call for the reopening of the winter subsistence hunt in Unit 19C in order to fulfill the board's obligations to provide reasonable opportunities for subsistence uses. Dall sheep are associated with customary and traditional uses, as determined by the board, and when there is an insufficient harvestable surplus to support all uses, nonsubsistence uses are the first to be eliminated pursuant to AS 16.05.258. Past closures of the subsistence hunt while sports hunting was allowed to continue is contrary to the subsistence priority statute.

PROPOSAL 91

Modify sheep hunting opportunity in Unit 19C or other subunits in the western Alaska Range by implementing a sheep management plan.

Comments:

TCC suggests the board take no action on Proposal 91 because the public should be able to review the management plan prior to it being adopted.

PROPOSAL 93

Lengthen the resident and nonresident brown/grizzly bear season in Unit 19C by opening the season on August 10.

Comments:

TCC supports Proposal 93 because the department has no biological conservation concerns and it would increase harvest opportunities.

PROPOSAL 104

Remove the requirement for a general season black bear harvest ticket in Unit 19D.



Comment:

TCC supports Proposal 104 because it removes an unnecessary burden from hunters and the board has already made an amount necessary for subsistence finding for black bears in this area. The department has no conservation concerns regarding black bears in Unit 19D because of the low number of black bears harvested. For these reasons, TCC supports the proposal.

Tok Area - Units 12 and 20E

PROPOSAL 108

Reactivate wolf control in a portion of Units 12, 20D, and 20E to benefit moose.

Comment:

TCC supports Proposal 108 to reactivate the intensive management program in Units 12, 20D, and 20E to benefit moose and to maintain this management tool in regulation.

PROPOSAL 110

Reauthorize the antlerless moose seasons in Unit 20E.

Comment:

TCC opposes the reauthorization of the antlerless moose hunt in Unit 20E in solidarity with the Eagle AC and the Tanana/Rampart/Manly AC.

PROPOSAL 111

Add an archery only, five-day moose season for residents and nonresidents in Unit 12.

Comment:

TCC opposes Proposal 111 because archery hunters and hunting during the regular season. TCC generally does not support special seasons for weapon-restricted hunts.

PROPOSAL 112

Limit nonresident hunting of the Fortymile caribou herd.

Comment:

TCC supports Proposal 112 in solidarity with the Resident Hunters of Alaska. TCC understands that 20-22% of the total take of Fortymile caribou is by nonresidents. Because of the conservation concerns associated with this caribou herd and the dramatic purposefully reduction of the size of the herd, TCC supports the limitation of nonresident hunting opportunities to only Zone 2, which is difficult to access and is principally accessed by aircraft, because it maintains limited nonsubsistence uses but serves to prioritize customary and traditional uses of Fortymile caribou by Alaska residents.

PROPOSAL 113

Close caribou hunting within 1/4 mile or 100 yards of the Steese Highway above tree line on Eagle and Twelvemile summits in Unit 20.

Comment:

TCC supports Proposal 113 to assist with better hunt management, mitigate past abuses, wanton waste, and excessive habitat damage. While hunting along the highway corridor provides efficient access, the conservation concerns associated with flock shooting and poor hunter behavior documented throughout the range of the Fortymile caribou herd range since the 1950s necessitates passage of this proposal.



PROPOSAL 114

Allow proxy hunting for caribou in Units 20B, 20D, 20E, 20F, and 24C registration hunts.

Comment:

TCC opposed Proposal 114 because proxy hunting of caribou in these areas had previously been abused by excessive harvest effort by hunters soliciting extra permits by visiting Pioneer homes to increase the hunters opportunities to harvest trophy animals. Proxy hunting also encouraged flock shooting and contributed to wanton waste. The proxy hunting prohibition was put in place as a tool to ensure reasonable opportunities for subsistence uses could be provided without posing conservation problems and abuse of the intent of proxy hunting.

PROPOSAL 122

Lengthen the wolf hunting season in Units 12 and 20E by approximately six weeks to end on June 15.

PROPOSAL 123

Lengthen the wolf hunting season by approximately six weeks.

Comment:

TCC opposes proposals 122 and 123 because their adoption would extend the hunting season to overlap the period during which wolves give birth to pups. Passage of this proposal would result in orphaning wolf pups, which would further mobilize animal rights organizations' membership drives and fundraising activities. Adoption of these proposals would serve to rally opposition to existing and future intensive management programs as well as customary and traditional uses of wolves and other predators. Wolves are a critical part of ecosystems and provide valuable sources of traditional materials for clothing and handicrafts as well as sources of cash. Wolf harvests should be allowed only during times when fur quality is prime or under controlled, sustainable intensive management programs.

PROPOSAL 124

Lengthen the marten trapping season in Units 20E and 25B by two weeks to close March 15 instead of the last day of February.

Comments:

TCC supports Proposal 124 in solidarity with the Eagle AC whose membership is most familiar with the area and fur quality. Lengthening the season to March 15 would not extend the trapping season to the period where marten give birth later in the spring.

Delta Junction Area - Unit 20D

PROPOSAL 134

Change the time frame for which a person can be awarded Mt. Harper sheep drawing permit DS206 in Units 20E and 20D, to one permit every four regulatory years or once per lifetime.

Comments:

TCC urges the board to take no action on Proposal 134 based upon comments on Proposal 135 and until such time that the requirements of AS 16.05.258 have been met.

PROPOSAL 135

Close Mount Harper sheep drawing hunt DS206 to nonresidents in Units 20D and 20E.



Comments:

TCC supports Proposal 135 to prioritize resident sheep hunting opportunities. TCC also calls upon the board to determine whether Dall sheep outside the Tok Management Area and Delta Management Area are associated with customary and traditional uses pursuant to AS 16.05.258. TCC knows that Dall sheep have a long history of customary and traditional harvest and use within the traditional territories of the Upper Tanana Tribes and that of the Native Village of Eagle based upon contemporary uses and oral traditions of the Upper Tanana people. If the board determines that Dall sheep have a positive customary and traditional use finding, then the law requires establishing regulations that provide reasonable opportunities for subsistence uses. The current drawing permit hunt for Alaska residents does not provide reasonable opportunities.

Galena Area - Units 21B, C, D & 24

PROPOSAL 139

Reduce the bag limit for taking caribou in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D and 26A to four caribou per year, only one of which may be a cow.

Comments:

TCC supports Proposal 139, as amended by RC021 during the Region V meeting in Kotzebue, to establish an annual bag limit of 15 caribou per year, only one of which may be a cow.

PROPOSAL 140

Close nonresident caribou hunting in Units 21D Remainder, 22, 23, 24B Remainder, 24C, 24D, and 26A.

Comments:

TCC supports Proposal 140 to prioritize customary and traditional subsistence uses pursuant to AS 16.05.258 and for conservation purposes given the ongoing challenges facing the Western Arctic caribou herd. TCC understands that the board already voted down this proposal during the Region V meeting in Kotzebue through their action on Proposal 3. TCC objects to the continuation of nonresident hunting while dramatically reducing the Alaska resident subsistence bag limit from 5 caribou per day to a total of 15 caribou per year, only one of which may be a cow. More than 533 hunters would have to take 15 caribou each to come close to harvests within the amount necessary for subsistence finding. TCC contends that this restriction of subsistence opportunity is excessive given that an annual bag limit will now be equivalent to the daily bag limit of only 3 days under previous regulations. This violates the intent and principles outlined in the state subsistence statute.

PROPOSAL 142

Change sheep hunting in portions of Units 24A and 25A to archery only.

Comments:

TCC opposes Proposal 142 due to ongoing conservation concerns associated with Dall sheep throughout this area.

PROPOSAL 144

Allow nonresident sheep hunting by drawing permit only in portions of Units 24A and 26B and reduce the nonresident season.

Comments:

TCC supports the intent of the proposal in solidarity with the Resident Hunters of Alaska, but opposes any reinstatement of nonresident hunting opportunities until such time that reasonable opportunities for subsistence uses of Dall sheep can be provided. Nonresidents harvested approximately 42% of the total harvest prior to the closure of this area to sheep hunting to rebuild the population.

PROPOSAL 149

Lengthen the wolf trapping season in Units 24 and the remainder of 25 by one month, to open October 1 instead of November 1.

PROPOSAL 150

Lengthen the wolf hunting season in Units 24 and 25 from Aug 1-April 30 to Aug 1-June 15.

PROPOSAL 151

Increase the hunting season for wolves in Units 24 and 25 from Aug 1-April 30 to Aug 1-June 30.

Comments:

TCC opposes proposals 149, 150, and 151 in solidarity with the Koyukuk River AC because their adoption would extend the hunting season to either be too early in the fall to provide quality fur or overlap the period during which wolves give birth to pups. Passage of this proposal would result in orphaning wolf pups, which would further mobilize animal rights organizations' membership drives and fundraising activities. Adoption of these proposals would serve to rally opposition to existing and future intensive management programs as well as customary and traditional uses of wolves and other predators. Wolves are a critical part of ecosystems and provide valuable sources of traditional materials for clothing and handicrafts as well as sources of cash. Wolf harvests should be allowed only during times when fur quality is prime or under controlled, sustainable intensive management programs.

PROPOSAL 152

Increase the resident bag limit for brown bear in Units 24C and 24D, and open a fall bait season in Units 21B and 24B.

Comments:

TCC supports Proposal 152 in solidarity with the Koyukuk River AC. TCC has some concern about opening brown bear baiting during the fall season during moose hunting because of the potential for inadvertent human-bear encounters.

PROPOSAL 153

Lengthen the wolverine hunting and trapping seasons in Unit 21 by one month to end on April 30.

Comments:

TCC supports Proposal 153 in solidarity with the Middle Yukon and Koyukuk River fish and game advisory committees who know this area best.

Northeast Alaska Area - Units 25A, B, D, 26B & C

PROPOSAL 154

Change the bag limit for caribou in the Remainder of Unit 26B from 4 bull caribou to 5 caribou for residents and 1 bull caribou to 2 bulls for nonresidents.

Comments:



TCC opposes the increase of the nonresident caribou bag limit because of widespread caribou declines and the fact that many Alaska residents will seek out subsistence caribou hunting opportunities in this area due to the caribou hunting closures and restrictions throughout the state. TCC supports the liberalization of the resident caribou bag limit proposed here and in Proposal 155.

PROPOSAL 155

Increase resident caribou hunting opportunity in Unit 26B Remainder from 4 caribou bulls to 5 caribou.

Comments:

TCC supports Proposal 155, as amended by Koyukuk River AC to be 5 bull caribou and 1 cow caribou, which can only be taken between Oct 1-April 30.

PROPOSAL 156

Change the nonresident caribou hunt in Unit 26B Remainder to a drawing hunt or registration hunt with a limited number of permits available.

Comments:

TCC supports Proposal 156 in solidarity with the Koyukuk River AC. Adoption of this proposal would reduce nonresident hunting pressure on one of the few caribou herds that remain stable in Alaska. Due to caribou hunting closures and restrictions elsewhere in Alaska along the road system, TCC expects much more Alaska residents traveling up the Dalton Highway to participate in this hunt. Reduction of nonresident hunting opportunities will ensure priority Alaskan resident subsistence uses.

PROPOSAL 159

Open a resident only archery only hunt for sheep in the Eastern Brooks Range Management Area with aircraft restrictions, and modify the existing youth hunt in the same area.

PROPOSAL 160

Change sheep hunting in a portion of the Arctic National Wildlife Refuge to archery only.

PROPOSAL 161

Change sheep hunting in a portion of the Arctic National Wildlife Refuge to archery only.

PROPOSAL 162

Change sheep hunting in a portion of the Arctic National Wildlife Refuge to archery only.

Comments:

TCC opposes proposals 159-162 due to general opposition to weapons-restricted-only hunts. Dall sheep in this area are associated with customary and traditional subsistence uses and restricting the hunts to only archery would represent a dramatic and unnecessary reduction in reasonable opportunities for subsistence uses.

PROPOSAL 163

Align salvage requirements for caribou in Units 25B, 25C, and 25D with Unit 25A to require meat of caribou remain on the bone when harvested prior to October 1.

Comments:

TCC supports Proposal 163 that would establish a meat-on-the-bone regulatory salvage requirement. This proposal would result in better meat care, reduce wanton waste, and ensure that caribou bones are salvaged as a valuable subsistence resource used for soup and marrow.



PROPOSAL 164

Require the liver, heart, and tongue of moose and caribou harvested in Units 25 to be salvaged.

Comments:

TCC supports Proposal 164, which seeks to expand salvage requirements for moose and caribou harvested in Unit 25. This proposal represents a crucial step towards reducing wanton waste, promoting responsible hunting practices, and honoring Alaska Native values of utilizing every part of the animal. The current requirement for salvaging caribou and moose liver and heart already reflects the importance of maximizing the use of harvested animals as required for some community subsistence harvests (e.g., 5 AAC 92.074(d)). However, Proposal 164 aims to further align regulations with these values by expanding salvage requirements to include the tongue and applying this regulation to Unit 25, where seven Alaska Native villages reside.

By expanding salvage requirements to encompass additional organs and applying these standards to Unit 25, Proposal 164 not only reinforces the importance of respecting the animals taken but also acknowledges the deep cultural significance of utilizing every part of the animal within Alaska Native communities.

TCC believes that Proposal 164 reflects an important step towards promoting sustainable hunting practices, reducing wanton waste, and preserving Alaska Native hunting traditions and heritage consistent with AS 16.05.255(a)(13). We stand in support of this proposal, recognizing its alignment with both ethical hunting principles and cultural values.

PROPOSAL 165

Create an intensive management plan for reducing wolves in Unit 25D to support high levels of human consumption.

Comments:

TCC supports Proposal 165. We recognize the urgent need outlined by the Yukon Flats AC to address the significant challenges facing Unit 25D moose populations. The plight of this unit, with some of the lowest moose densities in the state, directly impacts the ability of Unit 25D residents to meet their subsistence needs. Seven villages rely on moose meat as their primary food source, especially in light of consecutive years of subsistence salmon fishing closures. Unit 25D has a positive customary and traditional use determination for moose with an Amount Reasonably Necessary for Subsistence (ANS) finding of 50-70 moose in Unit 25D-West and 150-250 in Unit 25D-East (5 AAC 99.025).

The increasing pressures by wolves and bears in Unit 25D on low density moose populations in light of the salmon collapse pose serious threats not only to the moose population but Alaskan residents' food security and particularly those of Unit 25D communities. The current situation, with wolf packs expanding and predation on moose calves by bears intensifying, demands immediate attention.

TCC supports Proposal 165's call for more tools in the toolbox to address the escalating challenges faced by Unit 25D residents and moose populations. By implementing measures to reduce the number of wolves and bears, we can work towards rebuilding the moose population to a more sustainable level and safeguarding the subsistence livelihoods of local communities and other Alaskan residents.

PROPOSAL 170

Lengthen the wolverine trapping season in Unit 25A by two weeks to close on April 15.

Comments:

TCC supports Proposal 170 that would increase the trapping season for wolverine.



Fairbanks Area - Units 20A, B, C, F & 25C

PROPOSAL 171

Change all general season harvest ticket hunts to registration permits for moose in Units 20A, 20B, 20C, 20F and 25C.

Comments:

TCC supports Proposal 171, which would change all general season harvest ticket hunts to registration permits for moose in Units 20A, 20B, 20C, 20F, and 25C. While historically, Tanana Chiefs Conference has been cautious about such changes due to concerns about the burden on hunters and the potential impact on subsistence harvesters of the failure to report list, we recognize the significant benefits that this proposal offers. TCC stands in solidarity with the Tanana/Rampart/Manley AC and Minto-Nenana AC in supporting this proposal, which would result in more complete harvest data to better inform the department's management decisions and improve moose population estimates.

PROPOSAL 172

Create a muzzleloader only moose hunt for residents and nonresidents in Unit 20A.

Comments:

TCC opposes the restricted hunt suggested in Proposal 172. We believe that additional hunting opportunities should be accessible to everyone, ensuring fair and equitable distribution of resources. Muzzleloader hunters can hunt during the general moose hunting season.

PROPOSAL 173

Reauthorize the antlerless moose seasons in Unit 20A.

Comments:

TCC opposes Proposal 173 in solidarity with the Tanana/Rampart/Manley and Minto-Nenana fish and game advisory committees. Department staff regularly express concerns about moose harvests for certain religious ceremonies including Alaska Native funeral and memorial potlatches. Previous closures of ceremonial hunting opportunities due to lack of harvestable surpluses for antlerless moose demand that TCC oppose antlerless reauthorizations in units surrounding the greater Fairbanks area.

PROPOSAL 174

Change the boundary of the Wood River Controlled Use Area in Unit 20A.

PROPOSAL 175

Change the boundary of the Wood River Controlled Use Area in Unit 20A.

Comments:

TCC opposes Proposals 174 and 175, which seek to alter the boundaries of the Wood River Controlled Use Area in Unit 20A. We stand united with the Minto-Nenana AC's opposition to these boundary changes.

The rationale behind both of these proposals is insufficient. Proposing regulatory changes because an influential hunter was cited for violating the controlled use area motorized vehicle prohibitions is insufficient to alter a longstanding regulation. Hunters must exercise due diligence to ensure they remain in compliance with regulations and mindfully navigate motorized vehicles to remain outside prohibited



areas. It is the responsibility of motorized hunters to ensure safe and legal travel through the unit, without necessitating alterations to established boundaries.

PROPOSAL 176

Reduce the nonresident moose bag limit in portions of Unit 20B, and eliminate nonresident moose hunting opportunities in portions of Unit 20B.

Comments:

TCC supports Proposal 176 in solidarity with the Resident Hunters of Alaska. TCC supports restricting nonresident moose hunters in that portion of Unit 20B, the drainage of the Middle Fork of the Chena River as well as that Unit 20B, that portion of the Salcha river drainage upstream from and including Goose Creek from an any bull hunt to a bull with 50-inch antlers with four or more brow tines on at least one side.

TCC also supports restricting nonresident moose hunters within the Creamer’s Field Migratory Waterfowl Refuge of Unit 20B and the Unit 20B Remainder of the Fairbanks Management Area from an any bull hunt to a bull with 50-inch antlers with four or more brow tines on at least one side.

TCC also supports eliminating nonresident moose hunting opportunity to take an antlerless moose due to previous closures to ceremonial moose hunting opportunities of antlerless moose due to insufficient harvestable surpluses of cow moose in Unit 20B.

The Department’s objective for Unit 20B is to maintain a moose population of 12,000-15,000, yet initial 2023 counts estimate only 7,846 moose. TCC believes the population could benefit from a reduction of hunters, and this proposal aligns with conservation efforts to support a rebound in the moose population.

PROPOSAL 177

Extend the current moose season in Unit 20B Remainder by five days for certified bowhunters only.

Comments:

TCC opposes Proposal 177, which seeks to extend the moose hunting season in Unit 20B Remainder by five days exclusively for bowhunters. Unit 20B already faces considerable pressure with over 3,000 hunters annually, creating competition between hunters and local communities for harvest opportunities. Extending the season for bowhunters only creates an inequitable situation, granting additional opportunities to a limited group while excluding others. This selective extension risks further strain on the moose population in Unit 20B without offering fair access to all hunters.

TCC believes that additional hunting opportunities should be accessible to everyone, ensuring fair and equitable distribution of resources.

PROPOSAL 178

Reauthorize the antlerless moose seasons in Unit 20B.

Comments:

TCC opposes the reauthorization of antlerless moose hunts in those portions of Unit 20B outside the Fairbanks Management Area due to previous instances where ceremonial uses of cow moose were prohibited. TCC also opposes this proposal in solidarity with the Minto-Nenana fish and game advisory committee. While we recognize and appreciate the department’s promise that antlerless moose hunts will only be opened within the Fairbanks Management Area to reduce moose-vehicle collisions, TCC remains cautious about keeping all of the other Unit 20B antlerless hunts in regulation given the consecutive years of hard winters, which have dramatically reduced the moose population below population objectives. Antlerless moose hunts continued to be offered by the department even after the population fell below the

Intensive Management population objective. Department statements that these antlerless hunts would be difficult to restore in regulation is without merit given the longstanding support of antlerless hunts during the past two decades or more.

PROPOSAL 179

Shift the moose season dates in Unit 20B to Sept 15-30.

Comments:

TCC opposes Proposal 179 which would shift the moose season dates in Unit 20B. Extending the moose season in Unit 20B would make it the only management unit on the road system with a moose season extending until September 30th. Unit 20B, with an average of 3,000 hunters per season, already experiences extreme hunting pressures, particularly from locals residing in densely populated areas like Fairbanks and North Pole.

The accessibility of hunting grounds within Unit 20B via the road system exacerbates the competition. Changing the season dates would inevitably lead to a surge of hunters in this already heavily hunted area. Such an influx could greatly impact not only the local moose population, but also add to the challenges by Minto and Nenana in meeting their subsistence needs for moose.

PROPOSAL 182

Lengthen the brown/grizzly bear season in Units 20A, 20B, and 25C for residents and nonresidents by two weeks to close on June 15.

Comments:

TCC supports Proposal 182 to extend the brown bear season by 15 days, because it enhances hunting opportunities and the department has indicated there are no biological concerns with this proposal. Grizzly/brown bears have been recognized with a positive customary and traditional use determination in Units 20A and 20B outside the boundaries of the Fairbanks Nonsubsistence Area, with an amount reasonably necessary for subsistence of 1–3 brown bears (5 AAC 99.025(3)). TCC stands in solidarity with Tanana/Rampart/Manley AC and Fairbanks AC in their support of Proposal 182.

PROPOSAL 183

Lengthen the brown/grizzly bear hunting season in Unit 20A by two weeks to close on June 15.

PROPOSAL 184

Lengthen the brown bear hunting season in Unit 20A by three weeks.

PROPOSAL 185

Extend the brown/grizzly bear hunting season in Unit 20A and Unit 20B Remainder to close on June 30, to align with the rest of Unit 20.

Comments:

TCC recommends the board take no action on Proposal 183, 184, and 185 based on support for Proposal 182.

PROPOSAL 187

Lengthen the wolverine trapping season in Units 20A, 20B, 20D, and 20F by two weeks to align with 20C.

Comments:

TCC supports extending the wolverine trapping season later into the spring because it increases subsistence trapping opportunities.

Additional Proposals

PROPOSAL 192

Reauthorize the antlerless moose seasons in Unit 13A

PROPOSAL 193

Reauthorize the antlerless moose seasons in Unit 13C

PROPOSAL 194

Reauthorize the antlerless moose seasons in Unit 13E

Comments:

TCC opposes Proposal 192, Proposal 193, and Proposal 194 in solidarity with the Ahtna Intertribal Resource Commission and its 8 member Ahtna Tribes, Ahtna, Inc., and Chitina Native Corporation. Unit 13 moose populations are under stress and calf:cow ratios are below management objectives. Further reducing the moose cow population would compromise moose population recovery. Antlerless moose hunts should not be reauthorized because of poor calf recruitment.

PROPOSAL 210

Change the subunit boundaries of Units 20A and 20C to the current river channel.

Comments:

TCC opposes Proposal 210. The proposed boundary change, which would reclassify a portion of Unit 20A as 20C and would therefore prohibit the take of cow moose for certain religious ceremonies such as funeral and memorial potlatches. Currently, within Unit 20A, individuals have the opportunity to harvest either a cow or bull moose for potlatch ceremonies. However, in Unit 20C, the department has prohibited the take of cow moose for ceremonial purposes. Adoption of this proposal would unnecessarily restrict the constitutionally protected right to take moose out of season for Alaska Native funeral ceremonies as provided for in 5 AAC 92.017 and 5 AAC 92.019.

Sincerely,

TANANA CHIEFS CONFERENCE



Brian Ridley
Chief and Chairman



Kneeland Taylor's Comments re Interior and Eastern Arctic for March, 2024 meeting of the Board of Game.

- Proposal 46. Support with Amendment. Sheep populations throughout most of the State are declining rapidly. I am a mountain climber and seeing these animals high up in the mountains is a wonderful part of mountaineering. It is time for the Department to give out a limited number of permits in all areas where sheep are found, and allow permit holders to take any male; thus taking the pressure off the dominant full curl males, and the resulting disruption of sheep intra-family dynamics. The hunting of only full curl rams is not working to conserve Alaska's sheep populations. The numbers show that. Accordingly the FC management approach should be abandoned, if not throughout Alaska, at least in some GMU's as an experiment. Regarding allocation between residents and non-residents, the number of permits should be divided between non residents and residents in order to allow commercial guides, and their employees, assistants, transporters and others to continue their lifestyles, while ensuring that Alaska residents get a large share. The number of permits should be carefully limited and controlled to avoid over-hunting, and wounding of sheep. Alternatively, all hunting should be closed in some parts of the state, for as long as it takes for sheep populations to recover. The Department needs to do something significant to stop the decline of sheep in Alaska to point where only isolated bands of a few sheep survive. Proposal 46 could provide a framework for conservation.
- Proposal 50. Oppose. The marten trapping season should not be extended past February 28 which is the current date to close the season. Marten are denning in early March.
- Proposal 52. Oppose. Infrared and night vision goggles give hunters an unfair advantage over our wildlife, and make a mockery of Alaska's traditions.



Proposal 55. Oppose unless statute is complied with. This proposal would have the Board establish a positive finding for intensive management (IM) of moose in GMU 19C. For IM to be implemented, AS 16.05.255(e) requires positive findings based on evidence provided by Department biologists of unmet population and human harvest goals, and the likelihood that means adopted in an IM program will assist in meeting the population and human harvest goals. If the statute is complied with in good faith, then the undersigned does not oppose this proposal, but the mere existence of a moose hunt in GMU 19C is insufficient grounds for authorizing intensive management, and the BOG's history of ignoring the evidence provided by Department biologists suggests that the statute will not be complied with.

Proposal 57 Oppose. This proposal if adopted would authorize a new IM program, including aerial taking of both wolves and bears in Unit 19E, and continue IM, including the aerial taking, and same day airborne taking, of both wolves and bears in Unit 19D-East Predation Control Area. Allegedly to benefit moose. Because of the aerial taking (and same day airborne taking) authorized, the proposal if adopted, would violate the provisions of AS 16.05.783(a). Additionally, same day airborne taking of wolves and bears is a kind of sport hunting for some hunters, and is prohibited by 50 CFR Chapter 1, Subchapter B, Section 19.31(a). Members of the Board of Game are reminded that Alaska's voters in 1996 approved a ballot initiative prohibiting aerial and same day airborne taking of wolves unless specified conditions were met; and that the statute has been codified as AS 16.05.783(a). Although amended since 1996, the statute continues to prohibit the taking of wolves from an aircraft, or by a person the same day the person is airborne, unless specified conditions are met. The conditions are as follows:

A. Aerial predator control must be part of an approved Intensive Game Management Program approved pursuant to another statute, namely AS 16.05.255(e).



B. If aerial and same day airborne predator control is to be part of an IM program, then there must be evidence provided by Department biologists that population and human harvest goals are currently unmet, that predation is a significant factor affecting population of the prey species, and that predator control is likely to help achieve population and human harvest goals. Wishes and anecdotal evidence by members of the public is insufficient to meet this condition.

The Board of Game should comply with the AS 16.05.783(a) Many of the IM proposals for the Interior and Arctic appear to ask the Board of Game to ignore, or violate, AS 16.05.783(a). Intensive Game Management programs should not be approved unless the current circumstances indicate that population and human harvest goals are not being met. Current does not mean 10 or 20 years ago. It means in the last year or two, or as reliably forecast by Department biologists. If population and human harvest levels are currently within the Department's goals, then IM should not be approved. In other words, re-authorization of inactive plans violates AS 16.05.255(e). If aerial or same day airborne predator control is to be part of an IM program, then duration should be one hunting season, i.e. fall through spring. That's all the time necessary to remove a large number of predators.

Most importantly, with only a few exceptions, aggressive predator control has been ineffective in terms of increasing populations of prey species and human harvest of caribou, moose, and sheep. Adoption of this proposal (and others) without appropriate findings of unmet population and harvest goals would violate the mandate of Article VIII, Section 4 of the Alaska Constitution requiring that agencies take a hard look at circumstances before adopting regulations concerning wildlife.

Finally, all inactive IM programs, if adopted, should be amended to provide for prior public notice of the commencement of predator control activities.

Proposal 58. Oppose. This proposal would have the Board authorize a Unit



19A predation control areas. See my comments opposing Proposal 57 above.

- Proposal 60. Oppose. This proposal would have the Board allow aerial wolf control in a portion of Unit 19C. Adoption would violate AS 1605.255(e) and AS 16.05.783(a). See also my comments opposing Proposal 57 above.
- Proposal 61. Oppose. This proposal would have the Board adopt an IM plan and authorize same day airborne taking of wolves. See my comments opposing Proposals 57 and 60 above.
- Proposal 62. Oppose. This proposal would have the Board adopt a predator management proposal for Unit 19C. See my comments opposing Proposals 57 and 60 above.
- Proposal 65. Oppose. This proposal would have the Board “reauthorize” the Unit 19D Management Plan. However, the express language of the proposal indicates that the Unit 19D Management Plan expired by its own terms. Thus, the proposal asks for a new Intensive Management Plan. Adoption would violate AS 1605.255(e) and AS 16.05.783(a) since the specified conditions required by those two statutes are currently unmet. There is no statutory authority for intensive game management or aerial predatory control unless specified conditions are found to be met, by the Board of Game, in good faith, based on evidence. Besides violating the statutes, there is an abundance of peer reviewed literature demonstrating that predator control is effective only in limited, rare circumstances, over a short period of time. Adoption of this proposal would violate the mandate of Article VIII, Section 4 that agencies take a hard look at circumstances before adopting regulations concerning wildlife. See also my comments opposing Proposals 57 and 60 above.
- Proposal 73. Oppose. This proposal would have the Board “reauthorize” the Unit 21E IM plan. See my comments opposing Proposals 57 and 60 above.
- Proposal 76. Oppose. This proposal would have the Board open all sheep



hunts in Unit 19C. See my comments regarding Proposal 46. We need to give the sheep a break and allow them to recover.

- Proposal 78, Oppose. This proposal would have the Board reauthorize non-resident sheep hunting in Unit 19C. See my comments regarding Proposal 46.
- Proposal 79. Oppose. This proposal would reopen Unit 19C to non resident sheep hunters. See my comments regarding proposal 46.
- Proposal 108. Oppose. This proposal would have the Board reactivate wolf control in Units 12, 20D, and 20E. See my comments regarding Proposals 57 and 60 above.
- Proposal 109. Oppose. This proposal would have the Board authorize same day airborne hunting in Unit 12. Adoption would violate AS 16.05.783(a), and hard look rule mandated by Article VIII, Section 4 of the Alaska Constitution. See my comments regarding proposals 57 and 60 above.
- Proposal 115. Support. This proposal would have the Board require hunters taking Forty Mile caribou to gut their animals in the field, and not on the highway, or immediately next to the highway. Local residents should be given respect in requesting common courtesy from hunters.
- Proposal 116. Oppose. This proposal would have the Board authorize aerial shooting of wolves without adopting an IM plan. Adoption would violate AS 16.05.783(a). See my comments opposing Proposal 57.
- Proposal 122. Oppose. This proposal would authorize wolf hunting during the denning season, which is inhumane.
- Proposal 123. Oppose. This proposal would extend the wolf hunting season by six weeks through June 15, and thus during the denning season, which is inhumane. See my comments opposing Proposal 122.
- Proposal 142. Support. If adopted this proposal would close rifle sheep



hunting in the Dalton Highway corridor, and allow only bow hunting, and hopefully give sheep a break from over-hunting.

- Proposal 143. Support. This proposal would eliminate the extended sheep hunting season in the Dalton Highway Corridor and give sheep a break. Sheep need to be conserved for future generations, and this proposal if adopted would give them a break in the Dalton Corridor.
- Proposal 146. Oppose. See my comments opposing Proposal 57.
- Proposal 147. Oppose. See my comments opposing Proposal 57.
- Proposal 148. Oppose. See my comments opposing Proposal 57.
- Proposal 150. Oppose. This proposal if adopted would allow wolf hunting during the denning season which is inhumane.
- Proposal 151. Oppose. This proposal if adopted would allow wolf hunting during the denning season which is inhumane.
- Proposal 153. Oppose. This proposal if adopted would extend the hunting and trapping season for wolverine to April 30, and thus allow wolverine hunting and trapping during the denning season which raises biological concerns for this rare species, and is inhumane.
- Proposal 165. Oppose. See comments opposing Proposal 57.
- Proposal 166. Oppose. This proposal would authorize the use of bucket snares in trapping bears in Unit 25D. The practice is inhumane and a betrayal of Alaska's fair chase ethics.
- Proposal 168. Oppose. This proposal would extend the brown bear season in the Dalton Hwy. corridor to June 15 which is during the denning season and inhumane.
- Proposal 170. Oppose. This proposal if adopted would extend the trapping season for wolverine to April 15, and thus allow wolverine hunting and trapping during the denning season which raises



biological concerns for this rare species, and is inhumane.

- Proposal 181. Support. This proposal would reduce the non-resident take of full curl rams in Unit 20A, and potentially reduce the number of sheep taken by hunters. It is time to cut back sharply on the number of sheep harvested so as to conserve these marvelous animals in our state for future generations of Alaskans, including non-consumptive users. See my comments regarding Proposal 46.
- Proposal 186. Support. This proposal if adopted would provide a buffer area in the Stampede corridor just north of the Denali National Park where wolf trapping and hunting would be prohibited. Approximately 250,000 people ride tour buses on the Park Road every year looking to see wildlife. Many of those people are Alaskans. Wolves are one of the “mega-fauna” people want to see. In past years when there was a buffer, and more than 40% of the people on those buses got to see wolves, but after the Board eliminated the buffer the percentage has dropped to a range of 1% to 21%. It is a gross mis-allocation of this publicly owned resource to allow a handful of trappers to appropriate this resource to their personal gain. Article VIII, Section 3 of the Alaska Constitution provides for the common use of our wildlife, and it is time for a change benefitting the vast majority of Alaskans who would prefer to view wolves in this tiny piece of land. Resistance to a buffer is simply a matter of hunters and trappers being stubborn, and provides a “poster child” for Alaska’s mismanagement of its wildlife. If the Board wants to limit what it refers to as “Federal overreach” then it needs to approve a buffer in the Stampede Road area.
- Proposal 187. Oppose. This proposal would have the Board extend the wolverine trapping season in Units 20A, 20B, 20D, and 20F by two weeks to align with the season in Unit 20C. The wolverine trapping season should not be extended into the denning season. Instead, the trapping season for all of these units should be shortened to end on February 28. Wolverine are a rare species and trapping them during the denning season is inhumane.



Proposal 189. Oppose. Tag fees aid the Department in monitoring the hunt, and provide income to the Department, and should not be waived in Unit 16A for no reason other than politics.

Proposal 196. Oppose. This proposal would authorize an antlerless moose hunt in GMU 14C. Hunting in the Anchorage Bowl and other heavily populated parts of GMU 14C should be decreased, or eliminated (with the exception in cases of the defense of life or property). Most residents of the Municipality enjoy the presence of moose in their neighborhoods, and hunting moose in subdivisions and heavily visited public parks endangers our residents and visitors. I do not oppose antlerless moose hunts in the Twentymile/Placer hunt area since it is relatively unpopulated.



PC112

Name: Elena Tillman

Community of Residence: East Greenwich RI

Comment:

My name is Elena Tillman, I am an avid outdoorsman, wildlife photographer, lover of Denali, and have immense respect for our wolves that exist on our public lands.

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

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

Proposal 106: Oppose

Proposal 186: Support



PC113

Name: Elizabeth Turgeon

Community of Residence: Bradford, VT

Comment:

My name is Elizabeth Turgeon. I reside in Bradford Vermont and support the National park service proposal 186. I have left more comments below. Thank you.

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

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



PC114

Organization: robert valarcher photographie

Name: Robert Valarcher

Community of Residence: paris france

Comment:

I , robert valarcher , very strongly support the proposal to reinstate wolf protection in the stampede corridor ,wolves are the emblem of alaska wilderness , protect them every where you could !!!

robert valarcher



Proposal 43- I OPPOSE proposal 43. The proposal will only add pressure to other areas and further concentrate hunters doing exactly the opposite of what is intended. Sheep populations are lower and there are less full curl rams available for harvest but Full Curl management ensures and has proven in past declines to be a successful management tool to allow for the recovery of sheep populations while still providing hunter opportunity.

Proposal 44- I OPPOSE proposal 44. The proposal will only add pressure to other areas and further concentrate hunters doing exactly the opposite of what is intended. Sheep populations are lower and there are less full curl rams available for harvest but Full Curl management ensures and has proven in past declines to be a successful management tool to allow for the recovery of sheep populations while still providing hunter opportunity.

Proposal 45- I OPPOSE proposal 45. The proposal will only add pressure to other areas and further concentrate hunters doing exactly the opposite of what is intended. Sheep populations are lower and there are less full curl rams available for harvest but Full Curl management ensures and has proven in past declines to be a successful management tool to allow for the recovery of sheep populations while still providing hunter opportunity.

Proposal 46- I OPPOSE proposal 46. Full Curl management is self-limiting by nature and these areas are no easily accessible like some draw only area in the state. There is no biological concern in these areas to warrant a drawing hunt.

Proposal 47- I OPPOSE proposal 47. Drawing a Bison tag is hard enough. Allowing for proxy take just adds more applicants into the pool for someone that cannot go on the hunt but could proxy someone who also already applied.

Proposal 48- I SUPPORT proposal 48.

Proposal 49- I SUPPORT proposal 49.

Proposal 50- I SUPPORT proposal 50.

Proposal 51- I SUPPORT proposal 51.

Proposal 52- I OPPOSE proposal 52.

Proposal 53- I OPPOSE proposal 53.

Proposal 54- I OPPOSE proposal 54.

Proposal 55- I OPPOSE proposal 55.

Proposal 56- I SUPPORT proposal 56.

Proposal 57- I SUPPORT proposal 57.



Proposal 58- I SUPPORT proposal 58.

Proposal 59- I SUPPORT proposal 59.

Proposal 60- I SUPPORT proposal 60. Predator control is one of the few things we have control over. With the closure to sheep hunting in 19C efforts should be made to reduce predation on sheep in this area.

Proposal 61- I SUPPORT proposal 61.

Proposal 62- I SUPPORT proposal 62.

Proposal 63- I SUPPORT proposal 63.

Proposal 64- I OPPOSE proposal 64. Resident hunting should not be limited at this time. Nearly half of the moose hunters are non-residents currently.

Proposal 65- I SUPPORT proposal 65.

Proposal 66- I OPPOSE proposal 66.

Proposal 67- I SUPPORT proposal 67.

Proposal 68- I SUPPORT proposal 68.

Proposal 69- I SUPPORT proposal 69.

Proposal 70- I OPPOSE proposal 70.

Proposal 71- I SUPPORT proposal 71.

Proposal 72- I SUPPORT proposal 72.

Proposal 73- I SUPPORT proposal 73.

Proposal 74- I OPPOSE proposal 74.

Proposal 75- I SUPPORT proposal 75.

Proposal 76- I SUPPORT proposal 76 if non-resident hunting is re-opened under a draw quota for non-residents. The amount of state land in 19C and the amount of outfitter activity makes for unique circumstances that warrant a different approach.



Proposal 77- I SUPPORT proposal 77 if non-resident hunting is re-opened under a draw quota for non-residents. The amount of state land in 19C and the amount of outfitter activity makes for unique circumstances that warrant a different approach.

Proposal 78- I SUPPORT proposal 78 if non-resident hunting is re-opened under a draw quota for non-residents. The amount of state land in 19C and the amount of outfitter activity makes for unique circumstances that warrant a different approach.

Proposal 79- I SUPPORT proposal 79 if non-resident hunting is re-opened under a draw quota for non-residents. The amount of state land in 19C and the amount of outfitter activity makes for unique circumstances that warrant a different approach.

Proposal 80- I SUPPORT proposal 80 if non-resident hunting is re-opened under a draw quota for non-residents. The amount of state land in 19C and the amount of outfitter activity makes for unique circumstances that warrant a different approach.

Proposal 81- I SUPPORT proposal 81 if non-resident hunting is re-opened under a draw quota for non-residents. The amount of state land in 19C and the amount of outfitter activity makes for unique circumstances that warrant a different approach.

Proposal 82- I SUPPORT proposal 82.

Proposal 83- I SUPPORT proposal 83. If non-resident harvest is limited to Archery only I would see no reason for it to be a draw as harvest will be limited by the low success of Archery equipment.

Proposal 84- I OPPOSE proposal 84- The lions share of harvest in 19C has always been by guided non-resident hunters. Residents should not be limited in an area where the majority of take is by non-residents.

Proposal 85- I OPPOSE proposal 85.

Proposal 86- I OPPOSE proposal 86.

Proposal 87- I OPPOSE proposal 87.

Proposal 88- I SUPPORT proposal 88. Making 19C Archery Only for Residents and non-residents would allow harvest ticket sheep hunting opportunity for both residents and non-residents with very limited harvest due to the difficulty of archery sheep hunting.

Proposal 89- I OPPOSE proposal 89.

Proposal 90- I OPPOSE proposal 90.



Proposal 91- I OPPOSE proposal 91.

Proposal 93- I SUPPORT proposal 93.

Proposal 94- I SUPPORT proposal 94.

Proposal 95- I SUPPORT proposal 95.

Proposal 96- I SUPPORT proposal 96.

Proposal 97- I SUPPORT proposal 97.

Proposal 98- I Support Proposal 98.

Proposal 99- I SUPPORT proposal 99.

Proposal 100- I SUPPORT proposal 100.

Proposal 101- I SUPPPORT proposal 101.

Proposal 102- I SUPPORT proposal 102.

Proposal 103- I SUPPORT proposal 103.

Proposal 104- I SUPPORT proposal 104.

Proposal 105- I SUPPORT proposal 105.

Proposal 106- I SUPPORT proposal 106.

Proposal 107- I SUPPORT proposal 107.

Proposal 108- I SUPPORT proposal 108.

Proposal 109- I SUPPORT proposal 109.

Proposal 110- I SUPPORT proposal 110.

Proposal 111- I SUPPORT proposal 111. Adding Archery only seasons provides a lot of added hunter opportunity while adding very minimal extra harvest.

Proposal 112- I SUPPORT proposal 112.

Proposal 113- I OPPOSE proposal 113.



Proposal 114- I OPPOSE proposal 114.

Proposal 115- I OPPOSE proposal 115.

Proposal 116- I SUPPORT proposal 116.

Proposal 117- I SUPPORT proposal 117.

Proposal 118- I SUPPORT proposal 118. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.

Proposal 119- I OPPOSE proposal 119.

Proposal 120- I SUPPORT proposal 120.

Proposal 121- I SUPPORT proposal 121.

Proposal 122- I SUPPORT proposal 122.

Proposal 123- I SUPPORT proposal 123.

Proposal 124- I SUPPORT proposal 124.

Proposal 125- I OPPOSE proposal 125.

Proposal 126- I SUPPORT proposal 126.

Proposal 127- I OPPOSE proposal 127.

Proposal 128- I OPPOSE proposal 128.

Proposal 129- I OPPOSE proposal 129.

Proposal 130- I OPPOSE Proposal 130. Non- residents should get no more than 10% allocation of the drawing permits.

Proposal 131- I OPPOSE proposal 131. Non-residents should be allowed an allocation in the draw up to 10% of the available permits but should not be guaranteed these permit allocations.



Proposal 132- I SUPPORT proposal 132. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.

Proposal 133- I SUPPORT proposal 133. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.

Proposal 134- I OPPOSE proposal 134.

Proposal 135- I SUPPORT proposal 135. Non-residents should be limited to up to 10% of the available draw permits. DS206 only has 2 permits therefore there should not be a non-resident tag available to be drawn.

Proposal 136- I SUPPORT proposal 136.

Proposal 137- I SUPPORT proposal 137.

Proposal 138- I SUPPORT proposal 138.

Proposal 139- I OPPOSE proposal 139. Units 24B,C,D have very little WAC harvest.

Proposal 140- I OPPOSE proposal 140. Units 24B,C,D have very little WAC harvest and non-residents only kill bulls. Non-resident harvest is not the issue. The issue is subsistence hunters killing thousands of cow caribou when the WAC is in continued decline.

Proposal 141- I SUPPORT proposal 141. The youth season is not needed. It is a loophole for arial scouting. The general sheep season is 42 days and any weapon. There is plenty of opportunity for youth to hunt sheep during the general season dates.

Proposal 142- I SUPPORT proposal 142. The current 5 mile Archery Only corridor for sheep hunting is too small. 5 miles is not far and many rifle hunters walk 5 miles in and pressure rams away from the corridor into the rifle area where they are eventually harvested by rifle. This is currently the ONLY archery only Harvest Ticket sheep hunt in the state and it is closed by WSA. Extending the 5 mile corridor to 15 miles would greatly reduce harvest but continue to offer opportunity for any hunter who wishes to hunt with a bow and arrow.

Proposal 143- I OPPOSE proposal 143. This area is already closed by WSA. Additionally Archery harvest in this area is very minimal at only 1-3 rams per year on average. There is no justification for reducing hunting dates or archery only sheep hunting in this area.



Proposal 144- I OPPOSE proposal 144.

Proposal 145- I SUPPORT proposal 145.

Proposal 146- I SUPPORT proposal 146.

Proposal 147- I SUPPORT proposal 147.

Proposal 148- I SUPPORT proposal 148.

Proposal 149- I SUPPORT proposal 149.

Proposal 150- I SUPPORT proposal 150.

Proposal 151- I SUPPORT proposal 151.

Proposal 152- I SUPPORT proposal 152.

Proposal 153- I OPPOSE proposal 153.

Proposal 154- I OPPOSE proposal 154. Non-resident hunting pressure on the Haul Road is already extremely high and is getting to the point the hunting experience is quite poor. Allowing an extra tag inside the corridor will further this problem.

Proposal 155- I SUPPORT proposal 155.

Proposal 156- I OPPOSE proposal 156.

Proposal 157- I SUPPORT proposal 157.

Proposal 158- I OPPOSE proposal 158.

Proposal 159- I SUPPORT proposal 159. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.

Proposal 160- I SUPPORT proposal 160. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.



Proposal 161- I SUPPORT proposal 161. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.

Proposal 162- I SUPPORT proposal 162. There are only 3 Archery Only sheep hunts in the entire state and 2 of them are draws and the other is under Federal closure via WSA. Archery hunting in general season areas while having to compete with rifle hunters is extremely difficult and can even become dangerous. Archery hunting provides a lot of opportunity while hunter harvest remains low.

Proposal 163- I OPPOSE proposal 163.

Proposal 164- I OPPOSE proposal 164.

Proposal 165- I SUPPORT proposal 165.

Proposal 166- I OPPOSE proposal 166.

Proposal 167- I SUPPORT proposal 167.

Proposal 168- I SUPPORT proposal 168. I authored this proposal and support the extension of the Spring season and Fall season both within the DHCMA and in 26B Remainder. Brown bear populations are abundant and harvest is low. Additional brown bear harvest will help ungulate predation.

Proposal 169- I SUPPORT proposal 169.

Proposal 170- I OPPOSE proposal 170.

Proposal 171- I SUPPORT proposal 171.

Proposal 172- I OPPOSE proposal 172.

Proposal 173- I SUPPORT proposal 173.

Proposal 174- I SUPPORT proposal 174.

Proposal 175- I SUPPORT proposal 175.

Proposal 176- I SUPPORT proposal 176.



Proposal 177- I SUPPORT proposal 177. Adding Archery only seasons provides a lot of added hunter opportunity while adding very minimal extra harvest.

Proposal 178- I SUPPORT proposal 178.

Proposal 179- I OPPOSE proposal 179.

Proposal 180- I SUPPORT proposal 180. All non-resident draw permits should be on a 90/10 allocation where UP TO 10% of the permits MAY be awarded to non-residents but are not guaranteed.

Proposal 181- I SUPPORT proposal 181.

Proposal 182- I SUPPORT proposal 182.

Proposal 183- I SUPPORT proposal 183.

Proposal 184- I SUPPORT proposal 184.

Proposal 185- I SUPPORT proposal 185.

Proposal 186- I OPPOSE proposal 186. The park is already closed to hunting by Alaskans of over 4.7 Million Acres but that is not enough for them! The Federal overreach is beyond criminal and not welcome by Alaskans.

Proposal 187- I OPPOSE proposal 187.

Proposal 188- I SUPPORT proposal 188.

Proposal 189- I SUPPORT proposal 189.

Proposal 190- I SUPPORT proposal 190.

Proposal 191- I SUPPORT proposal 191.

Proposal 192- I SUPPORT proposal 192.

Proposal 193- I SUPPORT proposal 193.

Proposal 194- I SUPPORT proposal 194.

Proposal 195- I SUPPORT proposal 195.

Proposal 196- I SUPPORT proposal 196.



Proposal 197- I SUPPORT proposal 197.

Proposal 198- I SUPPORT proposal 198.

Proposal 199- I SUPPORT proposal 199.

Proposal 200- I SUPPORT proposal 200.

Proposal 207- I OPPOSE proposal 207. This proposal is not supported by any data what so ever. Rams are killed every year that are 5-7 and Full Curl.... What is the biological difference between those rams and rams that end up being killed on age and fall short of 8 years old as sub legal rams? Also there are many old rams on the mountain that are 10+ years old, not broomed and will never be full curl... The current definition of a full curl ram was very well thought out and the department has done a great job on providing educational material to hunters to determine if rams are legal. Hunters should bear more responsibility for shooting sub legal rams. Outfitters and guides should be held to an even higher standard!

Proposal 210- I SUPPORT proposal 210.

Proposal 211- I SUPPORT proposal 211.

Craig Van Arsdale
Soldotna,AK



PC116

Name: Nancy and James VanPelt

Community of Residence: Orlando, FL

Comment:

Imagine the first time you come to Alaska, riding the green transit bus in Denali National Park.... Suddenly a magnificent wolf comes walking next to the road... the entire bus full of people are in awe! Then find out close by is a section of land, surrounded by the Park on 3 sides, is a wolf killing zone. This needs to stop! Having the Stampede area open for killing wolves only benefits a very few people.... While thousands are being deprived of the chance to see them . Close this area for hunting and trapping! There is no scientific reason to continue this practice . As being yearly visitors we feel our voice should be heard ...and speaking for many others on that bus and many others who want the potential to see and hear them again. Nancy and James (Jim) VanPelt

Proposal 186: Support



PC117

Organization: Midnight Sun Safaris

Name: Parker Wallace

Community of Residence: Healy

Comment:

I am commenting on behalf of proposal 52, I believe this proposal is instrumental in aiding the effectiveness of predator control on the ground. I have in my lifetime observed our predator species, in particular wolves, become increasingly advanced at avoiding humans, be it individual or trap. I am not alone in this observation, I know there are many who agree with what I've seen. Predator management from a ground level is largely ineffective, the use of NV and forward facing IR technology are instrumental in successful predator management conducted by the individual. It won't solve the problem, the state needs to be more hands on, but it's a step in the right direction and it can't hurt. Predator management in our state is a huge issue, and although it won't be a solution (wider spread aerial control is the best solution) it will only aid in success and contribution by the public and individuals who hold this resource in such high regard.

Thank you for your time,

Parker Wallace

Proposal 43: Oppose
Proposal 44: Oppose

Proposal 45: Oppose
Proposal 46: Oppose

Proposal 47: Oppose
Proposal 52: Support



2-26-24

Protect Denali's Wolves in The Wolf Townships Support Proposal 186 - Written Testimony

I am a long term Alaskan who has worked in Denali National Park for the past 36 years; 33.5 as a Tundra Wilderness Tour (TWT) Guide and Transportation System driver.

Furthermore, from 1991 to 2009, I had worked on a part time professional basis as a nature photographer with representation by Alaska Stock Images who was later bought by Design Pics.

While the BOG may only concern itself with populations of animals, we in Denali never see entire populations of wildlife. What we see are the representatives of those populations: the individuals, family groups, small herds and flocks of wildlife that visitors from all over the world, (including Alaskans) visit Denali to see and enjoy.

Consequently, they have great value to the 600,000+ visitors to Denali each year.

As a TWT guide, I take up to 52 visitors (including Alaskans) into the park and give them a guided tour that includes wolves and other wildlife. Conservatively, I have taken over a 100,000 visitors into Denali during my career.

During this time, I can easily state that when visitors see and enjoy wolves, that the excitement level skyrockets. In fact, I have been told on many occasions prior to 2012 that wolves are what made a visitor's trip to Alaska.

Quoting from an economic study on Denali's wolves titled: **Economic Values of Wolves in Denali National Park and Preserve** (DNPP) - See: <https://static1.squarespace.com/static/5bc75d83e4afe931ade4f0d8/t/5c04334a70a6ad0f6bac84f5/1543779153926/Loomis-Economic-Values-of-Wolves-in-Denali-NPP-Final-3-30-2016.pdf>



“In 1997, non-resident visitors who came to Alaska primarily to view wildlife had average expenditures of \$6,000 per trip.”

“From economic valuation questions found in Alaska wildlife viewing literature, it can be inferred that a non-resident visitor may have an additional value in the range of \$200-\$300 per wildlife viewing trip to Alaska if a wolf is seen on their trip.”

“Qualitative content analysis of structured interview material with these same surveyed visitors yields a primary theme of dissatisfaction of not seeing wolves.” **End Quotes**

Declines in Wolf Viewing

Prior to 1995, 2005, and 2012, Headquarters, East Fork and Grant Creek wolf family groups were especially notable. Headquarter’s territory included the first 14.5 miles of the park road which allowed visitors the opportunity to view them without taking any kind of a bus into the park.

The trapping caused deaths of breeding females in each of the above wolf family groups in the above years, disrupted travel, use of territory, hunting, rendezvous and den site locations within these family groups, or in Headquarters case, lead to their complete disintegration.

All previous wolf family groups (Savage River, Headquarters, Sanctuary, Mt. Margaret, Nenana River, Riley Creek and East Fork (Toklat) that have moved into the far eastern portion of the Denali have suffered trapping/hunting caused deaths. In most of these, hunting/trapping was either a contributory or primary cause of their disintegration.

In all of these cases (and more) not only have the wolves been negatively impacted but so too has visitor viewing.



From 2004 to 2012, Grant Creek denned west of the Toklat River, a quarter mile away from the park road with two off years. This provided visitors unparalleled opportunities to view wolves and their pups with high quality sightings being common. Wolf viewing would reach its peak in 2010, when 45% of visitors saw wolves, primarily due to Grant Creek.

In 2012, the breeding female of Grant Creek was baited and killed outside the park by a local trapper.

Within one year, this led to a serious decline in Grant Creek from 15 wolves to 3. Additionally, it created massive behavioral disruptions to travel, territory, hunting, rendezvous and den site selection and caused visitor viewing to plummet to 4% from its high of 45% in 2010.

What this points out is that wolves are not expendable biological cogs that replicate the behaviors of previous wolf family groups. Each individual and family group is unique in its behaviors and whether they will be viewed by park visitors or not.

Over the past three seasons, I and my passengers had 0 sightings for 2021, 2 sightings for 2022 and 3 sightings for 2023.

This is not an isolated case of one Denali Tour Guide/Driver.

In 2019, I conducted mid-season and end of season sighting surveys of wolves among my fellow drivers and of the 68 Denali drivers who responded, there were only 27 sightings involving 32 wolves over the course of a 135 days (April 27 - September 8, 2019).

NPS would later establish that in 2019 and 2022, wolf viewing declined to its all time low of 1%. This is the reality of the state's policy's is that visitors and residents are being denied a truly rare and unique experience as not only wolves are being eliminated/disrupted but so to is wolf viewing in Denali National Park.



All Alaskans and visitors should have a realistic opportunity to experience Denali's Big Five (moose, caribou, Dall Sheep, grizzly bears and wolves). Targeting and killing Denali's wolves in The Wolf Townships significantly impacts wolf viewing in the park. It further degrades and cheapens the experience for Alaska visitors/residents and denies them that rare experience.

Wolf viewing isn't based on the numbers of wolves, but on the behaviors that individual wolves and family groups adopt such as: travel and hunting near or on the park road. Far more rare, is the establishment of rendezvous sites and the ultra rare den site near the park road; with den sites being the ultimate gold standard for viewing.

The targeting, trapping and killing of Denali's wolves within The Wolf Townships has repeatedly disrupted wolf family group dynamics impacting not only the wolves themselves but the viewing of wolves for up to 600,000+ visitors per year.

The above demonstrates the fragility of wolf family structure and the behaviors that allow for visitor viewing. These examples and more point out that one knowledgeable trapper can destructively impact the social structure of Denali wolf family groups and visitor viewing of wolves.....for years.

NPS Study

In January of 2023, NPS released a study on the impacts of human caused mortality to wolf family groups titled: **Human-caused mortality triggers pack instability in gray wolves** -

See: https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/fee.2597?fbclid=IwAR0rslfL9Cfm_fb6mNmE2T24LpP_BWFmQuk3QSud4ImtdLcARHNGT3-4uJ.

This study included: Denali, Yellowstone, Grand Teton, Voyageurs National Parks and Yukon Charley Rivers National Preserve.



The conclusions of this study support my testimony. Even the death of a single wolf (depending on which one) can have significant implications for wolf family structure, behaviors and/or whether they disintegrate as a family unit or not.

How the State Treats Wolves

The state typically treats wolves in its management as expendable, biological cogs while ignoring fundamental wolf family structure, behavior, and significant ecosystem and economic benefits. And in Denali's case, the state further ignores the devastating impacts to visitor viewing.

No place in Alaska, is a family group of wolves granted full protection throughout their territory. Even in Denali's 6.2 million acres, wolves are only protected in the 2 million acres of Denali's original park; not the 4 million acres of Preserve and New Additions.

In these areas, bag limits for trapping is unlimited and hunting begins on either August 1st or 10th (depending on the Game Management Unit - GMU) when wolf pups are using rendezvous sites and are highly dependent on the adults.

According to the Alaska Conservation Alliance and Ecotrust, wolves are only protected in 2.4% of Alaska leaving 97.6% open to wolf killing. Where is the balance in this type of biased management?

The Wolf Townships have been recognized for decades as critical winter habitat for Denali's caribou herd and wolves. Yet, while the caribou herd have enjoyed protection since 1972; the wolves have not. Why the double standard in wildlife management between these two species both of which spend most of their time within the park?

The Contempt by Extremist Trappers/Hunters for Visitors

The contempt by extremist trappers/hunters for Denali visitors, the tourism industry and all non consumptive users is best illustrated by quoting the trapper responsible for the death of Grant Creek's breeding female in 2012.



Quoting from the National Geographic article: **How Can Six Million Acres in Denali Still Not Be Enough?**

“That was the third time I ruined millions of people’s Denali National Park viewing experience,” Wallace quips.

The cascading and rippling impacts of the killing of this breeding female destroyed the best wolf viewing in my 36 years in Denali. And furthermore, it denied in the words of the above trapper “millions of people’s” unique and unforgettable wolf viewing experience; which included pups.

How does the desires of the above trapper as well as a handful of others outweigh the desires of “in the words of the above trapper;” “millions of people’s” who wish to see wolves?

Wolves are the number 1 wildlife draw in Yellowstone and bring in \$83 million dollars into the local economies. They further provide many direct and indirect jobs and are a significant economic benefit to Yellowstone’s tourism economy and consequently, to businesses and employees in Montana, Wyoming and Idaho.

A similar, positive economic effect on a lower scale could be achieved in Denali if and only if wolves are protected within The Wolf Townships. This would allow for wolf family group structure continuity (as best as possible) and help set the stage for realistic visitor viewing.

Quite simply the state’s policies have undermined and sabotaged wolf viewing in Denali to such a degree that the odds of visitors seeing and experiencing wolves is “almost nonexistent”.

While wolf viewing cannot be guaranteed, the stage can be set for its realistic possibility if wolves are fully protected in their critical habitats that are adjacent to Denali National Park.



No Government Overreach for Proposal 186:

Whenever a proposal is made to actually protect wildlife, especially wolves and/or grizzlies, the howling, caterwauling and whining begins over government overreach.

Proposal 186 isn't a case of Federal overreach on state lands; it is a proposal not a takeover. In past years, the Fairbanks North Star Borough (2016) as well as opinion polls by Remington Research Group in 2018, show overwhelming public support for the establishment of a protective buffer to protect the park's wolves, grizzlies and wolverines.

It is the vocal minority of howling extremists in the hunting/trapping community that are opposed to such a proposal.

Alaska wildlife is supposed to be managed for all Alaskans; including non consumptive users who wish to view, photograph, video and enjoy living wildlife.

The only places in Alaska where wolves enjoy complete protection is the original National Parks of Denali and Glacier Bay and the original National Monument/Park of Katmai. This being the case, they are not protected throughout their entire territories.

Consequently, I am currently on my sixth trip to Yellowstone in 2 1/2 years specifically to look for, observe and photo/video wolves. And even though, this trip has not been successful to the extent that I would like, at least I have the opportunity to view wolves while here. The same cannot be said for Denali. A one to six percent viewing possibility of seeing wolves in Denali is not a realistic opportunity but a spin of the roulette wheel.

Protecting Denali's wolves in The Wolf Townships will help set the stage for the visitor viewing of wolves for Alaskans and all visitors. It will further encourage these visitors to spend their hard earned cash in Healy and other Alaskan locations as opposed to Gardiner, Montana and locations in the Lower 48.



I urge you to support Proposal 186 in it's entirety and on a year round basis.

Wolf Control Proposals for GMU 19c

Am Opposed to the following proposals: 60, 61, 62, 65,

Sheep Proposals for GMU 19c

Am Opposed to the following proposals: 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 89, 90, 91

Support Proposal 92

Grizzly Bear Proposals for GMU 19c, 19e, 19b, 19d, 21a, 21e

Am Opposed to the following proposals: 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107

Tok Area Proposals for GMU 12, 20d, 20e, 24

Am Opposed to the following proposals: 108, 109, 120, 121, 122, 123, 136, 137, 138, 146, 147, 148, 149, 150, 151, 152, 153

Proposals for Units 20A, B, C, F, 25a 25c

Am Opposed to the following proposals: 166, 167, 168, 169, 170, 182, 183, 184, 185, 187



Notes on Opposing the Above Proposals

None of the Dall Sheep proposals mention human caused climate change impacts (heavy snowfall and/or icy winters) and their duration on sheep populations. It should be expected that as long as human beings continue to burn fossil fuels that climate change impacts will worsen for Dall Sheep and other species; including caribou.

Sheep populations are declining statewide, yet the following sheep proposals allow for expanded sheep hunting by resident and non resident hunters. This contradicts attempting to maintain and/or increase sheep populations and no amount of wolf control will alleviate the problem for sheep when it is a human caused, climate change issue. Consequently, Proposals 60, 61, 62 & 65 will only squander limited state resources.

Furthermore, no ADF&G studies of ungulate, sheep, wolf or grizzly/black bear populations are cited in any of these proposals. Nor, are any formal vegetation studies on lichen, mosses and willows mentioned to determine habitat condition.

It should be expected that as willows expand into areas of lichen and mosses that these important food sources for caribou will decline in time.

Habitat/vegetation quality is directly related to carrying capacity of the ecosystem for ungulates.

For proposal 65, ADF&G fails to give any reason to continue Intensive Management, or it's current state of effectiveness, or its current cost or future, expected costs.

Furthermore, no numbers of ungulates or predators are given or population goals to be reached.

Quite simply, no justifications based on rigorous scientific study is given for any of these proposals. The above proposals for intensive management and wolf control if approved, would continue to pour limited state resources into the "Black Hole" of wasteful spending.



Opposing all Expanded Grizzly Bear Hunting/Baiting Proposals

Grizzlies have the lowest reproductive rate of any North American mammal, consequently, their management must be scientifically based with comprehensive studies conducted beforehand.

No scientific justification for these proposals is given to justify expanding hunting seasons. No studies on the grizzly bear population is given, no population dynamics (ratios of males, females, subadults & cubs) is given, no natural mortality is established for cubs in GMU 19c (or other GMU's), or whether the population is increasing, stable or decreasing.

Furthermore, this GMU is adjacent to the southwest corner of Denali National Park/Preserve, meaning National Park/Preserve bears could be targeted and killed which is unacceptable.

Bear baiting is one of the most unethical practices to hunt grizzly or black bears. In addition to its unethical nature, it also carries with it the strong possibility of creating human food habituated bears.

Food habituation by grizzly bears has been well documented going all the way back at least to the 1967 bear attacks on two different women in two different areas of Glacier National Park, Montana by two different grizzly "dump" bears.

Grizzlies have the capability of creating indirect food association (no people present) through the presence of human scent on human food items or garbage. This has lead to human injuries and in rare cases, predatory behavior by grizzlies that has resulted in the deaths of people.

Bear bait stations are miniature dumps created by hunters. Since not every bear is killed at these bait stations, the possibility of hunters creating problem bears for others is a very real possibility.

Additionally, female bears with cubs who visit bait stations teach their cubs this association.



Lastly, it makes absolutely no sense to encourage the public to keep a clean camp, to never feed bears, to not put bird seed out in spring, summer and fall, to put trash cans out for pickup on the day of pickup, to clean fish by streams, to use bear proof food containers, food lockers, garbage cans for campers, backpackers, etc and then have hunters put out human food, grease and/or dog food in creating these bait stations.

Quite simply, bear baiting should be banned in Alaska; not expanded.

Sincerely,

Bill Watkins

References:

Economic Values of Wolves in Denali National Park and Preserve (DNPP)

<https://static1.squarespace.com/static/5bc75d83e4afe931ade4f0d8/t/5c04334a70a6ad0f6bac84f5/1543779153926/Loomis-Economic-Values-of-Wolves-in-Denali-NPP-Final-3-30-2016.pdf>

Human-caused mortality triggers pack instability in gray wolves

<https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/fee.2597?fbclid=IwAR0oca4a4yJT1rEq2renovZ4f8tUCchRbcV8R7Fhzm96zsJQCQ10uLsgE6k>



The Wolf Connection Podcast with Kira Cassidy on NPS Study: Human-caused mortality triggers pack instability in gray wolves

https://thewolfconnection.buzzsprout.com/1081496/12224184-episode-111-kira-cassidy-human-caused-mortality-triggers-wolf-pack-instability?fbclid=IwAR2LbfioqJNnXr-CldgrmpCk0JrCogkKnaTI4biUXocbsF_F0fNjDVViz-E

Trapper lures wolves from Denali, kills 2; pack's future in doubt

<https://www.latimes.com/nation/la-xpm-2012-may-21-la-na-nn-denali-wolf-20120521-story.html>

Battle over wolf hunting on Denali boundary continues

https://www.newsminer.com/features/outdoors/battle-over-wolf-hunting-on-denali-boundary-continues/article_25332818-b74c-11e9-9f0a-d71e8965fe25.html

Looking to see a wolf at Denali? A grassroots bus-driver survey puts the odds at 'not-quite nonexistent'

<https://www.adn.com/alaska-news/science/2019/07/29/looking-to-see-a-wolf-at-denali-a-grassroots-bus-driver-survey-puts-the-odds-at-not-quite-nonexistent/>

New Denali wolf study omits the full story

<https://www.adn.com/commentary/article/new-denali-wolf-study-omits-full-story/2016/05/04/>

How Can Six Million Acres at Denali Still not be Enough?

<https://www.nationalgeographic.com/magazine/article/denali-national-park-alaska>



NPS Wolf Sighting Index

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

NPS - 2022 Annual Wolf Report

<https://irma.nps.gov/DataStore/DownloadFile/689410> -

Quoting from Under Summary - Page 7 - A index of wolf viewing for the eastern portion of the road (to East Fork) was 0.01 in 2022.; only one data collection trip out of 91 observed a wolf in 2022.

No wolf sighting data is available for 2020 & 2021 due to Covid

Denali Wolves on FB - Educational/Advocacy Group

<https://www.facebook.com/groups/denaliwolves>

Denali Wolves & The Wolf Townships - Explanatory Video

<https://www.youtube.com/watch?v=q2Xi--9fuDw&t=913s>

Denali Wolf Time Capsule Photos - Prior to 2009

<https://billwatkins.photography/portfolio/denali-wolves>

More film images prior to 2009, will be scanned and added at a later date.

Bill Watkins
Denali Park, Alaska



PC119

Name: Bob and Karen Watson

Community of Residence: North Liberty, Indiana

Comment:

My wife and I hardly support Proposal 186 relating to the closure of a small piece of state land from hunting and trapping of Wolves. We have been coming to Alaska, and particularly Denali, since the early 1980's to view wolves in their natural habitat. This small amount of land should support the overall spirit of the area, not hinder it. It doesn't seem right that a wolf could be hunted or trapped just because it went slightly off National Park land. They don't know what land they're on. It's different if they wander miles and miles away, but to just cross this small state land area shouldn't be a death sentence. Thank you for your consideration. / Bob and Karen Watson 2-12-2024

Proposal 186: Support



PC120

Name: Kate Weber

Community of Residence: Healy , Alaska,

Comment:

I support proposal 186 to limit the wolf trapping that allows the wolf families to walk right into a trap at Unit20 C. I am concerned as an Alaskan and Healy community resident for any kind of Denali Nat Park tourism.

How can we say we are any kind of eco system at all of plants and animals when individuals bring in more and more trailers, 4 wheelers, guns , traps and then I see these hides either on some wall in the Healy community that connects to Denali National Park , via Unit 20C or in a National Geographic from Stampede .

What do the tourists from all over the world think of the pure selfishness of one person killing animals for their own profit in a heavy tourist area as the wolf townships are . These are places full of too many dogs already and children and working families all walking out on Dry Creek that one can walk or ski or snowshoe right up past the historic bluff into Stampede into Denali National park and view the wolf . This is right where Unit 20 C connects to Healy .

Photographers love the wildlife that has been there in the days of Murie and Haber who did enormous research of wolf communities . Are we pursuing just eliminating wild life for the tourist and calling that eco tourism ? I strongly believe that this proposal 186 will bring tons of benefit to the wolf townships that are right next to the Denali National Park . I doubt the safety of trapping in hiking and skiing areas not to mention the safety of the children and the tourists themselves . Already a bus trip out the Denali road has very few animals at all anymore to view or photograph . I have skied past a wolf but that was in the 70s . I have observed wolves

walking the " wrong way " in the 2020 s towards their own deaths and demise of their wolf communities right out of Unit 20 C into a trap for someone's personal gain. There is a lot of hunting and trapping area in Alaska . It is a huge state . People now have trailers, 4 wheelers, snow machines . They bring these in to the area but do not own land there to be trapping and hunting in residential areas. This is becoming a leisure sport , but it is eliminating the very thing a tourist photographer or animal plant lover would spend all the money it takes now to come to the Denali Park and stay in the wolf townships . Do they come to see animals or trap remains and ruined tundra and worse air ?

Proposal 186: Support



PC121

Name: Charmi Weker

Community of Residence: Anderson, Alaska

Comment:

I am supporting Proposal 186

Proposal 43: Support

Proposal 186: Support



PC122

Name: Stephen Wenzlick

Community of Residence: North Pole Alaska

Comment:

I am in support of proposal 176 on the salcha river and unit 20b to stop nonresidents from being able to have a anybull tag. Since I was a kid my family has owned a common the slash and we have seen a major decline in the moose population. Thanks Stephen

Proposal 176: Support



PC123

Name: April Woods

Community of Residence: Anchorage, AK

Comment:

Over many years I have watched our animal numbers decrease as our government fails to protect them. Alaska's Board of Game has proven by our wildlife numbers that they do NOT protect wildlife, they kill and they sell hunting licenses. This major conflict of issue has to be addressed,

if we continue on this course, all will go extinct. You can't put money on one side and wildlife on the other and expect wildlife to have a chance, not in this world.

I support the National Park Service Proposal 186. This proposal will provide well-needed protection for the wolves that venture onto state lands in the Stampede townships, and then return to the park for denning, pupping and other activities. The Denali Wolf Program has discovered detailed information on the life habits of wolves, and jeopardizing wolves in this area is not only disruptive to the scientific understanding of wolves, but also to the viewership experience in Denali National Park. The majority of Alaskans and visitors to Alaska support conservation of wolves for science, for viewing, and for their value to the ecosystem. And every time I go to Denali National Park I come home without seeing wolves. Wildlife sight seers are left empty handed again and again because our system does not protect wolves and all wildlife, it capitalizes on their death.

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

Proposal 186: Support



PC124

Organization: The village of Tanana

Name: Trenton Woods

Community of Residence: Fairbanks, Alaska

Comment:

Being an Alaska native from Tanana, I feel that the use of thermal technology is beneficial to my people to reduce predator population because we live off moose and caribou. The wolves have adapted and so should we. I am also a Alaskan big game hunting guide who spends 9 months a year out in the wilderness and sees the destruction wolves put on our state.

Proposal 52: Support



Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

September 29, 2023

Jerry Burnett, Chair
Alaska Board of Game
ADF&G Boards Support Section
ATTN: Board of Game Comments
P.O. Box 115526 | Juneau , AK 99811-5526
(Submitted electronically via www.boardofgame.adfg.alaska.gov)

Subject: Comments on proposals for 2024 Interior and Eastern Arctic Region meeting

Dear Mr. Burnett:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Copper Center, Alaska, on September 27 and 28, 2023. The commission is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. At this meeting, the SRC reviewed several proposals to the Alaska Board of Game for Unit 12 that will be considered during the 2024 Interior and Eastern Arctic Region meeting and would like to provide the following comments.

Proposal 52: Allow the use of night vision goggles and forward-looking infrared devices for taking furbearers with a trapping license in Units 12, 19, 20, 21, 24, 25, 26B, and 26C. The Wrangell-St. Elias National Park Subsistence Resource Commission supported Proposal 52. An authorization to use night vision goggles would provide the opportunity to hunt predators at night.

Proposal 111: Add an archery only, five-day moose season for residents and nonresidents in Unit 12. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 111. Concerns about this proposal included extending the season into a period of time when the animals are more susceptible to harvest along with the potential to wound rather than kill an animal. Archery doesn't guarantee a kill.

Proposals 120 and 121: Increase the brown/grizzly bear bag limit for residents in a portion of Unit 12. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposals 120 and 121 with modification to include all of Unit 12. There is no shortage of bears in Unit 12. Ad adoption of the proposal would provide additional harvest opportunity.

Chair: Susan L. Entsminger; Members: Mike Cronk, Daryl James, Clint Marshall, Suzanne McCarthy, Kaleb Rowland, Daniel E. Stevens, and Gloria Stickwan



Proposals 122 and 123: Lengthen the wolf hunting season in Units 12 and 20E. The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposals 122 and 123. Adoption of the proposal will provide additional opportunity to harvest wolves. For example, people who bait bears could harvest wolves that come into their bait stations. It was also noted that the fur quality of wolves is still good in June.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Susan L. Entsminger".

Susan L. Entsminger
Chair

cc: Superintendent, Wrangell-St. Elias National Park and Preserve



PC126

Name: Mary Zalar

Community of Residence: Fairbanks, AK

Comment:

I write in support of Proposal 186. I urge the Board to adopt proposal 186 and restore the prohibition on the harvest of wolves in a portion of Unit 20C (areas as specified in the proposal). Protecting wolves that spend time in Denali National Park benefits the people of Alaska and visitors who in turn contribute to local economies and the tourism industry. Visitors to Denali Park LOVE seeing wolves. There are thousands of visitors to Denali Park annually--many of whom are residents of Alaska. Wildlife resources (in this case wolves) should be managed for the maximum benefit of Alaska's people. The prohibition of the harvest of wolves in this relatively small area may displace a very few trappers. However, many, many people could benefit as wolves in this protected area are likely to spend time in Denali Park. Please prohibit harvest of wolves in this area, and pass Proposal 186.

Proposal 186: Support
