

Alaska Board of Game  
Southeast

November 6-11, 2010

## Public Comment Index

1. [Beth Visgo](#)
2. [Yakutat Tlinget Tribe](#)
3. [Voices for Douglas Island Wildlife](#)
4. [Daniel Kinny](#)
5. [Jane and Charles Butler](#)
6. [Tom McCallum](#)
7. [Kathy Sparks](#)
8. [David and Sall Hart](#)
9. [Dr. and Mrs. Bruce Bean](#)
10. [Linda Policarpio](#)
11. [Russel Wicka](#)
12. [Don Quarberg](#)
13. [Southeast Alaska Subsistence Regional  
Advisory Council](#)
14. [Michael O'brien](#)
15. [Jeff Sloss](#)
16. [Shona Hosley](#)
17. [Raymond Graham](#)
18. [Larry Shook](#)
19. [Teresa Hunt](#)
20. [Scott Eisner](#)
21. [Les C. Hartley](#)
22. [Richard Morrow](#)
23. [National Park Service](#)
24. [Judy Griep](#)
25. [Ketchikan Rod and Gun Club](#)
26. [Mike holman](#)
27. [Tina Brown](#)
28. [Alaska Wildlife Alliance](#)
29. [Gabrielle Aberle](#)
30. [Jarvis Schultz](#)
31. [Kurt Whitehead](#)
32. [Jim Green](#)
33. [Barry Burger](#)
34. [Gayle and James Eastwood](#)
35. [Dave and Leah Alcyon](#)
36. [Kimberly Busch](#)
37. [Mary Wilson](#)
38. [Patricia O'Brien](#)
39. [Linda Shaw](#)
40. [Jimmie Rosenbruch](#)
41. [Aran Felik](#)
42. [Else Poulsen](#)
43. [Capital Kennel Club of Juneau](#)
44. [Brennon Eagle](#)
45. [Nat Drumheller](#)
46. [Debbie McBride](#)
47. [Alaska Trappers Association](#)
48. [Calvin Casipit](#)
49. [Tom Hansen](#)
50. [Barbara Belknap](#)
51. [Della Dempsey](#)
52. [Otis Marsh](#)
53. [Michelle Masden](#)
54. [Drew Mathews](#)
55. [Greg Streveler](#)
56. [Aaliyah Chavez](#)
57. [Hollie McGee](#)
58. [Jenny Pursell](#)
59. [US Fish and Wildlife Service](#)
60. [Lee Benson](#)
61. [Susan Oehlers](#)
62. [Susan Schrader](#)
63. [Stephanie Latzel](#)

64. [Lin Davis](#)
65. [M. Robert Darche](#)
66. [Ruth and Dave Clancy](#)
67. [Francine Gelinis](#)
68. [Michael and Maureen Brookes](#)
69. [Catherine Nolan](#)
70. [John and Sandra Rodominik](#)
71. [Ross Smiles](#)
72. [Defenders of Wildlife / Alaska Center  
for the Environment / Alaska Wildlife  
Alliance](#)
73. [Steve and Patti Forsyth](#)
74. [Jim Kosmos](#)
75. [Ken Vorisek](#)
76. [Jeff Carlin](#)
77. [Brien Salazar](#)
78. [Alaska Center for the Environment](#)
79. [Kenji King](#)
80. [Susan Oehlers](#)
81. [Tania Lewis](#)
82. [Edward Toribio](#)
83. [Bev Davies](#)
84. [unsigned](#)
85. [George Utermohle](#)
86. [Alaska Professional Hunters Association](#)
87. [Brad and Minnie Dennison](#)
88. [Peggy Robinson](#)
89. [Mike Warner](#)
90. [Harley and Farrel Lewis](#)
91. [Jack Davies](#)
92. [Roger Skogen](#)
93. [Mike Vaughn](#)
94. [Edward Toribio](#)
95. [Trail Mix, Inc](#)
96. [Al Slagle](#)
97. [Sean Nielson](#)
98. [Grateful Dogs of Juneau](#)
99. [Della Dempsey](#)

Beth Vegso  
94 Optimist Park Drive  
London, Ontario Canada  
N6K 4K2  
519 471 3979

September 17, 2010

**ATTN: Board of Game Comments**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**  
**Fax: 907-465-6094**

**PROPOSAL 4 - 5 AAC 92.510 Areas closed to hunting:** Close the Margaret Creek Drainage area in Unit 1 to bear hunting

SUPPORT

I am in favour of the above proposal. I feel that there are many thousands of acres of land open to bear hunting while very few are left for people like myself who would like to go and view these majestic animals in their natural habitat. Too often we see bears at the sides of roads because they are used to people feeding them. We want the chance to fly in or go somewhere where these bears live as they should and where we can watch them in safety.

It would be of great concern to have hunting in this area while visitors are there simply to watch and enjoy. Please allow hunters to have their space outside of these area. Protect the animals and give them a space to be free.

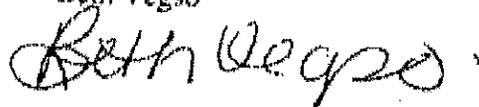
**PROPOSAL 5 - 5 AAC 92.510. Areas closed to hunting.** Close an area within the Misty Fjords National Monument in Unit 1 to brown bear hunting

SUPPORT

One of the greatest memories I have of travelling in Alaska was visiting an area where Grizzly bears congregated and where I could watch them in their natural space. No hunters were allowed in this area - Anan Creek. More areas such as the one in Proposal 5 - 5 AAC 92.510 should be kept for such activities. Give people a chance to visit bears and not have to worry about people hunting in the area. Protect the BEARS.

Regards,

Beth Vegso



RECEIVED  
SEP 21 2010  
BOARDS



# Yakutat Tlingit Tribe

606 Forest Hwy. 10 \* P.O. Box 418 \* Yakutat, Alaska 99689  
Phone (907) 784-3238 \* Fax (907) 784-3595 \* www.yttribe.org



September 24, 2010

Alaska Department of Fish and Game  
Board of Game  
P.O. Box 115526  
Juneau, Alaska 99811  
Fax: 907-465-6094

Dear Board of Game:

The Yakutat Tlingit Tribe is writing to ask you to support 2010 proposal number 47 submitted by the Yakutat Fish and Game Advisory Board for a trapping issue in the Yakutat area.

The purpose of this proposal is to create a safety area free from traps that will cause harm to dogs, children and other recreational users. This area will be around key local common use areas such as the following: 500 yards of a permanent resident within the city limits of Yakutat, 50 yards on either side of the Train Trail, 150 yards on either side of Cannon Beach Road, a section of Cannon Beach Recreational area from the Coast Guard Beach to "the Barge", and 500 yards back from the mean high tide line. These proposed areas would be closed to all 330 conibears and wolf snares. Generally, we believe these areas are where you would expect to harvest/trap furbearers.

We believe that this is an important proposal. It will benefit the community at large. By supporting this proposal we hope that these designations and restrictions will help avoid the accidental entrapment of pets or people.

In advance, we thank you for support.

Sincerely,

Victoria L. Demmert  
YTT Tribal President

RECEIVED  
SEP 29 2010  
BOARDS

To preserve, maintain and protect the unique culture, land & resources of Yakutat Tlingit people;  
to maximize our social, health & well-being while creating economic development benefits to all tribal members.





To: Alaska State Board of Game,( BOG ) Members  
Re: Positions on regulation proposals for SE Region BOG meeting cycle

RECEIVED  
OCT 15 2010  
BOARDS

From: Voices for Douglas Island Wildlife  
P.O. Box 33578  
Juneau, AK 99803

October 13, 2010

Dear Chairman Judkins and Board of Game Members,

Voices for Douglas Island Wildlife is an informal local Juneau/Douglas organization that was co-founded in the spring of 2002 by Tom Lee and Jenny Pursell to spearhead an effort to establish a regulation that would manage wolves on Douglas Island. As a result of this successful effort Douglas Island has been designated a special management area for wolves since early 2003. Subsequently The 'Douglas Island Wolf Management Plan', ( DIWMP ), which was crafted by a variety of user groups including assistance from the Alaska Department of Fish and Game, (ADF&G ), remains in place today. The Juneau/Douglas Advisory Committee and Board of Game unanimously supported the DIWMP in 2004 during the SE Regional BOG meeting.

Voices for Douglas Island Wildlife, (VFDIW ), has participated in all BOG meetings since 2002. Our focus concerns regulation proposals that pertain to wildlife in the Juneau/Douglas area as well as SE regional proposals which would directly impact wildlife in our area. Following are regulation proposals that we believe are significant to our area and therefore merit comment. Please note that we have categorized the various wildlife species and then have made comment re each regulation proposal impacting that particular species.

#### WOLF

Proposal 12: OPPOSE- would allow the use of snares for trapping in the Gustavus forelands. Snares are inhumane, can catch non-targeted animals including dogs, and are a threat to public safety.

Proposal 18: SUPPORT- this proposal would put conservation efforts into place for wolves on Prince of Wales Island, ( POW ). It will decrease the trapper bag limit from none to 10. It also would require the sealing of the hide to take place in 14 v/s 30 days which will allow quicker in-season management by the ADF&G. The wolves inhabiting POW are a subspecies of the Alexander Archipelago wolf and if conservation measures are not taken this species is apt to be listed on the threatened or endangered species list. This listing will affect Alaska and all wildlife user groups.

Proposal 25: SUPPORT- this proposal would also conserve wolves on POW by mandating that all snares and traps be marked with the owner's name and contact information. It also proposes multiple ways in which the ADF&G can conserve wolves such as reducing the harvest cap, reducing the time limit for checking traps and snares-

without conservation measures implemented this wolf subspecies could be listed on the threatened/endangered species list.

Proposal 43: SUPPORT- would change the wolf hunting season dates in all of SE Alaska, except for POW, from, current dates: August 1-April 30, to proposed dates: Sept.1-March 31. if not changed orphaned wolf pups will continue to starve in summer and early fall, pregnant full-term female wolves will be shot in April and hunters will continue to take poor quality trophies as the fur is often rubbed and of less than prime condition. The current extended hunting season is essentially a de facto wolf control program.

#### BEAR

Proposal 14: OPPOSE- would extend spring brown bear hunting season in Berners Bay by 3 weeks. The current season is March 15-May 31; the proposed season would end on June 20. Brown bear are vulnerable to hunting in the spring as they often are on beaches and out in the open grazing on greens. These conditions make bears vulnerable to being shot and an extended season will increase this likelihood.

Proposal 33: SUPPORT- would prohibit black bear trapping and the subsequent sale of meat, hides, skulls, and other parts in SE Alaska. Black bear populations in SE AK have decreased in the last several years. The sale of black bear meat and other parts for monetary gain will increase hunting pressure and more likelihood of illegal hunting practices and poaching. This proposal intends to conserve the black bear population which also is good for wildlife viewing which leads to a stronger economy.

Proposal 34: SUPPORT- essentially the same proposal as above, (33).

Proposal 35: SUPPORT- would decrease black bear resident hunting bag limit from 2 to 1 bear per year in all of SE except the ABC Islands, which don't have black bears, and POW which has special regulations already. This is an important conservational effort and should be adopted.

Proposal 36: SUPPORT- this is another black bear conservation measure by making changes to the hunting seasons and bag limits for black bears in all of SE except for ABC Islands, and POW. Some possible changes would entail: a draw hunt for non-residents, close the June portion of the spring hunting season for non- residents, close bear baiting in Ketchikan/Behm Canal area, POW, and Mitkof, Kupreanof, Wrangell areas. Black bear baiting is prohibited in our Unit 1C area; however, is allowed close to home in Unit 1D.

Proposal 39: SUPPORT- would ban black bear baiting in all of SE except ABC Islands and the Yakutat area. Bear baiting is currently allowed in the Haines, Skagway, and Klukwan area. Bear baiting habituates bears to human food, creates risks to public safety, and allows an unethical hunting practice i.e. enticing bears to food stations and then shooting them.

#### BEAVER

Proposal 29: OPPOSE- would extend the beaver trapping season by 1 month to 7 and ½ months in all of SE. There are no bag limits for trapping beaver. The ADF&G wants to use an extended season to resolve flooding presumably caused by beaver dams. Inadequate culverts and roads and trails in need of restoration also cause flooding problems. The department should look into other solutions to flooding problems v/s trapping more beavers by extending the season.

#### LOCAL TRAILS

Proposal 11: SUPPORT- would add the Treadwell Ditch Trail to a list of 18 popular, heavily used and 'all' seasonally used Juneau trails such as the Herbert Glacier Trail, Sheep Creek Trail, Perseverance Trail...which have a quarter mile buffer strip prohibiting trapping along their entire length. Please note; however; traps with an inside jaw spread of five inches or less which are set at least five feet above the ground and snow are allowed if set more than 50 yards from the trail. This proposal helps to ensure public safety measures for people and dogs.

Thank you for your time and consideration re Voices for Douglas Island Wildlife's positions on SE regulation proposals.

CO-founder of Voices for Douglas Island  
Jerry Purcell  
wildlife



**Date: September 27, 2010**

**ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094**

RECEIVED  
OCT 15 2010  
BOARDS

**From: Daniel Kinney  
900 East Portage Avenue  
Sault Sainte Marie, MI 49783**

**PROPOSAL 4 - 5 AAC 92.510:** Areas closed to hunting: Close the Margaret Creek Drainage area in Unit 1 to bear hunting.

I have been a guide leading wildlife photography bear tours in Southeast Alaska for the last three years. This season I guided for Island Wings Air Service. For the previous two seasons I guided for Taquan Air. In which time I have logged over three hundred bear viewing tours spread over three locations: Anan Creek, Polk Inlet and Traitors Cove. However, the majority of the tours I guided were at Traitors Cove.

That said I fully support Proposal 4 for three reasons.

The first reason being the undeniable decrease in bear sightings over the last three seasons.

- During the three seasons I guided at Traitors the bear viewing has dramatically decreased from my first season in 2008. In 2008 it wasn't uncommon to see three, four or five bears at the same time from the platform with other bears frequently coming and going. There were just a few trips overall I guided where groups did not see bears.
- In 2009 a good viewing opportunity would be a maximum of three bears seen from the platform, however usually less than three at a time for the most part. There were many more days in 2009 that no bears at all were seen by my groups.
- And then this year 2010, the most bears I ever saw with a group feeding at the same time were two. Seeing two bears at the same time this year only happened twice. This year not even fifty percent of my groups saw any bears at all.

The second reason I support Proposal 4 and more important than the decrease in bear numbers is safety for any and all persons who travel to Traitors Cove to see bears or other wildlife. In the last three seasons guiding at Traitors Cove I have witnessed many disturbing and unsafe practices from the hunting population.

- For starters I have come upon hunters actually hunting from both the upper bridge and the lower bridge. While bringing a group of six guests to the bridges to seek alternative bear viewing sites I came upon hunters couching over the guard rails with their rifles aimed down river and up river. At which time the hunters jumped to their feet and pretended to merely be watching the bears. They were not bear viewing, rather bear hunting.
- On multiple occasions, I have witnessed with my groups sounds of gunfire both above and below the main viewing platform. At which time the gunfire sounds did not appear to be up in the hills, rather up or downstream and not far away.

- Another shock to myself and my guests were two separate occasions of finding spent ammunition shells on the actual viewing platform as well as from both the upper and lower bridges.

Finally, the third and last reason I fully support Proposal 4 is for overall guest experience at Traitors Cove . Over the past three bear viewing seasons I and my guests have witnessed firsthand scores of unnatural sights that I have had to try to explain to my guests.

- Many times when loading or unloading guests from the planes on the dock there have been killed bears on the boats and on the dock itself.
- Many times as well I have been in the van driving guests to and from the platform when we were passed by ATV's with fresh killed bear on the back racks.
- I have also seen hunters with my guests on the actual platform with their high powered rifles beside them. Again, they say they are not hunting, but watching the bears instead.
- Finally, and not to be redundant, but hearing gun shots from the platform and from the bridges is a definite bad experience when trying to view wildlife.

Trying to explain the above occurrences to guests that pay top dollar to view wildlife from Traitors is a very difficult task to say the least. Not to mention, as I guide I can't in good conscience tell my guests they are completely safe knowing there are hunters breaking the hunting regulations already in place.

In conclusion, Traitors Cove is an unsafe place for wildlife viewers as well as a truly unnatural experience, over and above the steadily decreasing bear population. Thus, from a guides standpoint, bear viewing and bear hunting cannot co-exist in the same habitat.

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094

**PROPOSAL 4 - 5 AAC 92.510**

My husband and I have been to Alaska twice to see the wonderful wildlife of Alaska in 2003 and 2010. In 2003, my husband and I with two friends from Texas flew to Alaska for a vacation. The highlight of our vacation was to go to Anan Creek. The experience at Anan Creek was what I would call my "National Geographic" moment with black bear, brown bear, salmon and eagles. The salmon were running and as we walked up a boardwalk we saw for our first time a large brown bear in the creek eating salmon. To say this was exciting does not describe our feelings. We also experienced this event with many professional photographers that were there that day taking pictures. We saw several black bear and baby bear as they came down to the water to feed on the salmon. With Anan Creek protected from bear hunting we feel confident that this experience was also protected for viewers as my husband and I. We feel this way because when we returned to Alaska in 2010 we went to Margaret Creek instead of Anan Creek and did not see one bear! Bear hunting will ruin any possibility of experiencing what I experienced at Anan Creek at Margaret Creek. I was shocked in 2010 that I saw not one bear at Margaret Creek after my wonderful experience at Anan Creek in 2003. I realized that human intervention had caused this change and if you allow the hunting at Margaret Creek then I know that this will be a real loss to those of us like my husband and I who were willing to come to Alaska from Texas more than one time because of the bears. I also want to say that the number of people that experience bears for viewing would be a greater number than those hunting the bear. Tourists had booked flights continually throughout the day and in one day there would be more people who could of enjoyed a view of a bear than hunters wanting to kill for sport. Others I met when going to Anan Creek and Margaret Creek lived all over the United States or from foreign countries as Japan. I hope that my children will get to experience what I experienced at Anan Creek but if hunting is allowed at Margaret Creek I doubt they will get to have the same experience. Also, if hunting is allowed at Margaret Creek future potential tourist that are willing to spend a significant cost to come to Alaska to go view the bears would be greatly diminished. I realized that Alaska was very special since I live in an urban area. Texas nor any other state of the United States has the wildlife and outdoor experience that Alaska has to offer especially the bears.

Keeping areas as Margaret Creek like Anan Creek for bear viewing is the only way to ensure bears to be available for public viewing. I understand that Alaska has one bear for every mile and there must be other acreage in Alaska that could still allow for game hunting. Margaret Creek and Anan Creek are within a radius of Ketchikan that allows time to fly out to these viewing areas especially if you are on the limited timeframe allowed as a port of call from a cruise ship.

**Response submitted by: Jane and Charles Butler  
2700 Cresthill Circle  
Waco, Texas 76710**

RECEIVED  
OCT 15 2010  
BOARDS



**ATTN: Board of Game Comments**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**  
**Fax: 907-465-6094**

**PROPOSAL 4 - 5 AAC 92.510:** Areas closed to hunting: Close the Margaret Creek Drainage area in Unit 1 to brown bear hunting.

I support proposal 4

For the last twenty years my career has focussed on tourism. I have served and continue to serve on many national industry and government tourism bodies in Cayman and beyond (Caribbean, UK and others). My focus is on long term planning and strategy for tourism.

All of that is to give some weight to some simple statements.

Hunting bears certainly has some valid reasons behind it, but analysis and data has largely shown around the world that people will pay more to see wondrous animals in their natural habitat than they will to kill them.

Put another way, the economic value to SE Alaska of bears in a protected natural habitat is, I am almost certain, far higher than their value in being hunted.

In these harsh economic times around the world, I would urge the powers that be in SE Alaska to consider that argument and analyse carefully the balance they strike between hunting and protection in the areas they administer.

Regards

Tom McCallum  
e : [tom@mccallumsolutions.com](mailto:tom@mccallumsolutions.com)  
c : (345) 916-1084  
w : [mccallumsolutions.com](http://mccallumsolutions.com)  
t : [twitter.com/tomcayman](https://twitter.com/tomcayman)  
f : [facebook.com/McCallumSolutions](https://facebook.com/McCallumSolutions)



September 23, 2010

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

To Whom It May Concern:

The purpose of this letter is to provide written comment and support for Proposal 4-5AAc.510, the elimination of hunting in the Traitors Cove area of Misty Fiord. I had the pleasure and the privilege of viewing many parts of your great state, including Misty Fiord, during a 17 day vacation this past month. I cannot begin to describe the awe that I felt while viewing the vastness and beauty of Alaska. A large part of my pleasure and awe came from viewing wildlife in their natural habitat. Hunting should not be allowed in this very restricted area of Misty Fiord.

I also wish to support Proposal 5-5AAC 92.510, the banning of hunting in the Rudyard Bay and Walker Cove areas. My reasons for supporting this proposal are the same as above: every effort should be made to preserve and protect these wilderness areas, and their wildlife inhabitants, for the present and for future visitors to your great state. I hope you will be favorable to banning hunting in all of the areas mentioned in both of the proposals.

Thank you for your kind consideration of these matters.

Sincerely,



Kathy A. Sparks  
1230 Creekshore Drive  
Athens, GA 30606

RECEIVED

SEP 28 2010

BOARDS



**ATTN: Board of Game Comments**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**  
**Fax: 907-465-6094**

**PROPOSAL 4 - 5 AAC 92.510:** Areas closed to hunting: Close the Margaret Creek Drainage area in Unit 1 to brown bear hunting.

**PROPOSAL 5 - 5 AAC 92.510:** Areas closed to hunting. Close an area within the Misty Fjords National Monument in Unit 1 to brown bear hunting:

I support proposal 4

I support proposal 5

Dear Board Members,

My husband and I visited Alaska and in particular the Misty Fjord Monument area last year which was outstanding.

We plan to return for a longer period of time to enjoy the beautiful scenery and to view bears in their natural habitat. This is a dream of mine. Unfortunately we were too early in the season to catch the bears last year.

We implore you to set aside Traitor's Cove (Margaret Creek), Rudyerd Bay and Walker's Cove Fjords as areas to protect these unique and beautiful creatures.

Our family will come all the way from Australia to Alaska to witness the marvel of observing bears in their natural habitat. We implore you to stop the hunting of bears in this area. We will support an Alaska which looks after it's animals and environment for not only now, but also, for future generations.

Yours Sincerely David and Sall Hart, Western Australia.



September 18, 2010

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

Dear Board of Game, Alaska Department of Fish and Game:

As visitors to your great American wilderness, we urge you to accept the two proposals, PROPOSAL 4 - 5 AAC 92.510 and PROPOSAL 5 - 5 AAC 92.510, that have been put before you. My wife and I strongly support these proposals.

For most of us, bears and Alaska are synonymous. Seeing a bear in the wild is one of the main reasons we like to visit Alaska. We would never see one at home. Because the areas involved in these two proposals represent only a very small portion of Alaska, it seems reasonable that they should be off limits to hunting. There are many other areas for hunters to enjoy their sport. It seems that allowing bears a place to survive would also be good for the Alaskan economy. Seeing bears certainly is a draw for many visitors year after year, and we gladly spend our money for the experience.

Thank you for your consideration and approval of these proposals.

Sincerely,

Dr. and Mrs. Bruce Bean  
6348 West Redfield Road  
Glendale, Arizona 85306-4025



RECEIVED  
SEP 27 2010  
BOARDS

September 17, 2010

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: PROPOSAL 4 - 5 AAC 92.510  
PROPOSAL 5 - 5 AAC 92.510

To Whom It May Concern:

We recently visited the Traitor Cove bear viewing area and was amazed at the beauty of the land and, more especially to be able see a wild bear in his natural habitat. It is important for visitors to be able to have that opportunity and if you allow these proposals to pass, that will directly impact the reason many people come to Alaska and Traitor's cove. It is unfortunate with the amount of acreage available for bear hunting, that the Department of Fish and Game would choose an area established for wildlife viewing.

It is my hope that you can preserve the natural beauty of Traitors Cove and Margaret Creek Drainage and leave the other 22 million acres of land for hunting.

Sincerely,



Linda Policarpio



September 21, 2010

To: The Alaska Board of Game

From: Russel Wicka Yakutat Resident

POB 222

Yakutat AK 99689

Regarding: Proposal #47 submitted by the Yakutat Fish and Game Advisory Council

I, Russel Wicka, am writing to Inform the Board of my support for proposal #47 submitted by the Yakutat Fish & Game advisory council regarding safety zones from 330 conibear traps and wolf snares around common use areas in Yakutat. I support that the following rules be implemented:

No use of 330 conibears or wolf snares within 500 yards of any permanent residents in City limits,

or 50 yards on either side of the Train Trail,

Or 150 yards on either side of Cannon Beach RD,

Or on a section of Cannon Beach Recreational area from the Coast Guard Beach in the west to the Barge in the east and 500 yards back from mean high tide.

I believe that these changes would mitigate risk of harm to recreational users and their pets who utilize these areas. I feel that these areas are not areas that one would typically expect to harvest big game and predators out of, and, that this is a good common sense solution to a potential problem in our community.

Sincerely:

Russel Wicka

RECEIVED  
SEP 22 2010  
BOARDS



October 20, 2010  
Don Quarberg  
HC 60 Box 3070  
Delta Junction, AK 99737  
907-895-4650  
dmq@wildak.net

ATTN: Board of Game Comments  
AK Dept Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-5525

**COMMENTS ON PROPOSAL #46 5 AAC 92.050**  
**Required permit hunting conditions and procedures - Bonus Points**  
(Southeast Region Meeting 11/5-9/2010 in Ketchikan, AK)

**OPPOSE THIS PROPOSAL:** For the numerous reasons stated below.

- 1: The current Random Draw is the fairest and most equitable method of selecting recipients of limited draw harvest tags.
- 2: The proposed bonus point system discriminates against the young hunters (hoping to hunt sheep and bison prior to leaving home as young adults and against the older hunters. Neither, of these age groups, has surplus time to be accumulating bonus points in hopes of drawing a limited tag.
- 3: The bonus point system would be very expensive to conduct (computer programs and technicians to tally the points and record the activity of each individual hunter), especially in view of the current economic conditions in Alaska.
- 4: The bonus point system is in opposition to the standards set forth by the BOG. They have historically subscribed to the "No Net Loss" of hunting opportunity philosophy. The BOG and ADFG strive to manage Alaska's game to provide hunters with a reasonable opportunity to hunt. The bonus point system violates both of these concepts.

A: The BOG initially suggested and publicized the bonus point system for the Delta Bison Hunt. Then they arbitrarily applied it to all Sheep Hunts as well without informing the public or the ADFG Advisory Committees before it became a proposal before the BOG. The Delta AC submitted a proposal to the BOG (at the last meeting deliberating on proposals for Region III in 2009) to withdraw the Delta Bison Hunts and the GMU 20 Dall Sheep Hunts from the Bonus Point system. Mysteriously, this proposal was not included in the proposal booklet for that meeting. Apparently, it was never received by the ADFG Boards Support section.

**RECEIVED**

OCT 21 2010

**PC 12**

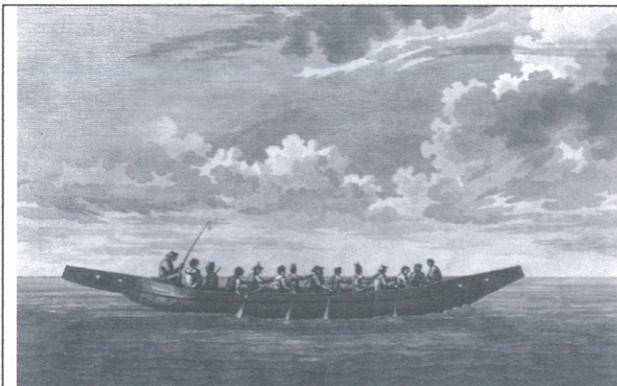
B: The bonus point system significantly reduces one's opportunity to hunt by drastically reducing the number of limited permits for which a hunter can apply. For example, a hunter in 2010 had the opportunity to apply for the limited draw of 75 sheep permits each, in the Delta Controlled Use Area Nonmotorized hunt and the Motorized hunt, for a total 150 permits. In addition they could also apply for one of the 40 limited draw permits for sheep in the Tok Mgmt Area (this used to be 120 permits but the BOG reduced it to 100, then to 80 and now two separate hunts of 40 permits each - all for no biological reason). Therefore, in 2010 a hunter could apply for one of a possible 190 limited draw permits for sheep. If the Bonus Point System is adopted and each of these limited draws is further divided in two (half for the regular draw and half for the bonus point system), a hunter will only be able to apply for 95 limited permits. This is a significant reduction in the opportunity to apply for limited permits and consequently a similar reduction in the opportunity to hunt (you can't hunt if you can't draw a permit). Remember, several years ago there was a proposal to increase, from 3 to 6, the number of limited draw permit hunts, for a single species, that one could apply for and that was rejected by the BOG.

C: The Bonus Point system is an ALL OR NONE system. Once the State adopts the bonus point they are committed to this forever. Once hunters have invested money in this system and if it were to be cancelled, they would most certainly sue the State. Other States with similar systems indicate that they wish they hadn't adopted a bonus point system but will not terminate the program for fear of lawsuits. Alaska does not need this liability.

In conclusion, I can see absolutely nothing advantageous to the bonus point system. In fact I consider the bonus point system as described in proposal #46 to be detrimental to hunting in Alaska. Please give **proposal # 46** serious consideration and **REJECT IT!**

Thank you,

Don Quarberg  
Alaskan Hunter and also member of Delta AC



***Southeast Alaska  
Subsistence Regional  
Advisory Council***

**Bertrand Adams Sr., Chair**

*kaadashan@alaska.net*

September 30, 2010

**Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526**

RECEIVED

OCT 07 2010

BOARDS

Dear Board of Game members:

During its September 28-30, 2010 meeting in Hoonah, the Southeast Alaska Subsistence Regional Advisory Council developed the following comments and recommendations for State wildlife proposals under consideration by the Board of Game when they meet in Ketchikan on November 8, 2010.

**Oppose Proposals 2, 3, 4, 5 and 19** – Black and brown bear hunting closures in and around bear viewing areas in Units 1 and 2.

**Current Federal regulations:** Federal lands in these areas are open to black and brown bear hunting.

**Impact to Federal subsistence users:** Closures would not affect Federal users unless the Federal Subsistence Board also adopts the closure areas. However, conflicts between Federal hunters and bear viewers who thought the areas were closed to all bear hunting could arise. It would be advantageous for the State to work with the Federal program to develop effective regulations if needed in these areas.

**There is not enough information to develop recommendations for Proposal 16 -**

Change the registration hunt to a drawing permit hunt for goat in portions of Unit 1C near Juneau.

**Current Federal regulations:** There is no Federal open season in the area between Eagle Glacier and Taku Glacier. Federally qualified users can harvest one goat by State Registration Permit in the remainder of Unit 1C.

**Impact to Federal subsistence users:** A portion of the area currently closed to Federal subsistence harvest will open to users hunting under State regulations. Changing this hunt from a State registration hunt to a draw hunt would bring the Federal subsistence hunt out

of alignment with the State managed hunt and could limit opportunity by Federal users. If the State allows harvest of goats in the closed area, the Federal program would likely consider a similar proposal to open this area under Federal rules.

**Neutral Proposal 18** -Modify wolf regulations in Unit 2 to: 1) Reduce annual bag limit for wolf trapping from unlimited to 10 wolves per season; and 2) Require sealing within 14 days of harvest.

**Current Federal regulations:** There is no bag limit for trapping wolves in Unit 2. Wolves taken must be sealed within 30 days.

**Impact to Federal subsistence users:** The intent of the Council is to provide rules that provide for an abundance of deer for consumptive use while maintaining a sustainable healthy and sustainable wolf population. During the past five years, the Council believes, based on local user testimony, that current rules have provided for an appropriate balance between the harvest and population levels of both deer and wolves in Unit 2. Restrictions adopted by the Board of Game would not affect Federal users unless the Federal Subsistence Board also adopts the restrictions. Differing State and Federal regulations could be confusing and may not be effective in addressing a resource concern. It would be advantageous for the Board of Game to work with the State-Federal program. If any change in the combined State-Federal quota is anticipated, the State must work with the Federal program in setting the new combined quota.

**Neutral Proposal 30** - Open trapping season for fisher in Southeast Region Units.

**Current Federal regulations:** There is no trapping season or other harvest regulations listed for fisher so it falls into the category of unclassified wildlife. Unclassified wildlife can be trapped year round without harvest limits.

**Impact to Federal subsistence users:** None. Federally qualified users can already trap and retain fisher under Federal regulations.

**Support Proposal 31**– Prohibit the use of traps with an inside jaw spread of less than 5 7/8 inches when mink and marten trapping is closed.

**Current Federal regulations:** Taking otter with a steel trap having a jaw spread of less than 5 7/8 inches is prohibited during any closed mink and marten season in the same unit.

**Impact to Federal subsistence users:** This restriction would not affect Federal users unless the Federal Subsistence Board also adopts a similar restriction. Differing State and Federal regulations could be confusing and may not be effective in addressing the resource concern. The Council does not see the need for the use of small traps to harvest river otter, wolf and wolverine and would likely support this proposal when and if there is a similar proposal submitted to the Federal program. Again, it would be advantageous for the State to work with the Federal program to develop effective regulations for coordinated action.

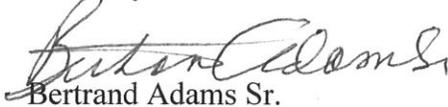
**Support Proposal 41**– Replace the deer hunter survey with deer harvest reports in Units 1-5.

**Current Federal regulations:** Deer harvest reporting is mandatory in Unit 2.

**Impact to Federal subsistence users:** Federal regulations require compliance with the State harvest reporting requirement unless specifically stated otherwise in Federal regulation. There are no specific regulations in units 1-5 exempting Federally qualified users from complying with State harvest reporting requirements. Federally qualified users would participate in the new deer harvest report process for deer harvested in Units 1-5. The Council endorsed the State-Federal joint harvest report system for Unit 2 in February 2005, the Alaska Board of Game gave its support in March 2005, and the Federal Subsistence Board approved a regulation mandating reporting for Federal users in Unit 2 in May 2005. The Federal Subsistence Board also eliminated the requirement for Federal registration permits for deer hunting in Unit 2, including the registration required for the antlerless deer hunt. The use of a statewide harvest reporting would eliminate the need for the Unit 2-specific harvest reporting. That harvest reporting system is expensive for both the State and Federal management program.

In conclusion, the Council supports collaboration between the State and Federal programs for effective management of our valuable natural resources and welcomes an increased pre-decisional dialog between our Agencies. Please address any questions arising from this letter either directly to me or through Mr. Robert Larson, Council Coordinator, U. S. Forest Service, Box 1328, Petersburg, Alaska 99833, 1-907-772-5930, robertlarson@fs.fed.us.

Sincerely,



Bertrand Adams Sr.

Chair

cc: Peter J. Probasco, Office of Subsistence Management  
Beth Pendleton, US Forest Service Regional Forester  
Forrest Cole, US Forest Service Tongass National Forest Supervisor



ATTN: Board of Game Comments

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

RECEIVED  
OCT 07 2010  
BOARDS

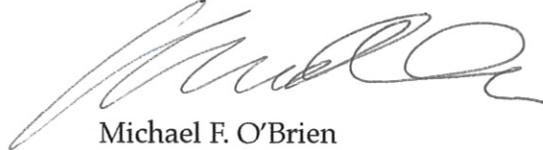
Dear Reviewers:

I am writing this note because I must voice my general **support** for all the upcoming bear view area proposals, including **proposals 2, 3, 4, 5, 19, 33, 34**. It is not fair that so few people should benefit from this beautiful and finite resource at the expense of so many more of us who rely on it for our seasonal income.

There is still so much open territory for bear hunters to go out and enjoy. Bear viewing activities only require limited areas, and seek to leave minimal impact on the bears. Viewing does not involve killing the bears, leaving them for so many others to enjoy. A bear viewed benefits many, time after time (the bear benefits, too). A bear hunted benefits few, once.

Thank you very much for your attention.

Sincerely,



Michael F. O'Brien  
1430 Millar Street  
Ketchikan, AK 99901



BOG Comments,  
ADF&G, Boards Support Section,  
P.O. Box 115526, Juneau, AK, 99811-5526

October 5, 2010

Fax: 907-465-6094

Dear Board of Game Members:

I am a longtime hunter and Alaska resident for 31 years, writing regarding the following upcoming proposals:

**(Regarding Wolf)**

**Proposal 12:** I oppose this which would allow the use of snares for trapping in the Gustavus forelands. Snares can too easily catch non-targeted animals, and are therefore a threat to dogs and other animals in this easily accessible area.

**Proposal 18:** I support this proposal which would put conservation efforts into place for wolves on Prince of Wales Island, (POW) by decreasing the trapper bag limit from none to 10. It also would require the sealing of the hide to take place in 14 v/s 30 days which will allow quicker in-season management by the ADF&G. Since the wolves inhabiting POW are a subspecies of the Alexander Archipelago wolf and if conservation measures are not taken, this species is apt to be listed on the threatened or endangered species list. This listing will affect Alaska and all wildlife user groups.

**Proposal 25:** I support this proposal that also conserve wolves on POW by mandating that all snares and traps be marked with the owner's name and contact information. It also proposes multiple ways in which the ADF&G can conserve wolves such as reducing the harvest cap, reducing the time limit for checking traps and snares. Without such conservation measures implemented, this wolf subspecies could be listed on the threatened/endangered species list.

**Proposal 43:** I support this which would change the wolf hunting season dates in all of SE Alaska, except for POW, from: August 1-April 30, to proposed dates Sept. 1-March 31. This change will help prevent orphaned wolf pups starving in summer and early fall, help prevent pregnant full-term female wolves being shot in April and reduce hunters take of poor quality fur as it is often rubbed and is of less than prime condition.

**(Regarding Bear)**

**Proposal 14:** I oppose extending the brown bear hunting season in the Hoonah Bay area by 3 weeks. The current season is March 15-May 31; the proposed season would end on June 20. Brown bear are not that numerous in the area and are already vulnerable to easy hunting in the spring as they often are on beaches and out in the open grazing on greens. By prolonging the spring hunt this would overlap the time when school is out and many wildlife viewers are visiting the bay for a chance to see such wildlife.

**Proposal 33:** I support this that would prohibit black bear trapping and the subsequent sale of meat, hides, skulls and other parts in SE Alaska. Black bear populations in SE AK have decreased in the last several years. The sale of black bear meat and other parts for monetary gain will increase hunting pressure and more likelihood of illegal hunting practices and poaching.

This proposal intends to conserve the black bear population which also is good for wildlife viewing which contributes to a stronger economy.

Proposal 34: I support this which is essentially the same proposal as above, (33).

Proposal 35: I support this which would decrease the black bear resident hunting bag limit from 2 to 1 bear per year in all of SE (except the ABC Islands, which don't have black bears), and POW which has special regulations already. This proposal also would help conserve the black bear population which is so popular for wildlife viewing that contributes to a stronger economy.

Proposal 36: I support this which is another black bear conservation measure that makes changes to the hunting seasons and bag limits for black bears in all of SE except for ABC Islands, and POW, which will also have positive implications for wildlife viewing that contributes to a stronger economy.

Proposal 39: I strongly support this which would ban black bear baiting in all of SE except ABC Islands and the Yakutat area. Bear baiting is already currently allowed in the Haines, Skagway, and Klukwan area and invites numerous problems. Bear baiting habituates bears to human food, creates risks to public safety, and allows an unethical hunting practice i.e. enticing bears to food stations and then shooting them. Bear baiting gives hunting and Alaska a bad reputation.

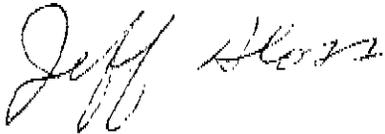
Also, regarding local trails:

Proposal 11: I support this to add the Treadwell Ditch Trail to the list of other popular Juneau trails which have a quarter mile buffer strip prohibiting trapping along their entire length. This trail is currently undergoing significant upgrades and will be inviting considerably more public traffic so this proposal will help to ensure public safety measures for people and dogs.

Thanks for the opportunity to comment.

Sincerely,

Jeff Sloss  
740 5<sup>th</sup> St.  
Juneau, AK 99801  
[jssloss@gci.net](mailto:jssloss@gci.net)



## ***Proposal Comments***

**ATTN: Board of Game Comments**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**  
**Fax: 907-465-6094**

RECEIVED  
OCT 15 2010  
BOARDS

**PROPOSAL 4 - 5 AAC 92.510:** Areas closed to hunting: Close the Margaret Creek Drainage area in Unit 1 to brown/black bear hunting.

**PROPOSAL 5 - 5 AAC 92.510:** Areas closed to hunting. Close an area within the Misty Fjords National Monument in Unit 1 to brown bear hunting.

**PROPOSAL 19 - 5 AAC 92.510:** Areas closed to hunting. Close the Dog Salmon Creek area to bear hunting in Unit 2

**I strongly support the above proposals for the following reasons.**

I am a 5<sup>th</sup> generation Alaskan born and raised in Southeast. Like many Alaskans for years I took for granted our ability to see wildlife in its natural habitat. I never took advantage of my ability to visit the bear viewing areas located in Southeast Alaska such as Traitors Cove, Anan Creek or Polk Inlet. Why bother when bear viewing can happen on garbage day right? Wrong!

In the last few years I have been fortunate enough to be able to visit some of these areas and see bears truly in their natural environment. Breathtaking does not begin to describe the experience. To be able to see bears fishing, eating and living in the wild (not at the dump or in my neighbor's yard) and to hear the roar of a black bear over the sound of the rushing river is just incredible. This is something that I want my daughter and the future generations of my family to be able to experience for many years to come.

When I first learned that hunting is allowed in the above areas I was shocked. I am not opposed to hunting in general, but there are safety issues that have to be taken into consideration. The likely hood of injury by a stray bullet or a wounded bear is very real.

I was appalled during a t visit to Traitors Cove when I found a spent bullet casing on the observation deck, the fact that "hunters" are allowed to advantage of the observation deck and photo blind sickened me and have heard of some visitors actually seeing dead bears on boats and ATV's.

The reality is that there are just a few small viewing areas and they should be made as safe as possible.

**Submitted by:** Shona Hosley

**Address:** PO Box 7432, Ketchikan, AK 99901

**Date:** October 13<sup>th</sup> 2010



**ATTN: Board of Game Comments**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**  
**Fax: 907-465-6094**

I support proposal 4 and I support proposal 5

Your eloquent appeal and attached proposals 4 -5 AAC 92.510 and 5 - 5 AAC 92.510 were shocking to read. With respect to the high numbers of bears being hunted and killed in an area more well known for the high-value ecotourism it provides, it made me realize how uninformed I was about the plight of your local bear population. But what really floored me was the insight that the current policies and legislation regulating bear hunting in Margaret Creek and the Misty Fjords Monument appears to have the potential of putting the lives of unsuspecting visitors at the genuine and sobering risk of being shot and killed by a bear hunter before they even catch a glimpse of a bear!

I accept that as clients and guests of eco-tour service providers, especially in remote and back country areas on boats and in planes, we assume some risks. Those risks would include anything from mosquito bites or being splashed by a breaching whale, to being late getting back to Ketchikan and missing the cruise ship. Or, Heaven Forbid, the day might come when someone is temporarily lost in the bush or at sea, or even permanently lost, sunk, or crashed. But these are the risks we gladly take, and if the worst should come to the worst, our friends and families would fondly recall that we "died happy".

But even so, and freely admitting there were risks involved that I was ready and willing to take, I believe it would be fair to say that I am just like 99.999% of visitors to Southeast Alaska in declaring that being shot, and killed or wounded, by a stray rifle bullet, while bear watching on a cruise out of Ketchikan, was definitely not one of them.

As a life-long resident of Victoria BC, the values of eco- and of ethnotourism in the sustaining of an economy previously based on otherwise dwindling resources, are clear to me. In that regard, as in many others, we have much in common with Southeast Alaska. Our whale-watching and sport-fishing industries are large and are growing, and our First Nations are providing visitors with rich experiences of the old ways. And, unlike resource extraction (eg. bear hunting), all the above are totally sustainable.

It is difficult to contemplate the harm that would be caused to such an economic driver as our own tourism industry, if some unwitting client were to be harmed or killed as a consequence of such a completely and reasonably avoidable accident as to be shot by someone legally hunting in the same area as the tourist's guide has just lead him into. But the harm would undoubtedly be substantial, and it would undoubtedly take time to recover from - during which time many service providers would not likely be able to persevere. I would expect the consequences to the economy of Ketchikan, after any similar incident, would be proportionally so much the worse, given it's remoteness and otherwise limited opportunities.

I fully endorse the arguments and the rationale of Proposals 4 -5 AAC 92.510 and 5 - 5 AAC 92.510, and wish you and their proponents success in convincing the Board of Game of the long term and high values of retaining the Margaret Creek and the Misty Fjords bears.

Raymond Graham



# SHOOK FAMILY

## Properties

Larry Shook  
4244 NE 124th  
Seattle, WA 98125

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

September 20th, 2010

Attn: Board of Game Comments:

RE: Proposal 4-5 AAC 92.510

This letter is to inform you that I am opposed to the shooting of bears in any of the known bear viewing areas. The primary attraction for tourist to book trips to Alaska is its wildlife. For most tourists, bears are number one on their list. The shooting of bears at or close to these observation areas is inconsistent with promoting Alaska's number one tourist attraction.. Shooting bears that are feeding on salmon and have become use to the viewing public is not hunting, it is killing.

Larry Shook

RECEIVED  
SEP 20 2010  
BOARDS



Teresa Hunt  
P.O. Box 471  
Yakutat, Alaska 99689  
September 7, 2010

ADF&G  
Board of Game Comments  
P.O. Box 115526  
Juneau, Alaska 99811  
FAX: 907-465-6094

Dear Board of Game:

I am writing in **support** for the proposal number **47**. I have spent the winter here in Yakutat and during that time I have met several dog owners that have had their dogs stuck in traps, and one dog has even died. It is imperative that this town has some locations where citizens can walk their dogs without the worry of having their dogs injured or even killed. I am writing to express my full support for the pending decision to designate, areas around Yakutat, closed to trapping.

I understand that some in our community have voiced concern over the possibility of continuing trapping thorough all of Yakutat.

However, I am one of many of citizens who walk their dogs several times a day, in fear that she will be caught, injured and killed. The restrictions that are presented in this proposal are designed so that safety areas are put in place around key local common used areas to protect users and pet owners from harm.

Dog owners, like me, would benefit greatly. Not only would we save the lives of our loved pets, but the proposed areas for closure are generally not thought of as places where you would expect to harvest game. This proposal may help a trapper avoid an unpleasant situation among community members.

I urge you to move forward on the decision to close areas around Yakutat to trapping to accommodate safe dog walking and recreating activities.

I am looking forward to your response.

Sincerely,



Teresa Hunt

RECEIVED  
SEP 8 2010  
BOARDS



ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094

**RE: PROPOSAL 4 - 5 AAC 92.510 and PROPOSAL 5 - 5 AAC 92.510.**

9/20/2010

Dear Sirs:

As both a recent visitor to Alaska for the purpose of bear viewing, and a hunter for large game, I am writing in support of both of these proposals to close these highly trafficked and popular areas to bear hunting.

In July, I came to Alaska for the first time and bear viewing was unquestionably the main reason for my trip. I went to the Anan observatory, and the thrill of seeing a multitude of brown and black bear in their natural habitat was beyond description.

In my experience as a hunter, and from my readings on other sites offering bear-viewing excursions, had Anan been a "hunted" area, the experience would have been a different one:

Sightings would have been fewer due to both reduced population and animal caution. It is the way that it is.

Population growth is naturally constrained by acreage and availability of food sources and providing additional areas of refuge for bear will unquestionably contribute to quality bear management.

If you close these parcels to hunting, some hunters will be inconvenienced but ultimately move to other areas for hunting (and receive the benefit of the improvement in the quality of the bear population).

Wildlife tourists will have a better, and safer, opportunity to view bear.

I support hunter rights but I also support wildlife tourism and closing these parcels to bear hunting is consistent with both causes.

Thank you,

Scott Eisner



8 Chestnut Court East

Buffalo Grove, IL 60089



September 16, 2010

Board of Game Comments  
ADF&G  
P.O. Box 115526  
Juneau, AK 99811

RECEIVED  
OCT 01 2010  
BOARDS

To: Alaska board of Game

This letter is in reference to proposal #47 submitted by the Yakutat Fish and Game Advisory Council addressing the issues of the use of animal traps near and around high use areas. I support this proposal.

During the winter months when trapping is allowed many of us walk our dogs along the area trails near town especially along Cannon beach and we always run the risk of our dogs getting harmed or even killed by a trap. I feel that common sense would dictate that trappers not trap within 5 miles of where our pets would most commonly be, however common sense seems to be in short supply. Knowing this I feel that the least we could do is implement the proposal and not to allow the use of conibears and snares within the boundaries suggested.

I am not against trapping. I am against some (not all) peoples inconsideration to others.

Please, I urge you all to think about this carefully before you make your decision.



Les C. Hartley  
P.O. Box 489  
Yakutat, AK 99689



**ATTN: Board of Game Comments**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**  
**Fax: 907-465-6094**

RECEIVED  
OCT 01 2010  
BOARDS

**PROPOSAL 4 - 5 AAC 92.510**

**PROPOSAL 4 - 5 AAC 92.510 Areas closed to hunting:** Close the Margaret Creek Drainage area in Unit 1 to bear hunting: As per other known bear viewing observatories such as Anan Creek the following should apply to Margaret Creek Bear Viewing Observatory: Region 1 Southeast Mainland, Unit 1A-1B, "Margaret Creek Drainage Area – Within 1 mile of Margaret Lake, the bear viewing platform, Margaret Creek downstream from the lake, the saltwater drainage and within 1 mile of any USFS maintained road accessed by the boat/floatplane dock in Marguerite Bay is closed to taking any bear."

**ISSUE:** The problem is trying to mix bear viewing facilities with bear hunting areas in Margaret Creek within Traitors Cove. At stake is the safety of visitors to the Traitor's Cove/Marguerite Bay bear-viewing areas and sustaining the bear population for the ever-expanding economic and recreational resource of bear viewing. It is a conflict of interests, i.e. those who wish to simply view the wildlife versus those who want to hunt bears. Viewers outnumber hunters by a large number: 46 percent (235,000) of Alaskans are wildlife viewers versus 14 percent (70,776) are hunters.

(source: [www.outdoorindustry.org/pdf/AlaskaRecEconomy.pdf](http://www.outdoorindustry.org/pdf/AlaskaRecEconomy.pdf))

The majority of visitors enjoy the opportunity for non-consumptive use by: viewing bears either at the United States Forrest Service (USFS) platform, on the roads, beaches, in the woods or Margaret Creek; ATV and bike use; hiking; canoeing/boating on Margaret Lake; fishing in Margaret Lake and Margaret Creek; flora and fauna photography; crabbing and shrimping in Traitor's Cove, Marguerite Bay and the Salt Chuck; camping in tents at the former log sorting yard; and over-nighting in boats at the dock.

Eleven years ago Margaret Creek was opened by the USFS as a bear viewing facility. The entire facility consists of a USFS dock used by boats and floatplanes, a logging road, and a one-third mile trail ending at a viewing platform from which to view bears. The USFS has authorized a total of 3436 Special Use Permits for visitors to participate in bear viewing tours. There are a total of six tour operators who bring passengers to Margaret Creek for bear viewing (Taqan Air, SeaWind Aviation, Island Wings, Southeast Aviation, Carlin Air and American Safari Cruises). These permits represent approximately 1.25 million dollars of revenue for Ketchikan (population approximately 12,000), representing a large percentage of these local companies' annual income. Based on data received from the USFS the total number of visitors to Margaret Creek who go there for bear viewing is between 2010 and 4020 persons annually. Approximately seventeen percent (292 to 584) of the visitors are local residents who arrive by their own means.

Anan Creek, another bear viewing facility in Unit 1B, sees approximately 3600 visitors

annually. Hunting has been closed in this area already. The Alaska Department of Fish and Game should acknowledge the growing naturalist user group and provide for such. According to department records, in the past eleven years that the bear viewing facility has been in place, 78 bears have been taken from the Margaret Creek drainage area. This is an average of seven bears per year. Additionally, bears that see between 2000 and 4000 people per summer have become habituated to humans and do not have a natural aversion to their presence.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Incompatibility of the two user groups is a safety issue. It is possible that an injury could occur. Currently viewing by locals and visitors is being negatively impacted. Risk of serious injury or death by, as per department quote, "stray bullets can travel over a mile and still be deadly" (source: [www.wildlife.alaska.gov/index.cfm?adfg=bears.problem](http://www.wildlife.alaska.gov/index.cfm?adfg=bears.problem)) and/or an encounter with a wounded bear. The department is creating a potentially dangerous situation by allowing bear hunting to continue in this area. The bears in this area are habituated to humans, making them easy targets for hunters and thus contributing to the decline in the bear population in southern Southeast Alaska as noted in the summer 2010 "Bear Trails" news from the Alaska Department of Fish and Game. Another consequence is the decline in revenue of the local bear-viewing companies and resultant negative impact on the local economy. The population of bears at this time is so low that many visitors fail to see any bears at all. Should this continue it could mean the end of bear viewing tours and the loss of a great deal of revenue for Ketchikan.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes, in that bears could not be harvested within the boundaries noted in the proposed regulation, thus ensuring the long-term conservation and sustainability of the species and in turn making it possible for recreational and commercial bear viewing to continue and flourish. This would be a positive economic impact to the local Ketchikan economy.

**WHO IS LIKELY TO BENEFIT?** Locals and visitors who enjoy viewing wildlife would benefit. It will also insure the continued economic benefit of local businesses that conduct tours of the area. It makes sense for the State of Alaska to be pro-active in managing the resources for everyone, to designate the acreage around an advertised and popular bear-viewing platform to be exempt to bear hunting. Thus providing the overwhelming majority of the Traitor's Cove/Marguerite visitors, who are not bear hunters, a designated place to enjoy bear viewing in safety and peace and the protection of this resource for the continuance of the bear-viewing industry.

**WHO IS LIKELY TO SUFFER?** A few hunters may have to seek other locations. However, given that there are twenty-two million acres in Southeast Alaska, most of which are open for bear hunting with very few closed areas, adoption of the suggested solution is unlikely to have any long term or far reaching effects.

**OTHER SOLUTIONS CONSIDERED:** A complete ban on hunting in the entire Traitor's Cove area would be restrictive on hunters. A seasonal ban on hunting in the Traitor's Cove area would not address the problem of the declining bear population.

**PROPOSED BY:** Jack and Bev Davies

**LOG NUMBER:** EG0812108

## **PROPOSAL 5 - 5 AAC 92.510.**

**PROPOSAL 5 - 5 AAC 92.510. Areas closed to hunting.** Close an area within the Misty Fjords National Monument in Unit 1 to brown bear hunting: Region 1 Southeast Mainland, Unit 1A-1B; Misty Fjords National Monument - Rudyerd Bay and Walker Cove. All drainages leading into Rudyerd Bay and Walker Cove are closed to taking brown bears and black bears.

**ISSUE:** The problem is the quality of bear sightings for visitors to Misty Fjords National Monument, specifically Rudyerd Bay and Walker Cove. There are thousands of locals and visitors combined who go to Rudyerd Bay and Walker Cove for whom the sighting of a bear is the quintessential symbol of Alaska's wilderness. For most, the trip to Misty Fjords National Monument is a once in a lifetime experience. People come from as close as Ketchikan and as far away as South Africa to visit this Alaskan treasure. Seeing a bear in its natural environment lives in the memory of these people for a lifetime. Most people come to Alaska to see a bear, yet most leave never having seen one. The numbers of people who would love to see a bear in Rudyerd Bay and/or Walker Cove is staggering compared to the numbers of people who wish to hunt them there. If only in a few areas, Alaska should be proactive in protecting one of its most valuable and sustainable resources - its bears. Rudyerd Bay and Walker Cove have the grandeur of a National Park if not so in name, we should treat them so in spirit. Future generations will appreciate our actions. According to United States Forrest Service (USFS) records there are 25 Ketchikan based companies who are permitted as outfitter/guides who take people to Rudyerd Bay and Walker Cove for the following activities:

7 flight seeing/fishing/hiking/shoreline use;

10 companies authorized for camping (kayak tours), freshwater fishing, hiking, and shoreline use;

8 companies - freshwater fishing.

In addition to the USFS permitted companies, there are at least 4 boat companies who operate on saltwater in Rudyerd Bay and Walker Cove bringing people to see the monument and its wildlife.

The revenue generated from these 29 Ketchikan based companies represents millions of dollars for the local economy annually. By comparison, there are 5 authorized hunting guides whose guided use areas are divided throughout the entire 2.2 million acres of Misty Fjords National Monument, of which Rudyerd Bay and Walker Cove comprise of only a small part. According to department records, in the past ten years 25 bears have been taken in Rudyerd Bay and Walker Cove, 7 from residents and the remainder from non-residents. The Alaska Department of Fish and Game has no records of population estimates for these areas and so cannot say how many bears are likely to inhabit the area. However, there are only a few drainages in Rudyerd Bay and Walker Cove and they are so short and so steep as to not offer much in the way of bear habitat. Experience has shown, the taking of two to four bears a year results in far fewer bears that can be seen by its visitors downstream. Aside from Rudyerd Bay and Walker Cove, there are many more fjords and literally dozen more drainages within Misty Fjords National Monument in which hunting bears would still be allowed, areas which are more appropriate for hunting as far fewer people go there. Setting aside the most highly used areas from hunting, areas where people expect to see wildlife, should not be a problem.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Sport hunting in tourist areas is bad for public relations, and discourages people from coming. People say they come to Alaska to see bears because they cannot see them anywhere else. If tourists come to Rudyerd Bay hoping to see bears and then do not see them, it could result in fewer visitors going to Rudyerd Bay and Walker Cove in the future. This would produce an economic loss for the Ketchikan economy already reeling from a decline in tourism.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Without an accurate assessment of the bear populations in Rudyerd Bay and Walker Cove it would be difficult to determine the impact of hunting. However, tourist dollars are an additional resource in Alaska, and should be managed for long-term sustainability. Without pressure from hunting bear sightings should increase thereby helping to insure the future of tourism to Rudyerd Bay and Walker Cove and sustaining the Ketchikan economy.

**WHO IS LIKELY TO BENEFIT?** All sightseers who are the major user group in Rudyerd Bay and Walker Cove would benefit. As a potential breeding ground and reserve, this area could help increase bear populations in adjoining areas where hunting will continue to be allowed.

**WHO IS LIKELY TO SUFFER?** There are five authorized guides who conduct hunts in Misty Fjords National Monument, a 2.2 million acre parcel of land, however only one of them is permitted to operate within Rudyerd Bay and/or Walker Cove. Given that there are 2.2 million total acres in Misty Fjords National Monument it seems reasonable that there is enough acreage to accommodate bear hunting in all the remaining areas.

**OTHER SOLUTIONS CONSIDERED:** 1) Allow only resident bear hunting in Rudyerd. Any bears taken out of Rudyerd diminish the number of possible future sightings for visitors.

2) Allow bow hunting only. Any bears taken out of Rudyerd diminish the number of possible future sightings for visitors.

**PROPOSED BY:** Michelle Masden



Richard Morrow  
7385 Cave Spring Rd  
Cave Spring, GA 30124



**United States Department of the Interior**  
**NATIONAL PARK SERVICE**

Alaska Region  
240 West 5<sup>th</sup> Avenue, Room 114  
Anchorage, Alaska 99501

IN REPLY REFER TO:

L30(AKRO-SUBS)

OCT 21 2010

Mr. Cliff Judkins, Chairman  
Alaska Board of Game  
Board Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chairman Judkins:

The National Park Service (NPS) has reviewed the 48 proposals the Board will be considering on November 5-9, 2010, at the Southeast Region meeting. We would like to provide the following comments on two proposals which would affect black bear and wolf hunting seasons in Glacier Bay and Wrangell-St. Elias National Preserves.

Specific comments:

**Proposal #35: Reduce black bear harvest limit from 2 to 1 bear per year in Units 1-3 and Unit 5.** We support this proposal due to conservation concerns expressed by the Alaska Department of Fish and Game about black bear populations in northern Southeast Alaska.

**Proposal #48: Extend the wolf hunting season adding an additional 31 days in Unit 5.** Consistent with past letters to the Board, we ask that NPS areas be excluded from any regulations affecting wolves where the intent is to reduce the wolf population for the benefit of the other species.

Once again, we appreciate the opportunity to work closely with the Board in the development of regulations that affect NPS areas within the region. Cooperative efforts such as these ensure that, together, we will continue to protect wildlife resources on NPS lands.

RECEIVED

OCT 25 2010

BOARDS  
PC 23

If you have any questions, please contact Debora Cooper, Associate Regional Director for Resources and Subsistence, at (907) 644-3505.

Sincerely,



Sue E. Masica  
Regional Director, Alaska Region

cc:

Denby Lloyd, Commissioner ADF&G  
Corey Rossi, Director, Wildlife Conservation, ADF&G  
Pat Pourchot, Special Assistant to the Secretary of the Interior for Alaska  
Debora Cooper, Associate Regional Director, Resources & Subsistence, NPS  
Susan Boudreau, Superintendent, Glacier Bay NP  
Meg Jensen, Superintendent, Wrangell-St. Elias NP  
David Mills, Team Manager, Subsistence, NPS  
Sandy Rabinowitch, Subsistence Manager, NPS  
Andee Sears, Special Agent, NPS

October 13, 2010

Alaska Board of Game,

It was with great sorrow I read of the plan to legalize the trapping of black bears in Alaska as stated in the San Jose Mercury News in October 2010. My husband and I fell in love with Alaska when we visited in August of 2008. One of the reasons we went there was to see the wildlife – which we were fortunate to see.

I feel that there are other ways to control the population of the black bear. It is cruel to snare a black bear and then leave it to either starve or chew off it's own foot or paw to get free. There must be a more humane way.

I recommend that you look into other means of controlling the black bear population. After all, many people come to Alaska for the wildlife. I would hate to think of Alaska as a state that would treat it's wildlife in such a manner.

*Judy A. Griep*

Judy A. Griep  
1341 Dale Avenue  
San Jose, CA 95125

*Happy to  
read on the  
internet that  
the Board tabled  
the proposal till  
its mtg in  
March 2012.*

RECEIVED  
OCT 25 2010  
BOARDS



# Ketchikan Rod and Gun Club

Alaska Dept. Fish and Game  
Board Support Section

In reviewing proposals #1-9, 18-25, 28, 29-46, we the members of Ketchikan Rod and Gun Club ask the members of Fish and Game management to duly uphold their job of managing and protecting our wildlife resources for all, and not to let any special interest group restrict the rights of any parties or interests for any reason other than sound management practices.

Members of Ketchikan Rod and Gun Club  
11 mi N Tongass  
Ketchikan, Alaska, 99901  
907-247-8400  
Terry Smith  
Secretary  
907-617-3497

RECEIVED

OCT 25 2010

BOARDS



Mike Holman  
700 Water Street  
Ketchikan, Alaska 99901

October 22, 2010

Alaska Board of Game  
P.O. Box 115526  
Juneau, AK 99811

These are my comments regarding certain proposals to be considered by the Board of Game at its November, 2010 meeting in Ketchikan:

I have lived in Ketchikan for 38 years beginning at age 14 and have been self-employed for the past 30 years. My wife and I own and operate a small wildlife tour company which specializes in bear viewing. Our tours are conducted aboard a 34' vessel which carries 13 passengers and was built solely for the purpose of viewing wildlife. Our business employs two people and contributes more than \$130,000 per year to Ketchikan's economy through purchases of goods and services and sales tax payments to local government.

I operate my tour from the middle of May through September. In the first half of the season I operate almost exclusively in Carroll Inlet. Later on I operate mostly in Neets Bay but continue to use Carroll Inlet 2-4 times per week.

I am the author of Proposal No. 2 which would shorten the season for black bear hunting on the beaches of lower Carroll Inlet and Neets Bay. In light of ADF&G's Proposal 36 and the Alaska Professional Hunters Association's Proposal 37, I would like to reduce the scope of my proposal so that it would only shorten the season for non-residents in lower Carroll Inlet. Two of the changes suggested by ADF&G in Proposal 36 would probably do more to address my concerns than my own proposal. Those changes are closing the June and Fall seasons for non-residents in Unit 1. Closing the June season to non-residents would be especially helpful even if it applied only to unguided non-residents.

I've spent hundreds of hours looking for black bears in lower Carroll Inlet over the past few years. Sometimes I find one and sometimes I don't. My customers understand there's no guarantee. There are many reasons why we don't see as many bears as I would like.

RECEIVED  
OCT 25 2010  
PC 26  
BOARDS

Bears certainly have other things to do than just hang out on the beach waiting for their picture to be taken. Obviously, they spend most of their time in the woods and brush. Another factor is that the bears in Carroll Inlet have been hunted hard for a long time so they also learn to avoid people and boats. In the last twenty years over 300 bears have been harvested in Carroll Inlet.

What my business needs is for the bear population in lower Carroll Inlet to remain "healthy". I would like to be seeing more cubs and better age stratification. Only 1 of the 6 cubs I saw in 2009 emerged in 2010. I saw no fresh cubs in 2010.

Basically, I make my tour on two kinds of bears: a very few one or two year old bears that I will see a number of times in one year but not at all the next year, and a handful of much older bears that I will see from year to year but not more than 3-4 times a year. I do not see very many young adult bears. With one exception I have never seen the same young adult more than 2 or 3 times before it disappears. I realize this can be explained in terms of natural bear behavior, feeding patterns and mortality but hunting also takes its toll. I'm up there 1-3 times day. There haven't been many trips in May and, this year, through the end of June, when there wasn't a skiff running the beach looking for a bear to kill at the same time as I'm trying to find one for my customers just to look at. I do my best to accept and work around it. It's not easy. It's especially hard when I lose a little one.

Because the area is so easy to access and there are no overall harvest limits based on size, sex, age or otherwise, I believe the bear population in lower Carroll Inlet is extremely vulnerable to any spike in effort. The area doesn't need any more hunting pressure than it's already got. Shortening the season for non-residents should enable a few more young bears to become middle age bears and have some cubs. Shortening the season would also reduce the risk of a rapid harvest increase due to shifts in non-resident effort from one area to another. After taking a total of only 6 females in the fourteen years from 1990 to 2004, non-residents more than doubled that rate by taking at least 12 females in the last 6 years. This year was the first year that non-residents took more bears in Carroll Inlet than residents. Thus, the trend has already begun.

Sincerely,



Mike Holman

From: tmbrown3@aol.com

To: TMBrown3@aol.com

Subject: Comments on Southeast Proposals, 2010

Date: Fri, Oct 22, 2010 10:16 am

---

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

RECEIVED  
OCT 22 2010  
BOARDS

October 16, 2010

19400 Beardsley Way  
Juneau, AK 99801

Re: October Southeast Region Meeting, 2010, Comments on Proposals

Dear Members of the Board of Game:

Below you will find my comments on selected proposals from the 2010 Southeast Region Meeting Board of Game proposal book. I very much appreciate the opportunity to submit my comments to you and appreciate the time you will give considering them.

**2. SUPPORT:** I support greater opportunities for wildlife (in this case, bear) viewing, as well as having fewer encounters between hunters and wildlife viewers.

**3. SUPPORT:** Given our growing and active nonconsumptive population and the growing wildlife tourism industry, I support this proposal. It is also important to note that the area in question abuts the  
Tongass National Forest boundary.

**4. SUPPORT:** Southeast Alaska will benefit from more bear viewing areas. Tourists support such areas, and residents enjoy them. It is critical to support local businesses, and the wildlife tourism industry  
is growing and supporting many Southeast Alaskan families.

**5. SUPPORT:** Misty Fjords National Monument is a celebrated tourist area and an important viewing area for all Southeast Alaskans. Rudyerd Bay and Walker Cove are important to the economy of

Ketchikan. It makes sense to set aside these two areas within the Monument for bear viewing. Additionally, since F&G has no records on brown bear populations in Rudyerd Bay and  
Walker Cove, it is irresponsible to allow bear hunting in these viewing areas.

**9. OPPOSE:** The writer of this proposal offers no reasonable evidence to support his view, and he erroneously states that "everyone" would benefit from his proposal. Nonconsumptive users, who are the  
majority in our state, would not benefit, and wildlife viewers would suffer

because of reduced opportunities for viewing wolves.

**10. SUPPORT:** This proposal provides protection to the public - both consumptive and nonconsumptive users alike - adults, children, and also pets. Land is limited in Juneau, and both Juneauites and visitors

enjoy spending time outdoors here. There are far more nonconsumptive users than trappers in Juneau as well as consumptive users who do not trap; many of them enjoy walking on Juneau's

trails and should be able to do so without the legal opportunity to be caught in a trap.

**11. SUPPORT:** The Treadwell Ditch Trail is an extremely popular trail that is accessible, scenic, historic, and is relatively easy on which to walk. The recent upgrade encourages even greater use by the

public. Safety on this trail is critical.

**12. OPPOSE:** Snares catch untargeted animals and pose a threat to public safety.

**14. OPPOSE:** I oppose this proposal for several reasons:

(1) The writer uses the word may repeatedly rather than providing factual data to back up his assertions.

(2) "Persistent winter conditions" is not a sound reason to allow more bears to be taken.

(3) The writer states that if nothing is done, "the brown bear resource in Berner's Bay will continue to be under-utilized," which completely disregards the many nonconsumptive users in that area.

(4) The writer erroneously states that "no one" is likely to suffer, but nonconsumptive users in Southeast Alaska, in Alaska, and, indeed, nationwide far outnumber consumptive users.

Nonconsumptive users would suffer because of reduced opportunity for bear viewing and the Berners Bay ecosystem would suffer an increased loss of a top predator. There are already

too few accessible areas for brown bear viewing in the Juneau area.

**15. SUPPORT:** I support making the job of the Wildlife Troopers easier in this manner. Also, members of the public should be readily able to avoid bear bait stations, which are dangerous to the public.

**18. SUPPORT:** It is well documented that wolf populations are declining on POW. The reasons for this include reduction of habitat and poaching. It is also well known that the documented decline in the

Alexander Archipelago wolf population could soon trigger an endangered species listing. This proposal is one responsible step in restoring the Archipelago wolf population, as well as the

POW ecosystem.

**19. SUPPORT:** I support this proposal because it deals with concerns expressed in F&G's Bear Trails regarding declining bear populations on POW. This proposal also addresses concerns regarding

potential bear viewing and bear hunting in the same area. Residents and visitors alike benefit from bear viewing in the Dog Salmon Creek area, so it makes sense to

close this area to

bear hunting. Additionally, as the Department states in the proposal, it is important to recognize the wolf population problem and to take a step towards collaborating with the U.S. Forest

Service on this critical issue.

**21. SUPPORT:** This proposal provides a black bear conservation measure that is much needed on POW.

**22. SUPPORT:** I support this proposal for the same reason that I support proposal 21.

**23. SUPPORT:** Again, I support conservation efforts regarding the documented decline in the black bear population on POW.

**25. SUPPORT:** It is well known that there is a high illegal unreported take of wolves in this area. This is of particular concern because the Alexander Archipelago wolf is a genetically distinct population that

is being overharvested. If measures are not taken to ensure the survival of the Alexander Archipelago wolf, then it is likely to be listed under the Endangered Species Act.

**29. OPPOSE:** This proposal is widespread, not allowing for differences in the various areas of Southeast Alaska. The proposal does not consider other causes of flooding, but instead simply proposes

the widespread killing of more beavers, disregarding the role beavers play in a healthy ecosystem. More research is needed on this issue before any action is proposed.

**33. SUPPORT:** Black bear populations are declining in Southeast Alaska, even while tourism is increasing. People come to Alaska to see wildlife, and wildlife tourism is a thriving industry in our area. It

makes no sense to encourage the decline of our black bear population. Additionally, the legality of the classification of bears as furbearers is questionable.

**34. SUPPORT:** I support this proposal for the same reasons that I support Proposal 33 above.

**35. SUPPORT:** I support this proposal for the same reasons that I support Proposal 33 above.

**36. SUPPORT:** I support taking action to strengthen the long term sustainability of black bear population, particularly since the black bear population is declining in Southeast Alaska. Because of the

seriousness of this issue, particularly given the importance of our bear population to the tourism industry and to nonconsumptive residents, I support approving more than one of the actions

suggested in this proposal.

**37. COMMENT:** While I agree with the intent of this proposal, I feel that Proposal 36 more thoroughly addresses the problem of the declining black bear population.

**38. SUPPORT:** It is irresponsible for hunters to establish baiting stations without anyone else knowing where these stations are, and it is negligent for authorities to allow this practice to continue. I salute our

Wildlife Troopers for submitting this proposal and I trust that our AC members will support our Wildlife Troopers' efforts to do their jobs well.

**39. SUPPORT:** I support the views expressed on hunting. Additionally, bear baiting is a dangerous practice that teaches bears to eat human food, and the practice puts other people who come across bear baiting stations in danger.

**41. SUPPORT:** This proposal provides a reasonable alternative that would allow for a more accurate harvest report.

**43. SUPPORT:** The Alexander Archipelago wolf is a distinct sub-species that should be preserved. Instead, the population is declining at an alarming rate. In fact, it is likely that the population will soon be listed as threatened or endangered. I support this proposal because it promotes conservation of the Alexander Archipelago wolf population.

**POSITION STATEMENT:** Fewer than 20% of Alaskans have hunting licenses, and this number drops annually, reflecting a nationwide trend. Nonconsumptive users make up the majority of Southeast Alaska's population. Additionally, as indicated by the many proposals in the Southeast region book, tourism is a large and growing industry in Southeast Alaska. It is critical that the Board of Game consider these factors in making decisions on the 2010 Southeast proposals so that the Board truly represents the changing views and lifestyles of our citizens.

Sincerely,  
Tina M. Brown  
Juneau

907-523-5402 (H)  
907-209-4219 (C)

**From:** tmbrown3@aol.com

**To:** john@akwildlife.org; dobieman@gci.net; connie@akwildlife.org; atsimon@uas.alaska.edu; mikejen@gci.net; ldonegan@TridentSeafoods.com; kneelandt@alaska.com; dlauren@hotmail.com

**Bcc:** TMBrown3@aol.com

**Subject:** AWA-SE Comments to the Board of Game, Southeast Region Meeting, 2010

**Date:** Wed, Oct 20, 2010 9:19 pm

Alaska Wildlife Alliance-Southeast Chapter  
19400 Beardsley Way  
Juneau, AK 99801

RECEIVED

October 16, 2010

OCT 22 2010

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

BOARDS

Re: Alaska Wildlife Alliance-Southeast Chapter  
Comments on Proposals for 2010 Southeast Region Meeting

Dear Members of the Board of Game:

The Alaska Wildlife Alliance is the only Alaskan-based group that advocates for Alaska's wildlife, and we have been active since 1978. Our state board members are all Alaskans. We support an ecosystem approach to wildlife management backed by the use of sound science. We believe in the intrinsic value of wildlife and represent non-consumptive users as well as true subsistence hunters.

Six months ago, I organized a Southeast chapter of the Alaska Wildlife Alliance. Already, there are seven members on our board; there are eight members on our advisory board; there are numerous committee and general members.

Below you will find our comments on the proposals submitted for the November, 2010, Southeast Region meeting in Ketchikan.

**PROPOSAL 2: Support:** This proposal would benefit bear viewing opportunities and promote public safety.

**PROPOSAL 3: Support:** This proposal would enhance bear viewing opportunities for Alaskans and for tourists, thus promoting the tourism industry in Southeast Alaska and, in particular, supporting the

economy of Ketchikan. It is also important to note that the area in question abuts the Tongass National Forest boundary, thus making it a prime bear viewing area as well as a

buffer zone for bears.

**PROPOSAL 4: Support:** Residents of and tourists to Southeast Alaska will benefit from having another bear viewing area. It is critical to support local businesses, and the wildlife tourism industry is

benefiting many small businesses in our region. Additionally,

closing this area to brown bear hunting would promote bear viewer safety, which is critical.

**PROPOSAL 5: Support:** Misty Fjords National Monument is a well known area for wildlife viewing for residents and tourists. Bear viewing in Rudyerd Bay and Walker Cove are important to the economy

of Ketchikan. It makes good financial sense to designate these areas as bear viewing areas. Also, since Fish and Game has no records on brown bear populations in these

areas, it is not advisable or sensible to allow the hunting of brown bears in this areas.

**PROPOSAL 19: Support:** This area is an important bear viewing area that attracts many visitors throughout the tourist season. The economy benefits from this situation, and the bears that are in the area

of the viewing platform become habituated to humans. It is unsportsmanlike and dangerous to hunt in this area, and it is beneficial to support the local economy by encouraging

wildlife viewing here.

**PROPOSAL 21: Support:** This proposal would help address the well documented concern about the decreasing black bear population on Prince of Wales Island.

**PROPOSAL 22: Support:** This proposal would help address the well documented concern about the decreasing black bear population on Prince of Wales Island.

**PROPOSAL 23: Support:** This proposal would help address the well documented concern about the decreasing black bear population on Prince of Wales Island.

**PROPOSAL 25: Support:** If measures are not taken quickly to support the population of the Alexander Archipelago wolves, then they are likely to become listed as threatened or endangered in the near

future. Being pro-active will save the state a great deal of trouble. These wolves are unique and are attractive to wildlife viewers who pay a great deal to spend time looking

for wildlife in Southeast Alaska; it would make more sense to provide viewing opportunities for these people than to risk losing more wildlife, particularly a unique species.

**PROPOSAL 26: Oppose:** We oppose this proposal because there is a known decrease in the black bear population in Southeast Alaska. Conservation efforts take precedence.

**PROPOSAL 33: Support:** It is well documented that black bear populations are decreasing in Southeast Alaska. At the same time, wildlife tourism is increasing. People come to Alaska and spend their

money here in order to see wildlife. Since wildlife tourism is a thriving, growing industry in Southeast Alaska, it makes sense to lower the bag limits on black bears.

**PROPOSAL 34: Support:** It is well documented that black bear populations are decreasing in Southeast Alaska. At the same time, wildlife tourism is increasing. People come to Alaska and spend their

money here in order to see wildlife. Since wildlife tourism is a

thriving, growing industry in Southeast Alaska, it makes sense to lower the bag limits on black bears.

**PROPOSAL 35: Support:** It is well documented that black bear populations are decreasing in Southeast Alaska. At the same time, wildlife tourism is increasing. People come to Alaska and spend their

money here in order to see wildlife. Since wildlife tourism is a thriving, growing industry in Southeast Alaska, it makes sense to lower the bag limits on black bears.

**PROPOSAL 36: Support:** We support action that builds the short and long term sustainability of the declining black bear populations in Southeast Alaska. Because of the seriousness of this decline, we

strongly advise that at least the first three measures be accepted and implemented.

**PROPOSAL 43: Support:** The Alexander Archipelago wolf population is decreasing to the point that the sub-species may soon be put on the threatened or endangered species list. The wolf is an iconic

wildlife figure of Alaska; tourists come here to see wolves, as well as other wildlife. It follows that we should act now to protect this important sub-species in particular.

#### **POSITION STATEMENT\*:**

The Alaska Wildlife Alliance-Southeast has elected to comment on proposals that directly affect wildlife conservation and that directly relate to the growing wildlife tourism industry in Southeast Alaska, throughout the state of Alaska, nationwide, and, indeed, worldwide. If our region is to compete in the wildlife tourism industry, we must have the support and cooperation of the Board of Game. The Alaska Wildlife Alliance recognizes this fact.

According to the Department of the Interior, in 2006, the total amount spent in Alaska on hunting was \$124,000,000 and declining, whereas the total amount spent on wildlife viewing was \$581,000,000 and growing. Indeed, the wildlife market in Alaska is composed of 18% consumptive use and 82% nonconsumptive use. In the lower forty-eight, nonconsumptive use of wildlife is enjoyed by more than 62,000,000 people with an annual expenditure of \$29,000,000,000 - and this amount is growing by 6-10% a year.

In the early 1900s, it was thought that predators had no value in the ecosystem and were, in fact, considered to be nuisances. Recent findings, however, have changed our views of the role predators play in our ecosystems and in our lives. For example, in a 2006 report, CNN stated that that in 2005, the re-introduction of wolves in Yellowstone National Park increased visitor numbers and expanded ecotourism by \$35,000,000.

Fewer than 20% of Alaskans and fewer than 20% of citizens nationwide hold hunting licenses, and this percentage is dropping annually. Meanwhile, the demand for wildlife viewing opportunities is increasing annually. This is reflected in the many proposals in this cycle's Southeast region proposal book that seek to conserve wildlife, many with the express purpose of fostering the strong and growing wildlife tourism industry in our region. It is now understood that a trophy brown bear, for example, rather than being shot, can be viewed thousands of times by tourists who bring hundreds of thousands of dollars into the local economy to see that

bear.

The Alaska Wildlife Alliance-Southeast supports healthy populations of wildlife and the healthy economy brought about by the support of the wildlife tourism industry. Wildlife has value in and of itself, as demonstrated by the growing number of people who will pay a lot of money simply to see it over and over again. We hope that the Board of Game will consider the well being of the wildlife population as well as the financial well-being of the growing wildlife tourism industry in Southeast Alaska as it deliberates on the proposals at the 2010 Southeast Region meeting.

\*The facts provided above were taken from the Department of the Interior and the Alaska Department of Fish & Game. Specific sources are available upon request.

Sincerely,  
Tina M. Brown  
President  
Alaska Wildlife Alliance-SE  
Juneau

907-523-5402 (H)  
907-209-4219 (C)

## Comments on Board of Game Southeast Region Proposals

**Proposal 11 – Support** – This is a popular local trail that has undergone recent improvements. It is likely these improvements will lead to increased trail use by non-trappers. Potentially negative trapper-hiker interactions would be reduced by closing this area to trapping.

**Proposal 16- Oppose-** Recent fly overs by ADF&G have not shown a sufficient number of goats in this area to support a hunt.

**Proposal 29 – Oppose** – Reducing the beaver population is not necessary to prevent flooding. Juneau’s Beaver Patrol provides a model alternative to trapping. The Beaver Patrol (local volunteers) in cooperation with the USFS, manage beaver dams to prevent flooding, allow fish passage, and ensure adequate water levels for fish and beaver habitat. A similar program initiated at the state level would negate the need to issue nuisance permits or lengthen the trapping season.

**Proposal 30 – Oppose** –The proposer suggests that a trapping season for fisher would allow more biological data to be available to ADF&G. However, at an Advisory Committee meeting in Juneau, the proposer suggested that fisher would not be a target species due to their low population; therefore, compliance with the current law would provide similar amounts of data, as fisher are required to be surrendered to the State. The other solution offered by the proposer—classifying the fisher as deleterious—cannot be considered, as the fisher is now as native as the marten, having established itself through natural dispersal (and is potentially in need of more protection given its small, but unknown, population).

**Proposal 33 – Support** – Black bear populations are known to be decreasing in Southeast Alaska. Allowing the sale of black bear meat or hides would further hamper a population recovery. Bears are a tourism draw for the southeast, and maintaining a healthy population strengthens, and helps diversify, our economy.

**Proposal 34 – Support** – for similar reasons to proposal #33

**Proposal 35 – Support** – for similar reasons to proposal #33

**Proposal 36 – Support** – Black bear populations are known to be decreasing in Southeast Alaska. Implementing any or all of the changes suggested in the proposal should help to stabilize and eventually increase the region’s black bear population.

**Proposal 43 – Support** – The proposal’s recommended modifications should assist in maintaining and strengthening this unique subspecies’ numbers. These wolves are a vital part of a complex and unique ecosystem and a draw for a sizable number of tourists.

Gabrielle Aberle  
Juneau, Alaska

RECEIVED  
OCT 22 2010  
BOARDS



Comments to ADF&G's Board of Game Southeast Region Proposals

**Proposal 8 - Oppose** - Lengthening the wolverine trapping season just to support wolf trapping efforts is inappropriate wildlife management. In addition, wolf harvest numbers have remained high so there appears to be no need to increase trapper effort.

**Proposal 11 – Support** – Recent trail upgrades will likely lead to increased use <sup>by</sup> of recreational hikers and their dogs on this already well used trail. Closing it to trapping will reduce potential trapper/hiker conflicts.

**Proposal 16- Oppose-** ADF&G has not reported high enough goat numbers in this area to justify a permit hunt .

**Proposal 21 – Support** - Shortening the season to reduce sow take should have a positive impact on Prince of Wales black bear populations which are currently suffering a downturn.

**Proposal 22 – Support** – for similar reasons to proposal #21

**Proposal 23 – Support** - for similar reasons to proposal #21

**Proposal 25 – Support** – The wolves of the Alexander Archipelago are a distinct and stressed subspecies of grey wolf. Continuing hunting and trapping pressures on a unique subspecies would not be sound wildlife management.

**Proposal 26 – Oppose** – Black bear populations are known to be decreasing in Southeast Alaska. While removing the CUA would disperse hunting effort, it would also disperse hunting pressures leading to greater stresses on an already declining species.

**Proposal 29 – Oppose** – Non-lethal alternatives to trapping have been successfully used in Alaska to manage water levels and eliminate the need to remove problem beavers. Data show that beaver ponds provide essential habitat for salmon fry which can lead to increased recruitment and, consequently, increased opportunity for recreational, commercial and subsistence salmon harvests. Reducing the beaver population would be detrimental to salmon stocks. This proposal would benefit only a small number of trappers rather than the large number of residents and nonresidents who desire robust salmon fisheries.

**Proposal 30 – Oppose** – Fisher CANNOT be considered non-indigenous as noted in the proposal. Its presence in the region is not the result of human intervention but rather of naturally occurring range expansion. Opening a trapping season on a species before more research is completed to further our understanding of their population size, cause for expansion, and effect on local ecosystems is shortsighted.

Jarvis Schultz  
Juneau, Alaska

RECEIVED  
OCT 22 2010  
BOARDS



KURT WHITEHEAD

Captain-Guide/Outfitter

P.O. Box 388

Klawock, AK 99925

Board of Game,

Thank you for your service on the Board. I am a registered guide/outfitter that operates fully guided black bear, mountain goat, deer and duck hunts in units 1 and 2 and have lived, worked, guided and/or hunted continuously in these and units 3 & 4 since 1999. Following are my written comments on various proposals.

Proposal 2,3,4,5,19: These proposals are all very similar and we are strongly opposed to them. The various groups are stating that the viewing opportunities should trump the hunting opportunities, which again, we strongly oppose. The majority of the hunting takes place outside of the prime tourist viewing opportunities in the summer and the heart of the issue is not addressed which is the decreasing number of black bears in those areas, not conflicting user groups.

Proposal 21,22,23: These proposals are all very similar and we are strongly opposed to them. These proposals would have a very detrimental impact to guide/outfitters in all of Southeast AK. These proposals still don't address the problem, which is the Unguided, Non-resident hunter. The adoption of Proposal 37 would address this problem and solve many of the issues that the ADF&G, Troopers, Guide/Outfitters, Nature Viewers and other user groups have with the Black Bear management in Southeast.

Proposal 24: We support this proposal. We agree that the non-resident hunter doesn't need to harvest does or more than 2 bucks.

Proposal 26: We are opposed to this proposal as it directly opposes the conservation-based issue on Kuiu Island, which is the decreasing number of black bears. The controlled use area that went into effect last year was proven to lower the sow harvest and total bear harvest.

Proposal 28: We support this proposal and the author's comments.

Proposal 32: We oppose this proposal since the best hunting for seaducks is later in the year.

Proposal 33: We strongly support this proposal since current regulations allowing the sale of black bear parts contradicts management objectives and further contributes to the decline in Southeast Black Bear populations.

Proposal 35: We support this proposal.

Proposal 36: We oppose this proposal on the basis that if proposal 37 is adopted this would take care of the black bear management issue in Southeast.



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

RECEIVED  
OCT 22 2010  
BOARDS

October 21, 2010

Ladies and Gentlemen,

I am a life long Alaskan that grew up in Ketchikan and currently live and work in Juneau. As an old southeast hand, I have seen many changes to the management of game and the natural resources that we all share. The following comments are made with the intention of preserving wildlife for both viewing and hunting, for future generations of Alaskans.

Proposal 1, Support: It would be better to limit bear baiting to dates that other trapping is not occurring. Bear baiting has the potential of not only drawing bears, but also other carnivores, and this could become an issue with the bait also used to catch wolves.

Proposal 2, Support: I encourage shorter hunting seasons, and NO hunting season near bear viewing areas. The bears are a valuable resource that draws tourists to the area, and they spend a lot of money flying or boating to the area and watching the bears.

Proposal 3, Support: I encourage no hunting allowed near areas of public and private wildlife viewing. The author of this measure has given you some hard figures detailing the loss to Alaska's economy, due to reduced wildlife viewing. Greater numbers of bears will encourage wildlife tours.

Proposal 4, Support: I encourage no hunting allowed near areas of public and private wildlife viewing. Greater numbers of bears will encourage wildlife tours, and the tours bring money to Alaska's economy.

Proposal 5, Support: I encourage no hunting allowed near areas of public and private wildlife viewing. Greater numbers of bears will encourage wildlife tours, and the tours bring money to Alaska's economy.

Proposal 9, Oppose: Fish and Game does not have a good base study of the wolf population in this area. It is my understanding that a lot of wolves are trapped from federal lands (which make up the majority of land in this area), and this take is not accounted for. Since these wolves may end up on the endangered species list, I suggest that the State be proactive and close trapping of wolves on state lands in Unit 1A. If the wolf is trapped or shot to the point of being put on the Endangered species list, there will be a huge cost to the state to monitor and mitigate actions that might harm the wolf population.

Proposal 10, Support: I support efforts to protect the public from traps that are set near trails. Fish and Game should have greater ability to monitor and control trapping in Unit 1C.

JGreen

Proposal 11, Support: The treadwell ditch in Unit 1C is a popular hiking and snowmobile trail. Trapping should be closed for public safety.

Proposal 12, Oppose: Snaring could catch other species and pose a danger to humans. Why are we even allowing this? If we are allowing it, why isn't GPS coordinates required? Aren't there other game management options available? Snaring just brings up a whole host of management issues.

Proposal 15, Support: I oppose bear baiting in general as being unsporting. However, if it is legal then we should have coordinates on the baiting stations so that Fish and Game can monitor them.

Proposal 18, Oppose: I oppose this measure because it does not go far enough. The reported population of 18 wolves can be wiped out in one season. Furthermore there is already trapping allowed on Federal lands, which makes up the majority of land in the POW area. The Alexander archipelago wolf may soon be on the endangered species list, in which case the state will pay much more money to monitor and mitigate our actions on POW. Due to these factors, I would support a total ban on hunting and trapping of wolves on POW until the population has recovered.

Proposal 19, Support: I would like to protect the wildlife in viewing areas from further hunting. Tourism and wildlife viewing bring a lot of money to the state, and are worth protecting.

Proposal 25, Support: We need greater regulation of Unit 2, POW to protect the Alexander archipelago wolf. The reported population of 18 wolves can be wiped out in one season. Furthermore there is already trapping allowed on Federal lands, which makes up the majority of land in the POW area. The Alexander archipelago wolf may soon be on the endangered species list, in which case the state will pay much more money to monitor and mitigate our actions on POW. Due to these factors, I would support a total ban on hunting and trapping of wolves on POW on both state and federal land, until the population of wolves has recovered.

Proposal 38, Support: I am in general opposed to bear baiting, but if we must use bear bait, we need to be able to locate the stations and regulate them.

Proposal 39, Support: I am opposed to bear baiting as it is an unsportsman like method of hunting. Hunting should be done traditionally by looking for and spotting a bear, and stalking it. To draw them in with bait, and shoot from a blind is not hunting. I am also concerned that feeding bears habituates them and other animals to receiving food from humans. I am also concerned that as an avid hiker and wilderness explorer, my life may be endangered by bears around baiting stations. It may also provide illegal means of taking other carnivores as incidental harvest.

Thanks for giving me this opportunity to express my views.

Sincerely,



Jim Green

PO Box 35401

Juneau, AK 99803

RECEIVED

OCT 22 2010

BOARDS

**ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526**

**Submitted by: Barry Burger  
222 Tongass Dr./Raven's Way  
Sitka, AK 99835  
Ph. 907-738-0125**

**I would like to submit the following comments/opinions to be considered prior to your taking action on these proposed changes to the regulations,  
Prop. 12 -5 AAC 92.095**

**I OPPOSE the use of snares for taking wolves on the Gustavus Forelands with emphasis on the Dude Creek Critical Management area accessed by the Good River Road. This is a public access area enjoyed by many residents and visitors a like. It is a popular area for skiers and snowshoers. Many with their dogs in tow. While the Gardner Snare does show promise regarding moose by catch it does nothing for dog by-catch and with the increasing recreational use of this area there would be conflict.**

**Prop. 32- 5AAC 85.065**

**I SUPPORT the waterfowl season opening sooner (Sept 1) I believe that it would provide an opportunity to harvest some resident birds and early arrivals providing better quality birds for the table. It would also provide more hunt time if there was an early freeze-up.**

**Prop. 33-5 AAC 92.200**

**I OPPOSE what basically appears to be changing black bear status from Big Game animal to furbearer status. Making bears and their parts a commodity to be bought and sold could have many negative effects, primarily overharvest for financial gain.**

**Prop. 36- 5 AAC 85.015**

**I SUPPORT better management/control of this hunt and if need be the reduction of the numbers of black bears harvested to meet sustainability issues.**

**Prop. 37- 5AAC 85.015**

**I SUPPORT a permit drawing to give wildlife officials a better control mechanism to fine tune the hunt based on geographical needs and issues.**

**Prop. 39- 5 AAC 92.044**

**I SUPPORT this amendment. Black Bears over bait is "fish in a barrel" and takes away any resemblance to "fair chase" which makes hunting-hunting.**

**Prop. 40- AAC 92.220**

**SUPPORT I believe that the meat hide and skull should have to be salvaged during all black bear hunts. If this meat for some reason is deemed inedible by the hunter they should be required to bring it out and offer it to others who may utilize it. If there are no "takers" it should then be offered to the many Raptor Centers or wildlife re-hab facilities in the area who may make provisions for shipping.**





Alaska Board of Game  
Juneau, Alaska 99811

cc: Governor Parnell  
Representative Wilson  
Senator Stedman

Dear Sirs and Madam;

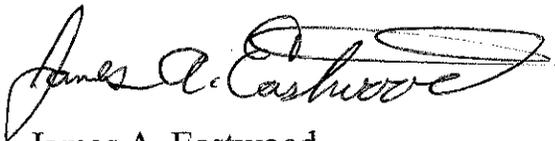
My husband and I are adamantly opposed to the proposed point system for permit hunts. We feel that this will unduly restrict available permits for Alaska residents currently residing here and for future resident hunters. By allowing a split in permit allocation due to 'bonus' points, we feel that this will cause an influx of non resident permit requests. This will increase the ratio of out of state permit applications to the number of resident permits actually drawn.

In addition, this proposed point system, will negatively impact our children's ability to successfully obtain a permit hunt which is part of our lifestyle of living in Alaska.

We feel this proposed system will negatively impact the majority of Alaskans while benefiting only a few Alaskan Guide and Outfitters. These Guides and Outfitters, have Out of State Clients, and therefore, have a monetary interest.

In conclusion this proposal would definitely hurt Alaskan residents and their children, especially younger Alaskan residents, in the future, from obtaining a permit.

Sincerely,



James A. Eastwood  
P.O. Box 1185  
Petersburg, Alaska 99833



Gayle M. Eastwood  
P.O. Box 1185  
Petersburg, Alaska 99833

RECEIVED  
OCT 22 2010  
BOARDS



ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094

October 15, 2010

My husband and I want to comment on both proposals to ban hunting in tourist areas of Alaska:

PROPOSAL 4 - 5 AAC 92.510 addresses the hunting at Traitors Cove (also known as Margaret Creek) and

PROPOSAL 5 - 5 AAC 92.510 which addresses hunting in the fjords Rudyerd Bay and Walker Cove.

We enjoyed a fantastic vacation to both Traitor's Cove and Misty Fjords in August of 2009 and it is terrible to think that in the past 10 years 78 bears have been killed in Traitors Cove and 25 bears have been killed in Rudyerd Bay/Walker Cove, the very areas serviced by the massive tourist industry of Ketchikan. Is it seriously not possible to find bears in other parts of Alaska near Ketchikan but not directly where we, as well as thousands of other tourists, go to actually see and enjoy bears? On our final flight into the Misty Fjords we were lucky enough to see a Black bear out strolling around and it was definitely the highlight for all persons on that trip.

We were also fortunate to see a few bears on the viewing platform at Traitor's Cove, but to hear that the US Forest Service manages the land while the Alaska Dept of Fish and Game permits hunting there is truly an example of mismanaged government.

Please end this poor economic decision by banning bear hunting in the above locations.

Sincerely,



Dave and Leah Alcyon  
4040 30th Ave W  
Seattle, WA 98199

RECEIVED  
OCT 22 2010  
BOARDS



Kimberly B. Busch  
P.O. Box 20629  
Juneau, Alaska 99802  
October 21, 2010

RECEIVED

OCT 22 2010

BOARDS

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526 Juneau, AK 99811-5526

Dear Members of the Board of Game:

I do not usually submit comments to the Board but I was moved to do so at this time because of the potential impact on areas of particular interest to me.

I have made my residence in Alaska since 1975. I have lived both in Juneau and Anchorage and worked extensively in remote and rural communities. For a few years, I lived overseas in the U.K. where my husband was stationed. While I was in Europe my appreciation grew even greater for the wilderness surrounding my Alaska home and, especially, the ability to view and photograph wild animals in their natural habitats. This has all but disappeared in much of Europe.

I want to voice my support for the proposals (listed below) that I believe will help to sustain bear viewing and tourism in Southeast Alaska. We frequently host visitors to Southeast and their first interest is in seeing wildlife, particularly bears. More recently, because of publicity and photographs of Romeo, the black wolf, many have also been interested in seeing wolves. Because of the importance that viewing wildlife has both to me as a Southeast resident and to the local tourism industry I support the following: Proposals 2, 3, 4, 5, 10, 11, 13, 18, 19, 21, 22, 23 and 25.

I would like to further comment on Proposal 18: I have particular concern for the survival of the Alexander Archipelago wolf, which is one of Alaska's unique animals. Until we have current studies and numbers on sustainability for this special wolf, the number that may be taken should be reduced to zero. I recall from my brief time working for the Department of Fish and Game that we are especially fortunate in that sustainability is required in the Alaska constitution for all Alaska wildlife. I think that the statesmen who crafted our constitution were visionaries who understood how intertwined wildlife is with the identity of Alaska and its culture, to the extent that animals need special protections. We do not want our unique animals to suffer the same fate as the gray wolf in northern New Mexico or the many animals in Europe that are now only a part of their history and not their present.

Thank you for considering my comments

*Kimberly B. Busch*



**ATTN: Board of Game Comments**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**

001 2 2 200  
BOARDS

Proposal 10 (defining the Juneau area for discretionary trapping permits)

I support this proposal. The Juneau area trails are heavily used by residents in all seasons. These many trail users should not be at risk from traps set by only a few people.

Proposal 11 (add Treadwell Ditch trail to closed area)

I support this proposal, because of the numerous Juneau resident who use this trail.

Proposal 12 (allow wolf snaring in Gustavus)

I oppose this proposal. There needs to be evidence that wolves are depleting the moose population there as well as evidence that moose are not already overeating their food supply.

Proposal 13 (using a good landmark to limit a hunting area)

I support this proposal. It makes perfect sense to use a clear landmark.

Proposal 14 (expand bear hunting in Berners Bay)

I oppose this proposal. The supposed difficulty of hunting in certain months is totally irrelevant; why should hunting always be easy? There is no evidence that the moose population (introduced to this area some years ago) is limited by bears. "Under-utilized" is a notion peculiar to hunters, with no relationship to ecological relationships.

Proposal 18 (limit on wolf take on POW)

I support the proposal of limiting the take by any one trapper, given the Department's concern about declining wolf populations there.

Proposal 25 (limits to wolf season)

I support this proposal for all the reasons given in the proposal.

Proposal 27 (lengthen wolf season in Unit 3)

I oppose this proposal. If deer populations are low because of hard winters, then wolf populations will also decline, naturally. There is no need to increase the killing of wolves.

Proposal 29 (to lengthen beaver-trapping season).

I oppose this proposal. If there are so-called nuisance beavers in certain specific areas, then let the extended season apply ONLY to those particular areas, based on evidence of nuisance.

Beavers provide wonderful habitat for many other species, including juvenile coho and Dolly Varden, mink and otter, herons and ducks, to name a few. They have great ecological value and, in fact, are have been reintroduced in some regions because of their ecological value.

Proposal 30 (opening season for fisher)

I oppose this proposal for two reasons

The proposal contains faulty information. According to MacDonald and Cook (2009) Recent Mammals of Alaska, fishers occur naturally in Southeast Alaska, with specimens taken from the Taku River and from near Bessie Creek north of Juneau. So it is NOT TRUE that they are 'nonindigenous', as stated in the proposal.

Furthermore, there are no data to support the claim of serious competition with marten. It would be a grievous error to simply assume it.

Proposal 31 (forbid use of small-jawed traps when mink/marten seasons are closed)

I support this proposal.

Every effort should be made to restrict the take of animals to the legal season only.

Proposal 32 (earlier season for waterfowl)

I oppose this proposal. Fall is the migration season for these species. They need some time to feed en route and to rest. If the later migrants don't taste good, then don't shoot them!

Proposal 33 (no sale of black bear parts in Southeast)

I support this proposal.

Sale of bear parts would be detrimental to the bear population, because many would be killed just to sell body parts. In addition, viewing opportunities for tourists would indeed be decreased, to the detriment of this important industry.

Proposal 34 (no trapping of black bears in Southeast)

I support this proposal, for the same reasons as #33. Sale of bear parts would be detrimental to the bear population, because many would be killed just to sell body parts. In addition, viewing opportunities for tourists would indeed be decreased, to the detriment of this important industry.

Proposal 35 (reduce bag limits for black bear in Southeast)

I support this proposal, because of the concern for sustainability of bear populations in the region.

Proposal 36 (reduce harvest of black bears)

I support this proposal in general, for the same reason in #35 (the concern for sustainability of bear populations in the region.) I would prefer than non-residents be excluded as much as possible and I reject the entire concept of bear baiting, because it requires no skill (unlike real hunting).

Proposal 38 (permit for bear baiting)

I oppose this proposal. Bear baiting is not hunting at all, it is just shooting for the sake of killing. It requires no skill and no real knowledge of the animal.

Proposal 39 (no bear baiting)

I support this proposal. Bear baiting is not hunting at all, it is just shooting for the sake of killing. It requires no skill and no real knowledge of the animal.

Proposal 40 (salvage of bear meat etc)

I support this proposal. Why waste good meat, given that the animal was killed?

Proposal 43 (limits on wolf season)

I support a limited hunting season for wolves, for all the reasons given in the proposal.

MARY F. WILLSON  
5230 TERRACE PL.  
JUNEAU AK 99801

*Mary Willson 5230 Terrace Pl, Juneau AK 99801*



Patricia J. O'Brien  
PO Box 35451  
Juneau, Alaska 99803-5451  
(907) 789-9405  
[patriciaobrien@gci.net](mailto:patriciaobrien@gci.net)  
October 21, 2010

RECEIVED  
OCT 22 2010  
BOARDS

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Dear Members of the Board of Game,

Below are my considered recommendations and comments on Southeast proposals. For your information I am a 70 year old Alaskan (here 42 years) with life-long outdoor experience and a deep appreciation for the opportunity to live near such wildness.

Proposal 2: Support. Proposal 2 would benefit bear viewing and support tourism, a key economic issue in SE Alaska. I personally don't relish the thought of a bear being pursued by hunters near a place I might be bear viewing – not a smart idea.

Proposal 3: Support. This proposal would benefit bear viewing and support tourism, a key economic issue in SE Alaska. The proposal has laid out the argument well and should be supported by the board. A far greater number of persons in Ketchikan would benefit from this proposal than the few hunters who would be required to hunt elsewhere.

Proposal 4: Support. I support this proposal for the sound reasons contained in the proposal. By now it should be clear to the Board that bear viewing is a big deal in Southeast Alaska. Much of our economy thrives on it.

Proposal 5: Support. I support this proposal for the sound reasons contained in the proposal.

Proposal 8: Oppose. This proposal does not even appear internally consistent.

Proposal 10: Support. As a trail user, among many, I support this proposal.

Proposal 11: Support. I plan to use this new trail, and so support this proposal. Similar trails have protection, so it makes sense to close the Treadwell Ditch trail to trapping.

Proposal 12: Oppose. The reasoning in this proposal is biased and faulty, especially the statement on what will happen if nothing is done. No scientific evidence supporting the proposal is provided.

Proposal 13: Support. Clarity makes sense to me.

Proposal 14: Oppose. As stated earlier, bear viewing in SE Alaska is a big deal to the economy – tourism and photography. The proposer is absolutely wrong in stating no one will suffer. I grew up in a hunting family and respected the ethics of the hunters of my youth. Persistent requests by some hunters today, to make hunting easier, is troubling.

Proposal 18: Support with an additional recommendation. The Juneau Empire covered the Alexander Archipelago wolf in today's paper shedding light on the uniqueness of this wolf. Given that DF&G studies (albeit outdated) indicate concern over the declining numbers of this unique animal, the number that may be taken should be reduced, but reduced lower than ten (preferably 0 but no more than five) until further study establishes sustainable numbers. If I recall correctly sustainability is required in the Alaska constitution for all Alaska wildlife, not just the wildlife we eat or trap.

Proposal 19: Support. I support this proposal for the sound reasons contained in the proposal. Safety again appears to be an issue. In this region of the state bear viewing and photography are huge economic factors. I can see no reason to allow hunting in this area.

Proposal 20: Oppose. This proposal admittedly is unsure the proposal is biologically sound and should be denied.

Proposal 21: Support. Proposals 21, 22, and 23 should all be supported to ensure the declining black bear population on Prince of Wales Island reaches sustainable levels.

Proposal 22: Support. Proposals 21, 22, and 23 should all be supported to ensure the declining black bear population on Prince of Wales Island reaches sustainable levels.

Proposal 23: Support. Proposals 21, 22, and 23 should all be supported to ensure the declining black bear population on Prince of Wales Island reaches sustainable levels.

Proposal 24: Support for the idea, but I would go further. Occasionally I have the privilege of seeing deer in my back yard. I cannot support any non-resident hunting in Alaska. I fully support Alaskans hunting near their homes to sustain their families, but deer and our other wildlife are far too valuable to squander on people who fly to Alaska for the experience.

Proposal 25: Support I support this proposal for the sound reasons given in the proposal and my comments in Proposal 18.

Proposal 26: Oppose. It is mind boggling that in an economy where bear viewing is a major part of the SE economy that a few continue to expect the majority to accept the killing of these extremely valuable animals not only to tourism but to photographers. Note the photograph on today's front page as a case in point.



Proposal 27: Oppose. This is a cruel proposal. Pups will be highly dependent on parents during the suggested extension. In addition management should be science based. This isn't.

Proposal 29: Oppose. I have spent three years dealing with people/beaver conflict areas and was extremely disappointed in the outdated information provided by DF&G. Beavers are a keystone species providing a rich habitat for fish, birds and a wide variety of animals. "Nuisance" is an antiquated description, given that relatively simple solutions are available with little maintenance required and in the case of saving trees, fencing requires no maintenance.

Washington State spent a fortune trying to enhance salmon numbers and failed until someone got the bright idea to re-introduce beavers. Habitat depletion for coho fry has a significant impact on reducing coho numbers. I recommend you obtain collaboration with fisheries experts.

Beavers have educational value too. Schools take children on field trips to learn about these interesting animals. Beavers demonstrate a capability to change and enrich the environment.

DF&G should be in the forefront of advising highway maintenance staff and communities where concern is expressed of the alternatives to killing these ecologically valuable animals.

Proposal 31: Support. I support this proposal for the reasons provided in the proposal.

Proposal 32: Oppose. Instead of moving hunting earlier to September 1<sup>st</sup>, and causing greater loss of some migrating birds, I suggest you eliminate hunting in December for the reason given in the proposal.

Proposal 33: Support. Support for the reasons provided in the proposal and the reasons given throughout my comments on the value of black bears to the economy of Southeast.

Proposal 34: Support. Support for the reasons provided in the proposal. The sale of bear parts would increase the killing of bears (valuable to the tourism economy here) just to sell body parts. And who are we kidding? With gall bladders being worth thousands, there is plenty of room for the black market trade – law or no law. We still get DWI's.

Proposal 35: Support. I support this proposal for the same reasons that I support proposal 33 and proposal 34. Black bears are subject to the same sustainability requirements in our constitution as any other wildlife.

Proposal 36: Support with modification. I support this proposal, for the same reason as proposal 35. I further recommend non-resident hunting of black bears be eliminated. The amount DF&G receives for non-resident licenses doesn't come close to the value of the animal for wildlife viewing. Revenue for wildlife viewing in Alaska is estimated at roughly five times the amount received for hunting licenses.

Proposal 37: Oppose. The amount DF&G receives for non-resident licenses doesn't come close to the value of the animal for wildlife viewing. Revenue for wildlife viewing in Alaska is estimated at roughly five times the amount received for hunting licenses.

Proposal 38: Oppose with a caveat. I totally oppose bear baiting. It is an unsportsmanlike and dangerous practice. But if the BoG decides to allow this practice, by all means GPS coordinates should be required.

Proposal 39: Support. I support this proposal for the reasons given in the proposal.

Proposal 43: Strong Support. I support a limited hunting season for wolves, for the sound reasons given in the proposal.

Proposal 45: Support. In general I support this proposal because I support sustainability for all species of wildlife, not the sustainability of selected species and not others.

Proposal 48: Oppose. I am always surprised when I read "No one will be harmed" in a proposal. A fortune comes into this state through tourism. Of course our mountains and terrain draw people, but what they really want to see is wildlife. That includes wolves. The times I have been fortunate enough to view wolves count among my most memorable Alaskan experiences. Ditto for bears, moose, deer, beaver, otters and on and on.

I hope the BoG will take wildlife viewing, photographing wildlife, the educational value of wildlife, and the lucrative tourism draw that brings tourists to Southeast Alaska seriously. The vast majority of Alaskans do not engage in the activities regulated by the BoG. We are counting on you to balance your decisions to reflect the needs of the entire population and on the sustainability of all wildlife. Thank you for your time in considering my comments.



Patricia J. O'Brien

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

RECEIVED  
OCT 22 2010  
BOARDS

From: Linda Shaw  
9684 Moraine Way  
Juneau, AK 99801

October 22, 2010

To whom it may concern,

I have lived and worked in Juneau, Alaska since 1991. I am an outdoor enthusiast and am becoming increasingly concerned with the direction of wildlife management in Alaska. I am hopeful that wildlife in Alaska will be managed in a manner that preserves it for the current and future enjoyment of all Alaskans.

Proposal 1, 15, 38 , Oppose: I am opposed to these measure because I am opposed to bear baiting. Bear baiting is feeding bears and teaching them to associate food with humans and so is dangerous to every Alaskan that uses the outdoors. In addition it is unsportsmanlike behavior that is ripe for abuse. Common sense has led to regulations for keeping our garbage away from bears and the same common sense should outlaw bear baiting in the State of Alaska.

Proposals 2 , 3, 4, 5 & 19, Support: I oppose hunting near bear viewing areas. The bears are supporting a renewable resource that supports a sustainable economic tourism industry that depends on healthy bear populations.

Proposal 8, Oppose: I oppose proposal 8 because it provides no information on the health of the wolverine and wolf populations in question.

Proposal 9, Oppose: I oppose this proposal because it provides no information on the status of the wolf population in question.

Proposal 10 & 11, Support: I support these proposals as a public safety issue for the many groups in Juneau that use trails. In addition, visitors who are unfamiliar with the area should be able to use the trail system without being at risk of harm. I would also like greater wildlife viewing opportunities along trails that have not been degraded by trapping activity.

Proposal 12, Oppose: I am opposed to snaring, which is dangerous to non-target species, humans and is simply inhumane.

Proposal 18, Oppose: I oppose this measure because no trapping should be allowed on this population of depleted wolves

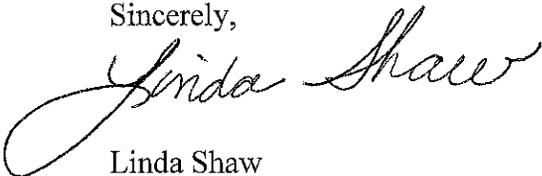
Proposal 25, Support: I support the added measures that attempt to reduce the illegal unreported taking of wolves in Unit 2, however, a total ban on hunting and trapping of wolves on both state and federal land should be implemented until the population of has recovered.

Proposal 29, Oppose: Beaver ponds provide important rearing habitat for juvenile coho salmon, a valuable fisheries resource of the State, as well as benefitting many other species of wildlife. Many culverts are not designed properly for flood control or fish passage and can become clogged from other sources such as storm debris. Inexpensive methodologies using easily constructed fencing are available, that, when properly placed, prevent beavers from clogging culverts. These methodologies are being currently used in Juneau at the Dredge Lakes area to address such problems. Resources spent to remove beaver populations that may return later to re-create a problem would be better spent on preventative measures that allow for humans and beavers to co-exist and for beavers to continue to provide valuable fisheries habitat.

Proposal 39, Support: I am opposed to bear baiting as an unsportsman like method of taking this resource that has the potential to habituate bears to feeding, endanger others who use the outdoors, and lead to the habituation and illegal take of other wildlife.

Thank you for the opportunity to comment.

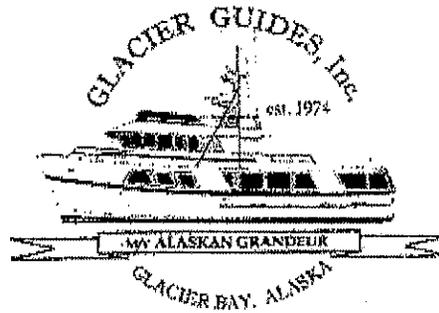
Sincerely,

A handwritten signature in cursive script that reads "Linda Shaw". The signature is written in black ink and is positioned above the printed name.

Linda Shaw

**Alaska Guides & Outfitters**  
Jimmie C. Rosenbruch  
MaryAnn Rosenbruch  
Alisha Rosenbruch-Decker  
Zachariah B. Decker  
Dustin C. Hammer

www.glacierguidesinc.com  
Email: jrosen@redrock.net



**Booking/Correspondence Office**  
P.O. Box 460 Santa Clara, UT 84765  
(435) 628-0973 Phone/Fax

**Alaska Office**  
P.O. Box 219 Gustavus, AK 99826  
(907) 697-2190 Phone

October 5, 2010

**Board of Game**  
Alaska Department of Fish & Game  
Southeast Region Meeting  
November 5-9, 2010  
Ketchikan, Alaska  
Fax # 907-465-6094

To All Board Members:

The new regulation that allows the sale of black bear hides and skulls in GMU 1-3, 5 & 6 is completely inconsistent with the October 2010 Board of Game Bear Conservation Harvest and Management Policy.

The Boards Conservation Management Policy states "in Southeast Alaska and Prince William Sound, black bears will generally be managed as trophy species, food animals or for viewing opportunities."

Allowing the sale of hides and skulls promotes "market hunting" of a game species already in decline.

I support proposal number 33 and 34.

Sincerely,

Jimmie C. Rosenbruch  
P.O. Box 219  
Gustavus, Alaska 99826

RECEIVED  
OCT 06 2010  
BOARDS





## Grateful Dogs of Juneau

P.O. Box 20887  
Juneau, AK 99802  
www.gratefuldogsofjuneau.org

October 4, 2010

RECEIVED  
OCT 07 2010  
BOARDS

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: SUPPORT - **Proposal 10**: Juneau area Unit 1C: Discretionary Trapping  
SUPPORT - **Proposal 11**: Areas Closed to Trapping: Treadwell Ditch

Dear Sirs:

The Grateful Dogs of Juneau (Grateful Dogs) whole heartedly supports the adoption of **PROPOSALS 10 and 11**. Grateful Dogs believes that the adoption of the two proposals would benefit dog owners in Juneau and would be in the best interest of all users of the trails in Juneau. Grateful Dogs also believes that the proposals would not unduly interfere with lawful trapping activities because the potential adverse consequences on trapping activities are minimal.

**Proposal 10** would give the Department of Fish and Game authority to set trapping permit conditions and procedures in the Juneau area as necessary to prevent conflicts between user groups in the densely populated Juneau area. This proposal is needed because there is limited habitable land between the marine waters and mountains of the Juneau area. In the limited area available it is difficult for trapping activities to occur at a safe distance from dense residential areas and from heavily used recreational areas. We are aware of at least one incident in recent years in which a dog was caught and died in a lawful trap set close to a popular trail. Grateful Dogs would like to avoid similar incidents by allowing the Department to insure that trappers in the Juneau area are adequately informed of open and closed areas and other regulations and take the appropriate measures to prevent such tragedies in the future. GDOJ SUPPORTS

**Proposal 11** would add Treadwell Ditch Trail area to the list of similar trails closed to trapping in Juneau. The Treadwell Ditch Trail is being upgraded and more dog owners and other outdoor enthusiasts are using the trail. The trail parallels the residential areas along the Douglas and North Douglas Highways along the length of the trail. The safety of the public is at risk if trapping is allowed in close proximity to this increasingly popular trail and the adjacent residential areas. GDOJ SUPPORTS

Grateful Dogs of Juneau, Inc. is an Alaska nonprofit organization that promotes responsible ownership of dogs in Juneau and advocates on behalf of responsible dog owners.

Sincerely,

Aran Felix  
Board Member

Grateful Dogs of Juneau, Inc.



Open Submission to the Alaska Board of Game

To: Alaska Board of Game

Fax: (907) 465-6094

Re: Legislation To Legalize Bear Trapping And Bear Snaring

From: Boycott Alaska's War Against Wildlife [Facebook]

Contact Information:

<http://www.facebook.com/?tid=1666619665763&sk=messages#!/group.php?gid=152475524788746>

Date: October 11th 2010

The members of this group believe that the government of Alaska's war against wildlife must end before it does any further damage to the environment. Today's pest animal is tomorrow's endangered specie. Clearly your brand of wildlife management has failed miserably in country after country around the world, and has caused the extermination and endangerment of specie after specie, particularly large carnivores thought of as competitors for human hunters. Your brand of wildlife management is entirely human centric and not science based. The Alaskan government makes money off of selling trapping permits, while your voters lose jobs in the tourism industry as Alaska's reputation for backwards thinking and cruelty towards its wildlife gains international momentum.

Aside from all of the political arguments, one indisputable fact remains. Bears are sentient creatures who understand and experience the hideous pain and stress that trapping and snaring cause. Would anyone of the members of the Alaska Board of Game or its supporters for a moment willing allow their family pet dog to undergo such torment?

This Facebook group is made up of members from all over the world, and was just created on October 7<sup>th</sup> 2010. In just a few days this site has grown to hundreds, and behind every member are hundreds more who feel as we do.

Thank you,  
Boycott Alaska's War Against Wildlife - Administrator

Eise Poulsen  
Behavioral & Environmental Solutions  
905 309-1370

Smiling Bears - A Zookeeper Explores the Behavior and Emotional Life of Bears  
<http://www.dmplbooks.com/book/9781553653825>  
Smiling Bears - Facebook  
[www.facebook.com/#!/group.php?gid=106986302670408&ref=ts](http://www.facebook.com/#!/group.php?gid=106986302670408&ref=ts)

RECEIVED

OCT 12 2010

BOARDS  
RECEIVED

OCT 13 2010

BOARDS

SMILING  
BEARS



Author Interview on The Wildlife  
<http://laurelbearpodbean.com/>

Shape of Enrichment, Taxon Advisors Chair  
[www.enrichment.org](http://www.enrichment.org)

**CHANGE HABITS, NOT HABITATS**

## Capital Kennel Club



Capital Kennel Club of Juneau  
PO Box 32513  
Juneau, AK 99803

October 3, 2010

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: **Proposal 10: Juneau area Unit 1C: Discretionary Trapping Permit – SUPPORT**  
**Proposal 11: Add Treadwell Ditch Trail to Areas Closed to Trapping – SUPPORT**

Dear Board of Game:

The Capital Kennel Club of Juneau (CKCOJ) supports PROPOSALS 10 and 11.

**Proposal 10** would give the Department of Fish and Game authority to set discretionary trapping permit conditions and procedures in the Juneau area of Unit 1C. CKCOJ supports giving the Department of Fish and Game this discretionary authority for the Juneau area in order to prevent or ameliorate future conflicts between trapping and other user groups in the densely populated land area of Juneau. This proposal would give the Department the necessary tools to hopefully prevent a recurrence of the tragic incident 2 years ago where a basset hound was killed in a trap along a popular trail. CKCOJ SUPPORTS THIS PROPOSAL.

**Proposal 11** would add the Treadwell Ditch Trail area to the list of trails closed to trapping in Juneau. Many Juneauites of all skill levels, ages, and interests are hiking this trail with their dogs. The Treadwell Ditch Trail is being upgraded. As more segments of the trail are rehabilitated and improved, even more people will use the trail. The trail is close to residential areas for most of its length. The Board of Game can prevent future conflicts between trapping and other uses of this trail by limiting the amount of trapping permitted in the area immediately adjacent to the trail. CKCOJ SUPPORTS THIS PROPOSAL.

CKCOJ believes these proposals are reasonable, will benefit the public, and will not adversely interfere with trapping in the Juneau area.

CKCOJ, established in 1989, is a non-profit organization which offers dog training in Juneau and sponsors canine performance and obedience activities in Juneau.

Sincerely,



Camille Stephens  
President,  
Capital Kennel Club of Juneau

RECEIVED  
OCT 05 2010  
BOARDS



Brennon Eagle  
PO Box 576  
Wrangell, AK 99929

October 13, 2010

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

RECEIVED  
OCT 13 2010  
BOARDS

Chairman Judkins:

I am writing to state my opposition to Proposal 32 to move the waterfowl season start date back to September 1.

During the past year my two sons and I participated in two waterfowl hunts during the second half of December when it was not open in the past. We had a great time, my youngest son was able to get his first goose and we found the quality of the birds to be excellent. One of the trips was a larger party where we were able to take 4 adults and 4 kids that were school age. We were able to easily schedule hunts this time of year because of the school vacation so we did not need to work around their schedule. We hunted in both Unit 1 and Unit 3.

My main opposition to this is that I don't want the ending date of the season moved back to December 15 and it is my understanding that if the opening date is moved the ending date would also need to be earlier.

Thank you for taking my comments into consideration.

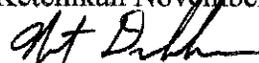
Sincerely



Brennon Eagle



Comments in support or opposition to regulatory proposals to be considered by the Alaska Board of Game at its Southeast Region meeting in Ketchikan November 2010.

Thank you for considering these comments. 

Nat Drumheller  
PO Box 186  
Gustavus, Alaska 99826

11 October 2010

**Proposal 8 -OPPOSE** There is no justification for taking more wolverines in Unit 1A. The proposal justifies lengthening the wolverine season so that more wolves will be taken, which in itself is flawed reasoning, while at the same time admitting that wolf harvest numbers are already high. There are no legitimate reasons to support this proposal.

**Proposal 9 -OPPOSE** The proposal states that thirty wolves are taken on average with the target set at twenty-five. The logic of this proposal seems to be that the author would like to set the target at thirty wolves so that thirty-five or forty wolves will be taken. Wolves deserve greater protection. Wolves play a vital role in ecosystem health, not only in helping to keep ungulate populations healthy, but in helping to keep the populations of their many other prey species in balance. Wolves are increasingly important as a wildlife species for tourists to have the chance to see. Wolves are revered and admired by Alaskans. We do not want to see wolves treated like villains. If you ask Alaskans and tourists to Alaska "what are the animals you would most like to see?" wolves will be high on the list.

**Proposal 12 -OPPOSE** The use of snares for trapping wolves was banned in the Gustavus area because the community was outraged at the irresponsibility of the few trappers here. Not only were these trappers killing, torturing, and maiming numbers of moose, but they were snaring pets and other non-target species. Moose caught by the nose, moose with bloody stumps after losing a foot, moose that died after wire snares had cut to the bone and that had been left to be scavenged by wolves and birds were all part of business as usual for Gustavus trappers.

The proposal suggests reintroducing snares because moose calf recruitment "partly" suffers from predation by wolves. That is a pretty big "partly". I am not aware of any solid evidence which shows that calf recruitment in the Gustavus area is negatively impacted by the presence of wolves.

For years, the greatest concern in the Gustavus area has been that there were too many moose and that they were destroying the habitat. Suddenly, according to this proposal, we have a shortage of moose and, of course, the culprit must be the wolf. On the contrary, wolves play a vital role in keeping moose populations healthy as well as being an integral part of a healthy ecosystem in many other ways. The willow habitat around Gustavus supports much more than moose, and the presence of wolves can only serve to decrease the impacts of the moose on this habitat.

Residents of and visitors to Gustavus like seeing wolves. We like seeing wolf tracks on the beach and hearing wolves howl at night. We do not like seeing bald eagles and moose caught in

RECEIVED

OCT 13 2010

PC 45  
BOARDS

Page 1 of 3

traps. We do not like seeing traps set with no identifying signs or tags as required by law. We do not like seeing traps set along roads, beaches, and trails where people and pets go. We do not like seeing the ruts, mud, and tracks left by trappers using ATVs to get around where the rest of us walk. We do not like seeing the trash left by trappers.

The alternative proposal is to allow Craig Gardner type snares. These snares kill moose that are trapped by the nose. A moose caught by the nose does not put up a fight because it is painful so it does not break the snare and it dies. These snares would also continue to trap pets and other none target species. In addition, there is a history of trappers in Gustavus going un-penalized for not following regulations. In setting a Craig Gardner type snare, corners would likely be cut, to the detriment of wildlife.

**Proposal 25 -SUPPORT** Wolves deserve greater protection. Wolves play a vital role in ecosystem health, not only in helping to keep ungulate populations healthy, but in helping to keep the populations of their many other prey species in balance. Wolves are increasingly important as a wildlife species for tourists to have the chance to see. Wolves are revered and admired by Alaskans. We do not want to see wolves treated like villains. If you ask Alaskans and tourists to Alaska "what are the animals you would most like to see?" wolves will be high on the list.

**Proposal 27 -OPPOSE** There is no justification for lengthening the season on wolves. As the proposal points out, depressed deer numbers are the result of winter conditions and not wolf predation. Wolves help keep deer populations healthy. The justification of extending the wolf hunting season so that wolf numbers won't crash, so that deer numbers can recover, is circular and nonsensical.

**Proposal 29 -OPPOSE** Beavers are not "nuisances" they are wild animals. Beavers are an important creator of unique habitat types from which many species benefit.

Under "who is likely to suffer" you could list everyone who finds trapping to be cruel and reprehensible in addition to all the plants and animals that benefit from the activities of beavers.

**Proposal 32 -OPPOSE** The justification for this proposal is flippant. There is no reason to think the quality of the meat of birds taken will be improved if the opening of the hunting season is moved to September 1. There is reason to think that increased hunting pressure on these birds if the date was moved would be detrimental to the birds. Migratory birds are undergoing an ever increasing threat from habitat loss, pollution, and obstacles in their migration corridors. We do not need to add to this list by extending the hunting season. Sandhill Cranes are especially vulnerable during Autumn migration when adults are escorting their offspring south on their first migration.

Nat Drumheller  
PO Box 186  
Gustavus, AK  
99826

Page 2 of 3

**Proposal 33 -SUPPORT** This just makes good sense given that black bear numbers in Southeast have declined to a level of concern. Allowing the sale of black bear parts is an incentive to kill more bears and an incentive to ignore regulations governing the killing of black bears. Trapping of black bears is cruel and indefensible.

**Proposal 35 -SUPPORT** Bag limits for black bear should be reduced.

**Proposal 36 -SUPPORT** I am in favor of reducing and closing seasons for hunting black bears. Bear baiting is reprehensible and should be illegal. Bear baiting leads to garbage and food conditioned bears. The type of persons who bait bears is evident in the following statement from proposal 38. "Nearly 75 percent of (bear baiting) sites located by Wildlife Troopers are in violation of some regulation."

**Proposal 39 -SUPPORT** Bear baiting is reprehensible and should be illegal. Bear baiting leads to garbage and food conditioned bears. The type of persons who bait bears is evident in the following statement from proposal 38. "Nearly 75 percent of (bear baiting) sites located by Wildlife Troopers are in violation of some regulation."  
Black bear numbers are at a level of concern in Southeast and ending unethical means of killing bears is a good place to begin rectifying the situation.

**Proposal 43 -SUPPORT** Wolves deserve greater protection. Wolves play a vital role in ecosystem health, not only in helping to keep ungulate populations healthy, but in helping to keep the populations of their many other prey species in balance. Wolves are increasingly important as a wildlife species for tourists to have the chance to see. Wolves are revered and admired by Alaskans. We do not want to see wolves treated like villains. If you ask Alaskans and tourists to Alaska "what are the animals you would most like to see?" wolves will be high on the list.

**Proposal 48 -OPPOSE** Wolves deserve greater protection. Wolves play a vital role in ecosystem health, not only in helping to keep ungulate populations healthy, but in helping to keep the populations of their many other prey species in balance. Wolves are increasingly important as a wildlife species for tourists to have the chance to see. Wolves are revered and admired by Alaskans. We do not want to see wolves treated like villains. If you ask Alaskans and tourists to Alaska "what are the animals you would most like to see?" wolves will be high on the list.

Walt Drumheller  
PO Box 186  
Gustavus, AK 99826

Page 3 of 3



October 11, 2010

Alaska Department of Fish & Game  
Board Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

RE: Comment regarding proposed change in regulations to allow baiting and trapping of bear

To Whom it May Concern:

I read with dismay the article in the Juneau Empire regarding the state's proposed change in regulation to allow baiting and trapping of bear in Alaska. I am against this proposed change. Not only is the baiting and trapping method cruel, the reason for potentially allowing it is also cruel: sports hunting of caribou and other game. As stewards of Alaska's wildlife, Fish & Game would be irresponsible, in my opinion, to allow such a practice.

I don't believe we Alaskans should mess with the natural ebb and flows of nature and its game populations.

Again, I am against this proposed change, and hope that feedback from constituents, such as this letter, has some impact on whether or not this change is enacted.

At the very least, if it is enacted, find a less-cruel manner of killing bears!

Sincerely,



Debbie McBride

RECEIVED  
OCT 13 2010  
BOARDS

PC 46



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

RECEIVED  
OCT 12 2010  
BOARDS

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

October 7, 2010

Dear Chairman & Members of the Board:

On behalf of the nearly 900 members of the Alaska Trappers Association, we wish to share our opinions on several proposals which you will be considering during your November 2010 Region I meeting in Ketchikan.

**We SUPPORT Proposal #8.**

We view this proposal as providing additional trapping opportunity for both wolves and wolverines. We anticipate that there will be minimal impact on the wolverine population. If the Department of Fish & Game does not support the proposed closing date of April 30, perhaps the Board could reach a compromise date.

**We SUPPORT Proposal #9.**

We view this as a house-keeping proposal which would align objectives with historic harvest levels.

**We OPPOSE Proposal #10.**

We don't believe that it is necessary to create a new management system for trapping near Juneau. Most trappers try to avoid conflict with other users, but not all trappers have learned this lesson. Education is the key. Areas such as this are important to youth trappers and families which are trying to get started. Don't allow inexperienced trappers and irresponsible pet owners to close down this opportunity.

**We SUPPORT proposal #11.**

Restrictions on trapping near established trails have become an accepted means of preventing conflicts in the Juneau area. Adding the Treadwell Ditch Trail to this system will hopefully work well for everyone.

**We SUPPORT Proposal #12.**

Snares are a good way to harvest wolves. We understand that snares were prohibited in this area due to concerns over catching non-target species. The "break-away" snare system developed by ADF&G is successful at preventing catch of moose and caribou. We strongly advocate use of these snares in all of our workshops. We believe that a workshop offered in this area would be well-received by local trappers.

**We are NEUTRAL on Proposal #18.**

We accept that the wolf population in the area has declined. However, we don't believe that trapping was responsible for the decline. If ADF&G feels that some action must be taken, we recommend that they convince the feds to modify their regulations.

As a side note, we are skeptical that the designation of wolves in this area as a distinct sub-species has any biological significance. Experts may be able to demonstrate minor

differences in DNA, compared to wolves from other parts of Alaska. However, we view this as a mere scientific technicality. These wolves behave the same as any other wolves.

**We OPPOSE Proposal #25.**

We object to:

- a requirement that traps and snares be tagged with the owners name,
- implementation of a bag limit or "harvest cap," or
- implementation of a minimum trap check period.

**We SUPPORT Proposal #29.**

Beaver are abundant throughout the State. In many areas, they have become a nuisance. This proposal would allow additional harvest of an under-utilized resource.

**We are NEUTRAL on Proposal #30.**

We see both sides of this issue. If the fisher population is low, perhaps they should be protected. On the other hand, if the fisher is taken in a trap set for another species and is dead when found, the trapper should not be penalized for taking it. If ADF&G wants to collect biological information from fisher taken by trappers, perhaps the Board could require that all fisher be sealed. In this way, ADF&G would have an opportunity to examine all fisher carcasses.

**We SUPPORT Proposal #31.**

ATA does not believe trappers should take advantage of loopholes to harvest species during a closed season. Thus, we don't support trappers who take mink and marten as described in this proposal. However, we're not sure that the proposal addresses the problem directly. If the problem is trappers who catch mink and marten out of season, then address that directly rather than a restriction on what types of traps can be used for wolf and wolverine.

**We SUPPORT Proposal #47.**

Based on the fact that this proposal was submitted by the local Advisory Committee, we assume that local trappers are comfortable with the concept. We recommend a clarification of the final phrase in the proposal. Does the "500 yards back from the mean high-tide line" refer to ONLY that area within the park boundaries? We would not want this proposal to be adopted if it could be interpreted to apply to "500 back from the mean high-tide line" throughout GMU 5.

We appreciate the opportunity to participate in the regulatory process.

Sincerely,



Randall L. Zarnke, president

Calvin Casipit  
8699 Duran St  
Juneau, AK. 99801

October 8, 2010

Alaska Board of Game  
Board Support Section  
PO Box 115526  
Juneau, AK. 99811-5526

Dear Honorable Board Members:

I write this letter in support of my own proposal before you; #32 to change the waterfowl season for Southeast Alaska back to Sept. 1.

I have a small house in Gustavus, Alaska. I keep my boat there year round. I hunt and fish there. It was so nice to be able to scout for moose after Sept 1 and have the opportunity to harvest a crane, goose or teal or two before the moose season started in earnest on Sept 15.

I remember over 25 years ago living on Prince of Wales Island, having great labor day weekend camping trips out under a wolf spruce tree near a big marsh where a large stream entered salt water. I got there in my skiff with my trusted black lab and eagerly hunted geese and ducks in the mornings and evenings and fishing for dime bright cohos in the afternoon in the river near by.

The first couple of weeks in September still have decent light and weather to be able to spend time hiking out and spending the time needed to get a crane or goose on the Gustavus forelands. Trading that for a couple of weeks at the end December to chase nervous starving birds in nasty weather and poor light doesn't seem like a good trade.

I believe the stated reason for making this change to the waterfowl season two years ago was to allow kids to hunt waterfowl during Christmas break. I seriously doubt that a whole bunch of kids are hunting during this time. Trading opportunity in December for my significant lost opportunity to harvest cranes and geese early in early September does not make sense. The Board of Game should ensure that sanity prevails and move the waterfowl season start date back to Sept. 1., if not for all of Southeast Alaska, at least for unit 1C.

Sincerely,

Calvin H. Casipit

RECEIVED  
OCT 12 2010  
BOARDS



Oct. 10, 2010

Kristy Tibbles  
Exec. Director, AK Board of Game

To the Board of Game:

As a hunter and consumer of AK wild game meat, I have difficulty understanding why the board of game is considering legalizing trapping &/or snaring of black bear in some areas of Alaska. Perhaps some information provided to the public as to why this change is needed and as to the scientific data found to confirm the fact that this would be good for Alaska's big game populations - would be useful for public understanding of this issue.

I already have some difficulty with the concept of setting out bait stations; essentially conditioning black bears to come to human placed food sources - not required to be further than one mile away from human habitation? I think most large mammals can walk a mile pretty leisurely in 15 minutes - and we wonder why bears are more frequently becoming shot as a dangerous "nuisance" in urban border areas?

It seems to me that sitting at this bait station and shooting the bear that has been conditioned to come to this food source, already stretches the concept of "fair chase". Now we're considering placing traps or snares so that the hunter doesn't even have to invest the time waiting for the bear to show up?

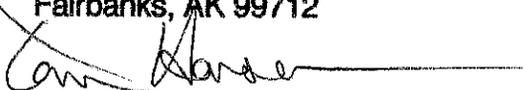
I've been out a number of times with a friend working a trap line and understand the huge amount of work and time invested in trapping smaller fur bearing animals such as marten, fox, lynx, etc. - the trapper deserves every penny they earn for those pelts. However, I believe a bear should stay classified as a large mammal to be hunted because in many cases, the meat is very edible; whereas I've never heard many folks suggest that the mammals currently classified as fur bearers are frequently edible.

Lastly, if we are considering reclassifying a large mammal such as the black bear to be a fur bearer to be snared or trapped - why not trap or snare other large mammals such as moose or caribou - unless we tend to value the concept of "fair chase" in hunting? Perhaps, it might simply be too easy to take too many of these mammals with all of the extenuating circumstances of traps and snares that may sometimes get left in places where we recreate after hunting seasons are over?

Is it also that there is a persistent bias in this state in favor of the moose / caribou large mammal management for the greatest number of hunters? However, I've heard on the news recently that Alaska's human population is one of the fastest aging (if not the fastest) in the United States - that is, there are far fewer young people moving into this state than in the past. When considering that, and the overall trend towards fewer practicing hunters in this country, is it not quite possible that at some point in the not too distant future, we're going to be wishing we had all the "predators" we can get in order to properly manage populations of moose or caribou that may overgraze their habitat or become diseased? (Witness the attempts to manage Chronic Wasting Disease in the Lower 48??)

Please discontinue this effort to institute trapping of black bear in Alaska or clearly explain to those of us who live here why it is needed.

Thank You - Tom Hansen  
1067 Daisy Dr. Fairbanks, AK 99712  
457-2563



RECEIVED  
OCT 12 2010  
BOARDS



Fax 465-6094

Board of Game  
State of Alaska  
October 10, 2010

RECEIVED

OCT 11 2010

BOARDS

Attention: Kristy Tibbles

Dear Kristy,

I have never written to the Board of Game before, but I want to express my strong opposition to the latest Board proposal to trap/snare black bears for the first time since Alaska became a state.

I realize that there are members of the Board of Game who believe that the animals that live in Alaska are here at our discretion. If they become inconvenient, they can be killed. I think they are wrong.

The rationale behind so many of these decisions is that the people who live in the bush don't have enough of (fill in the blank) game to kill to eat. Ergo, the predators are fair game (pun intended). This is faulty reasoning and so out of date. People who choose to live off the road system in areas of Alaska that can only be reached by air or boat have made a decision to live off the grid. They cannot have it both ways: living off the grid in a cabin and expecting the state to make sure they have enough animals to eat.

The same goes for trappers and trophy hunters. Their game, their client's trophy, their thrill of the hunt is my wildlife. It's the wildlife we say we treasure here in this great state. It's the wildlife that millions of tourists come here to see and photograph. It's the wildlife that television and movie crews pay big bucks to film for the rest of the world to see.

Killing wild animals who are doing what they have done for eons, or just happen to be the species the Game Board has targeted this year, is unethical. If you are defending your life against a bear attack, that's one thing. Snaring a black bear with a wire because somebody decided to "live off the land" and is having a tough time is unjustifiable and wrong.

I am an Alaskan. I oppose this proposal. I want my voice heard.



Barbara Belknap  
4481 Abby Way  
Juneau, Alaska 99801

780-8602



Oct. 4, 10

AK Dept. of Fish & Game Board Support  
P.O. Box 115526  
Juneau, AK 99811-5526  
ATT: Scott

RECEIVED  
OCT 07 2010  
BOARDS

Re: Bear Predator Control

To Whom It May Concern:

As a registered voter and concerned citizen, I want to go on record as being against the (barbaric) practices being put forth regarding bear control. IF they must be hunted, I believe it should be done the old-fashioned (and more fair) way of tracking them.

I feel I was tricked by Sarah Palin into voting against what I believe regarding wolf predator control, so I definitely want to be heard on the bear issue.

It appears as if the board of game disregards the wishes of the majority of the people, so I am prepared to join with others and devote some of my time to this issue.

Sincerely,  
Della Dempsey



Oct 11, 2010

①

RECEIVED Proposal 42

OCT 14 2010

BOARDS Last year (2009) I shot a small bull moose that was a 3-point on one side and a 2-point or fork on the other side. The moose was close, in the open and in no hurry to move on. On the fork side he had a swelling or bump that was not a point since it was wider than long.

When the moose was on the ground I saw that the swelling or bump was a damaged point. It had started to grow so it was obvious that I did not break it.

At that point I had to decide if I should just walk away and leave the moose or start cutting it up to bring home. I decided that I could not just leave that beautiful animal lay there and go to waste. I also thought that if I could not keep it someone else would love to have it.

The judge found me guilty of shooting an illegal moose and reduced the fine ~~\$~~ \$370 because that's what it cost me to fly it to town. The fine was \$110 or it cost me \$480 to let someone else have it. Then it took months for the meat to be given away so it may have been freezer burned. So killing an illegal moose and salvaging the meat got me a \$480 fine - leave it in the woods, no fine.

## Proposal 42

(2)

Fish and Game people comforted me by saying "There are only 2 kinds of moose hunters in South East, the ones who have killed an illegal moose and the ones that will kill an illegal moose."

Many residence of South East do not hunt moose in South East because it is too easy to break the law. How many Fish & game employees hunt moose in South East? They could get lots of press coverage or lose their jobs.

The system for moose in South East needs to be changed.

Possibilities are:

1. Have an any bull season with drawing ~~permits~~ permits.
2. Do not harvest small bulls - let them grow up.
3. Give out some amount of any bull permits to harvest small bulls.

The system we have encourages hunters to abandon a mistaken kill in the in the woods instead of face a fine.

Otis Marsh  
Box 606

Petersburg AK 99833

907 772 3208

PC 52

Commissioner Denby Lloyd  
PO Box 25526  
Juneau, AK 998811-001

October 11, 2010

Michelle Masden  
Island Wings Air Service  
PO Box 7432  
Ketchikan, AK 99901  
Email: [mm@islandwings.com](mailto:mm@islandwings.com)  
Phone (907) 225-2444

Dear Commissioner Lloyd,

I am writing to inform you of an attempt to change to the current bear hunting policies in some limited areas in southeast Alaska. I am seeking your help to back up these proposals and inform you of what's at stake economically.

Enclosed are three proposals on the Board of Games' meeting agenda for this November 5<sup>th</sup>-8<sup>th</sup> in Ketchikan and the deadline for public comments is October 22, 2010. As a reminder of the urgency of the situation, the Board of Game will not meet again in Ketchikan until 2019.

These proposals would restrict bear hunting in two of the twelve fjords in the Misty Fjords National monument as well as at two USFS established bear viewing observatories, Margaret Creek in Traitors Cove and Dog Salmon Creek in Polk Inlet. Thousands of visitors are transported by Ketchikan air taxi companies every year to see bears in these areas representing millions of revenue dollars for Ketchikan businesses.

I have had the good fortune to spend the past nineteen years self employed as an air taxi pilot operating out of Ketchikan, Alaska. Currently there are 10 air taxi business operating in Ketchikan employing approximately 213 people. Additionally there are ancillary businesses who depend on and benefit greatly from the air taxi companies. They include but are not limited to independent tour salesman, aviation maintenance, insurance companies and retail fuel companies. Air Taxi business is one of transportation, transportation of locals, loggers, hunters, tourists etc... Over the years, as logging has diminished on the Tongass, the air taxi industry has evolved into one largely dependent on tourism. The Ketchikan Visitors Bureau estimates that over 930,000 visitors come through Ketchikan yearly. The amount of air taxi revenue dollars generated here during the summer months transporting tourists for bear viewing exceeds the dollars generated over the entire year from general transportation of Alaskans from point to point. The combined potential revenue dollars to Ketchikan air taxi companies from all the bear viewing observatories in this area including Polk Inlet/Dog Salmon Creek, Margaret Creek/Traitors Cove, Anan Bay and Neets Bay amounts to over \$3.4 million annually! The following numbers were obtained from the USFS data and published bear viewing tour prices.

Dog Salmon/Polk Inlet	1600 visitors	(\$365 per person x 1600 = \$584,000)
Traitors Cove/Margaret Creek	3436 visitors	(\$365 per person x 4000 = \$1,254,140)
Anan Creek	384 visitors	(\$485 per person x 384 = \$147,456)
<u>Neets Bay</u>	<u>8000 visitors</u>	<u>(\$365 per person x 8000 = \$2,920,000)</u>
Totals for Bear Viewing	15,384 visitors	\$4,905,596 total revenue dollars

The demand for bear viewing in the wild is a growing industry and the current demand far exceeds the opportunities. It is time Alaska became proactive in protecting a vital resource for its future, its bears!

Bear hunting is allowed on almost all lands across the state including 22 million acres in Southeast Alaska. Currently the only excluded areas in southeast are the established bear viewing observatories Pack Creek near Juneau and Anan Creek near Wrangell and within the townships of most southeast communities. The enclosed proposals are asking to close a few small areas where thousands of people who hope to see a bear in the wild visit.

Proposal 5-5 AAC 92.510 addresses two fjords in the Misty Fjords National Monument, Rudyerd Bay and Walker Cove. The people who visit Misty Fjords do not go there exclusively to see bears, however most if not all hope to see one. The number of people visiting these areas and who wish to see bears staggeringly outweigh the number of people who wish to hunt them there. I operate one of 33 airplanes operating commercially in Ketchikan and I annually take over 2,000 visitors to the fjords. There may be as many or more than 66,000 visitors taken annually by air (not including boat tours) The average price per person to go there is \$239, making for a potential revenue of \$15.7 million. The ADF&G records indicate in the past 10 years, 25 bears have been killed in Rudyerd Bay and Walker Cove. That is an average of 2.5 bears per year.

PROPOSAL 4 - 5 AAC 92.510 and PROPOSAL 19 - 5 AAC 92.510 address hunting at the USFS established bear viewing observatories of Margaret Creek/Traitors Cove and Dog Salmon Creek/Polk Inlet. The US Forest Service issues permits to commercial operators for limited visitation to these two observatories and have also provided the infrastructure to include: dock facilities, a maintained logging road, a trail, a viewing platform and a blind all for the purpose of providing access to the public for bear viewing. The USFS permits 6 Ketchikan air taxi companies to bring a total of 3436 visitors to Margaret Creek for a revenue of \$1.25 million. Additionally the USFS estimates 17% of the total visitors to Margaret are local families who not there on a permit, bringing the visitor total up to about 4,000. According to ADF&G records, in the past 10 years 78 bears have been killed in Margaret Creek/Traitors Cove or about 7-8 bears annually. When I first began bringing visitors to Margaret Creek 10 years ago the average visitor was able to continuously view 5 to 7 bears from the observatory platform. This year, visitors were lucky to see one fleeting glimpse of a bear for less than a minute. Many visitors saw no bears at all and we had to cancel more than 50 percent of our bear viewing tours due to lack of bears. At the Dog Salmon Creek bear viewing observatory the USFS permits a total of 1600 visitors for revenue of about \$584,000. According to the ADF&G records in the past 10 years 215 bears have been killed there.

I am not against hunting in general. I too have enjoyed hunting in Alaska. Every year I transport deer, elk, goat and bear hunters to a variety of locations. For example, this September I took part in the Travel Channels' filming of "Hunter Gatherer" a Zero Point Zero Production. They went out hunting both deer and bear. I am against the mixing of bear hunting and bear viewing at the same location. Such activities are a dangerous and incongruent mix. I am for protecting a few small areas from bear hunting to ensure the revenue of tourist dollars for our future. I believe the vastness Alaska has to offer can accommodate both bear hunting and bear viewing.

In addition to the economic issue there is also the obvious safety issue. How safe is it to mix hunters and potentially wounded bears with 3000 bear viewers? It seems only a matter of time before someone is injured from a bear or a stray bullet.

I have sent this same request out to thousands of my customers and have received many supportive comments. For your review I have included two examples of the comments I have received. For most people, the sighting of a bear is the quintessential symbol of Alaska's wilderness!

Thank you for your time and effort to ensure the future of bear viewing in Alaska!

Best regards,

Michelle Masden  
Pilot / Owner

Island Wings Air Service  
PO Box 7432  
Ketchikan, AK 99901  
Email: [mm@islandwings.com](mailto:mm@islandwings.com)  
Phone (907) 225-2444

**PROPOSAL 4 - 5 AAC 92.510**

**PROPOSAL 4 - 5 AAC 92.510 Areas closed to hunting:** Close the Margaret Creek Drainage area in Unit 1 to bear hunting:

As per other known bear viewing observatories such as Anan Creek the following should apply to Margaret Creek Bear Viewing Observatory: Region 1 Southeast Mainland, Unit 1A-1B, "Margaret Creek Drainage Area - Within 1 mile of Margaret Lake, the bear viewing platform, Margaret Creek downstream from the lake, the saltwater drainage and within 1 mile of any USFS maintained road accessed by the boat/floatplane dock in Marguerite Bay is closed to taking any bear."

**ISSUE:** The problem is trying to mix bear viewing facilities with bear hunting areas in Margaret Creek within Traitors Cove. At stake is the safety of visitors to the Traitor's Cove/Marguerite Bay bear-viewing areas and sustaining the bear population for the ever-expanding economic and recreational resource of bear-viewing.

It is a conflict of interests, i.e. those who wish to simply view the wildlife versus those who want to hunt bears. Viewers outnumber hunters by a large number: 46 percent (235,000) of Alaskans are wildlife viewers versus 14 percent (70,776) are hunters.

(source: [www.outdoorindustry.org/pdf/AlaskaRecEconomy.pdf](http://www.outdoorindustry.org/pdf/AlaskaRecEconomy.pdf))

The majority of visitors enjoy the opportunity for non-consumptive use by: viewing bears either at the United States Forrest Service (USFS) platform, on the roads, beaches, in the woods or Margaret Creek; ATV and bike use; hiking; canoeing/boating on Margaret Lake; fishing in Margaret Lake and Margaret Creek; flora and fauna photography; crabbing and shrimping in Traitor's Cove, Marguerite Bay and the Salt Chuck; camping in tents at the former log sorting yard; and over-nighting in boats at the dock.

Eleven years ago Margaret Creek was opened by the USFS as a bear viewing facility. The entire facility consists of a USFS dock used by boats and floatplanes, a logging road, and a one-third mile trail ending at a viewing platform from which to view bears. The USFS has authorized a total of 3436 Special Use Permits for visitors to participate in bear viewing tours. There are a total of six tour operators who bring passengers to Margaret Creek for bear viewing (Taquan Air, SeaWind Aviation, Island Wings, Southeast Aviation, Carlin Air and American Safari Cruises). These permits represent approximately 1.25 million dollars of revenue for Ketchikan

Page | 4  
(population approximately 12,000), representing a large percentage of these local companies' annual income. Based on data received from the USFS the total number of visitors to Margaret Creek who go there for bear viewing is between 2010 and 4020 persons annually. Approximately seventeen percent (292 to 584) of the visitors are local residents who arrive by their own means. Anan Creek, another bear viewing facility in Unit 1B, sees approximately 3600 visitors annually. Hunting has been closed in this area already. The Alaska Department of Fish and Game (department) should acknowledge the growing naturalist user group and provide for such. According to department records, in the past eleven years that the bear viewing facility has been in place, 78 bears have been taken from the Margaret Creek drainage area. This is an average of seven bears per year. Additionally, bears that see between 2000 and 4000 people per summer have become habituated to humans and do not have a natural aversion to their presence.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Incompatibility of the two user groups is a safety issue. It is possible that an injury could occur. Currently viewing by locals and visitors is being negatively impacted. Risk of serious injury or death by, as per department quote, "stray bullets can travel over a mile and still be deadly"

(source: [www.wildlife.alaska.gov/index.cfm?adfg=bears.problem](http://www.wildlife.alaska.gov/index.cfm?adfg=bears.problem)) and/or an encounter with a wounded bear. The department is creating a potentially dangerous situation by allowing bear hunting to continue in this area. The bears in this area are habituated to humans, making them easy targets for hunters and thus contributing to the decline in the bear population in southern Southoast Alaska as noted in the summer 2010 "Bear Trails" news from the Alaska Department of Fish and Game. Another consequence is the decline in revenue of the local bear-viewing companies and resultant negative impact on the local economy. The population of bears at this time is so low that many visitors fail to see any bears at all. Should this continue it could mean the end of bear viewing tours and the loss of a great deal of revenue for Ketchikan.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Yes, in that bears could not be harvested within the boundaries noted in the proposed regulation, thus ensuring the long-term conservation and sustainability of the species and in turn making it possible for recreational and commercial bear viewing to continue and flourish. This would be a positive economic impact to the local Ketchikan economy.

**WHO IS LIKELY TO BENEFIT?** Locals and visitors who enjoy viewing wildlife would benefit. It will also insure the continued economic benefit of local businesses who conduct tours of the area. It makes sense for the State of Alaska to be pro-active in managing the resources for everyone, to designate the acreage around an advertised and popular bear-viewing platform to be exempt to bear hunting. Thus providing the overwhelming majority of the Traitor's Cove/Marguerite visitors, who are not bear hunters, a designated place to enjoy bear viewing in safety and peace and the protection of this resource for the continuance of the bear-viewing industry.

**WHO IS LIKELY TO SUFFER?** A few hunters may have to seek other locations. However, given that there are twenty-two million acres in Southeast Alaska, most of which are open for

Page | 5  
bear hunting with very few closed areas, adoption of the suggested solution is unlikely to have any long term or far reaching effects.

**OTHER SOLUTIONS CONSIDERED:** A complete ban on hunting in the entire Traitor's Cove area. This solution would be restrictive on hunters. A seasonal ban on hunting in the Traitors's Cove area. This solution would not address the problem of the declining bear population.

**PROPOSED BY:** Jack and Bey Davies

**LOG NUMBER:** EG0812108

.....

PROPOSAL 5 - 5 AAC 92.510.

**PROPOSAL 5 - 5 AAC 92.510. Areas closed to hunting.** Close an area within the Misty Fjords National Monument in Unit 1 to brown bear hunting:  
Region 1 Southeast Mainland, Unit 1A-1B; Misty Fjords National Monument - Rudyerd Bay and Walker Cove. All drainages leading into Rudyerd Bay and Walker Cove are closed to taking brown bears and black bears.

**ISSUE:** The problem is the quality of bear sightings for visitors to Misty Fjords National Monument, specifically Rudyerd Bay and Walker Cove.

There are thousands of locals and visitors combined who go to Rudyerd Bay and Walker Cove for whom the sighting of a bear is the quintessential symbol of Alaska's wilderness. For most, the trip to Misty Fjords National Monument is a once in a lifetime experience. People come from as close as Ketchikan and as far away as South Africa to visit this Alaskan treasure. Seeing a bear in its natural environment lives in the memory of these people for a lifetime. Most people come to Alaska to see a bear, yet most leave never having seen one. The numbers of people who would love to see a bear in Rudyerd Bay and/or Walker Cove is staggering compared to the numbers of people who wish to hunt them there. If only in a few areas, Alaska should be proactive in protecting one of its most valuable and sustainable resources - its bears. Rudyerd Bay and Walker Cove have the grandeur of a National Park if not so in name, we should treat them so in spirit. Future generations will appreciate our actions.

According to United States Forest Service (USFS) records there are 25 Ketchikan based companies who are permitted as outfitter/guides who take people to Rudyerd Bay and Walker Cove for the following activities: 7 flight seeing/fishing/hiking/shoreline use; 10 companies authorized for camping (kayak tours), freshwater fishing, hiking, and shoreline use; 8 companies - freshwater fishing. In addition to the USFS permitted companies, there are at least 4 boat companies who operate on saltwater in Rudyerd Bay and Walker Cove bringing people to see the monument and its wildlife. The revenue generated from these 29 Ketchikan based companies represents millions of dollars for the local economy annually.

By comparison, there are 5 authorized hunting guides whose guided use areas are divided throughout the entire 2.2 million acres of Misty Fjords National Monument, of which Rudyerd

Page | 6  
Bay and Walker Cove comprise of only a small part. According to department records, in the past ten years 25 bears have been taken in Rudyerd Bay and Walker Cove, 7 from residents and the remainder from non-residents. The Alaska Department of Fish and Game has no records of population estimates for these areas and so cannot say how many bears are likely to inhabit the area. However, there are only a few drainages in Rudyerd Bay and Walker Cove and they are so short and so steep as to not offer much in the way of bear habitat. Experience has shown, the taking of two to four bears a year results in far fewer bears that can be seen by its visitors downstream.

Aside from Rudyerd Bay and Walker Cove, there are many more fjords and literally dozen more drainages within Misty Fjords National Monument in which hunting bears would still be allowed, areas which are more appropriate for hunting as far fewer people go there. Setting aside the most highly used areas from hunting, areas where people expect to see wildlife, should not be a problem.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** Sport hunting in tourist areas is bad for public relations, and discourages people from coming. People say they come to Alaska to see bears because they cannot see them anywhere else. If tourists come to Rudyerd Bay hoping to see bears and then do not see them, it could result in fewer visitors going to Rudyerd Bay and Walker Cove in the future. This would produce an economic loss for the Ketchikan economy already reeling from a decline in tourism.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Without an accurate assessment of the bear populations in Rudyerd Bay and Walker Cove it would be difficult to determine the impact of hunting. However, tourist dollars are an additional resource in Alaska, and should be managed for long term sustainability. Without pressure from hunting bear sightings should increase thereby helping to insure the future of tourism to Rudyerd Bay and Walker Cove and sustaining the

Ketchikan economy.

**WHO IS LIKELY TO BENEFIT?** All sightseers who are the major user group in Rudyerd Bay and Walker cove would benefit. As a potential breeding ground and reserve, this area could help increase bear populations in adjoining areas where hunting will continue to be allowed.

**WHO IS LIKELY TO SUFFER?** There are five authorized guides who conduct hunts in Misty Fjords National Monument, a 2.2 million acre parcel of land, however only one of them is permitted to operate within Rudyerd Bay and/or Walker Cove. Given that there are 2.2 million total acres in Misty Fjords National Monument it seems reasonable that there is enough acreage to accommodate bear hunting in all the remaining areas.

**OTHER SOLUTIONS CONSIDERED:** 1) Allow only resident bear hunting in Rudyerd. Any bears taken out of Rudyerd diminishes the number of possible future sightings for visitors. 2) Allow bow hunting only. Any bears taken out of Rudyerd diminish the number of possible future sightings for visitors.

**PROPOSED BY:** Michelle Masden

PROPOSAL 19 - 5 AAC 92.510

**PROPOSAL 19 - 5 AAC 92.510. Areas closed to hunting.** Close the Dog Salmon Creek area to bear hunting in Unit 2:

The Dog Salmon Creek drainage within one mile of Dog Salmon Creek downstream from the wildlife viewing platform within a one-mile radius from the mouth of Dog Salmon Creek at Polk Inlet, is closed to taking any bear.

Page | 20

**ISSUE:** The inherent dangers of bear viewing and hunting taking place at the same location. This is happening at the wildlife viewing platform on Dog Salmon Creek, near Polk Inlet on Prince of Wales Island. This location is connected to the island road system by a United States Forrest Service (USFS) road, and is accessible by boat or floatplane at a USFS dock one mile away at Polk Inlet. Taquan Air has been flying groups of visitors to this area for nine years. The company maintains a guide with a van in the area from July through September each summer season, and is permitted by the USFS to bring 2,000 visitors for wildlife viewing to Polk Inlet / Dog Salmon Creek in 2010. Based on our guide's reporting, there has been increased bear hunting activity and annual declines in bear sightings since we started bringing guests to this location.

There is strong demand from both Alaska residents and visitors to see Alaska wildlife, particularly bears, and there are relatively few locations where the infrastructure is in place to satisfy the need. Polk Inlet is one of these special places: 25 minutes by floatplane from Ketchikan, or by the Prince of Wales Island road system. At the present rate of bear population decrease, it won't be long before the platform on Dog Salmon Creek will not be a viable bear viewing facility.

In the Summer 2010 issue of Alaska Department of Fish & Game's publication *Bear Trails*, concern is expressed about the declining bear population on Prince of Wales Island.

**WHAT WILL HAPPEN IF NOTHING IS DONE?** We are concerned that bear viewer lives are at risk when hunting is permitted at established bear viewing locations. Bears at these popular viewing locations become somewhat habituated to humans and no longer represent a hunting challenge. Continued bear hunting at these clearly identifiable locations will deplete the resource to the point where hunters go elsewhere and it is no longer attractive to wildlife viewers. Along with the loss of a resource goes a substantial revenue loss for air carriers and related employment. The board has an opportunity to introduce regulations at this and other established bear viewing locations to solve the concerns of the two user groups, to the benefit of all.

**WILL THE QUALITY OF THE RESOURCE HARVESTED OR THE PRODUCTS PRODUCED BE IMPROVED?** Will enable the bear population to grow, provide separation of the viewing and hunting user groups, and maintain existing revenue sources for tour operators.

**WHO IS LIKELY TO BENEFIT?** Alaskans and visitors will benefit from being able to view bears in their natural habitat, and keep them out of areas favored by hunters.

**WHO IS LIKELY TO SUFFER?** Some hunters may want to seek other areas. The vastness of the Tongass National Forest offers unlimited hunting opportunities.

**OTHER SOLUTIONS CONSIDERED:**

**PROPOSED BY:** Venture Travel LLC and Taquan Air

**LOG NUMBER:** EG08121011

\*\*\*\*\*

PLEASE READ CAREFULLY

DEAR REVIEWER:

September, 2010

Public comment, in combination with Advisory Committee comments and department staff presentations, provide the Board of Game with useful biological and socioeconomic data to form decisions.

When providing written comments on the proposals in this proposal book, please consider the following tips to help ensure board members and the public more fully understand recommendations to the board:

**Timely Submission:** The deadline for mailed or faxed comments to the Juneau address below is no later than 5:00 p.m. on Friday, October 22, 2010.

**List the Proposal Number:** Written comments should indicate the proposal number(s) to which the comments apply. Written comments should specifically state "support" or "opposition" to the proposal(s).

**Do Not Use Separate Pages When Commenting on Separate Proposals:** If making comments on more than one proposal, please do not use separate pieces of paper. Simply begin the next set of written comments by listing the next proposal number.

**Provide an Explanation:** Please briefly explain why you are in support or opposition of the proposal. Board actions are based on a complete review of the facts involved in each proposal, not a mere calculation of comments for or against a proposal. The board benefits greatly from understanding the pro and cons of each issue. A brief description consisting of a couple of sentences is sufficient.

**Write Clearly:** Comments will be photocopied so please use 8 1/2" x 11" paper and leave reasonable margins on all sides, allowing for hole punches. Whether typed or handwritten, use dark ink and write legibly.

**Use the Correct Address or Fax Number:** Mail written comments to:

**ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094**

Sample Comment from Misty Fjords Visitor

Attn : Board of Game Comments

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Fax : 907-465-6094

Proposal 5-5 AAC 92.510

I could only describe my experience of flying over the Misty Fjords as a spiritual journey into the most majestic and pristine nature I have ever seen. I believe bears belong in this incredible nature and I would have been totally elated to have seen one on my flight. Permitting hunting in this area, makes it less likely that tourists like myself would see a bear now and in the future. Therefore, I ask that the area mentioned in the proposal within the Misty Fjords National Monument be closed to bear hunting.

I thank you for your attention to this matter.

M. Robert Darche

Sample Comment from Margaret Creek Visitor

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094

**PROPOSAL 4 - 5 AAC 92.510**

My husband and I have been to Alaska twice to see the wonderful wildlife of Alaska in 2003 and 2010. In 2003, my husband and I with two friends from Texas flew to Alaska for a vacation. The highlight of our vacation was to go to Anan Creek. The experience at Anan Creek was what I would call my "National Geographic" moment with black bear, brown bear, salmon and eagles. The salmon were running and as we walked up a boardwalk we saw for our first time a large brown bear in the creek eating salmon. To say this was exciting does not describe our feelings. We also experienced this event with many professional photographers that were there that day taking pictures. We saw several black bear and baby bear as they came down to the water to feed on the salmon. With Anan Creek protected from bear hunting we feel confident that this experience was also protected for viewers as my husband and I. We feel this way because when we returned to Alaska in 2010 we went to Margaret Creek instead of Anan Creek and did not see one bear! Bear hunting will ruin any possibility of experiencing what I experienced at Anan Creek at Margaret Creek. I was shocked in 2010 that I saw not one bear at Margaret Creek after my wonderful experience at Anan Creek in 2003. I realized that human intervention had caused this change and if you allow the hunting at Margaret Creek then I know that this will be a real loss to those of us like my husband and I who were willing to come to Alaska from Texas more than one time because of the bears. I also want to say that the number of people that experience bears for viewing would be a greater number than those hunting the bear. Tourists had booked flights continually throughout the day and in one day there would be more people who could of enjoyed a view of a bear than hunters wanting to kill for sport. Others I met when going to Anan Creek and Margaret Creek lived all over the United States or from foreign countries as Japan. I hope that my children will get to experience what I experienced at Anan Creek but if hunting is allowed at Margaret Creek I doubt they will get to have the same experience. Also, if hunting is allowed at Margaret Creek future potential tourist that are willing to spend a significant cost to come to Alaska to go view the bears would be greatly diminished. I realized that Alaska was very special since I live in an urban area. Texas nor any other state of the United States has the wildlife and outdoor experience that Alaska has to offer especially the bears.

Keeping areas as Margaret Creek like Anan Creek for bear viewing is the only way to ensure bears to be available for public viewing. I understand that Alaska has one bear for every mile and there must be other acreage in Alaska that could still allow for game hunting. Margaret Creek and Anan Creek are within a radius of Ketchikan that allows time to fly out to these viewing areas especially if you are on the limited timeframe allowed as a port of call from a cruise ship.

**Response submitted by: Jane and Charles Butler**  
**2700 Cresthill Circle**  
**Waco, Texas 76710**

**ATTN: Board of Game Comments**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**  
**Fax: 907-465-6094**

**Date: October 21, 2010**

**From: Michelle Masden**  
**Cell 617-6925**

**25 year Ketchikan Alaskan resident**

**PROPOSAL 3-5 AAC 92.510:** Close the Eagle Creek/Whitman Lake Hatchery area to bear hunting: I am in support of this proposal for the same reasons listed for Proposal 4- 5 AAC 92.510

**PROPOSAL 19 - 5 AAC 92.510:** Close the Dog Salmon Creek Wildlife Viewing area to bear hunting in Unit 2. I am in support of this proposal for the same reasons listed for Proposal 4- 5 AAC 92.510

**PROPOSAL 4 - 5 AAC 92.510:** I am in support of Proposal 4 closing Margaret Creek in Traitors Cove to bear hunting. To simplify the area closed to hunting, it should read the same as at the Anan Creek Bear hunting closure: **Margaret Creek: to within 1 mile of Margaret Creek downstream from the mouth of Margaret Lake including the area within one mile radius from the mouth of Margaret Creek outlet is closed to hunting.** For review, Anan was closed to Black bear hunting in 1939 and to brown bear hunting in 1996. When the Anan Creek proposal came up for review in 1996, the ADF&G's recommendation to the Board of Game voted to adopt this closure. While the 2010 ADF&G recommendations to the Board of Game state "no recommendation" with respect to Proposal 4, in the Black Bear Management reports of 2001 and 2007, the ADF&G reports that "Margaret Creek is a contentious area." Further stating "that there have been several clashes with hunters and bear viewers during the past several years and that this site received more complaints to the Tongass USFS Supervisor than any other site in all of SE Alaska. Bear viewers would like to see some or all of the areas closed to hunting." And in conclusion they state that "as local bear viewing interest continues to grow we will undoubtedly be faced with allocation issues related to both human safety and bear preservation issues."

The Alaska Board of Game needs to address the escalating problems that exist at Margaret Creek between the two user groups, bear hunters and bear viewers. The problems include but are not limited to: Dwindling Bear Populations, Safety, Incompatibility, Habituated Bears, Easy Access to Hunting and Economics.

For the past 18 years I have owned and operated a single plane air taxi service out of Ketchikan. The air taxi business is one of transportation that includes bear hunters and bear viewers. They are two valid but very different and incompatible user groups. I have been transporting bear hunters and guiding bear viewers for all 18 years. I began taking visitors to Anan Creek in 1993 and to Traitors Cove in 2000.

**Dwindling Bear Populations:** To date no population density studies have ever been conducted in Unit 1A. Presently the best guess of population density is 1.5 bears per square mile. Black bear estimates for Unit 1A are based on studies conducted in Washington State in the 1960's. Using only this data, in 1990 Wood and Larson calculated a slightly higher density for most of southern southeast Alaska. By their own admission these are only assumptions as no data was ever collected here in Alaska. (Black Bear Management Report 2007). We do not really know how many bears per square mile exist in Unit 1A. The only real data that ADF&G has with respect to bear populations in Unit 1A is the harvest data. There is no way to track other sources of mortality including illegal kills and wounding loss. However, according to the 2001 and 2007 Black Bear Management reports the ADF&G expect wounding loss to become a more serious issue if non-resident harvest continues to increase. Non-resident harvest has increased, from a historical 34% in the past 20 years to 52% over the past three years, 2004-2007. The ADF&G conclude that they continue to see increasing numbers of non-resident hunters. Harvest data for Traitors Cove show non-resident hunting to account for 49% of the harvest there from 2000 to present.(38 of 78 bears in 11 years) Additionally the ADF&G report that transporters are increasing in Unit 1A, which is supportive of non-resident hunters. These management reports also address the long term results of logging and the subsequent declines in bear populations. Margaret Creek/Traitors Cove is an area that has seen extensive logging. The report states "second growth stands at many previously logged Revilla Island sites are now reaching the stem exclusion stage and ADF&G expects productivity of this habitat to decline resulting in lower bear densities." Margaret Creek is one such an area. Supporting declines in populations, the 2010 Bear Trails reports the public (field biologists, local residents, hunting guides, tour operators, transporters, local hunters) are increasingly voicing concerns about chronic

low bear numbers compared to 10-15 years ago. Finally I have personally witnessed the consistent decline in bears at Margaret Creek over the past ten years of guiding bear viewers there.

2000	5-7 bears average in view at any one time from the viewing platform
2008	3-5 bears average in view at any one time from the viewing platform
2009	0-3 bears seen from platform in 2 hour period, some groups see no bears at all
2010	0-1 bears seen, no bears were seen from the platform, 50% of visitors who went to Margaret saw no bears at all and 70% of the scheduled bear viewing tours we sold were cancelled due to lack of bears. This is a loss of significant revenue dollars and is problematic for all six companies permitted to go there. The lack of bears at Margaret could mean an annual economic loss to Ketchikan of over \$1.2 million.

By comparison the 2010 Anan bear monitoring done by the USFS states: 9 black bears and 1 brown bear seen on a 2 hour average scan with 3 bears in view at any one time. 79% of the time there are over 20 people on the viewing platform. Anan sees a similar number of bear viewers annually as Margaret, with 60 permits per day and over 3000 permits per season issued by the USFS. In the 18 years I have taken visitors to Anan, without exception, every single group has seen bears.

**Safety:** Over the years that I have been guiding groups to Margaret, I have witnessed many unsafe and disturbing practices of bear hunters using this area. Even though it is illegal to discharge a gun from the viewing platform, nearly every year either myself or one of my bear guides have found spent ammunition shells on the viewing platform at the observatory site. We have also found shells at both the upper and lower bridges. On more than one occasion we have been standing on the viewing platform when gun shots have been fired very close to the platform near the creek. We have come upon hunters on the bridges with their rifles aimed at the creek. The bear hunters will also congregate on the viewing platform with their rifles.

There are approximately 60 visitors per day (or 3436 persons per year) permitted by the USFS to visit the Margaret Creek bear viewing observatory site. According to the USFS about 17% of the total bear viewing visitors to Margaret are unpermitted local residents. That could bring the bear viewer count up to 70 persons on any given day. With this number of people in the area it is only a matter of time before someone is injured either by a stray bullet or a wounded bear. Some research has shown that a wounded bear may act aggressively towards people or abandon the area all together. (BOG's 1996 Proposal 16/Gilbert 1993)

**Incompatibility:** Bear hunting and bear viewing activities are a dangerous and incongruent mix. On many occasions over the past 10 years I have unloaded passengers at the dock at Margaret Creek. Those passengers have been witness to some of the following: dead bears laying on the dock, dead bears hanging from the masts of boats tied up to the dock and eerie bear carcasses needlessly tied up to the dock underwater. Along the road we have encountered bear hunters with dead bears on the back of their ATV's. A privately owned vehicle used to transport bear viewers was stolen by a bear hunter to transport his bear down to the dock. In all, listening to gun shots, being in the range of live fire near the viewing platform, finding spent shells on the platform, being witness to dead bears and watching hunters in and around the bear viewing platform are not compatible activities. It is difficult for bear viewers to understand why the State of Alaska Board of Game still allows hunting in this area.

**Habituated Bears:** "Habituated bears are characterized by a lack of response to human presence or activity." (Aumiller 1994) "It is unclear whether all bears that become habituated to people in viewing areas are more susceptible to hunting mortality elsewhere" (Titus 1993) The potential hazards of allowing hunting near a bear viewing observatory warrants a closure of bear hunting within the Margaret Creek watershed. According to the USFS, consistency of bear-human interactions is an important guideline for management for bear viewing areas. "Humans who interact with bears should behave consistently and homogenous management encourages consistent behavior." (Aumiller 1994). Viewing bears in an area where the bear population is also hunted does not appear to be compatible under the circumstances now present at Margaret Creek. If Margaret Creek were closed to bear hunting, hunters in the area will benefit by not having negative reactions expressed by visitors when they learn that bears, being habituated to human presence, may also be hunted in the same area.

**Easy Access to Hunters:** ADF&G records indicate that bear hunters tend to target/concentrate in areas where access is easy and bears congregate. The ADF&G harvest records show from beginning in January 1, 2000 through

October 22, 2010 there have been 844 black bears harvested in Unit 1A or an average of 76 bears per year. "Hunters harvest bears throughout Unit 1A, although the highest harvests continue to come from WAA's 405(Thorne Arm), 406 (Carroll Inlet), 407 (George Inlet), and 510 (NW Revilla Island- which includes Traitors Cove)." (Black Bear Management Report 2007). Over the same time period, January 1, 2000 – October 22, 2010, 78 bears have been harvested in the Traitors Cove /Margaret Creek area an average of 7 bears per year. 7 bears per year represents 10% of all bears harvested annually in Unit 1A are being taken from Traitors Cove (Harvest Units 904,1004 &1005). There are at least 104 minor harvest units altogether in Unit 1A. Margaret Creek offers easy access for hunters with a dock, a road system and congregating bears on the salmon stream. If 10% of all bears harvested in Unit 1A are coming from Traitors Cove, this demonstrates that they are using areas that have easy access. Closing only the Margaret Creek drainage to bear hunting would still leave most of Traitors Cove open to hunting.

**Economics:** The US Fish and Wildlife published a document in July 2008 entitled "Wildlife Watching in the US: The Economic Impacts on National and State Economies in 2006." This document states "Wildlife related-expenditures in 2006 were \$45.7 billion. Expenditures on wildlife watching are equivalent to the amount of revenue from all spectator sports (football, baseball, and other sports) all amusement parks, and arcades, casinos (except casino hotels), bowling centers and skiing facilities. Nearly a third of the US population, 71 million people, enjoyed wildlife watching in 2006. This is more than 4 times greater than attendance of all National League Football teams during the 2006 season. Expenditures rippled through the economy generating more than \$122 billion in total industry output and 1,063,482 jobs. The more than 1 million jobs supported by wildlife watchers are almost three times the number of people who work for the US Postal Service. The magnitude of its economic impacts prove that wildlife watching is a major force, driving billions in spending around the country. These economic impacts can be the life blood of a local economy. Rural areas can attract thousands of wildlife watchers each year, generating millions of dollars." Wildlife watchers increased 24% from 2001 to 2006 and Trip Related Expenditures increased 38% from 2001-2006. This report includes a table listing the top ten states of economic output, Alaska is not on the list. In fact 24 states make more revenue in wildlife watching than Alaska. In 2006, of the total Wildlife-Watching Economic Expenditures Alaska saw less than 1% of the \$122 billion generated in the entire US.

The demand for wildlife viewing is growing and the current demand far exceeds the opportunities. It is time Alaska supported its wildlife viewing infrastructure and become proactive in protecting a vital resource for its future, the bears!

Over the years as logging has diminished on the Tongass, many businesses in Ketchikan have evolved to depend on tourism. The Ketchikan Visitors Bureau reports that 1,000,232 tourists visited Ketchikan in 2009. There are hundreds of Ketchikan businesses directly and indirectly involved in tourism, including land, sea and air tour companies. Currently there are 10 air taxi businesses operating in Ketchikan employing approximately 213 people. Additionally there are many ancillary businesses who depend on and benefit greatly from the air taxi companies. They include but are not limited to insurance companies, aviation maintenance, retail fuel companies, advertising & promotional companies, office supply companies, public utilities, independent tour salesman, local property taxes, licensing and permitting fees, the list goes on. Air taxi business is one of transportation, transportation of locals, loggers, tourists, hunters, etc.. The amount of air taxi revenue dollars generated during the summer months transporting tourists for bear viewing exceeds the dollars generated, over the entire year, from general transportation of locals. The combined potential revenue dollars to Ketchikan air taxi companies from all the bear viewing observatories in this area including Polk Inlet/Dog Salmon Creek, Margaret Creek/Traitors Cove, Anan Bay and Neets Bay amounts to over \$4.9 million annually. The following numbers were obtained from the USFS data and published bear viewing tour prices.

Dog Salmon/Polk Inlet	1600 visitors	(\$365 per person x 1600 = \$584,000)
Traitors Cove/Margaret Creek	3436 visitors	(\$365 per person x 4000 = \$1,254,140)
Anan Creek	384 visitors	(\$485 per person x 384 = \$147,456)
Neets Bay	8000 visitors	(\$365 per person x 8000 = \$2,920,000)
Totals for Bear Viewing	13,410 visitors	\$4,905,596 total revenue dollars

The AK Rainforest/Eagle Creek land based tour operation states they have 16,000 visitors who go to Herring Cove for bear viewing at \$100 per person x 16,000 = \$1,600,000. This brings the total bear viewing visitors up 29,410

and the revenue dollars for Ketchikan up to \$6,505,596. This amount does not include other land based or boat based operators who conduct bear/wildlife watching tours.

Ketchikan may have the largest bear viewing potential in the entire state. Wildlife viewing, in particular bear viewing, is a vital resource that we cannot afford to lose. Supporting and promoting bear viewing facilities and their infrastructure will help to ensure the future of Ketchikan's economic stability.

**Conclusion:** According to Alaska Statute AS 16.05.221 (B) which states that the Board of Game exists "For the purposed of the conservation and development of the game resources of the sate" and, according to Regulations of the Board of Game Management Requirements, Alaska Statute AS 16.05.255 (1), "The setting apart of game reserves, refuges and sanctuaries in the water or on the land of the state over which it has jurisdiction." If it is true that the Board of Game exists to conserve resources and that the first item on the Board of Game management requirements is to set aside refuges or sanctuaries, then it must be true that the Board of Game's responsibility is to manage the game not only for hunters but for all the user groups in Alaska. According to the Outdoor Industry Foundation a census done in 2005 indicates that within the state of Alaska there are 235,000 residents (or 46% of the population) who participate in wildlife viewing and 70,776 residents (or 14% of the population) who participate in hunting. The vast majority of land in Alaska is open to bear hunting. Presently there are very few closed acreages. In all of the Tongass' 22 million acres only Pack Creek (Closed in 1984) and Anan Creek (closed in 1939 & 1996) are closed to hunting. Due to lack of bears, bear viewing has dropped significantly at Margaret Creek Observatory, Dog Salmon Observatory and Whitman Hatchery enough to threaten the future of bear viewing in these areas. Setting aside established bear viewing observatories such as Margaret Creek from bear hunting addresses the needs of a user group in the Ketchikan as well as ensuring a portion of Ketchikan's economic future by providing for the viewing of bears in safety. Allowing the status quo hunting at Margaret will no longer suffice. These problems must be addressed.

#### **Literature Cited:**

Alaska Board of Game: 1996 Proposal 16-5 AAC 92.510(2)(A) Unit 1B Anan Creek Closed Area

ADF&G Board of Game Recommendations; October 1996 Proposal 16; Department Recommendation: Amend and Adopt; This proposal was adopted by the Board of Game and amended with the collaboration of ADF&G and the USFS district ranger in Wrangell.

ADF&G Unit 1A Black Bear Harvest records 2000-2010

ADF&G 2001 & 2007 Black Bear Management reports

Aumiller, LD, 1994 "Management of McNeil River State Game Sanctuary"

Bear Trails 2010, News from ADF&G

Outdoor Industry Foundation: "The Active Outdoor Recreation Economy a \$730 Billion Contribution to the Economy"- Fall 2006 (Data was collected by Southwick Associates Inc.; specializes in qualifying the economics of fish, wildlife and outdoor related activities for government agencies and industry)

Published Internet Pricing

Titus, K., 1993 "Managing bears as both game and non-game"

US Fish and Wildlife Service; July 2008 "Wildlife Watching in the US: The Economic Impacts of National and State Economics 2006"

USFS 2010 Anan Season Review: Bear Monitoring records

USFS Special Use Permits records, Ketchikan-Misty Fjords Ranger District

Drew Mathews  
Ketchikan, Alaska

RECEIVED  
OCT 12 2010  
BOARDS

Proposal 1: Change the bear baiting season dates in unit 1A.

Change from April 15 - June 15, to May 1 - June 15.

Bear baiting seasons do not need to be changed in unit 1A. I typically do not bear bait, as I prefer spot and stalk, but the two times I have hunted over bear baits were in April - early May. I did this specifically to target large male black bears as they are typically the first ones out in the spring and their hides and meat are at a premium.

I am also a trapper and as such, I feel that the slight overlap of season has little effect on trappers. I can see that bear baits near a wolf bait set may alter the behavior of wolves on few occasions, but overall I do not see a significant enough issue to limit a few bear bait hunters to a shorter season to satisfy a few trappers wish to have the area to themselves for the last 15 days of the wolf season.

As a wolf trapper, I would not mind a bear bait in the area as it may bring wolves to the area and they may mill around and get caught in my snares. I appreciate both user groups and would not wish to pit one user group against the other for 15 days that both user groups are enjoying the resources of our great state.

Proposal 2: Shorten hunting seasons near certain bear viewing areas in Unit 1A.

In regards to areas in Carroll Inlet and Neets Bay, I am an avid bear hunter and bear viewer. I spend lots of time each year hunting and taking photographs. I specifically use the Carroll Inlet area specified in this proposal for both activities. I am a supporter of tourism and the use by wildlife viewers, and I am an advocate for bear hunters.

I view this proposal to take something away from one user group to very slightly benefit another user group. I disagree with this as the resource belongs to the people, not just some people. It appears that one user group wants to ensure "money bears" or bears that are more consistently viewable. As a bear viewer, I have to be able to find the bears, typically in the evening hours, in order to photograph them. In order for me to view the bears, I have to hunt for them first "locate" then view them. The user group that wants to change the bear seasons, typically operates during business hours, which is not the prime time for bear viewing as the bears are not as easy to find during the middle of the day. Part of viewing bears is the unknown. Am I going to see one, can I find one. Just because some users have a very limited amount of time to find a bear should not be the reason the other user group can't use the resource. Reducing the season may reduce the harvest in the area, potentially increasing the bear sightings, but should not be done at the expense of another user group. In the proposal it talks about viewers and

hunters avoiding the unpleasant experience of encountering each other and their incompatible uses. I disagree. Seeing someone watch bears does not bother hunters. The other side of this is the fact that to enforce this regulation would be an enforcement nightmare and take away from the Alaska Wildlife Troopers ability to enforce regulations that need enforced.

Proposal 3: Close a portion of Unit 1A to bear hunting.

This regulation is similar to prop. 2 and can be address similarly. There are a few exceptions. I live in the habitat near this area and feel that the bear viewing is a great thing. I do it yearly. I know some bears are killed in this area by hunters, but there is no over harvest in this area. Currently there is a regulation in place to keep big game hunters from hunting ¼ mile from the S. Tongass Highway. Nothing needs to change. From what I know, most of the bears killed near this area are taken by people that live in the area and live with the bears year round, putting up with them around their pets, house and kids. A few bears killed in the area may improve public safety and does not stop people from viewing the bears when they are on the fish. Some bears may get smart and come at night, but there are still bears there during the day, typically younger bears that get a chance to feed when the older smarter bears are hold up waiting to come out when less people are around. It was also mentioned that some of the area is private property and posted. If someone hunts on your place, deal with them for trespassing as it is posted. Don't stop the legal hunting that goes on. There is no need to close this area to hunting.

Proposal 4: Close the Margaret Creek Drainage area in Unit 1 to bear hunting.

Deal with the public safety issue of discharge of firearms near the viewing area as I think has already been done. Again one user group wants to have "money bears." I would rather see a small area closed to the discharge of firearms for public safety ¼ mile from the viewing area, than to see one user group get exclusive access to the resource. This is a public resource and should be managed as such. The tourism industry puts a monetary value on the resource. To hunters, the monetary value typically does not exist, but is priceless.

Proposal 5: Close an area within the Misty Fjords National Monument in Unit 1 to brown bear hunting.

Again one user group wants "money bears" in that they want more bears in the area. More bears are not always better. This proposal would close square several miles of prime hunting habitat. This is a prime hunting area and a good viewing area. The tourist season and the hunting overlap slightly in this area. During the time the tourist season is going on there are about three months of black bear hunting opportunities and five months of tourist viewing opportunities. Brown bear season barely overlaps with the tourist season. The number of total bears harvested from this proposed closed area is very few as this is a great area to hunt but very remote and thus the number of hunters is somewhat limited. I have been in this area in the spring and summer and have found ample opportunities to view bears. I

understand that the non-hunter user group wanting this area closed to provide better viewing, which may occur as human interaction may not scare the bears away as fast if they did not have any hunting pressure, but the last time I was there, a plane was beached near a feeding bear, very close, and the tourist were able to get some great photos, as was I. These bears are subjected to more activity from tourism than in other areas, but there are many areas for bear viewing in S.E. Alaska. As is stated in this proposal, there are 2.2 million acres in Misty Fjords that they could be bear viewing in and they want to make one area dedicated to one user group. Most bears use the area after the normal business hours, thus accounting for many viewers not seeing bears. You can't expect to see a bear if you only spend 1-2 hours or less in the outdoors.

Every year I am hunting bears, I have planes buzz me when I am bear hunting. I am not hunting in the area proposed to be closed, but I do not complain or wish them to give up their time of areal viewing just to benefit me. I feel both user groups can utilize the same areas and without conflict. Again, part of the argument in this proposal is the amount of money generated per user group. This is not a money issue, it is a public resource use issue and all user groups should have the right to use this resource responsibly.

Proposal 6: shorten the deer hunting season in Unit 1A.

I know hunters want a larger deer population in 1A, but I am not sure shortening the season would do much to improve the herd health. I feel that the good wolf and bear populations and a few poor winters have dampened deer numbers but the herd should still be able to rebound where despite hunting pressure in December. I would argue that the illegal harvest of does year round is more detrimental than the legal harvest of bucks in December. Do not shorten the season, or if shortened, shorten only to Dec. 15 when many of the Bucks have dropped their antlers.

Proposal 7: Hunting season and bag limits for goat in a portion of Unit 1A.

Please address this issue as the decrease from 25 tags to 4 tags was unreasonable when the population has been stable and/or expanding.

Proposal 8: Lengthen the wolverine trapping season in Unit 1A.

I can live with the current season or with an expanded season. The presence of wolverine with or without a season does not affect my trapping practices or techniques. I do not want to see an over harvest of Wolverine, but I am not opposed to a longer season unless the take of increased number of females becomes evident.

Proposal 9: Raise the management objective for wolves in Unit 1A

This would be a good thing. Wolf numbers are very high in unit 1A and can withstand the pressure and even flourish under a 30 wolf management objective.

Proposal 10: Designate a Juneau area in Unit 1C under discretionary permit conditions for trapping.

As Juneau grows, more restrictions have been placed upon trappers. When I lived there, there were a ton of places that had good mink populations that were closed to trapping, thus not allowing a resource to be used. I agree with public safety, but I have yet to have a trap do any damage to me when I stepped on it. I think they are meaning pet safety not public safety. Trapping season is open for a short period of time and the season information is available to all. As a pet owner, I understand that when I take my pet in the woods, I need to be careful as there may be traps in the woods. Posting signs does not work, but encourages persons to look for your gear and tamper with it or steal the gear. It is noted that non-trappers with pets view this as a conflict, but to a trapper, a pet getting in his gear is a conflict as the pet was not being handled responsibly and actually interfering with the trappers gear. Most trappers try to keep their gear out of sight and out of mind, but some new trappers have not learned this yet. Education is the key. If areas accessible to fathers trapping with kids or kids learning to trap are all closed off, there will be no new trappers. Don't let inexperienced trappers and pet owners that are not acting responsibly close an area down. These conflicts are typically few and far between and education of pet owners and new trappers may be a better option.

Proposal 11: Add the Treadwell Ditch Trail to the list of trail areas closed to trapping in Unit 1C

As Juneau grows, more restrictions have been placed upon trappers. When I lived there, there were a ton of places that had good mink populations that were closed to trapping, thus not allowing a resource to be used. I agree with public safety, but I have yet to have a trap do any damage to me when I stepped on it. I think they are meaning pet safety not public safety. Trapping season is open for a short period of time and the season information is available to all. As a pet owner, I understand that when I take my pet in the woods, I need to be careful as there may be traps in the woods. Posting signs does not work, but encourages persons to look for your gear and tamper with it or steal the gear. It is noted that non-trappers with pets view this as a conflict, but to a trapper, a pet getting in his gear is a conflict as the pet was not being handled responsibly and actually interfering with the trappers gear. Most trappers try to keep their gear out of sight and out of mind, but some new trappers have not learned this yet. Education is the key. If areas accessible to fathers trapping with kids or kids learning to trap are all closed off, there will be no new trappers. Don't let inexperienced trappers and pet owners that are not acting responsibly close an area down. These conflicts are typically few and far between and education of pet owners and new trappers may be a better option.

Proposal 12: Allow the use of snare for taking wolves in Unit 1C

I am in favor of using snares for wolf trapping. Foot holds can be difficult to use in this area and snares may be more effective. Break away snares may be a solution to possible moose conflicts. Reporting of Moose kills by traps is required by law, and using a moose killed in a snare as bait is illegal.

Proposal 18: modify wolf regulations in Unit 2

I am ok with requiring sealing within 14 days, but I am suspect of the limit change. The majority of wolves harvested from Unit 2 are not taken under a trapping license or season, but are taken under the federal subsistence regulations. Much of unit 2 has good wolf numbers, but there are places in the central area that seem to be down a bit. One area I was informed by the ADF&G biologist that was showing low scat observations (supposedly relating to low wolf numbers) had the highest number of wolves this year that I had ever documented in that area since I started hunting that area in 1988. Where they thought there were low wolf numbers there were two nice sized packs and some lone wolves (Polk Inlet area). The central area seems to be down in numbers. I know the Stanney Creek area wolf sign has been down for a few years as compared to my observations from 1988-2007.

Deal with the USFS in getting their management plan for wolves in line with the States objectives as putting lower limits on non-subsistence trappers is not the solution. Also deal with the want and waist and the few illegal trappers. This could be assisted by the USFS requiring all traps to be marked as is required by non-subsistence trappers.

This proposal will have little to no immediate effect on wolf populations as stated by ADF&G. The answer is to work with the USFS and their subsistence board to come up with a joint management plan.

Proposal 19: Close the Dog Salmon Creek area to bear hunting in Unit 2.

Here we go again with "money bears" being the issue. There is an area closed shooting to deal with the public safety issue already in place. The sponsor of this proposal went to ADF&G to find another place to view bears after they exceeded their use days, and were caught, in the Marguerite Bay. ADF&G, from what I hear, suggested Dog Salmon as another place to go. The state can close bear hunting in the area, but subsistence hunting for bear could still continue. Bear hunters were using that area long before sightseeing tours were and I feel both user groups can continue to use the area with little conflict. I have yet to hear a hunter complain about a person viewing a bear in the area as a conflict. Hunters do the same thing, they view bears. Closing this area is not the answer. Keep the area posted with public safety signs, but do not stop bear hunting. People also deer hunt this same area and they did not ask to close that because they are not looking for money deer, just money bears.

They say hunters can go somewhere else, the same is true for tourist, but that is not what hunters are asking for. Hunters want to use the area together.

Proposal 20: Set a number of tags to be allocated for black bear hunting in Unit 2

Parts of Unit 2 have good bear populations but other areas are down considerably. I know the total bear harvest is greatly affected by the number of takes by non-residents. Suggestion: Allow residents to have a 1-2 bear limit, Allot non-resident tags to guides based upon their permit number of bears, implement a non-resident drawing. Do away with the sale of black bear parts as this may cause an increased bear harvest by some. Bears should not be hunted for money, period. This is coming from a hunter that has tons of bear parts that I could legally sell, but refuse to do so because it is not right.

Proposal 21: Shorten the opening of black bear season in Unit 2.

Do not change the season. Parts of Unit 2 have good bear populations but other areas are down considerably. I know the total bear harvest is greatly affected by the number of takes by non-residents. Suggestion: Allow residents to have a 1-2 bear limit, Allot non-resident tags to guides based upon their permit number of bears, implement a non-resident drawing. Do away with the sale of black bear parts as this may cause an increased bear harvest by some. Bears should not be hunted for money, period. This is coming from a hunter that has tons of bear parts that I could legally sell, but refuse to do so because it is not right.

Proposal 22: Shorten the black bear hunting season in Unit 2:

Do not change the season. Parts of Unit 2 have good bear populations but other areas are down considerably. I know the total bear harvest is greatly affected by the number of takes by non-residents. Suggestion: Allow residents to have a 1-2 bear limit, Allot non-resident tags to guides based upon their permit number of bears, implement a non-resident drawing. Do away with the sale of black bear parts as this may cause an increased bear harvest by some. Bears should not be hunted for money, period. This is coming from a hunter that has tons of bear parts that I could legally sell, but refuse to do so because it is not right.

Proposal 23: Change the black bear hunt in Unit 2 to a registration hunt and shorten the season dates:

Bear tags and reports are currently required.

Suggestion to deal with the issue: Allow residents to have a 1-2 bear limit, Allot non-resident tags to guides based upon their permit number of bears, implement a non-resident drawing. Do away with the

sale of black bear parts as this may cause an increased bear harvest by some. Bears should not be hunted for money, period. This is coming from a hunter that has tons of bear parts that I could legally sell, but refuse to do so because it is not right.

Proposal 24: Lower the non-resident bag limit for deer in Unit 2:

I do not feel that the total number of deer harvested by non-residents is a big issue. They pay a bunch for the tag, enjoy the hunt, support the community and the total number of deer harvested is not that great and only represents a very small percentage of all deer killed. There are more deer killed by people using spotlights or other illegal takes than all non-residents kill in one year.

Proposal 25: Modify the wolf trapping and hunting regulations for unit 2

The majority of wolves taken in Unit 2 are not taken under a trapping license or season, but are taken under the federal subsistence regulations. Much of unit 2 has good wolf numbers, but there are places in the central area that seem to be down a bit. One area I was informed by the ADF&G biologist that was showing low scat observation (supposedly relating to low wolf numbers) had the highest number of wolves this year that I had ever documented in that area since I started hunting that area in 1988. Where they thought there were low wolf numbers there were two nice sized packs and some lone wolves (Polk Inlet area). The central area seems to be down in numbers. I know the Stoney Creek area wolf sign has been down for a few years as compared to my observations from 1988-2007. Deal with the USFS in getting their management plan for wolves in line with the States objectives as putting limits on non-subsistence trappers is not the solution. Also deal with the want and waist and the few illegal trappers. This could be assisted by the USFS requiring all traps to be marked as is required by non-subsistence trappers.

This proposal will have little to no immediate effect on wolf populations. The real problem is the issues that need to be dealt with between the State and the USFS/subsistence board. I recommend the State and the game board work with the USFS/subsistence board and address the issue.

Proposal 28: Modify the department policy for setting allowable harvest for brown bear in Unit 4.

I would agree with this proposal.

Proposal 29: Change the opening date for beaver trapping from December 1 to November 1 in Units 1-5.

I would agree with this proposal. The fur should be prime by then and the beavers are not under ice and the access is not totally blocked off by snow in November and would allow for a little more access to trappers.

Proposal 30: Open trapping season for fisher in Southeast Region Units.

Most fisher would likely be bycatch to martin trapping and be dead upon checking the traps. Having a fisher season would eliminate the waste of this bycatch and enable a trapper to use the fur or sell it. Put in a sealing requirement for fisher so ADF&G could capture the harvest rates.

Proposal 31: Prohibit the use of traps with an inside jaw spread of less than 5 7/8 inches when mink and marten trapping is closed.

This proposal heading sucks vs. the regulation change wording. It will not accomplish ADF&G's goal of keeping martin/mink traps out of the woods pre or post season. A person trying to cheat the system would still be able to use small traps for red squirrel and etc. and the intent of the law would not accomplish the mission. Who cares what size trap catches a wolf or wolverine. The real issue is to help enforcement charge persons trapping marten pre or post season and eliminating their excuses for having traps set early.

This needs some re-writing before it would work. Something like this might help: Prohibit the use of foothold traps with an inside jaw spread of less than 5 7/8 inches and body grip traps with an inside jaw spread of less than (whatever a 280 con is) when mink and marten trapping season is closed. Do not prohibit the use of Flat traps (ie. Rat traps as some people trap squirrels etc. Got to remember beaver trappers can set traps as well and the season is longer than mink and marten. Get it right before implementing a new regulation. I give a pat on the back to ADF&G for trying to solve a problem, but the proposed wording would not come close to working.

Proposal 36: Black bear hunting changes.

Suggestion to deal with the issue: Allow residents to have a 1-2 bear limit, Allot non-resident tags to guides based upon their permit numbers of bears, implement a non-resident drawing in areas where populations are a concern.

Proposal 37: Open a nonresident permit hunt for black bear in Units 1-3 & 5

Good with this as long as it is unguided nonresidents only.

Proposal 39: Disallow the hunting of black bear over bait.

Please to not take this opportunity away from bear hunters. Not all hunters hunt this way, but I would like to see this continue as it is a good opportunity for many hunters especially handicapped hunters, young hunters and archery hunters. It also allows a hunter to look over a bear for size and quality and observe them to try and ensure they do not take a sow with cubs.

Proposal 40: Modify the salvage requirement for black bear in Southeast region Units.

No problem with the salvage of spring bears. Most bears are as good to eat in June as they are in May with a few exceptions in areas that have early fish runs. It is a salvage rule, not a consumption rule. Some bears are just not worth eating even in the spring, but many are very good. I even salvage the meat in the fall season on the bears that do not smell like rotten fish. Do not impose this requirement in the fall part of the season.

Proposal 41: Replace the deer hunter survey with deer harvest reports in Units 1-5

Please do change this. Also allow on-line reporting.



Gustavus, Alaska 99826  
October 14, 2010

Attn: Board of Game Comments  
Alaska Dep't of Fish & Game  
Boards Support Section  
Box 115526  
Juneau, AK 99811

RECEIVED  
OCT 19 2010  
BOARDS

Dear Ms. Tibbles:

Please include these comments in the on-time packet for the upcoming SE Regional Board of Game meeting. Thank you.

**Proposal 12**

I support, in principle, the proposal to re-instate wolf snaring in Unit 1C, Gustavus Forelands, for these reasons:

- 1) The present wolf population provides an additional harvest opportunity.
- 2) Wolves are a likely factor in the recent decline in moose recruitment. The moose herd now seems to have declined to the point of allowing forage recovery, and further decline may unnecessarily remove a meat source for the community. Removing some wolves in winter would remove some predation pressure during the winter/spring season when one would expect predation on young moose to be greatest.
- 3) The new breakaway snares seem likely to greatly reduce moose bycatch (but not of smaller non-target species).

My support is conditioned on appropriately dealing with the following issues:

- 1) In my view, the snaring reinstatement would be to allow harvest opportunity, and not confused with a wolf population reduction program. Since these wolves likely range largely in Glacier Bay National Park where management objectives include maintaining substantially natural populations, there should be a monitoring /reporting regime in place that holds yearly harvest to no more than 25% of the total wolf population, so as not to precipitate a multi-year population decline. This harvest limit should include wolf mortality from all harvest activities, hunting trapping and snaring.
- 2) This program has a high potential for local polarization unless it is confined to the fringes of town and uses very well-marked set spots. The proponent of this proposal is an experienced local trapper, and can help outline proper limits and guidelines in consultation with ADFG.
- 3) Snaring should be set for a 2-year trial that is sunsetted after the next SE Regional BOG meeting unless re-instituted at that time. There should be a regime for a) reporting snaring bycatch during the trial period to gauge the effectiveness of the new snare design in our environment, for moose as well as smaller species; and b) seeing if there has been public acceptance for the program.

## Black Bears, Proposals 33 - 37

Evidence is accumulating that black bear populations are in decline in places throughout the region. In northern SE, this may be exacerbated by competition with an increasingly evident brown bear population. In my view, further conservation measures are warranted under these circumstances, including direct and indirect restrictions on harvest.

Regarding proposals **33 & 34**, I support prohibiting for-sale use of any parts of carcasses of sport-harvested black bears. I agree with the proponents' rationale that the opportunity to sell these parts is an inducement to harvest beyond one's personal use and need.

Regarding proposals **35**, I support reducing the resident bag limit to one bear per year. This is warranted under the present circumstances; one bear a year is plenty for most people, and should be adhered to except, perhaps, in times of particular bear abundance.

Regarding proposals **36 & 37**, among the various tools mentioned, I support cessation of bear baiting and implementing a drawing hunt for non-residents. These actions would eliminate the most ethically compromised harvest method (baiting), and further regulate the type of hunt (non-resident non-guided) most likely to cause unnecessary mortality.

Thank you for this opportunity to comment.



Sincerely,  
Greg Streveler  
Box 94, Gustavus

10-10-10

RECEIVED  
OCT 19 2010  
BOARDS

Mr. Cliff Judkins, Chair  
Alaska Department of Fish and Game  
Board Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Dear Mr. Judkins:

I read about Alaska's black bear problem in a Saturday, October 9, 2010 article in the Denver Post newspaper.

Even though I do not live in Alaska, I would very much appreciate it if you would listen to my feelings about the possibility of reducing the numbers of black bears through the use of leg traps.

Black bears are like any other living creature, like us. Hunting for other animals in order to eat is just part of their nature.

I understand that there are too many black bears in Alaska, but there are better and more humane ways of bringing their numbers down.

I really hope that your department of fish and game will consider this idea: You can trap the black bears in live traps and find a nice home for them or, if necessary, hunt for them during a big-game hunting season. Since Alaska is a source of oil, the money it earns from selling oil should be used to help pay for this idea.

I think that bear cubs, especially, should not be trapped in leg traps because they are doing no harm to the moose and caribou. I think that the mother bear also should not be trapped in a leg trap because then it can't feed her cubs and her cubs will be orphaned.

I also think that a black bear should not have to try to escape the trap by having to chew off its paw. The reason that I think that is that it is very cruel and the bear does not deserve to lose its ability to feed itself or its cubs.

I would hate to see another state besides Maine being allowed to use leg traps. I am very sorry that Maine allows leg traps.

Mr. Judkins, thank you very much for taking your time to read my letter.

Yours truly,

*Aaliyah M. Chavez*

Aaliyah Chavez, a 5<sup>th</sup> grader in Jefferson county school

7055 West 5<sup>th</sup> Ave

Lakewood, CO 80226

RECEIVED  
OCT 19 2000  
BOARDS

Hollie McGee  
1188 Crescent Drive  
San Jose CA 95125

October 11, 2010

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
(907) 465-4110  
(907) 465-6094 FAX

RECEIVED  
OCT 19 2010  
BOARDS

To Whom It May Concern,

I am writing to express my vehement opposition to the proposed reinstatement of bear trapping to control the overpopulation of bears in Alaska. Trapping is a cruel and inhumane practice and should be abolished.

Not only does the animal suffer excruciating pain when its leg or paw is ensnared in the trap, it could suffer a long and painful death from dehydration or starvation if not found immediately. Some animals will even chew off their own limb to escape.

I urge you to seek an alternative to trapping; No living creature deserves to be tortured and killed this way.

Sincerely,



Hollie McGee



To: Alaska State Board of Game, ( BOG ) Members  
Re: Positions on regulation proposals for SE Region BOG meeting cycle

From: Jenny Pursell  
P.O. Box 33578  
Juneau, AK 99803

RECEIVED  
OCT 19 23:0  
BOARDS

October 12, 2010

Dear Chairman Judkins and Board of Game Members,

My name is Jenny Pursell and I am a 9 year resident of Juneau, Alaska. I have participated in all SE region BOG meetings since 2002. I am a sitting member on various wildlife management and wildlife advocacy related boards and advisory committees; two of which are directly related to the ADF&G and state BOG system. I am serious about my work concerning wildlife management, wildlife conservation, and advocacy. I consider myself to be a 'bridge builder' in wanting to work with different wildlife user groups to devise management plans in which all user groups are represented with the paramount goal of ensuring sustainable yield and that healthy wildlife populations remain intact. With this in mind I ask that you take consideration of my positions on the following SE REGION regulation proposals.

Proposal #2: Support- this proposal will enhance specific bear viewing areas in GMU 1A as it will shorten the black and brown bear hunting seasons while still enabling bear hunters to reach bag limits in adjacent areas. This proposal considers both user groups.

Proposal #3: Support- this would enhance black bear viewing for a private business which owns a bear sanctuary in GMU 1A by closing a portion of the area to bear hunting. Bear hunters could continue to hunt in other open areas. This proposal would lend to the wildlife viewing tourism economy of the Ketchikan area.

Proposal #4: Support- this would close an area in 1A to brown bear hunting for viewer safety at an established bear viewing area- I believe that public safety should be paramount in wildlife management plans

Proposal #5: Support- this would close an area in Misty Fjords National Monument to brown bear hunting for wildlife viewing which would enhance tourism related economics in the Ketchikan area. Brown bear hunters could hunt in adjacent areas.

Proposal #6: Support- a conservation effort in managing deer in Unit 1A to help boost deer populations over the long term

Proposal #7: Oppose- I oppose increasing permits for goat hunts in Unit 1A until population surveys re done

Proposal #8 Oppose- the lengthening of wolverine season in U1A by 2 months as there is no biological justification for this. The BOG shortened the season by 2 and ½ months in 2008 for conservational reasons.

Proposal #9: Oppose- there is no scientific justification to increase wolf bag limits in U1A by 5

Proposal #11: Support- would create a ¼ mile buffer zone prohibiting trapping along the Treadwell Ditch Trail on Douglas Island which is a heavily used recreational trail including use by dog walkers. This trail has had recent renovations which will likely increase usage and the buffer zone will provide a public safety component.

Proposal #12: Oppose- would reinstate 'breakaway' snares for wolf trapping within the Gustavus Forelands. These traps pose a public safety risk for dogs and incidental catch.

Proposal #13: Support- would clarify a hunting area in the Peterson Creek area. Submitted by State Wildlife Troopers.

Proposal #14: Oppose- would extend the brown bear hunting season in Berners Bay by 3 weeks. The brown bear population in Berners Bay is unknown and thought by the ADF&G to need a conservational approach in its brown bear management.

Proposal #15: Support- would mandate GPS coordinates for black bear bait stations in U1D. This would save State Wildlife Troopers time in assessing bait station compliance with regulations.

Proposal #16: Support- would allow for a few permit hunts for goat in U1C while providing wildlife viewing opportunities and maintaining a healthy goat population

Proposal #17: Support- would lend management consistency to a goat management area. Submitted by the ADF&G.

Proposal #18: Support- would establish conservational measures re the Alexander Archipelago wolf on Prince of Wales Island. The ADF&G is concerned with the significant decrease of this subspecies, which may if measures are not enacted, be listed on the threatened or endangered species list. Should this occur then this would impact all user groups and the state of Alaska.

Proposal #19: Support- there is great concern re the decreasing black bear population on Prince of Wales Island, ( POW ). A wildlife viewing business wants to create a no hunting buffer zone for black bear around a viewing platform on Dog Salmon Creek. The bears frequenting this viewing platform area are habituated to humans. It is unsportsmanlike to hunt such bears which also decreases the number for wildlife viewing. Wildlife viewing businesses lend to the economic benefit of POW.

Proposal #21: Support- would shorten black bear season on POW by 1 month. There is a concern re the decreasing black bear population on POW. This proposal lends a conservational measure re that concern.

Proposal #22: Support- same as #21 re black bear conservation efforts on POW. Ending the season on May 31 v/s June 30 would lower the take of sows and bears with rubbed hides, which are not of prime value.

Proposal #23: Support- another black bear conservation effort on POW- would shorten the season and would make it a 'registered hunt' in which the ADF&G would get more information which will assist in better management

Proposal #24: Support- reduces bag limit for non-residents on POW to 2 antlered deer annually- this is a deer conservation effort as deer on POW are heavily hunted by local hunters.

Proposal #25: Support- would place conservational measures for Alexander Archipelago wolves inhabiting POW. If measures are not implemented this subspecies could be listed on the threatened or endangered species list. This listing would impact all user groups as well as the state of Alaska. The ADF&G is concerned re the significant decrease of these unique wolves on POW.

Proposal #26: Oppose- there is a concern re the decreasing black bear population in the SE southern panhandle. This proposal would open a now closed area in Unit 3. All conservational efforts for black bear should remain in Unit 3.

Proposal #27: Oppose- extending wolf season by 1 month in Unit 3 has no scientific justification.

Proposal #28: Oppose- would eliminate the number of brown bear killed due to the 'defense of life and property' law in Unit 4 when formulating the annual harvest cap for brown bear. This should be rejected as it is not in the best interest of maintaining a healthy bear population.

Proposal #31: Support- this conserves mink and marten that otherwise could be trapped during the closed season by eliminating traps for wolverine and wolf with an inside jaw spread of less than five and seven eights inches during any closed mink and martin season in Units 1-5

Proposal #32: Support- this would revert the current waterfowl hunting season back to its initial season of Sept.1-Dec.16 rather than continue the current season dates of Sept.16-Dec.31. Many folks in Juneau are concerned that the current season going to the end of December is hard on Canada geese who use the Mendenhall Refuge to rest and feed in the winter.

Proposal #33: Support- this would prohibit the trapping of and the selling of black bear meat, hides, skulls, and other parts in all of SE. There is concern of a declining black bear population in SE- to allow black bear to be trapped so that meat and hide can be sold for monetary gain will likely decrease the bear population even more. Incidents of illegal

hunting and poaching are likely to increase placing more burden on the already burdened State Wildlife Troopers.

Proposal #34: Support- for the same reasons stated in #33

Proposal #35: Support- this is a black bear conservation effort as submitted by the ADF&G

Proposal #36: Support- black bear harvest levels need to be reduced in Units 1-3 and 5. I commend the ADF&G's proposal efforts to conserve black bear harvest through shortening seasons, implementing a draw hunt for non-residents, and closing bear baiting in Units 1A, 1B, 2 and 3.

Proposal #37: Support- I commend the Alaska Professional Hunters Association, Inc. for submitting this proposal which addresses some conservation measures for black bear. This proposal would implement a non-resident permit hunt for black bear which would provide educational components re the gender biology of black bear as well as the wounding loss law for out of state hunters. It also would decrease the number of non-resident hunters.

Proposal #38: Support- would mandate GPS coordinates for black bear baiting stations. This proposal will save State Wildlife Troopers time in finding bait stations to assess regulation compliance and also lend some additional safety factors for the Troopers and other 'need to know' entities.

Proposal #39: Support- would disallow the baiting of black bears in Units 1,2, and 3. I consider this to be a black bear conservation tool which is important due to the declining black bear population in the SE region. This proposal would also address the habituation of black bears to human food which creates problems and jeopardizes safety factors for both bears and humans.

Proposal #40: Support- This proposal addresses 'wanton waste' in the field as well as placing an extra condition on black bear hunters, which may result in decreasing black bear hunting. This would be positive as there is concern due to the declining black bear population in SE.

Proposal #41: Support- creates a better management tool to estimate deer populations and therefore the ADF&G can better manage for sustainability.

Proposal #43: Support- Decrease wolf hunting/trapping season by 2 months, i.e. revert back to original season of Sept.1-March 31 v/s the current season of August 1- April 30. If the season is not shortened orphaned wolf pups will continue to starve and die inhumanely in the summer and early fall. Pregnant full term females will continue to be shot in April and hunters will continue to take wolves with less than prime fur. The SE Alexander Archipelago wolf population will continue to be targeted and conservation concerns may arise as this is a unique subspecies of the timber wolf and if

hunting/trapping regulations remain too liberalized this subspecies may become threatened or endangered putting it at risk for threatened or endangered species listing..

Thank you for your time and consideration regarding my positions on the SE regulation proposals.

Sincerely,

A handwritten signature in cursive script that reads "Jenny Pusee". The signature is written in black ink and is positioned to the right of the word "Sincerely,".





IN REPLY REFER TO:

# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

1011 E. Tudor Road  
Anchorage, Alaska 99503-6199



FWS/OSM 10081/CA

OCT 7 2010

RECEIVED

OCT 12 2010

BOARDS

Mr. Cliff Judkins, Chair  
Alaska Board of Game  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Dear Chairman Judkins:

The Alaska Board of Game is scheduled to meet November 5-9, 2010, to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Southeast Region. We have reviewed the 48 proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal Subsistence users and wildlife resources. Our comments are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact Chuck Ardizzone, Wildlife Liaison, 907-786-3871, with any questions you may have concerning this material.

Sincerely,

Peter J. Probasco,  
Assistant Regional Director

Enclosure

cc: Denby Lloyd, ADF&G  
Tim Towarak, Chair, FSB  
Kristy Tibbles, Board Support Section  
Tina Cunning, ADF&G  
Interagency Staff Committee  
Chuck Ardizzone, OSM

TAKE PRIDE  
IN AMERICA 

PC 59

**RECOMMENDATIONS**

**ALASKA BOARD OF GAME PROPOSALS**

**Southeast Alaska Region**

**November 5-9, 2010**

**Ketchikan, Alaska**

**U.S. Fish and Wildlife Service Office of Subsistence Management (OSM)**

**Proposal 11 - 5 AAC 92.510 Areas closed to hunting.** Add the Treadwell Ditch Trail to the list of trail closures to trapping in Unit 1C:

**Current Federal Regulation:**

**Unit 1C, Juneau area,** the trapping of furbearers for subsistence uses is prohibited on the following public lands:

- *A strip within one-quarter mile of the mainland coast between the end of Thane Road and the end of Glacier Highway at Echo Cove;*
- *That area of the Mendenhall Valley bounded on the south by the Glacier Highway, on the west by the Mendenhall Loop Road and Montana Creek Road and Spur Road to Mendenhall Lake, on the north by Mendenhall Lake, and on the east by the Mendenhall Loop Road and Forest Service Glacier Spur Road to the Forest Service Visitor Center;*
- *That area within the U.S. Forest Service Mendenhall Glacier Recreation Area;*
- *A strip within one-quarter mile of the following trails as designated on U.S. Geological Survey maps: Herbert Glacier Trail, Windfall Lake Trail, Peterson Lake Trail, Spaulding Meadows Trail (including the loop trail), Nugget Creek Trail, Outer Point Trail, Dan Moller Trail, Perseverance Trail, Granite Creek Trail, Mt. Roberts Trail, Nelson Water Supply Trail, Sheep Creek Trail, and Point Bishop Trail.*

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

**Impact to Federal subsistence users/wildlife:** Restricting access may adversely affect subsistence users trapping under State regulations by making it more difficult to run traplines in this area. This will not affect Federally qualified subsistence users trapping under Federal regulations.

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

**Rationale:** This proposal suggests the closure would be for the safety of the public, mountain bikers, hikers, joggers and dog owners in the community and is not based on conservation concerns for furbearers in the unit. If adopted the closures would only apply to Federally qualified subsistence users trapping under State regulations. If the Board adopts this change, the Federal Subsistence Board would need to take parallel action in order for these changes to be applicable to Federally qualified subsistence users. However, ANILCA Title VIII ANILCA Title VIII §802 (2) states –

*nonwasteful subsistence uses of fish and wildlife and other renewable resources shall be the priority consumptive uses of all such resources on the public lands of Alaska when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of*

*such population, the taking of such population for nonwasteful subsistence uses shall be given preference on the public lands over other consumptive uses;*

Consequently closing additional lands to trapping is not an action the Federal Subsistence Board would likely support, unless there is a legitimate public safety concern.

---

**Proposal 15—5 ACC 92.044 Permit for hunting black bear with the use of bait of scent lures.** Require GPS coordinates for baiting black bears in Unit 1D.

**Current Federal Regulation:**

**General Provisions**

***Restrictions for Baiting of Black Bear***

- No person may establish a black bear bait station unless they first register their site with ADF&G.
- A person using bait shall clearly mark the site with a sign reading BLACK BEAR BAIT STATION. The sign should display the person's hunting license number and their ADF&G assigned number.
- You may only use biodegradable materials for bait. Only the head, bones, viscera, or skin of legally-harvested fish and wildlife may be used for bait.
- No person may use bait within one-quarter mile of a publicly maintained road or trail.
- No person may use bait within one mile of a house (or other permanent dwelling), campground, or developed recreational facility.
- When hunting is completed, a person using bait shall remove all litter and equipment from the bait station site.
- No person may give or receive payment for the use of a bait station, including barter or exchange of goods.
- At any one time, no person may have more than two bait stations with bait present.

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

**Impact to Federal subsistence users/wildlife:** Requiring GPS coordinates for bait stations in Unit 1D may adversely impact subsistence users who are baiting black bears in the unit and do not have a GPS to record their bait stations exact location. However, providing bait station coordinates would allow law enforcement to locate the sites much easier and help ensure they comply with all the regulations, including clean-up of the sites at the end of the season.

**Federal Position /Recommended Action:** The OSM recommendation is to **oppose** the proposal.

**Rationale:** Federal subsistence users are required to register any black bear bait station sites with the Alaska Department of Fish and Game. If this proposal is adopted as written Federal Subsistence users would be required to register their bait stations with ADF&G then provide GPS coordinates of their bait site to the Alaska Department of Natural Resources. If the Board adopts this proposal it would make more sense to have individuals report the GPS coordinates of their bait stations to ADF&G while registering their bait station.

---

**Proposal 16—5 ACC 85.040. Hunting seasons and bag limits for goat.** Change the registration permit to a drawing permit for goat in Unit 1C.

**Current Federal Regulation:**

**Goat – Unit 1C**

*Unit 1C—that portion draining into Lynn Canal and Stephens Passage between Antler River and Eagle Glacier and River, and all drainages of the Chilkat Range south of the Endicott River—1 goat by State registration permit only.* Oct. 1–Nov. 30

*Unit 1C—that portion draining into Stephens Passage and Taku Inlet between Eagle Glacier and River and Taku Glacier.* No Federal open season

*Unit 1C remainder—1 goat by State registration permit only.* Aug. 1–Nov. 30

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

**Impact to Federal subsistence users/wildlife:** Currently Federally qualified subsistence users are required to obtain a State registration permit to hunt goat in Unit 1C. If the permit is converted to a drawing permit the chances of a Federal Subsistence user being able to obtain a permit would be greatly reduced.

**Federal Position /Recommended Action:** The OSM recommendation is to oppose the proposal.

**Rationale:** If this proposal is adopted it would adversely affect Federal subsistence users by eliminating the State registration permit in the area, which is used to report Federal subsistence users goat harvest. If the Board changes the registration permit to a drawing permit the Federal Subsistence Board would need to take action to address Federal goat regulations in the area, specifically reporting requirements for Federally qualified

subsistence users. This would likely result in the use of a Federal permit to manage subsistence goat harvest in the area.

---

**Proposal 18—5 AAC 84.270. Furbearer trapping, and 5 ACC 92.170 Sealing of marten, lynx beaver, otter, wolf and wolverine.** Modify wolf regulations in Unit 2 to: 1) Reduce annual bag limit for wolf trapping from unlimited to 10 wolves/season: and 2) Require sealing within 14 days of harvest.

**Current Federal Regulation:**

**Wolf trapping – Unit 2**

*No limit*

*Nov. 15–Mar. 31*

*Any wolf taken in Unit 2 must be sealed within 30 days of harvest*

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

**Impact to Federal subsistence users/wildlife:** If the wolf trapping harvest limit and sealing requirements are adopted, Federally qualified subsistence users trapping under State regulations would have less opportunity to harvest wolves and would be required to seal their harvest in a shorter time frame. The reduced harvest limit may cut the number of wolves harvested in the Unit and help the population rebound. However, Federal lands comprise approximately 85% of Unit 2 and without a similar action by the Federal Subsistence Board overall harvests of wolves would probably not be reduced significantly as Federally qualified subsistence users could still trap wolves, in Unit 2, under Federal regulations.

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

**Rationale:** ADF&G is concerned about the long term sustainability of the Alexander Archipelago wolf, because it is a distinct subspecies and low population numbers could trigger listing as a threatened or endangered species. If the Board adopts this change based on conservation concerns for the wolf population, the Federal Subsistence Board would need to take parallel action in order for these changes in harvest limit and sealing requirements to be applicable to Federally qualified subsistence users trapping under Federal regulations. Federal public lands comprise approximately 85% of Unit 2 and without changes to Federal regulations overall harvests of wolves would probably not be reduced significantly enough to address possible conservation concerns for the wolf population.

---

**Proposal 36—5 AAC 54.015. Hunting seasons and bag limits for black bear.** Consider making one or more of the following changes to the black bear seasons in Units 1-3 and 5.

- Implement a draw hunt for non-residents
- Close the fall (Sept 1. – Dec. 31) hunting season for non-residents
- Close the June portion of the spring hunting season for non-residents
- Extend the Controlled Use Area for Units 2 and 3 through October
- Close bear baiting in Units 1A, 1B, 2 and 3 (there is no baiting in 1C)

**Current Federal Regulation:**

**Black Bear - Units 1-3 and 5**

*2 bear, no more than one may be a blue or glacier bear. Sept. 1–June 30*

**General Provisions**

***Restrictions for Baiting of Black Bear***

- No person may establish a black bear bait station unless they first register their site with ADF&G.
- A person using bait shall clearly mark the site with a sign reading BLACK BEAR BAIT STATION. The sign should display the person's hunting license number and their ADF&G assigned number.
- You may only use biodegradable materials for bait. Only the head, bones, viscera, or skin of legally-harvested fish and wildlife may be used for bait.
- No person may use bait within one-quarter mile of a publicly maintained road or trail.
- No person may use bait within one mile of a house (or other permanent dwelling), campground, or developed recreational facility.
- When hunting is completed, a person using bait shall remove all litter and equipment from the bait station site.
- No person may give or receive payment for the use of a bait station, including barter or exchange of goods.
- At any one time, no person may have more than two bait stations with bait present.

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

**Impact to Federal subsistence users/wildlife:** The options presented in this proposal would benefit the black bear population in the region by reducing harvest opportunities however several of the options could have impacts on Federally qualified subsistence users hunting under State regulations.

**Federal Position /Recommended Action:** The OSM recommendation is to **support the proposal** options that have minimal impact to Federally qualified subsistence users, specifically those addressing non-resident harvest of black bears. Non-resident harvest of black bears is a significant portion of the harvest in most of the affected units, reducing their harvest will help the bear population in the region and have no impact to Federally qualified users.

**Rationale:**

ADF&G states that there are conservation concerns for the black bear populations in Southeast and provides a number of options for consideration. Options are addressed individually below:

1. Implement a draw hunt for non-residents – Non-resident harvest of black bears in a number of the units this proposal addresses is significant, this option would provide ADF&G a mechanism to manage the non-resident harvests of black bears in the region.
2. Close the fall (Sept 1. – Dec. 31) hunting season for non-residents – Fall harvest of black bears in the region is relatively low when compared to the harvest in the spring. This option would be less effective than adjusting the spring non-resident season or implementing a draw hunt.
3. Close the June portion of the spring hunting season for non-residents – Closing the June portion of the spring hunting season for non-residents would eliminate some of the black bear harvest in the region, however to be most effective a closure in May when the majority of bears are harvested would be the most beneficial.
4. Extend the Controlled Use Area for Units 2 and 3 through October – Extending the controlled use areas in Units 2 and 3 where the majority of black bears are harvested would help to control bear harvest, as the majority of hunters in these units have reported using motorized transport to hunt. This option would not address bear harvest in Units 1 and 5.
5. Close bear baiting in Units 1A, 1B, 2 and 3 (there is no baiting in 1C) – Closing bear baiting in these units would help address conservation concerns for the resource. However, Federal lands comprise approximately 94% of Unit 1A, 99% of Unit 1B, 83% of Unit 2, and 93% of Unit 3 and without a similar action by the Federal Subsistence Board overall harvests of black bears by residents would not be reduced significantly. Federally qualified subsistence users hunting black bear could still bait black bears under Federal Subsistence regulations, although it would complicate the regulations as currently Federal users are required to register their bait stations with ADF&G.

Currently there is a non-resident season for black bear hunting in Units 1-3 and 5. Reported non-resident harvest is a significant portion of black bear harvests in many of these units and should be the first source of harvest to be reduced. Many resident hunters harvest black bear for subsistence purposes and should be the last user group to be restricted.

---

**Proposal 38—5 ACC 92.044 Permit for hunting black bear with the use of bait of scent lures.** Require GPS coordinates for bear baiting stations in Units 1-5.

**Current Federal Regulation:**

**General Provisions**

***Restrictions for Baiting of Black Bear***

- No person may establish a black bear bait station unless they first register their site with ADF&G.
- A person using bait shall clearly mark the site with a sign reading BLACK BEAR BAIT STATION. The sign should display the person's hunting license number and their ADF&G assigned number.
- You may only use biodegradable materials for bait. Only the head, bones, viscera, or skin of legally-harvested fish and wildlife may be used for bait.
- No person may use bait within one-quarter mile of a publicly maintained road or trail.
- No person may use bait within one mile of a house (or other permanent dwelling), campground, or developed recreational facility.
- When hunting is completed, a person using bait shall remove all litter and equipment from the bait station site.
- No person may give or receive payment for the use of a bait station, including barter or exchange of goods.
- At any one time, no person may have more than two bait stations with bait present.

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

**Impact to Federal subsistence users/wildlife:** Requiring GPS coordinates for bait stations in Units-5 may adversely impact subsistence users who are baiting black bears and do not have a GPS to record their bait stations exact location. However, providing bait station coordinates would allow law enforcement to locate the sites much easier and help ensure they comply with all the regulations, including clean-up of the sites at the end of the season.

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

**Rationale:**

Federal subsistence users are required to register any black bear bait station sites with the Alaska Department of Fish and Game. If this proposal is adopted Federally qualified subsistence users would be required to provide ADF&G with the GPS coordinates of their bait station when they register their bait site. Although some subsistence users may not have GPS units to enable them to provide coordinate locations, this requirement would

help ensure users comply with current regulations including cleaning up of the bait site at the end of the season.

---

**Proposal 41—5 AAC 92.010. Harvest tickets and reports.** Replace the deer harvest survey with deer harvest reports in Units 1-5.

**Current Federal Regulations:**

**50 CFR § 100.6 Licenses, permits, harvest tickets, tags, and reports.**

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

**Unit 2 – Deer**

*5 deer; however, no more than one may be a female deer. July 24–Dec. 31*

*Female deer may be taken only during the period Oct. 15–Dec. 31. You are required to report all harvest using a joint Federal/State harvest report. The harvest limit may be reduced to 4 deer based on conservation concerns.*

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

**Impact to Federal subsistence users/wildlife:** Federally qualified subsistence users are already required to have State harvest tickets for deer in Units 1-5. Additionally, Federally qualified subsistence users harvesting deer in Unit 2 are required to report all deer harvest using a joint Federal/State harvest report. If this proposal is adopted it would require Federally qualified users to return deer harvest reports, as they do for other species that already require harvest reports. If this proposal is adopted it would provide data to aid in the management of deer populations and have minimal impact on Federal subsistence users.

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

**Rationale:** Federally qualified subsistence users are required to have State harvest tickets when hunting deer and in Unit 2 are already required to report their deer harvest using a joint Federal/State harvest report. Currently ADF&G uses deer hunter surveys to determine the deer harvest in the majority of Southeast Alaska. If this proposal is adopted it would allow the integration of deer harvests into the current State harvest database allowing managers easier access to analyze deer harvest data. Additionally, returning deer harvest reports should have minimal impacts to Federal users.



United States  
Department of  
Agriculture

Forest  
Service

Alaska Region  
Tongass National Forest  
Yakutat Ranger District

P.O. Box 327  
Yakutat, AK 99689-0327  
Phone: (907) 784-3359  
Fax: (907) 784-3457

File code: 2600  
Date: October 15, 2010

Board of Game Comments  
ADF&G  
P.O. Box 115526  
Juneau, AK 99811

RECEIVED  
OCT 19 2010  
BOARDS

Dear Alaska Board of Game members,

I am writing to express my support for proposal #47, submitted by the Yakutat Fish and Game Advisory Council, which requests buffers in specific high-use recreational areas where lethal trapping methods would be restricted.

My District Biologist, Susan Oehlers, worked with the AC on this issue, after continued input from several concerned community members. As the Yakutat District Ranger, I am responsible for managing the National Forest Lands for multiple uses; therefore, I support the idea of identifying areas where families and their pets are safe to recreate without threat of injury or death to their pets or possibly children. I feel that the areas in question are small relative to the areas that would remain open to trapping; furthermore, these areas have a low probability rate for capturing big game. If passed, this regulation will reduce the potential conflicts between trappers and non-trappers and incidents of dogs being caught and sometimes killed in traps, allowing both user groups to enjoy our public lands.

We have addressed this issue at the community level by bringing it to the attention of the AC, the Yakutat Assembly, and Yakutat Tlingit Tribe in addition to, soliciting additional community input. At this time I have not received any input opposed to this proposal.

I strongly urge you to pass this proposal. Please feel free to contact me at (907) 784-3359 if you have any questions.

Sincerely,

LEE A. BENSON  
District Ranger





October 20, 2010

Board of Game Comments  
ADF&G  
P.O. Box 115526  
Juneau, AK 99811

To: Alaska Board of Game

This letter is in reference to proposal #47 submitted by the Yakutat Fish and Game Advisory Council requesting trapping buffers in high-use recreational and residential areas. I support this proposal as amended below.

As a member of the Yakutat community, I spent a great deal of time outdoors exercising myself and my dogs. I consider myself a responsible dog owner and do not let them run at large. I use caution regarding traps when walking with my dogs; however, given the current regulations, there is nowhere I can safely go with my dogs without the risk of entrapment and potentially death even close to a trail or road. I have personally had 2 different dogs caught in traps (a snare and a leg-hold trap) right next to a trail and a road where I was walking with them in the areas under consideration in recent years. I believe that the Yakutat forelands are expansive enough to afford a few small areas where dog owners and families can recreate without the threat of injury to or loss of a pet, while still allowing plenty of opportunities for trapping. I applaud the AC for acknowledging this issue and taking the proactive approach towards preventing future entrapments and possible fatalities.

I feel that this proposal represents a compromise between the user groups, and that these areas represent the most likely scenarios for conflicts. I would, however, recommend including a prohibition on larger leg-hold traps, in addition to snares and 330 conibears, within the proposed buffer areas. These types of traps can be very damaging and potentially life-threatening to a pet. Again, the proposed closure areas are small, and therefore including leg-hold traps should have minimal impact on trappers.

I thank you for your consideration.



Susan Oehlers  
P.O. Box 203  
Yakutat, AK 99689

RECEIVED  
OCT 21 2010  
BOARDS



PO Box 240325  
Douglas, AK 99824  
October 20, 2010

Board of Game Comments  
c/o Board Support Section – ADF&G  
P.O. Box 115526  
Juneau, AK 99811-5526

**SUPPORT: Proposal 10: 5 AAC 92.051. Discretionary trapping permit conditions and procedures.** Designate Juneau area in Unit 1C under discretionary permit conditions for trapping.

As a twenty year resident of Juneau, I use the trails and public lands around town on a daily basis for a variety of outdoor activities, all year long. The extensive Juneau area trail system is used heavily by all types of recreationists, who are wedged between the alpine areas of the mountains and the shoreline. To date, we have been fortunate to have had very few conflicts between trappers and other users. Trapping user conflicts, however, are not just an issue of minor annoyance over noise or air pollution; when problems do arise around trapping, they can result in serious injury to humans or domestic animals.

As a precaution to address potential conflicts *BEFORE* they occur, Proposal 10 offers a common sense approach. By allowing the Dept. of Fish and Game the discretion to place conditions and restrictions on permits as needed and as appropriate to protect all users, we can help ensure that any future conflicts that may arise will be handled in a timely manner. Please vote to adopt this proposal.

\*\*\*\*\*

**SUPPORT: Proposal 11: 5 AAC 92.550(1)(F). Areas closed to trapping.** Add the Treadwell Ditch Trail to the list of trail areas closed to trapping in Unit 1C under 5 AAC 92.550(1)(F).

Within the past few weeks, a large new bridge has been installed along the Treadwell Ditch Trail. This installation is just one of many improvements slated for this popular Juneau trail that will undoubtedly lead to more use. Due to its proximity to many densely-populated neighborhoods on Douglas Island, the Ditch Trail is enjoyed by growing numbers of users, including families with children and dogs.

At our recent F&G Advisory Committee meeting, I heard trappers speak against this proposal, stating that by adding another trail, we start down a "slippery slope" to banning all trapping. This argument makes as much common sense as complaining that a new stop light at a busy intersection will soon lead to banning all vehicles from the roads.

It is simply good public policy to insure that the users of the Treadwell Ditch are not confronted with traps in the middle of the trail. For the safety of all recreationists, I urge the Board of Game to adopt this proposal.

Sincerely,

  
Susan K. Schrader, D.V.M.

RECEIVED  
OCT 20 2010  
BOARDS



To: Alaska Board of Game  
From: Stephanie Latzel  
Date: October 15, 2010  
Subject: Written Comment on Proposal #47

I am in support of proposal #47 submitted by the Yakutat Fish and Game Advisory Council to establish safety areas in common use areas to protect recreational users from harm caused by traps.

As the special education teacher at Yakutat Schools, I feel the use of traps in common use areas, such as cannon beach and the train trail are unsafe for children. Listed trapping areas and established safety areas provide for safe educational and recreational use.

As a resident of Yakutat, I would like to have designated safety areas that do not pose a risk for my pets and myself.

Stephanie Latzel  
640 Haida Street  
Yakutat, AK 99689  
907-784-3844  
steftone@gmail.com

RECEIVED  
OCT 28 2010  
BOARDS



10/3/10

Dear ADF&G Board Support Section  
PO Box 115526  
Juneau, AK 99811-5526  
Fax 465-6694

Thank you for the opportunity to comment on some of the regulation proposals.

I have been a lifetime walker and wildlife appreciator. I appreciate every effort to balance the needs of hunters and trappers with those of us who are non-consuming appreciators of the richness of our wildlife in Southeast. As one of the cruise ship tourists recently told Laurie Ferguson Craig, "It was worth the whole price of the trip to see the bears at Steep Creek." Our viewable animals are economic-drivers in our SE economy, as tourists visit from around the world. There is return on investment in creating wild environments where we have plenty of healthy animals to view and even a spiritual return in knowing that the harvesting of wildlife is well managed and scientifically balanced.

**The Wolf:**

**#12: OPPOSE:** I strongly urge that snares not be used for trapping in the Gustavus forelands. They can catch non-targeted animals, pose a threat human safety and are inhumane.

**#18: Support** I love the animal richness and diversity of POW. It is wise to decrease the trapper bag limit. It is wise to require that trappers seal the hide within 2 weeks which facilitates better real time management by ADF&G. Improved management is required to preserve the POW Alexander Archipelago wolf from moving onto the threatened or endangered list. This will have big impact on all user groups. POW residents are in a world of hurt from the downturn of the island economy. Measures that will assist all user groups certainly make economic sense and help support unique POW small businesses and tourism.

**#25: SUPPORT:** please consider this regulation which will conserve wolves on POW. It urges that all snares and traps be marked with the owner's name and contact info. This proposal has many ideas for conserving wolves by reducing the harvest cap, reducing the time limit for checking traps and snares. To balance the needs of all users and to conserve the POW wolves, this regulation will offer a number of effective solutions. If the POW wolves are assigned to the threatened/endangered list, all user groups will be impacted. Conservation benefits all user groups.

**#43 Support:** this will change the wolf hunting season dates in all of SE AK except POW. The new and proposed dates would be Sept 1-March 31. Without the change proposed by this regulation, orphaned wolf pups will continue to starve, and pregnant full term females will be shot in April and result in poor quality hides since the fur is often rubbed and in less than prime condition. All user groups are negatively impacted by the status quo. There will be a strong return on investment for all groups by making this change.

**The Bear:**

**#14 OPPOSE:** Please do not extend Berner's Bay brown bear hunting by 3 extra weeks. Extending the season to June 20 catches the bears while they are out on the beaches and very vulnerable to being shot as they graze on their beloved greens. The season is long enough to balance needs of all user groups.

**#33 SUPPORT:** Please prohibit black bear trapping and please prohibit selling black bear meat in SE Alaska. Selling meat and other bear parts sets up hunting pressure and increases likelihood of illegal hunting and poaching. The goal of this proposal is to conserve black bears and create return on investment for tourism and small businesses through wildlife viewing.

**#34 Support:** same as 33.

RECEIVED

OCT 20 2010

BOARDS  
PC 64

**#35 Support:** decrease black bear resident hunting bag limit from 2 to 1 per year in all of SE except ABC Islands & POW which has special regs already. Conservation is needed for black bears to balance needs of all user groups.

**#36 SUPPORT:** thank you for conserving black bears by supporting this measure which will change the bag limits and hunting times in all of SE except the ABC Islands and POW. Some interesting conservation measures are proposed like closing the June part of hunting season for non-residents; close bear baiting in Ktn/Behm Canal, POW, Mitkof, Kupreanof & Wrangell areas. Maintain prohibition against bear baiting in Unit 1C; do a draw for non-residents.

**#39 SUPPORT:** this will ban black bear baiting in all of SE except ABC and Yakutat. Some areas do allow it and it is widely regarded as an unethical practice of enticing bears to food stations and then shooting them. It is also a hazard to public safety. Gives Alaska a black eye- tourists and wildlife viewers find this barbaric.

#### **Beaver:**

**#29 OPPOSE:** please don't extend the beaver trapping season by 1 month in all of SE. Because there are no bag limits for trapping beaver, this is not necessary. This is simply a way to try and deal with flooding presumably caused by beaver dams. Local Juneau wildlife supporters have studied the beaver dams in the Dredge Lake area and found that improved culverts can remedy the flooding. Killing the beavers is not the answer. Wildlife viewers deserve their needs being met especially since other flooding remedies work.

#### **Local Trails**

**#11 SUPPORT:** Important to add Treadwell Ditch to the list of trails which are very popular and have the quarter mile buffer strip preventing trapping along the whole length in that area. This ensures public safety. Pets have been trapped, and hikers have had to sadly hear animals crying in the traps as they slowly die.

Thank you for taking my comments into consideration.

Further comments after attending the 10/6/10 Juneau AC meeting at DIPAC: As a small child growing up in Eastern WA in the late 40's, a neighbor would load his car with neighborhood kids and drive out into the high desert sunsets. He would give us a nickel for each bird or animal that we spotted. He and his wife loved sharing their knowledge of wildlife. We were eager learners. It remains an important life memory, this learning to deeply love wild creatures.

I emailed comments to the Jnu AC prior to the meeting. After listening to all the proposal comments, I especially supported Prop 10 and 11, and both of them failed the AC vote. Those proposals were important to me and the non-consumptive user groups. Here are my rebuttal comments for these 2 props and for other proposals that you will be considering in Ketchikan that urge special care and balance on behalf of maintaining healthy wild animals for non-consumption.

In the Juneau area 2 dogs have been caught in traps. Recently a basset died in the trap. In the late 90's, Salty, a Norwegian elkhound was trapped near the boy scout trail to Eagle Beach. She lived.

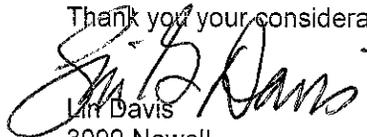
It is wise to designate Juneau as a discretionary area for trapping and not wait till there are more negative incidents. With national health promotion, more Alaskans and their families are getting out on the trails winter and summer. More families are looking for winter sports they can do together, and x-country skiing and snowshoeing are growing in popularity on these public trails. Trappers are one of the user groups, but because their sport has high impact and involves lethal equipment and various killing techniques, their sport naturally deserves higher scrutiny and higher safety proscriptions.

In Juneau, the dog association, Grateful Dogs, is doing a good job of educating dog owners about leashing dogs or developing voice control that is immediate and accurate. The Oct 6 AC meeting

resulted in a lot of language that blamed dog owners for trapping incidents. This is not the complete issue here. Just as there are dog owners who let their dogs run at large on public trails, there are less experienced, less artful recreational trappers who are not part of the 10 or regular and experienced lifetime trappers who work the Juneau area. Both user groups have their so called "problem children." But the trapper group utilizes lethal means, and time has shown that they have more cards in their deck, in terms of impact. Therefore higher scrutiny and some restrictions on their sport make sense from a safety standpoint.

If there are more trapped pets or well publicized non-target animal captures, the average citizen and trail user may want even higher restrictions on trapping. Those members of the public will not have participated in these public AC meetings where trappers talk about what it means to them to do the sport and all that goes into practicing it as a craft. A large public outcry against trapping could restrict their sport tremendously.

Thank you for your consideration. Best wishes with the Ketchikan meeting.

  
Linn Davis  
3099 Nowell  
Juneau 99801  
586-4111



M. Robert Darche  
7300 boul. les Galeries d'Anjou, suite 902  
Montréal (Anjou) Que. H1M 0A2  
Canada.  
evox@videotron.ca  
Tel. : 514 594 1160

September 22, 2010.

Attn : Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax : 907-465-6094

To whom it may concern :

During the month of August of this year, I spent two weeks in Alaska, doing a land tour and a cruise. I was looking forward to seeing much wildlife during my road trip, especially bears, but was very disappointed as I only saw a few caribous, one moose, swans and bald eagles. This, in spite of taking the train twice through mountainous areas of Alaska, travelling more than 300 miles in the interior by bus and taking a hydroplane flight over the Misty Fjords National Park.

Consequently, I am writing to you regarding the following:

**Proposal 4-5 AAC 92.510**

Since the area of Margaret Creek is a bear viewing area and visited by tourists, I ask that the proposal to close the area to bear hunting be approved by the board for safety reasons and to promote the viewing of wildlife by visiting tourists.

**Proposal 5-5 AAC 92.510**

I could only describe my experience of flying over the Misty Fjords as a spiritual journey into the most majestic and pristine nature I have ever seen. I believe bears belong in this incredible nature and I would have been totally elated to have seen one on my flight. Permitting hunting in this area, makes it less likely that tourists like myself would see a bear now and in the future. Therefore, I ask that the area mentioned in the proposal within the Misty Fjords National Monument be closed to bear hunting.

I thank you for your attention to this matter.

M. Robert Darche



ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094

**PROPOSAL 4 - 5 AAC 92.510:** Areas closed to hunting; Close the Margaret Creek Drainage area in Unit 1 to brown bear hunting.

**PROPOSAL 5 - 5 AAC 92.510:** Areas closed to hunting. Close an area within the Misty Fjords National Monument in Unit 1 to brown bear hunting:

I support proposal 4  
I support proposal 5

#### PROPOSAL 4-5 AAC92.510

I have to express my opinion on this proposal and I am (and my husband) totally support to his proposal. This year was our first visit to Alaska and we were determined to see bears in the wild. Our trip proved to be the best memory we have ever had and have informed many people in the UK that on visiting Alaska they **must** do a trip to see bears in the wild. It is so important to be able to see bears in the wild, be so close and yet respect them and them us.

#### PROPOSAL 5-5 AAC 92.510

I and my husband are totally opposed to this proposal also. There are very few areas in the world were we can observe wild bears. We live in the UK and this year had the fantastic, 'one-off' experience of being able to see bears in the river, catching salmon. It did bring tears to our eyes, literally and it is something that I will never forget and would wish that other people could experience this unique experience. Please do not allow this to happen!!!

Ruth and Dave Clancy



*Francine Gélinas  
197 Maxime Terrace  
Ste Anne de Bellevue, Qc  
Canada H9X 3W7*

September 22, 2010.

Attn : Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax : 907-465-6094

To whom it may concern :

During the month of August of this year, I spent two weeks in Alaska, doing a land tour and a cruise. I was looking forward to seeing much wildlife during my road trip, especially bears, but was very disappointed as I only saw a few caribous, one moose, swans and bald eagles. This, in spite of taking the train twice through mountainous areas of Alaska, travelling more than 300 miles in the interior by bus and taking a hydroplane flight over the Misty Fjords National Park.

Consequently, I am writing to you regarding the following:

**Proposal 4-5 AAC 92.510**

Since the area of Margaret Creek is a bear viewing area and visited by tourists, I ask that the proposal to close the area to bear hunting be approved by the board for safety reasons and to promote the viewing of wildlife by visiting tourists.

**Proposal 5-5 AAC 92.510**

I could only describe my experience of flying over the Misty Fjords as a spiritual journey into the most majestic and pristine nature I have ever seen. I believe bears belong in this incredible nature and I would have been totally elated to have seen one on my flight. Permitting hunting in this area, makes it less likely that tourists like myself would see a bear now and in the future. Therefore, I ask that the area mentioned in the proposal within the Misty Fjords National Monument be closed to bear hunting.

I thank you for your attention to this matter.

Francine Gélinas



**ATTN: Board of Game Comments**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**  
**Fax: 907-465-6094**

SUPPORT FOR PROPOSAL 4 - 5 AAC 92.510 (hunting at Traitors Cove (Margaret Creek) and  
PROPOSAL 5 - 5 AAC 92.510 (hunting in the Rudyerd Bay and Walker Cove fjords)

I am fully supportive of the above proposals for the following reasons:-

Although bear watching is not the only reason for visiting Alaska, it a **major** reason for doing so, and a highlight. Any move which could result in a smaller bear population would inevitably have a detrimental effect on tourism and therefore on Alaska itself. Such a move would be short sighted and irresponsible. On a personal note I live in a very urban area where even the sight of a fox is out of the ordinary. If I wish to visit Alaska to see bears in their natural habitat and thus boost the Alaskan economy I would expect American governmental departments to help rather than hinder.

Michael and Maureen Brookes  
75 Park Lane  
Wednesbury  
WS10 9PT  
England.



ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094

11 Kabbarli Court  
Wallsend N.S.W. 2287  
Australia  
Ph: (612) 49512182  
Email: [nolan11@hunterlink.net.au](mailto:nolan11@hunterlink.net.au)

Re: **PROPOSAL 4 - 5 AAC 92.510 Areas closed to hunting:** Close the Margaret Creek Drainage area in Unit 1 to bear hunting:

Dear Sirs/ Mesdames,

I would like to add my support to the above proposal.

My husband and I have just returned from a trip to Canada and Alaska which included an Alaskan cruise visiting the port of Ketchikan. We had a fabulous time and are recommending it to all of our friends. However there was one disappointment, and only one, during our holiday and that was that we were unable to view bears at Traitor's Cove while in Ketchikan. We had booked the bear viewing tour with Island Wings months in advance of our departure from Australia as we wanted to see bears in their natural environment. The tour was cancelled as there were no bears in the area. Ketchikan was our last chance to see bears and we have come home to Australia disappointed.

Many people in Australia visit Alaska and most of them are interested in seeing wildlife *in the wild*. Just as visitors to Australia want to see kangaroos, Australians visiting Alaska want to see bears. Many of these visitors are prepared to spend a lot of their tourist dollars on tours that will guarantee them such an experience. I believe that allowing hunting in these areas could eventually ruin the Traitor's Cove as a bear viewing destination. The bears may become accustomed to humans that come to watch them and then get killed by hunters because they have lost their fear. The bear numbers would eventually become too low to have any chance of a viewing.

One of the questions our friends have asked us about our trip is "Did you see any bears?" I wish I could have told them I saw lots of bears at Traitor's Cove when we were in Ketchikan. Please consider the above proposal from the point of view of overseas tourists and the potential of tourist dollars, if nothing else.

Sincerely,

Catherine Nolan  
22<sup>nd</sup> September, 2010



DATE: September 23, 2010

TO: Alaska Dept. of Fish and Game

FROM: John and Sandra Rodominick  
2 Corona St.  
South Grafton, MA 01560

RE: **SUPPORT FOR PROPOSAL 5-5 AAC 92.510**  
**SUPPORT FOR PROPOSAL 4-5 AAC 92.510**

***PROPOSAL 5-5 AAC 92.510 - Close an area within the Misty Fjords National Monument in Unit 1 to brown bear hunting***

This past July, my husband and I visited Alaska and fell in love with your amazing state. Part of our 2-week vacation included a tour of the Misty Fjords via float plane. The scenery was beautiful, but unfortunately, we did not happen to see any bears. We are planning a return trip to Alaska, but have no inclination to re-visit Ketchikan or Misty Fjords. The area we are excited about is Denali, where we saw bears, among other wildlife. It was a heart-stopping experience to see them in the wild doing the things that bears do in their natural environment. The above proposal preserves vast acreage for hunting, but additionally gives some consideration to tourists and passive wild-life enthusiasts; increasing our chances of that once-in-a-lifetime, up-close-and-personal bear encounter. We therefore support this proposal.

***PROPOSAL 4-5 AAC 92.510 - Close the Margaret Creek Drainage area in Unit 1 to bear hunting***

We strongly support this proposal and urge you to as well. It's hard to believe that hunting is presently allowed in a designated bear-viewing area. As tourists who plan on returning to Alaska specifically to seek out bear-viewing opportunities, we will intentionally avoid this area for its' lack of basic safety, (not to mention its' lack of bears to view.) Adoption would certainly increase the bear population over the long term and consequently increase tourism. It would, more importantly, bring immediate relief to the current hazardous, irresponsible situation.



ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094

**PROPOSAL 4 - 5 AAC 92.510:** Areas closed to hunting: Close the Margaret Creek Drainage area in Unit 1 to brown bear hunting.

**PROPOSAL 5 - 5 AAC 92.510:** Areas closed to hunting. Close an area within the Misty Fjords National Monument in Unit 1 to brown bear hunting:

I support proposal 4  
I support proposal 5

To those who have the power, I support the closure of the area to bear hunting

We idolise their strength by naming our sports teams and individuals after them, we admire their parenting of their children, we watch in awe of their tenacity and resourcefulness to survive in the harsh environment, we send our children to sleep with their lifelike representations. They do not kill for the sake of sport or for some sort of ego gratification, they kill to survive in the only way they can in the short time mother nature allows them. We go to areas that have no value to us other than that we can, surely we owe them and ourselves the right to have areas that man can let the natural world live and leave to our future generations the beauty and diversity of our world.

We've destroyed so much, it's time to try and right the wrong's before there is nothing left but our memories. A zoo is not what I want to be the last of the natural world.

The economic returns that can be obtained by allowing the bears to live in these areas, protected from hunting, is obvious from the amount of tourists who go to your country for the specific reason to see mother nature

Please do the what you can to allow them the freedom, which we as human's hold so dear.

Ross Smiles  
20/17 Wetherill St  
Narrabeen  
NSW  
2101  
AUSTRALIA



**Alaska Office**

333 West 4th Avenue, #302 | Anchorage, AK 99501 | tel 907.276.9453 | fax 907.276.9454  
[www.defenders.org](http://www.defenders.org)

October 22, 2010

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

To Whom It May Concern:

The Alaska Center for the Environment, The Alaska Wildlife Alliance, and Defenders of Wildlife appreciate the opportunity to submit these written comments on proposals that will be considered at the November 5-9, 2010 meeting in Ketchikan, Alaska.

The Alaska Center for the Environment (ACE) is a non-profit environmental education and advocacy organization, whose mission is to enhance Alaskans' quality of life by protecting wild places, fostering sustainable communities and promoting recreational opportunities. ACE advocates for sustainable policy on behalf of nearly 6,000 Alaskan members.

Founded in 1978, the Alaska Wildlife Alliance (AWA) is the only group in Alaska solely dedicated to the protection of Alaska's wildlife. Our mission is the protection of Alaska's natural wildlife for its intrinsic value as well as for the benefit of present and future generations. AWA is your voice for promoting an ecosystem approach to wildlife management that represents the non-consumptive values of wildlife. AWA was founded by Alaskans and depends on the grassroots support and activism of its members.

Established in 1947, Defenders of Wildlife (Defenders) is a non-profit membership based organization dedicated to the protection of all native wild animals and plants in their natural communities. Defenders focuses on the accelerating rate of species extinction and associated loss of biological diversity and habitat alteration and destruction. Defenders also advocates for new approaches to wildlife conservation that will help prevent species from becoming endangered. We have field offices around the country, including in Alaska where we work on issues affecting wolves, black bears, brown bears, wolverines, Cook Inlet beluga whales, sea otters, polar bears and impacts from climate change. Our Alaska program seeks to increase recognition of the importance of, and need for the protection of, entire ecosystems and interconnected habitats while recognizing the role that predators play as indicator species for ecosystem health. Defenders represents more than 3,000 members and supporters in Alaska and more than one million nationwide.

**National Headquarters**

1130 17th Street, N.W.

Washington, D.C. 20036-4604

tel 202.682.9400 | fax 202.682.1331

## COMMENTS ON THE ALASKA BOARD OF GAME PROPOSALS

### Proposal 8 - 5 AAC 84.270 Furbearer trapping.

We **oppose** this proposal. The proposal aims to lengthen the wolverine trapping season by 2.5 months in Game Management Unit (GMU) 1A in order to align wolverine trapping with wolf trapping and facilitate the taking of more wolves.

The proponent states that the Alaska Department of Fish and Game (ADF&G) data fails to justify the short season and claims that wolf trapping effort has dropped in the later part of the wolf season because of the short wolverine season; however, the proponent fails to provide evidence to support this claim. According to ADF&G's 2007 furbearer management report, wolverines are not generally targets for trappers in this region but are taken incidentally to wolf or marten trapping. Therefore, increasing the wolverine harvest season would be expected to have little if any effect on wolf trapping in this GMU.

The ADF&G report also states that little is known about southern southeast wolverine populations or abundance. Adoption of regulations that could potentially result in the increased take of a species about which so little is known is not wise management of a valuable resource.

The proponent states that the proposal would improve deer and goat populations; however, there is no evidence that increasing the take of wolves would be beneficial for deer or goat numbers or increase hunter success in GMU 1A, nor is there evidence that predation is limiting these populations. The rationale for having excessively long seasons in order to benefit prey populations is therefore invalid. Accordingly, we find that there is no rationale for wolf control in GMU 1A and extending the trapping seasons in order to provide de facto wolf control is not justified.

---

### Proposal 9 - 5AAC 84.270 Furbearer trapping; and 85.056 Hunting seasons and bag limits for wolf.

We **oppose** this proposal. The proposal aims to increase the management objective in GMU 1A from 25 to 30 wolves per year stating that the harvest levels have averaged 30.5 wolves annually over the last 24 years; thus, according to the proponent, exceeding the harvest objectives. However, the proponent fails to provide any evidence to support the claim that "thirty wolves is a realistic number." Despite the fact that an average of 30.5 animals have been harvested from GMU 1A, the year to year harvest

has varied dramatically. As population estimates do not exist for this population there is no basis for increasing the management objective.

---

**Proposal 15/ Proposal 38 - 5AAC 92.044.** Permit for hunting black bear with the use of bait or scent lures.

We support the adoption of either of these proposals as the resulting regulation would be the same. The proposals call for requiring GPS coordinates for baiting black bears in GMU 1D. Baiting stations should be marked in the interest of public safety and to assist with enforcement of frequently violated bear baiting regulations.

---

**Proposal 18 - Furbearer trapping; and 5 AAC 92.170.** Sealing of marten, lynx, beaver, otter, wolf, and wolverine.

We support this proposal. This proposal would modify wolf trapping regulations by implementing an annual bag limit of 10 wolves and require sealing of wolf pelts within 14 days of harvest.

The Alexander Archipelago wolf (*Canis lupus ligoni*) is a subspecies of gray wolf that is genetically distinct from interior Alaskan wolf populations and lives in geographically and genetically isolated island populations in Southeast Alaska. Due to changing forest habitats in Southeast, concern over the continued long-term viability of this genetically distinct wolf population continues to grow. ADF&G as well as numerous conservation organizations have expressed their concern over the long-term viability of this subspecies.

ADF&G states that the reported harvest of this population has decreased dramatically in recent years and biologists working in the field in GMU 2 have seen little wolf sign this year. Both factors indicate a possible population decline.

As ADF&G states in the proposal, reducing the bag limit to 10 wolves/year will spread opportunity between trappers, while requiring sealing within 14 days will allow managers to more quickly determine when the harvest cap has been reached. Adoption of this proposal combined with a lower harvest cap will assist in stabilizing the wolf population in this GMU and reduce the potential for listing under the Endangered Species Act.

---

**Proposal 25** – 5 AAC 84.270. Trapping seasons and bag limits for wolves; 85.056. Hunting seasons and bag limits for wolves; and 92.051. Discretionary trapping permit conditions and procedures.

We support the intent behind this proposal, however the objectives would be met by the passage of **Proposal 18**, which we support. This proposal urged, the Board of Game (BOG) to utilize the best available biological and social information to determine the best course of action and to consider implementing multiple regulatory changes. ADF&G has analyzed the issue and has determined that the best course of action would be what is proposed in **Proposal 18**.

In addition to passing **Proposal 18**, we appreciate that ADF&G will work closely with the US Forest Service to pass stricter federal regulations for marking traps and we encourage the BOG to work with the Department of Public Safety to ensure current regulations are enforced.

---

**Proposal 27** – 5AAC 85.056. Hunting seasons and bag limits for wolf

We oppose this proposal. The proposal seeks to extend the season to May 31<sup>st</sup> from its current closure of April 30<sup>th</sup>.

The proponent of this proposal states that deer populations are suppressed in this area due to three winters of record snowfall and a record high population of wolves. However, as the proponent states “three consecutive winters of record snowfall” are largely responsible for the “depressed” deer populations in GMU 3. The proponent provides no evidence to support the claim that populations of wolves are at a record high.

Forest habitats in Southeast have been dramatically altered by timber production in the Tongass National Forest and changing forest conditions will likely continue to impact wildlife species. Biologists expect to see a decline in deer populations throughout the region due to changes in forest habitat quantity and quality. Wolf hunting seasons in GMU 3 already extend late into the spring (April 30) when females are pregnant and dens are being established; shooting them during this time is inhumane and not sound management for a subspecies of conservation concern or one with big game and furbearer values. Hides in late April are already often badly rubbed and have much reduced value on the fur market. They make poor quality trophies for recreational hunters. Fur quality further deteriorates by the end of May greatly decreasing its value.

There is no evidence that closing wolf hunting seasons later would be beneficial for deer numbers or hunter success in GMU 3, nor is there evidence that predation is

limiting these populations. The rationale for having excessively long seasons in order to benefit prey populations is therefore invalid. Accordingly, we find that there is no rationale for wolf control in GMU 3 and extending the hunting seasons in order to provide de facto wolf control is not justified.

---

**Proposal 28 – 5 AAC 92.410. Taking game in defense of life or property (DLP)**

We oppose this proposal. The proponent of this proposal argues that the ADF&G should eliminate consideration of animals taken in DLP in GMU 4 when setting harvest caps for brown bears – stating that “DLP brown bear kills...as a result of poor garbage management has little or nothing to do with wildlife management related to sport hunting.” Unfortunately, this proposal fails to consider the impact that DLP kills have on the regional brown bear population.

When setting harvest objectives or caps the ADF&G must consider all sources of mortality in order to prevent over-exploitation. If – as the proponent states – DLP kills are increasing, the ADF&G must pay more, not less, attention to the potential for over-harvest. Lack of consideration of DLP kills would represent a failure by ADF&G to sustainably manage brown bear populations.

If the proponent is concerned that brown bear hunting opportunities are decreasing as a result of poor waste management, we urge them to be more proactive in improving management of waste in order to prevent DLP kills rather than advocate for regulations which could lead to over-exploitation of the brown bear population.

---

**Proposal 35 – 5 AAC 85.015. Hunting seasons and bag limits for black bear.**

We support this proposal. This proposal seeks to reduce resident black bear bag limit from 2 bears to 1 bear in GMUs 1-3 and 5; the proposal would work in conjunction with Proposal 36 to ameliorate concern over potentially declining bear populations in these GMUs.

Black bears in Southeast Alaska live in isolated island populations and their continued viability is necessary to promote ecological health of the forest system. Further, black bear hunting is an economic driver in the region and thus any population decline is of great consequence to the local economy. In order to insure the continued viability of the population, it is clear that black bear harvests must continue to be tightly regulated in order to prevent over-exploitation.

ADF&G has expressed concern over the potential over-harvest of black bears in these GMUs. While we would have liked to have seen a harvest cap implemented –

especially for GMU 2 where considerable concern exists over the over-harvest of females and declining skull size of harvested animals – such a proposal was not introduced as a management option and we trust that ADF&G's solution will be sufficient. However, we urge the ADF&G to closely monitor the results of this regulatory change and consider further steps, such as implementing harvest caps, should these populations continue to show signs of decline.

---

**Proposal 36 – 5AAC 85.015. Hunting seasons and bag limits for black bear.**

We **support** the adoption of one of the proposed changes in order to regulate the harvest of black bears and prevent over-exploitation in GMUs 1-3, and 5. The implementation of one of these harvest regulations would work in concert with regulations proposed in **Proposal 35** to prevent over-harvest of black bears.

While ADF&G states that the implementation of a draw hunt for non-residents is their preferred alternative, we would also like to see bear baiting closed in these GMUs. Baiting bears is a highly contentious issue and often considered a method of ensuring adequate harvest of bears in areas where they are deemed significant predators of ungulates. However, ensuring adequate harvest of a population of black bears in a region where conservation concern exists is neither necessary nor responsible. Further, shooting of bears over bait is not considered fair chase.

---

**Proposal 37 – 5 AAC 85.015. Hunting seasons and bag limits for black bear.**

We **oppose** this proposal. The proposal seeks to decrease the harvest of black bears by implementing a drawing permit program for **unguided, nonresident** hunters (emphasis added). The proposal does not go far enough to limit the harvest of black bears in these GMUs. Proposals 35 and 36 more adequately meet this objective.

---

**Proposal 39 – 5 AAC 92.044 (12). Permit for hunting black bear with the use of bait or scent lures.**

We **support** this proposal. The proposal seeks to eliminate bear baiting in GMUs 1, 2, and 3. Baiting bears is a highly contentious issue and often considered a method of ensuring adequate harvest of bears in areas where they are deemed significant predators of ungulates. However, ensuring adequate harvest of a population of black bears in a

region where conservation concern exists is neither necessary nor responsible. Further, shooting of bears over bait is not considered fair chase.

---

**Proposal 43 – 5AAC 85.056. Hunting seasons and bag limits for wolf.**

We support this proposal. This proposal aims to modify the wolf hunting season in GMUs 1, 3, 4 and 5 to open on September 1<sup>st</sup> and close on March 31<sup>st</sup>. Wolf hunting seasons in GMUs 1, 3, 4, and 5 now open on August 1<sup>st</sup> and close on April 30.

The Alexander Archipelago wolf (*Canis lupus ligoni*) is a subspecies of gray wolf that is genetically distinct from interior Alaskan wolves. These populations are endemic to Southeast, isolated from the mainland, and isolated from each other by large bodies of water. Forest habitats in Southeast have been dramatically altered by timber production in the Tongass National Forest and changing forest conditions will continue to impact all wildlife species in this region. The issue of forest management and long term carrying capacity of forest habitat need to be considered when making wildlife management decisions and regulations for Southeast Alaska

In late April, female wolves are pregnant and nearly at full term. On August 1<sup>st</sup> wolf pups are only about half grown and are totally dependent on adults for food and protection from predators including bears. Shooting them during these time periods is inhumane and not sound management for a subspecies of conservation concern, or one with big game and furbearer values. Hides in late April are often badly rubbed and have much reduced value on the fur market. In August, wolf hides are nearly worthless and make very poor trophies for recreational hunters.

In their 2005 Wolf Management Report, the ADF&G stated that most wolf hunting and trapping that occurs in Southeast is recreational and viewed by many as simply a means of controlling wolf populations to improve deer and moose populations. While wolf hunting seasons such as those currently in effect might be justified if de facto wolf control was necessary and the regulations accomplished the goal of reducing wolf numbers and increasing prey, there is no evidence that any of these conditions apply. The BOG has issued no written findings indicating deer populations in southeast Alaska currently require predator control to increase deer numbers – in fact the bag limit for deer in GMUs 1, 3, and 4 is at least 2 and up to 4 animals in GMUs 1, 3, and 4 and all GMUs remain open to non-resident hunters. Accordingly, we find that there is no rationale for de facto wolf control in Southeast Alaska and the excessively long hunting seasons designed to provide de facto wolf control are not justified.

In the fall of 2002 the BOG voted to close hunting in the months of August and April due to concerns over early and late season pelt quality and harvesting during denning. However, this decision was rescinded in the fall of 2004. We believe this decision was

an oversight as the concerns that led the BOG to shorten the hunting season in 2002 still apply.

Thank you for considering our comments.

Sincerely,

Valerie Connor  
Conservation Director  
Alaska Center for the Environment

John Toppenberg  
Director  
Alaska Wildlife Alliance

Theresa Fiorino  
Alaska Representative  
Defenders of Wildlife

Steve & Patty Forsyth  
PO Box 154  
Yakutat, AK 99689  
907-784-3212

Board of Game Comments  
ADF&G  
PO Box 115526  
Juneau, AK 99811  
Fax # 907-465-6094

To Whom It May Concern:

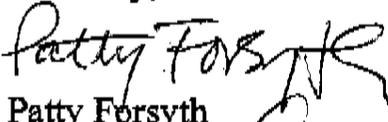
We support Proposal #47 concerning the trapping law changes in Yakutat.

We use these areas for recreation with our dog and know that many other dog owners do so as well. In years past, several residents of Yakutat have lost their beloved pets to trapping too near to the proposed areas listed.

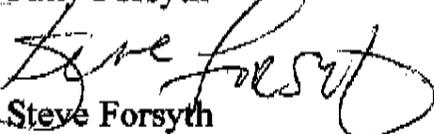
Other pets, luckily, have either escaped the traps or were found alive still in the trap or snare. We hope the safety areas proposed would help to avoid the accidental trapping or snaring of companion animals or humans.

We appreciate your consideration on this issue and look forward to positive changes for all concerned parties.

Sincerely,



Patty Forsyth



Steve Forsyth



**SOUTHEAST AVIATION  
P. O. BOX 5797  
KETCHIKAN, AK 99901  
(907) 225-2900  
[www.southeastaviation.com](http://www.southeastaviation.com)**

10/20/2010

**ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526**

Dear Board Members:

I am writing to express my support for the following proposals: #2, 3, 4, 5, 19, 33 & 34.

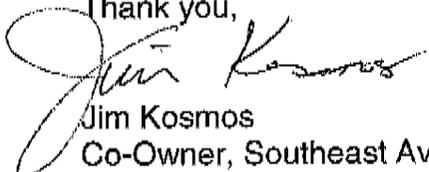
As co-owner of a small flightseeing business in Ketchikan, we rely on seasonal summer business to support us year-round. Bear viewing in and around the Ketchikan area is very popular with locals and visitors alike and is an important part of our revenue. The continued use of Traitor's Cove and Rudyard Bay as bear hunting sites is problematic. We have continued to see bear numbers (sightings) dwindle in these popular sites.

Bears are one of Alaska's most precious resources and they must be protected. Bear hunting and bear viewing cannot mix. This practice leads to a negative reaction by the locals and visitors alike. When tourists and locals visit Traitors and walk up the beach and see a dead bear they get mad, it's not a pretty picture. This is not the picture we want to paint for the public. There are other more remote areas for harvesting bears. It is hard to explain to visitors why this practice is allowed in these areas.

The revenue from bear viewing filters thru local tour companies and local guides, but the money goes deep into educating the public about our wonderful resource, thru the Forest Service to build new trails and cabins and into the schools and tax base.

Please take the appropriate action to pass these proposals and protect and preserve our bears.

Thank you,

  
Jim Kosmos  
Co-Owner, Southeast Aviation



**PROPOSAL 15 and 38 - 5 AAC 92.044 (12)****(Very similar proposals)****OPPOSE**

These proposals offer no biological support to justify their restrictive nature.

Requiring GPS Coordinates prior to being issued a Bear Baiting Permit creates an extreme hardship to the hunter, and in fact, will create more problems than solve.

Requiring GPS Coordinates will in effect require the hunter to make multiple trips to and from the hunting area. A hunter would have to first travel to the hunting area, (which may be very remote), scout and locate bait sites, then travel to a F&G issuing office with coordinates, get their bait permit, and then return to the hunt area to place their bait. Many bait sites can only be accessed by boat, airplane, ferry system, or hiking. The additional cost in time and money would make most bear baiting in South East cost prohibitive.

The Proposals state that the GPS requirement is currently being required by the Department inconsistently. Proposal #38 says, "Some area biologists have included the GPS requirement as a permit condition. Others do not require GPS locations on the permits." 5 AAC 92.044 provides the conditions for bear baiting and it does not have GPS coordinates as a condition for issuing a baiting permit. If there are places in South East where area biologists are requiring GPS coordinates then they are doing so outside the governing regulation. This hardly seems like reasonable justification for imposing such costly baiting conditions.

The Department may argue that they are requiring GPS coordinates under 5 AAC 92.052 (Discretionary permit hunt conditions and procedures.) Under 5 AAC 92.052 there are some 21 different discretionary conditions that may be placed on Permit Hunts by the Department. None of those conditions provide for the mandatory use of GPS Coordinates. In fact, at least twice in recent years the Department has asked the BOG to allow GPS Coordinates in specific proposals, and for good reasons the BOG has denied those requests.

Proposal #38 states, "Some years, nearly 75 percent of the sites located by Wildlife Troopers are in violation of some regulation." We dispute the accuracy of the 75% claim, we believe it is considerably less. Two years ago the Department made the same 75% claim of problems associated with bear baiting. At the time, Under the Public Information Act, I requested the Department to supply the data used to support such a claim. The written response I got from the Department was "There is no state

data base that references the information you have requested.” So in short, the claim is totally subjective and without support, there is simply no way to accurately quantify the number of problem sites. Again, hardly justification for imposing such restrictive and costly regulations.

The Proposal states that “Enforcement of black bear bait sites is difficult”. We fail to see how they are any more difficult to enforce then the majority of other hunting regulations. When a hunter shoots a Moose, Caribou, Sheep or any other animal there is a potential for a game violation. Wanton waste, shooting from a road, violating bag limits and the list goes on, are we to establish regulations that require a hunter or trapper to give GPS coordinates for every animal shot and every trap set? Much less require the location before the animal is shot or trapped? Policing bait sites is no more difficult, and in many cases easier, then policing most other hunting activity within the state.

Under the Proposal #38 in WHO IS LIKELY TO SUFFER? there is only mention of the hunters who might break the law and get caught. It would be most appropriate to add all hunters wishing to use bait to hunt black bear. The cost of baiting in SE will go up by hundreds, if not thousands, of dollars and require several additional days of travel. It will be cost prohibitive for many people wishing to bear bait.

**These proposals will create more problems then they will solve.**

Because of the high costs and transportation difficulties, the effect of these proposals will make bear baiting impractical in large areas of SE Alaska. They will force bear baiters to concentrate their efforts in the most accessible areas. This will increase conflicts closer to civilization while leaving the more remote areas un-baited.

I am sure that the pin-point accuracy of bait stations the Department and/or Troopers are looking for will not be achieved. Instead, because of the cost and travel burden, it will encourage hunters to simply pick GPS coordinates from Topo Maps, get their permits, and once in the field adjust their bait site location to productive areas. Once again leaving bait sights hard to find and creating new violations from otherwise law abiding hunters.

I am not sure how adding additional, costly regulations to bear baiting promotes fewer baiting violations. If some hunters (either willfully or accidently) violate the multitude of current baiting conditions, how does adding a hard to comply with condition encourage fewer violations? In an effort to reduce violations it is easy to place unreasonable burdens on the hunter or to regulate an activity into non-existence. Please don't let that happen to bear baiting or our hunting heritage.

## **PROPOSAL 45 - 5AAC 92.052**

### **REPEAL 5 AAC 92.052 AS CONDITIONS FOR BEAR BAITING.**

I applaud the BOG for it's Proposal 45 and its apparent attempt to review the Department's use of Discretionary Permit Hunt Conditions and Procedures. The Department has been using Discretionary Permit Hunt Conditions in South East as a means to attach conditions to General Hunts. (Please note that the Department is using the discretionary conditions in 5 AAC 92.052 to govern bear baiting permits, however, they have not disclosed that use in their list of Permit Hunts for region 1.)

It is important to understand that 5 AAC 92.052 provides discretionary conditions that apply to **“a permit hunt, when necessary for the management of the species hunted”** (Not general hunts or means of take). Currently the Department is using these discretionary conditions on bear baiting permits, which is not a “permit hunt” but rather a means of take. Permit Hunt is defined under 5 AAC 92.990 (Definitions) as: **““permit hunt” means a hunt for which a permit is issued on a drawing or registration hunt bases”**. Black bears are hunted under the general season without the need for a drawing or registration. Baiting Permits are simply a permit that allows the hunter to use bait as a means of take, by regulatory definition they are not Permit Hunts. The regulation for governing bear baiting permits is 5 AAC 92.044, it provides the specific set of conditions that strictly govern bear baiting.

Over the past several years, through Department Proposals and under the pretext of housekeeping that would simplify, clarify and unify regulations, the BOG granted the Department the ability to add the discretionary conditions in 5 AAC 92.052 to bear baiting permits. We now have both 5 AAC 92.044 and 5 AAC 92.052 (Discretionary Condition's) governing bear bait permits.

Contrary to Department predictions, adding the Discretionary Conditions to baiting permits has only created additional problems and conflicts within the regulations. It has also promoted area wide inconsistent and arbitrary application of the regulations. As testified in Proposal #38 by the Alaska Wildlife Troopers this inconsistency has become an enforcement problem and a point of public confusion. Instead of solving problems and simplifying regulations it is creating the need for even more regulations which is evident by the Troopers proposal.

5 AAC 92.052 Discretionary Conditions was established to give the Department broad authority to managed Permit Hunts, allowing for the harvest of specific limited game populations that require a drawing or registration. And, it is a good tool for this purpose. However, these discretionary conditions were not designed or established to

govern bear baiting, general hunts, means of take, or a host of other game issues. And, it is a poor tool for that purpose. 5

5 AAC 92.044., was designed and established to govern bear baiting. And, is a good tool for that purpose. If there is a need for additional baiting conditions they should be promulgated under 5 AAC 92.044 and through the BOG process. If the Department is allowed the continued use of 5 AAC 92.052 to manage bear baiting, subjective and inconsistent application of regulations will continue. Further, regulations will be implemented at the discretion of area biologists that may be arbitrary in nature, over restrictive, ineffective or unfair.

It is easy to understand why the Department wants to have broad discretionary power, however, giving the Department this authority circumvents due public process and takes the BOG out of the regulatory process. The Department will argue that giving them this authority will make it less cumbersome for them to do their job. However, such broad discretionary authority as 5 AAC 92.052 should not be granted simply for their convenience.

It is my understanding that the purpose of the BOG Proposal #45 is to evaluate if 5 AAC 92.052 is being appropriately used in South East. In this case it is not. Throughout the state, as well as in SE, the Department has increasingly used discretionary conditions in a manner that is far removed from the original intent of 5 AAC 92.052. It has become increasingly popular for area biologist to very broadly interpret the conditions in 5 AAC 92.052 and use them as a catch-all to justify implementing any condition they want to any hunt.

We ask that the BOG repeal 5 AAC 92.052 as a method to govern bear baiting permits or general hunts and use it as was intended, to govern "Permit Hunts". By doing so, we will once again have integrity in the regulatory process and one clear regulation governing bear baiting which will benefit the Department, the public and resource. Thank you for your consideration.

Ken Vorisek  
Heritage 32/C  
Wrangell, Alaska 99929  
[timberwf@gci.net](mailto:timberwf@gci.net)  
907-479-3075



# Carlin Air

P.O. Box 5542 ❖ 1249 Tongass Avenue ❖ Ketchikan, Alaska 99901



---

10/18/2010

**ATTN: Board of Game Comments**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**

Dear Board Members:

I am writing to express my support for the following proposals: #2, 3, 4, 5, 19, 33 & 34.

Bear Viewing in and around the Ketchikan area is popular with locals and visitors alike. Our visitor's number one request is to "see bears".

I believe that our bears are a resource when they are alive. Yes, they provide revenue to many tour operators, but more than that, they provide wonder and joy to adults and children alike. It does not make sense to allow hunting of these creatures in areas that are maintained as "viewing" areas.

Please take the appropriate action to pass these proposals and protect and preserve our bears.

Thank you,

Jeff Carlin  
Carlin Air

---

**www.carlinair.com**  
reservations@carlinair.com

907.225.3036 Telephone ❖ 907.247.1249 Facsimile ❖ 888/594.3036 Toll Free

**PC 76**



October 22, 2010

Board of Game Comments  
ADF&G  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-465-6094

Dear Board Members,

Established in 1977, Taquan Air is a leading Ketchikan based air carrier and operator of floatplane excursions. I am the President and CEO of Taquan Air as well as Alaska Rainforest Sanctuary, a private 40 acre wildlife preserve, located 8 miles by road from Ketchikan at Herring Cove.

The largest demand for wildlife viewing in Southeast Alaska is to see bears. In this regard Ketchikan excels . . . that is until now. The resource is quickly diminishing as a growing number of hunters utilize the easy access afforded at established wildlife viewing sites, to harvest black bears. These animals become habituated to humans and are easy targets. Viewing bear carcasses does not generate the kind of memories people seek on a wildlife viewing excursion.

Taquan Air operates bear viewing tours to two remote Tongass National Forest locations, Traitors Cove/Margaret Creek and Polk Inlet/Dog Salmon Creek, under the auspices of USFS Outfitter/Guide Permits. The Forest Service maintains access trails and wildlife viewing platforms at both locations. This year we hosted over 4,000 visitors to these sites, who each paid an average of \$365 in anticipation of seeing bear activity in the wilderness. Our on-site guide wildlife reports record a growing reduction of bear sightings each year from 2007. That year groups usually would see 5-8 bears; in 2010 there were limited sightings.

Alaska Rainforest Sanctuary borders the Tongass National Forest boundary. Eagle Creek flows through our property and alongside the Whitman Lake Hatchery (operated by the Southern Southeast Regional Aquaculture Association). Large numbers of hatchery raised salmon return to spawn here, normally attracting a sizeable bear population. We believe that hunting activity in the Herring Cove /Eagle Creek area is the prime reason that bear sightings have declined each year at the sanctuary since it opened in 2004. We hosted 16,000 guests on guided wildlife trail hikes in 2010, many of whom did not see a bear.



Comments on proposals relevant to the bear viewing activities in which we are involved are attached.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brien Salazar', is written over a horizontal line.

Brien Salazar  
President and CEO

Attachment: Comments to the Board of Game – 3 sheets

FAX TO: 907-465-6094

**Board of Game Comments**  
Alaska Department of Fish and Game

DATE: October 22, 2010

FROM: Brien Salazar, President and CEO  
Taquan Air and Alaska Rainforest Sanctuary  
Life-long resident of Ketchikan (cell: 907-617-2923)

**PROPOSAL 3 – 5 AAC 92.510: SUPPORT**

Alaska Rainforest Sanctuary makes highly accessible bear viewing available to large numbers of Alaskans and visitors - over 16,000 in 2010. It generates employment – 30 to 45, depending on the level of bear activity (many of the guides live in the local area), and \$1.5 million in economic activity in 2010. It is a resource enjoyed by many Ketchikan residents.

Based on our guide bear tracking reports we know that harvesting is a major reason that the bear population in Herring Cove has declined. Our trained naturalists identify a number of bears by markings and habits. Some of these animals do not reappear from season to season, and we know that hunting is taking place in the immediate area. We have "No Hunting" and "Private Property" signs posted at strategic locations in the sanctuary, but they are ignored by some hunters. There are also safety concerns; bear hunting and bear watching do not mix, particularly with so many people transiting a relatively small residential area.

Research indicates that the home range of black bears is between 1-15 square miles. Based on individual identifications, we know that at least some of the bears return to Herring Cove in subsequent years. It is therefore believed that harvesting bears in this location is a key reason for the declining population.

Continued declines in bear populations will result in fewer jobs, and negative economic impacts in the community.

Closing the Eagle Creek drainage to bear hunting within a one mile radius of the Whitman Lake Hatchery, will encourage bear conservation in an area dedicated to providing nature and wildlife experiences to Alaskans and visitors. This will greatly improve the wildlife viewing for school groups, educators, thousands of visitors, and the economy, each year. Hunters have many other locations on the Ketchikan road system from which to choose.

**PROPOSAL 4 – 5 AAC 92.510: SUPPORT**

Taquan Air has been operating bear viewing tours to the Forest Service maintained trail and wildlife viewing platform on Margaret Creek for over 10 years. These tours are sanctioned under a USFS Outfitter/Guide Permit, which allows us to take 1,632 persons annually to this location. Other operators are permitted to take an additional 1,804

persons to Margaret Creek. Access to this area is by floatplane or boat. Participants in bear viewing tours to Margaret Creek pay an average of \$365 for the experience.

The improved access trail and wildlife viewing facility at Margaret Creek is one of three similar improvements operated and maintained by the USFS in southern Southeast Alaska. The others are at Polk Inlet on Dog Salmon Creek in Unit 2 and Anan Creek on Bradfield Canal in Unit IB.

During the last 15 years the economy in southern Southeast Alaska has changed, with tourism making major inroads, as the forest products industry has declined. Bear viewing now plays a major role in this growth, with an estimated \$7 million of revenues generated in the Ketchikan area. The largest segment of visitors to the region are cruise ship passengers. Following a soft season in 2010, it is forecast that the number of cruise passengers will grow by 2.5% to 955,000 in 2011. The demand for bear viewing will also increase.

With 17 million acres in the Tongass National Forest there is ample room to accommodate the needs of locals and visitors. Needed at this point are management policies that recognize the recreational and economic changes taking place.

#### **PROPOSAL 19 – 5 AAC 92.510: SUPPORT**

Taquan Air has been taking visitors to Dog Salmon Creek at Polk Inlet on Prince of Wales Island since 2001. A USFS managed access trail and wildlife viewing platform is located here. These tours are sanctioned under a USFS Outfitter/Guide Permit, which allows us to take 1,627 persons annually to this location. A USFS road connects Polk Inlet/Dog Salmon Creek with the island road system. Access to this area is by floatplane, boat, or road. Participants in bear viewing tours to Dog Salmon Creek pay an average of \$365 for the experience.

Guide wildlife observation reports show that bear sightings at Dog Salmon Creek have declined to the point where many participants do not see a bear, resulting in disappointed guests. We are aware of increased hunting activity at this location, particularly in the last three years. It appears that this is a contributing factor to the major reduction in bear sightings at the wildlife viewing platform.

The Summer 2010 issue of the ADFG publication Bear Trails reports that “managers of black bears on Prince of Wales Island and elsewhere in Southeast Alaska are concerned about apparent declines in the bear population.” The same issue states “Historically, hunters consistently harvested an average of 225 black bears annually from POW and the surrounding archipelago in southern Southeast Alaska. However, beginning in the late 1990s harvest began to steadily increase until it peaked at nearly 500 bears during the 2005 regulatory year (July 1-June 30). Since then the annual harvest has declined each year.”

Although the number of bears harvested on POW from 2006 has decreased, this report does not identify the impact on POW by area. We believe that more detailed harvest information would identify increased bear hunting in the Dog Salmon Creek drainage during the same period.

**PROPOSAL 35 – 5 AAC 85.015: SUPPORT**

Taquan Air supports limiting the number of bears permitted for harvest in units 1 and 2. Over the last several years Taquan Air has closely monitored the viewing rates at sites common for black bear viewing. The continued monitoring of wildlife sightings in these areas pose great concern as a user of the established viewing sites in unit 1A and 2. Sightings have substantially decreased and it can be assumed that there is an occurrence of over-harvest. This proposal will contribute to the sustainability of the black bear population and keep it available for all user groups.

**PROPOSAL 36 – 5 AAC 85.015: SUPPORT**

Taquan Air supports limits to hunting black bears in units 1 and 2. Over the last several years Taquan Air has closely monitored the viewing rates at sites common for black bear viewing. The continued monitoring of wildlife sightings in these areas pose great concern as a user of established viewing sites in unit 1A and 2. Sightings have substantially decreased and it can be assumed that there is an occurrence of over-harvest. This proposal will contribute to the sustainability of the black bear population and keep it available for all user groups.



## **ALASKA CENTER *for the* ENVIRONMENT**

807 G Street, Suite 100 Anchorage, Alaska 99501

907-274-3632 [valerie@akcenter.org](mailto:valerie@akcenter.org) [www.akcenter.org](http://www.akcenter.org)

Board of Game Comments

Alaska Department of Fish and Game

Boards Support Section

PO Box 115526

Juneau, Alaska 99811-5526

FAX: 907-465-6094

October 21, 2010

**Re: 2010 Southeast Region**

*(Proposals #2, 3, 4, 5)*

Dear Chair Judkins and the members of the Board of Game,

I am submitting these comments on behalf of the Alaska Center for the Environment and our 6,000 Alaskan members who value and appreciate wildlife. Many of our members are wildlife viewers, hunters, small business owners, and recreationalists who rely on a vibrant and diverse environment and economy for their security and well-being.

First, we would like to thank you for postponing the bear snaring proposals to the 2012 Interior meeting. The process for making these kinds of ground-breaking and controversial decisions needs to be fully transparent and allow for a meaningful discourse with the public. We appreciate the fact that the Board recognized the impropriety of eliminating the public from participating in this decision, and we look forward to being part of this discussion.

**Alaska Center for the Environment supports Proposals 2, 3, 4, and 5.**

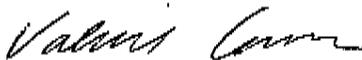
Wildlife viewing is becoming an increasingly popular activity, with nearly one-third of the US population qualifying as "active" wildlife viewers. Here in Alaska, over 50% of visitors polled stated that viewing wildlife was one of the principle reasons they chose to visit our state. Several studies confirm that wildlife viewing is trending upwards. One of them, the National Survey of Fishing, Hunting, and Wildlife-Associated Recreation Survey has been conducted since 1955 and is one of the oldest and most comprehensive recreation surveys.

This sector of Alaska's economy is growing rapidly and yet the Department of Fish and Game has not yet fully acknowledged or promoted wildlife viewing. Indeed, in the recent proposal to amend the Board of Game Bear Conservation, Harvest, and Management Policy (#2006-164-BOG), it is clear that the changes intend to undermine the importance of wildlife viewing to our state's economy by changing language to reflect the bias of the Department towards hunting. In our comments we stated that while language regarding the rapidly growing industry of bear viewing in Alaska is included in the revised bear policy, the tone of the section has been altered from the 2006 version. The revised bear policy implies that wildlife viewing is a cause of conflict over competing uses (i.e. hunting) rather than an opportunity to be promoted. It also states that the two activities are compatible. The revised bear policy eliminates language regarding maximization of public benefits and the need to pursue management programs designed to provide wildlife viewing opportunities. In addition, language regarding the exclusion or integration of other uses in areas important for viewing is eliminated in the revised plan. Rather than broadening the purposes of bear management for a variety of uses or improve the conservation of bear species as it should, the intent of the revised bear policy is to instead focus on the importance of bear hunting and the need to reduce bear numbers because of the predatory role they play in the ecosystem.

Proposals 2, 3, 4, and 5 are submitted by residents and business owners who rely directly on a robust and healthy population of bears. They have all noticed a marked decline in the past few years, and are asking the Board to help protect their livelihoods. Each of these proposals is reasonable and deserves your consideration.

The Board of Game is charged with providing wildlife opportunities for different user groups of Alaska's wildlife. This is a perfect opportunity for you to support tourism and wildlife viewing interests.

Sincerely,



Valerie Connor

Conservation Director  
Alaska Center for the Environment  
807 G Street, Suite 100  
Anchorage, Alaska 99501  
(907)274-3632  
[valerie@akcenter.org](mailto:valerie@akcenter.org)

**Proposal 20 – Lottery issuing of black bear tags.**

Comment: My greatest concern would be the number of tags and how many were allocated for just the outfitters. I have heard rumor of different ideas to allocate tags for outfitters. If that information is in this book then I apologize for not having enough time to read it and respond to the proposals in time. Leaving many tags for only a few people gives them a virtual monopoly. The outfitters on POW already have a monopoly for guiding. Allocating more than an equal share of tags gives them a monopoly on the marketable black bear hunting as well. If the outfitters are given half the tags then people can put in for tags or just pay the guide for a guaranteed tag, and that gives the outfitter and unfair marketing advantage. There are many do-it-yourself hunting lodges on the island that will be effected just as greatly if the tags are limited and I doubt they will be allocated any of the tags to offer directly to their clients. It would be more reasonable to have a lottery and for those that do receive tags they can decide to go with a guide or a do-it-yourself lodge.

**Proposal 21 – Shorten the black bear hunting season by removing September from the months that are open for hunting.**

Comment: With the current regulation not allowing the use of a motorized vehicle as transportation to hunt for black bear during the month of September is essentially closed already. If the percentage of sows taken during the fall is too great then a full closure of the fall hunt seems more sensible. During the fall people visiting can fish or hunt for deer so the financial impact to the small towns would be much less.

**Proposal 22 – Shorten the black bear hunting season by removing June from the months that are open for hunting.**

Comment: The small towns on POW have very little happening, as far as tourism, in the spring so the economic impact will be much greater felt if you implement this proposal. There are better options to help preserve bear populations.

**Proposal 23 – Shorten the black bear hunting season by removing June and September, and go to a lottery issuing of black bear tags.**

Comment: As stated in previous proposal responses I believe the closing of the fall black bear hunt is the best option for reducing the amount of time available to hunt and thus reducing the amount of bears killed. Again as stated above the lotter drawing for black bear tags is an option if the number of tags does not make it impossible for local do-it-yourself businesses to book their clients. If the outfitters on POW are allowed to have a large amount of guaranteed tags then their clients don't even have to consider the lotter drawing. They can simply pay their way past the regulations. For the "average joe", who can't afford a guide, they will be left with fewer options and fewer opportunities to hunt. If the lottery tags were left open those that do draw a tag can decide who they want to do business with.

About me:

I am an Oregon resident but I have spent over a lot of time on the island over the last 12 years. I have worked over the summers there as a fishing guide on the rivers. I have spent a lot of time fishing and hunting the island for my own recreation. I have family that live on the island and consider it my second home. What I can say is that in the time I have spent hunting POW for black bear I have noticed a definite change in behavior but not a change in population. The bears have gotten smarter and more aware of humans as a threat. Despite that I continue to have good success hunting black bear on POW with my bow. I do not bait bears so I consider my hunting fair chase. With that being said I still don't have trouble finding bears they just don't make themselves as easy to find as they once did. There are still many large bears on POW I just think they don't hang out in the wide open as often as they used to. Be careful not to implement regulations that will make an already tough economy, even tougher on the local business, because a few people are having trouble finding the bears. Bears learn to adapt to changes in hunting pressure as well.

Thanks for taking the time to listen to my comments.

Kenji King  
503-504-6760

October 20, 2010

Board of Game Comments  
ADF&G  
P.O. Box 115526  
Juneau, AK 99811

To: Alaska Board of Game

This letter is in reference to proposal #47 submitted by the Yakutat Fish and Game Advisory Council requesting trapping buffers in high-use recreational and residential areas. I support this proposal as amended below.

As a member of the Yakutat community, I spent a great deal of time outdoors exercising myself and my dogs. I consider myself a responsible dog owner and do not let them run at large. I use caution regarding traps when walking with my dogs; however, given the current regulations, there is nowhere I can safely go with my dogs without the risk of entrapment and potentially death even close to a trail or road. I have personally had 2 different dogs caught in traps (a snare and a leg-hold trap) right next to a trail and a road where I was walking with them in the areas under consideration in recent years. I believe that the Yakutat forelands are expansive enough to afford a few small areas where dog owners and families can recreate without the threat of injury to or loss of a pet, while still allowing plenty of opportunities for trapping. I applaud the AC for acknowledging this issue and taking the proactive approach towards preventing future entrapments and possible fatalities.

I feel that this proposal represents a compromise between the user groups, and that these areas represent the most likely scenarios for conflicts. I would, however, recommend including a prohibition on larger leg-hold traps, in addition to snares and 330 conibears, within the proposed buffer areas. These types of traps can be very damaging and potentially life-threatening to a pet. Again, the proposed closure areas are small, and therefore including leg-hold traps should have minimal impact on trappers.

I thank you for your consideration.

Susan Oehlers  
P.O. Box 203  
Yakutat, AK 99689



**ATTN: Board of Game Comments**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**  
**Fax: 907-465-6094**

Dear Board of Game:

Thank you for the opportunity to comment on the proposals to be considered in the upcoming Southeast Region Meeting.

**Proposal 12**

I oppose proposal 12 to reinstate the use of wolf snares in Gustavus based on the by-catch and poor snare trapping practices I have observed in Gustavus in the past, and because of concern for the wolf population in the area if snares are legalized.

I have lived in Gustavus over 15 years and for much of that time wolf snares were legal and used frequently around town. Gustavus is a large flat area with a long wide beach meadow that many of us walk regularly with our friends, children, and dogs. When wolf snares were legal, a common place for trappers to set them was in the first groups of trees above the beach meadow. My first encounter with these snares was when my dog disappeared from my side while walking a commonly used section of beach. I may not have found him except my other dog followed his scent to a large pile of carcasses and compost where the first dog was caught in a neck snare. I released him and luckily he was fine. A year or two later I found another set of snares surrounding rotting carcasses with a dead bald eagle next to it. The eagle had apparently been caught in a snare and then discarded as more bait. Later in the winter I found a dead moose calf, caught by the nose in a wolf snare. The moose remained for almost a week, indicating that the trapper did not check his/her traps frequently. After ADF&G was notified and the trapper was told to remove the snares, I went to the site and found one remaining snare near the carcass, still set to trap, that had been overlooked.

The break-away snares that are being proposed are designed to minimize by-catch of moose caught by the leg or large animals such as bears. Break-away snares will not prevent by-catch of eagles, moose caught by the nose, dogs, or small bears. Break-away snares will not prevent poor trapping practices such as infrequent trap checking or accidentally leaving traps set. I know of no trapping licenses in Gustavus that have been revoked, so if snares are legalized again I expect we will see the same type of trapping practices and a similar amount of by-catch. We do not have a State Wildlife Troopers in Gustavus so violators will likely not be caught. If trappers are allowed to set snares along the beach meadow and other popular hiking areas, I expect that more dogs will be caught and potentially killed.

Legalizing snares would likely increase wolf mortality on the Gustavus forelands because snares are cheaper and easier to transport and set than currently legal leg hold traps. There seems to be a growing belief that increasing wolf numbers is resulting in a decrease in moose recruitment.

This belief is not backed up with scientific data. We not have a population estimate of wolves using the Gustavus area, we do not know how far these wolves range, or how much time they spend in the forelands. We do not know the extent that wolves kill moose in Gustavus as it has been observed very infrequently. We do know that wolves are frequent scavengers of carcasses and I personally have found at least 5 moose that died naturally and were later scavenged by wolves. Moose appear to be on the downward trend following a population irruption in the early 2000's, and several variables likely influence the decrease in recruitment including forage quality, hunting pressure, and predation. To further complicate predation, there are also black and brown bears present. Without a good examination of predator-prey dynamics in an area that is NOT designated for intensive management, there is no justification in managing towards decreasing wolf populations. I understand that 3 wolves have been shot in Gustavus so far this fall. If there are 12-20 wolves in the area, this represents a 15-25% mortality before trapping season begins. I fear that cheap efficient trapping means could mean the elimination of the entire Gustavus pack.

Even a temporary loss of wolves on the forelands will have negative effects on the ecosystem and community. Wolves have been shown to play a critical role in maintaining the fitness of prey species and increasing habitat for birds, reptiles, fish, and insects by controlling herbivory. My family and I love to hear wolves howl and see their tracks in the sand, as do most people in Gustavus that I talk to. Locals get very excited if they get a rare glimpse of a wolf, and many tourists inquire as to where they might be able to see these wild elusive animals. Most of us also hunt moose and while we may wish there were more to harvest every year, NOT at the cost of the integrity of the ecosystem. A healthy ecosystem and natural predator-prey dynamics are a large part of why many of us live in and love Gustavus. If proposal 12 passes, I fear the opportunities for non-consumptive uses of wolves such as wildlife viewing and photography will be lost.

#### Proposals 33-40

**I support proposals 33-40** to limit and decrease incentives for black bear harvest in Southeast Alaska. ADF&G states in proposals 35 and 36 that they have "concerns about black bear populations in some parts of region" and that "black bear harvest levels need to be reduced in the region". I share the departments concern and would like to see the BOG take actions to decrease harvest by passing the following:

**Proposals 33 and 34** - prohibit black bear trapping and the sale of black bear parts. My understanding is that the BOG reclassified black bears as furbearers to make hunting easier and provide incentives to hunters in Intensive Management GMUs in the Interior. Southeast AK has no intensive management GMUs so these incentives are not warranted and should not be allowed. In addition, SE AK has a small number of rare glacier bears that may be specifically targeted if hunters are allowed to sell their hides.

**Proposal 35** - reduce annual resident harvest from 2 bears to 1. This is a straightforward way to reduce mortalities in areas of population concern, and still allows each resident to harvest 1 black bear per year.

**Proposals 36, 37, and 39** - limit resident and non-resident hunts through various means. I think

the BOG and ADF&G should use all methods listed in props 36, 37 and 39 to reduce black bear take, especially the prohibition of bear baiting. Bear baiting is ethically questionable and according to the Wildlife Troopers (in prop 38), almost 75% of baiting stations are illegal in some manner.

**Proposal 38** – require a GPS location of bear baiting stations. If bear baiting continues to be allowed, precise locations of these stations is necessary for adequate enforcement.

**Proposal 40** – require black bear meat to be salvaged during June. Hunters in June should be required to salvage the edible meat because there is no reason to allow it to be wasted. If hunters do not want the meat themselves, they should give it to one of the many families that need it.

**Proposal 43**

I support proposal 43 to limit the wolf hunting season. Wolf harvest levels are too liberal in Southeast AK where there is concern for subspecies population levels in some places and insufficient data in most others. As I have mentioned before, Southeast AK has no intensive management GMUs, so liberalized and potentially unsustainable harvest of predators is not warranted.

Thank you for reading and considering my comments,



Tania Lewis  
P.O. Box 251  
Gustavus Ak 99826



## **Written Comments to Alaska Board of Game Southeast Region Meeting Fall 2010**

**Proposal 2: I am in OPPOSITION of this proposal.** Although I do not guide hunters in this specific area, I believe this area holds opportunity for recreation hunters who are not able to travel far from town. Many hunters are limited in their ability to travel, due to boat size or speed and limited time on weekends or after work. I believe there is a healthy bear population in this area and plenty of bears to satisfy the needs of hunters as well as wildlife viewers.

**Proposal 4: I am in OPPOSITION of this proposal.** Recreational sportsman have been using the Marguerite Bay road system for hunting fishing since its creation decades ago. I personally started hunting bears in off of this road system in 1982. This road system provides a unique opportunity to travel by boat and then ORV to access clear cuts, standing timber and muskeg for the purpose of hunting deer, bear and wolf within a reasonable proximity to Ketchikan. The Forest Service already has a rule of "No Shooting" within 150 yards of the Bear Viewing Platform and trail. There is no risk to bear viewers from hunters. I believe a deer hunter should be able to shoot a black bear that has come to a deer call or is trying to "steal his deer" if that hunter has not already filled his annual bag limit for black bear. There are lots of bears in this drainage. I believe the decrease in sightings by summertime bear viewers may be a function of plentiful food in other areas as well as change in bear behavior due to the large numbers of bear viewers visiting the area.

**Proposal 5: I am in OPPOSITION of this proposal.** Of all the proposals, I am most concerned about Proposal 5 which describes closing all of Rudyerd Bay and Walker Cove drainages to both brown and black bear hunting. These drainages both fall into GUA 01-10 in GMU 1A.

As a registered guide permitted by the Forest Service to operate in Misty Fiords, GUA 01-10 is one of my primary areas for black and brown bear hunting. I have avoided hunting in Rudyerd Bay and Walker Cove drainages during the tourist season to reduce human interaction of any kind as well as conflict with user groups. As a guide, I strive to provide a true wilderness experience for my clients who are often interested wildlife viewing, fishing, camping as much as the actual stalking and harvest of the bear. These hunters pay a high price for the experience and are often satisfied even though they may not harvest a bear. Some of these hunters return year after year, just for the wilderness experience.

I do hunt in these areas, when I feel that there is little chance of encountering tourists or any other people. I realize that Rudyerd and Walker are popular with other hunters due to it's proximity to Ketchikan, protected anchorage, and high brown bear density. Closing Walker Cove and Rudyerd Bay would probably result in a shift in hunting pressure to more secluded drainages that I hunt and increase the amount of human interaction, hunting conflicts and all the things we strive to avoid when guiding a hunter in a

wilderness setting. A closure as suggested by Proposal 5 would effectively shrink our wilderness opportunities.

Although the writer of this proposal (5) can fly her airplane over all 2.2 million acres in Misty Fiords, the bear hunting opportunities for myself, my clients and most bear hunters are limited to just the shoreline of the bays, tideflats and those portions of the rivers that are "navigable" by jet boat, skiff or foot travel. There is already a moratorium on "guided brown bear hunts" in Misty Fiords and "Forest Wide" (TNF) freeze on guided black bear hunts. Taking away (closing bear hunting in) entire drainages is just another way to reduce our ever shrinking opportunities to make a living as guide.

**Proposal 33: I SUPPORT this proposal.**

**Proposal 36: I am in OPPOSITION of this proposal.** If the department feels that there is a need to reduce black bear harvest numbers, I suggest that the Board consider Proposal 37.

**Proposal 37: I SUPPORT proposal 37.** This proposal offers the Department an avenue to control the black bear harvest when deemed necessary.

Thank you for your consideration to my comments.

Sincerely,

Edward Toribio  
Ketchikan, Alaska

FAX TO : 907-465-6094 (by 5:00pm October 22, 2010) Southeast Nov. 5-9 Board of Game meeting

Or Mail: ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Page 1 of 8

FROM: Bev Davies 37-year resident of Ketchikan, Alaska (cell 907-617-7207)

Proposal 1 SUPPORT

Reducing the season dates by 2 weeks will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

Proposal 2 SUPPORT

Reducing the season for hunting in those 2 areas will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

Protect the livelihood of those who work for, and the operators of, the bear viewing businesses in those locations and resultant positive effect on the economy in Ketchikan.

In the case of the Neets Bay salmon hatchery, where app. 8000 tourists per summer are guided there for the purpose of bear viewing, reducing the hunting season will solve the problems of conflict between the 2 user groups and improve the hunters, and Alaska's, reputation with these visitors who don't consider hunting at a salmon hatchery, where bears are also habituated to humans due to the tours, ethical or "fair chase".

Proposal 3 SUPPORT

Closing the bear hunting within a one-mile radius of the Whitman Lake Hatchery will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

This salmon hatchery is located 8 miles by paved highway from downtown Ketchikan. 16,000 people were guided at the adjacent private acreage, named the Alaska Rainforest Sanctuary, in the summer of 2010. Residences are in close proximity to the hatchery and this business. In addition to the reasons cited in Proposal 3 above for the Neets Bay salmon hatchery there is the added problem of safety. Closing just one mile to bear hunting around this hatchery will create a safety zone for the 16,000 clients, plus employees and residents in this human-populated area.

The number of people to this site should continue to increase, dependent upon the bear population, as there is an anticipated increase to 955,000 cruise ship visitors next year. **Tourism has replaced timber as the anchor industry in Ketchikan so the economy of Ketchikan is dependent upon tourism with bear viewing being a favorite tour, contributing millions of dollars to the economy and employing hundreds of Ketchikan residents.**

Proposal 4 SUPPORT

Closing the Margaret Creek USFS bear viewing platform in the Traitor's Cove area to bear hunting will help solve the **problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter. This declining bear population is a serious concern to ADF&G. Please read the email**

Proposal 4 cont'd SUPPORT

Page 2 of 8

quoted below dated October 21, 2010 from Boyd Porter, Wildlife Management Biologist with ADF&G in Ketchikan (907)225-2475:

"Bev, We don't have specific home range information for black bears in southeast Alaska. I am currently working on a project to get that exact information on black bear in Unit 2 (Prince Of Wales Island), but realize these studies are labor and cost intensive . I spent 6 years pulling funding together for the two bear projects I currently have going on POW. I also only have myself and one assistant on POW to do all the work. Remember we have all other species to manage and although very important, bears are just one component.

We use bear density estimates from Washington State where they have done extensive bear studies. We look at our habitat capability in specific areas here and extrapolate from that Washington work. At the end of our 3-year research project on POW we will also have better estimates from southeast bear populations. However, using that work to estimate bears in this area (Margaret Creek in the Traitor's Cove area) will still take some extrapolation because this habitat is not nearly as productive as most of Unit 2. **Regardless of what we do with hunting seasons and bag limits, we expect drastic changes in bear numbers in the next 10 years in many parts of southeast because of vast tracks of second growth timber reaching stem exclusion and reducing carrying capacity (less food) for bears.** If you apply 1.5 bears to this area you will be pretty close to a density estimate for Revilla. You can look at my management reports on the state website and get literature citations for the Washington work and other studies we have gleaned information from to manage bears. Revilla Island has about 1064 sq miles of habitat.

I hope this answers your questions. Boyd"

An average of 8 bears per year or 80 over the last 10 years have been legally (we suspect many are taken illegally) harvested from the Margaret Creek/Traitor's Cove area. This area was heavily logged in the 1950's and 60's with the most recent logging activity in some parts in the 1990's and no logging activity upcoming. The ADF&G's concern for a drastic decline in the bear numbers definitely applies to this area. My husband and I have spent almost every weekend from mid May in 2003 to early October in 2010 at the dock at Marguerite Bay in Traitor's Cove and we hike the 1.5 miles to the USFS bear viewing platform each day that we are there. The problem is we used to see a lot but now we see fewer and fewer bears with this summer being noticeably scarce on bears and those we did have the good fortune to see were quite small.

We meet many people each weekend at the dock. The vast majority (over 95%) are there for bear viewing and not bear hunting. These are mainly local Ketchikan residents out boating like us, some are boaters from other places. We also talk to many of the people who arrive by floatplane who, like us, are thrilled at the anticipation of seeing a bear in the Alaskan wilderness. None of us want to see a dead bear. Unfortunately this has happened many times with one hunter even asking a couple at the dock how to skin the dead mother bear and cub he had on the dock. This is distressing to the non-consumptive use segment of our population. We witnessed a bear being harvested from the beach across from the dock and were thankful our young nieces (ages 4,6,&8) were not with us that day. Forcing hunters and bear viewers to share the same space is like expecting whale watching and whale hunting to co-exist. We are asking for the BOG's help in allocating space for the Ketchikan residents to access for bear viewing. This proposal only asks for 1 mile from the USFS bear viewing platform, etc. **In the Black Bear Management Report by ADF&G 1 July 1998 to 30 June 2001 it was noted then; over 10 years ago, that Margaret Creek was "a contentious area" with "several clashes with hunters and bear**

viewers during the past several years; this site received more complaints to the Tongass Forest Supervisor than any other site in Southeast Alaska. Bear viewers would like to see some or all of the area closed to hunting, but the hunters do not want any more hunting area taken away from them.\* ADF&G has safety concerns with an increasing number of bear viewers at the site and bear hunters using the same area for sport hunting." It also cites "our crude population estimate" and concludes with "As local bear viewing interest continues to grow we will undoubtedly be faced with allocation issues related to both human safety and bear preservation issues, requiring compromise by hunters and wildlife watchers." Again, this was over 10 years ago. \*The only area currently closed to hunting is the Ketchikan road system: a strip ¼ mile wide on each side of the Tongass Highway system including the Ward, Connel, and Harriet Hunt Lake roads. Anan Creek (near Wrangell) for 1 mile of the Anan Creek drainage and mouth of the creek and the Hyder Salmon River drainage, both of which are not easily accessible from Ketchikan, are the closest bear viewing areas that are closed to hunting. There are app. 3 million acres in the Ketchikan-Misty Fjords Ranger District (Tongass National Forest surrounding Ketchikan) that is available to hunters plus all of Prince of Wales Island.

Now there are 6 tour operators with a total of 3436 USFS Special Use Permits for visitors to participate in bear viewing tours (revenue to the economy of Ketchikan of \$1,250,000.00) and an ever-increasing number of local Ketchikan families using this facility for bear viewing and various other utilizations of the logging roads, etc. mentioned in our proposal. The dock is owned and maintained by the USFS and Taquan Air added a section of dock for the boaters to use eliminating congestion with boats and floatplanes. The dock is full (up to 8 or 9 boats) most weekends now. This is the only USFS bear viewing facility in unit 1A (Ketchikan area). Most experienced hunters do not frequent this area due to the high volume of people there, however there is conflict with those that do and a **very real safety concern**. For example, hunters harvested a bear (we saw it draped over the handle bars of their 4-wheeler) on September 11, 2010. The next day we saw a wounded bear (couldn't use one leg). Fortunately for us this bear limped away. Bears are intelligent, shy animals that can also be dangerous if surprised or wounded.

**Consistency of bear-human interactions** is an important guideline for management of bear viewing areas. Humans who interact with habituated bears should behave consistently, and homogeneous management encourages consistent human behavior (Aumiller, 1994).

In the Board of Game Bear Conservation and Management Policy May 14, 2006 it is stated that "public interest in bears has increased dramatically in Alaska during the past decade. Some of this interest is specifically targeted at bear viewing. Bear viewing is a rapidly growing industry in selected areas of the state. **The interest exceeds the opportunities provided now by such established and controlled sites as McNeil River, Pack Creek, Anan Creek, Wolverine Creek and Brooks Camp.**" This BOG has the unique opportunity to acknowledge sites such as the USFS Margaret Creek bear observatory to add to this list of established and controlled bear viewing sites and thus be pro-active in contributing to the needs of the public and the economy of Ketchikan, Alaska. With over a million visitors a summer (955,000 cruise ship visitors plus independent travelers) Ketchikan is the bear viewing capital of Alaska with perhaps a higher volume and revenue than all the other sites listed above, combined. For example:

The following numbers were obtained from the USFS data (except Eagle Creek) and published bear viewing tour prices.

Proposal 4 cont'd SUPPORT

Page 4 of 8

Dog Salmon/Polk Inlet	1600 visitors	(\$365 per person x 1600 = \$584,000)
Traitors Cove/Margaret Creek	3436 visitors	(\$365 per person x 4000 = \$1,254,140)
Anan Creek	384 visitors	(\$485 per person x 384 = \$147,456)
Neets Bay	8000 visitors	(\$365 per person x 8000 = \$2,920,000)
AK Rainforest/Eagle Creek	16000 visitors	(\$100 per person x 16000 = \$1,600,000)
Totals for Bear Viewing	31,384 visitors	\$6,505,596 total revenue dollars

There were less tours to Anan Creek (closer to Wrangell) because of the greater distance from Ketchikan, resultant higher cost, and closer accessibility of the USFS platform at Margaret Creek. Promech Air has an exclusive contract to take bear viewing tours to the Neets Bay salmon hatchery owned and operated by Southern Southeast Regional Aquaculture Association (SSRAA).

These numbers do not include several companies that conduct bear viewing tours by boat nor the huge number of Misty Fjords flightseeing tours where all the clients inevitably ask the pilot "are we going to see a bear?"

This proposal only effects a small portion of the Traitor's Cove/Marguerite Bay area to bear hunting. A 1.5 mile portion from the dock to the Margaret Lake and the 2 USFS maintained roads. One road is a 4-mile road from the dock to just beyond the lake and the other is an 8-mile road from the dock over the lower bridge (over Margaret Creek downstream from the USFS platform) and around Marguerite Bay to Point Francis. It does not effect the many roads that lead off these 2 nor the Traitor's Cove salt chuck, and most of Traitor's Cove itself. The roads in Marguerite Bay are not connected to the Ketchikan road system nor to any of the other road systems on Revilla Island that are USFS roads such as at SW Neets, Fire Cove, Bluff, Shrimp Bay, Hassler, Klu, Upper Carroll Inlet, Elf Point, and the vast road systems at Shelter Cove and Shoal Cove.

If a compromise is needed then Margaret Creek: to within 1 mile of Margaret Creek downstream from the mouth of Margaret Lake including the area within one mile radius from the mouth of Margaret Creek outlet is closed to hunting, is reasonable and would provide a much needed safety zone.

However, this amended proposal would not solve the problem of the declining bear population and manage the resource for the bear viewing industry. Unfortunately, there are no studies done to determine the population of bears in this area or their home range. A female bear lives in one area. One estimate is the average female black bear's home range is 1 - 15 sq. miles depending upon the availability of food in her habitat. Males roam further. My husband and I and others hike and utilize all of the roads in the Marguerite Bay area so the original proposal as written would safeguard us more from stray bullets and wounded bears and conserve more of the bears that live in the area than the amended version.

Again, there are serious problems in this area that need to be solved, as stated earlier, and we request the BOG help in solving these problems for the benefit of all Alaskans. This area has been a problem for 10 years and we can't continue to ignore these safety and conservation issues. We will work with you to come to a solution that is in the best interests of all. Thank you.

**Proposal 5 SUPPORT**

Page 5 of 8

Closing the drainages leading into Walker Cove and Rudyerd Bay to bear hunting will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

My husband and I have been to Rudyerd Bay in the Misty Fjords National Monument three times, by boat. We saw bears there only the first time, about 10 years ago. We were at the mooring buoy and a magnificent mother brown bear and her 3 cubs were playing on the beach, a true National Geographic moment. However, before this brown bear family appeared there was a scrawny orphaned brown bear cub on the beach. We learned that the mother was dead on the beach around the corner and had been shot from a boat and only the gall bladder was taken.

If a compromise needs to be reached with this proposal I favor closing the drainages leading into Rudyerd Bay. The economic impact of tourism to Ketchikan cannot be overstated.

**Proposal 6 SUPPORT**

If hunters are proposing to limit the season for "bucks only" deer hunting out of concern for rebuilding deer herds then that makes sense to me.

**Proposal 18 SUPPORT**

Proposal recommended by the ADF&G based on what seems like an alarmingly low number of wolves in Unit 2 (POW Island).

**Proposal 19 SUPPORT**

Closing the Dog Salmon Creek area at Polk Inlet on Prince of Wales Island will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

For reasons of safety, sustainable bear population, public need for bear viewing opportunities, and the significant economic impact of guided tours.

**Proposal 20 SUPPORT**

Setting a number of tags to be allocated for black bear hunting in Unit 2 will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

**Proposal 21 SUPPORT**

Reducing the opening of black bear season in Unit 2 will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

**Proposal 22 SUPPORT**

Reducing the opening of black bear season in Unit 2 will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

**Proposal 23 SUPPORT**

Changing the black bear hunt in Unit 2 to a registration hunt and shortening the season dates will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

**Proposal 24 SUPPORT**

Page 6 of 8

Lowering the nonresident bag limit for deer in Unit 2 to conserve the deer population. This will benefit the Alaskan resident hunters.

**Proposal 25 SUPPORT**

Modifying the wolf trapping and hunting regulations for Unit 2 to conserve the wolf population, a similar objective to the ADF&G's proposal 18.

**Proposal 31 SUPPORT**

Proposed by the ADF&G to close a loophole in the regs enabling some trappers to take marten and mink before the legal season.

**Proposal 33 SUPPORT**

Prohibiting the sale of black bear meat, hides, skulls and other parts in the Southeast Region will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

Why encourage the harvesting of bears for profit when we already have a declining bear population?

Again, the economic impact of bear viewing in Southeast cannot be overstated.

**Proposal 34 SUPPORT**

Prohibiting black bear trapping and the sale of black bear meat in the Southeast Region will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

It will also prevent the huge numbers of visitors to our State from having a very negative impression of Alaska for allowing such a practice on such large, intelligent and shy animals. Bear traps are indiscriminate in taking sows, cubs, brown bears, dogs or even people. Would a child know to stay away from a bear trap?

Again, the economic impact of bear viewing in Southeast, and protecting this resource for such, cannot be overstated.

**Proposal 35 SUPPORT**

Proposed by the ADF&G to reduce the black bear bag limit and thus it will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

**Proposal 36 SUPPORT**

Proposed by the ADF&G to reduce the black bear harvest limits in the region to help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

**Proposal 37 SUPPORT**

Proposed by the Alaska Professional Hunters Association recognizing their "continued serious concern for black bear conservation in Southeast Alaska" with a proposal to open a nonresident drawing permit hunt for blackbear. This will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

**Proposal 38 SUPPORT**

Page 7 of 8

Proposed by the Alaska Wildlife Troopers to require GPS coordinates for bear baiting stations to assist with law enforcement of bait stations.

**Proposal 39 SUPPORT**

No bear baiting in Units 1, 2, and 3. This will help solve the problem of the declining bear population as reported in the ADF&G 2010 Bear Trails newsletter.

**Proposal 40 SUPPORT**

Salvaging the black bear meat from the field is good utilization of the resource.

**Proposal 41 SUPPORT**

Allows for better management of the deer population by ADF&G.

**Proposal 43 SUPPORT**

Allows for conservation of the wolf population.

*Ben Davis 10/22/10 5:00pm*

Ben Dawlos

Page 8 of 8

**Alternative 3**  
**Access and Travel Management Environmental Assessment**  
**Ketchikan-Misty Flords Ranger District**



Map produced using GIS data.  
 This map may or may not meet  
 National Map Accuracy Standards.

0 2 4 8 Miles

1 inch equals 3.7 miles

- \* ML - Maintenance Level
- \* OHV - Off Highway Vehicle
- \* NFS - National Forest System

**Legend**

- |                          |                         |
|--------------------------|-------------------------|
| * Marine Access Facility | ML 1 Closed Road        |
| 500-foot contour line    | ML 2 Mixed Use          |
| Major Streams            | ML 3 Passenger Vehicles |
| Non-NFS Lands            | ML 4 Paved Road         |
| Lakes or Saltwater       | OHV Trail               |
|                          | Non-NFS Roads           |

**ATTN: Board of Game Comments**  
**Alaska Department of Fish and Game**  
**Boards Support Section**  
**P.O. Box 115526**  
**Juneau, AK 99811-5526**  
**Fax: 907-465-6094**

**PROPOSAL 4 - 5 AAC 92.510 Areas closed to hunting:** Close the Margaret Creek Drainage area in Unit 1 to bear hunting:

As a 3 time visitor to Alaska, I am in favor of restricting bear hunting in viewing areas to allow others to experience the visions of wildlife in Alaska in person. Alaska uses their wildlife as a marketing tool in brochures, websites, travel magazines and guides. Knowing that one is able to view bears safely without fear of being shot with a stray bullet, or hunted by a trigger happy person would allow visitors to photograph and watch bears in their native habitat without harming them or destroying natural resources. Visitors travel great distances, spend millions of dollars each year that they gladly and willfully spend, in the hopes of seeing live animals. For many, this is a lifetime goal and dream. They return to their homes with photographs and memories to share with family and friends, in the hope that they too will make this trip and be a fortunate as they were to see these magnificent creatures. This cycle perpetuates the visitor and dollar stream to the state of Alaska, and supports many local small businesses.

Hunters have so many more opportunities to hunt bears elsewhere in the state. Please keep this area closed to hunting.

**PROPOSAL 5 - 5 AAC 92.510. Areas closed to hunting.** Close an area within the Misty Fjords National Monument in Unit 1 to brown bear hunting:  
Region 1 Southeast Mainland, Unit 1A-1B; Misty Fjords National Monument - Rudyerd Bay and Walker Cove. All drainages leading into Rudyerd Bay and Walker Cove are closed to taking brown bears and black bears.

As a 3 time visitor to Alaska, I am in favor of restricting bear hunting in viewing areas to allow others to experience the visions of wildlife in Alaska in person. Alaska uses their wildlife as a marketing tool in brochures, websites, travel magazines and guides. Knowing that one is able to view bears safely without fear of being shot with a stray bullet, or hunted by a trigger happy person would allow visitors to photograph and watch bears in their native habitat without harming them or destroying natural resources. Visitors travel great distances, spend millions of dollars each year that they gladly and willfully spend, in the hopes of seeing live animals. For many, this is a lifetime goal and dream. They return to their homes with photographs and memories to share with family and friends, in the hope that they too will make this trip and be a fortunate as they were to see these magnificent creatures. This cycle perpetuates the visitor and dollar stream to the state of Alaska, and supports many local small businesses.

Hunters have so many more opportunities to hunt bears elsewhere in the state. Please keep this area closed to hunting.



Comments of George Utermohle  
Proposals 10 and 11

October 22, 2010

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: SUPPORT - Proposal 10: Juneau-Douglas Unit 1C: Juneau area Discretionary Trapping Permit  
SUPPORT - Proposal 11: Areas Closed to Trapping: Treadwell Ditch Trail

Dear Members of the Board of Game:

I have proposed PROPOSALS 10 and 11 and respectfully request your consideration and adoption of the proposals. These proposals are intended to promote the public safety and welfare for trail users in the Juneau area. These proposals are NOT intended to significantly interfere with lawful trapping activities in the Juneau area.

**Proposal 10** would give the Department of Fish and Game authority to set discretionary trapping permit conditions and procedures in the Juneau area under 5 AAC 92.051. The Department would determine if and when any of the authorized conditions or procedures are appropriate.

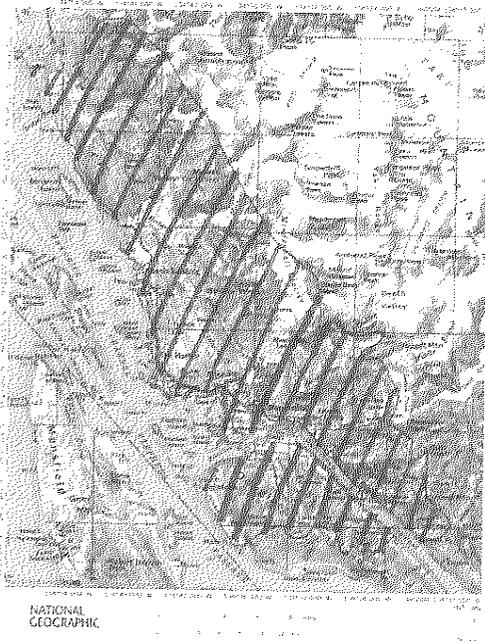
Most of the Juneau area is marine waters, mountains, and glaciers. The limited habitable area of Juneau is compressed between the mountains and the sea. Similarly, the trappable area of Juneau is restricted into this same limited area. It is only a matter of time before another conflict between trapping and other outdoor users arises again. The death of a Bassett hound in a legally set wolf trap adjacent to a popular trail two years ago is an example what Proposal 10 seeks to avoid. The Anchorage area has experienced a number of tragic incidents involving trapping adjacent to populated areas in recent years. We have been fortunate in avoiding similar incidents in Juneau during that time. We would like to ensure that Juneau does not have the same unfortunate experiences as the Anchorage area.

Proposal 10 is *pro-active*. The Proposal gives the Department the necessary authority to implement measures that can minimize or prevent adverse interactions between trapping activities and other outdoor users in a timely manner BEFORE an adverse event occurs. Until the Department determines the need to act under the authority of Proposal 10, there would be no need to adopt any of the permit conditions authorized by 5 AAC 92.051. If Proposal 10 is not adopted then there could be a delay of more than 2 years before the Board of Game could respond to and address a conflict between trapping and other users of Juneau's outdoor space.

There are many popular trails in the Juneau area that are enjoyed by residents and visitors to Juneau. Proposal 10 could make those trails safer for hikers, skiers, and other users of Juneau trails, as well as the dogs and children that accompany them into the outdoors.

Comments of George Utermohle  
Proposals 10 and 11

Proposal 10 would be applicable to the "Juneau Area" which is the densely populated area along the Juneau road system. The suggested area to be included in the "Juneau Area" is shown in the following map:



MAP Proposal 10: Juneau-Douglas Unit 1C: Juneau area  
Discretionary Trapping Permit

Proposed "Juneau Area" = cross-hatched area

**Proposal 11** would add the Treadwell Ditch Trail to the list of similarly situated trails closed to trapping in Juneau under 5 AAC 92.550(1)(F).

The Treadwell Ditch Trail parallels the Douglas and North Douglas Highways and the Fish Creek (Eaglecrest) Road throughout its length. The Trail is adjacent to the densely populated residential areas along the Douglas and North Douglas Highways. The Trail receives daily use by residents of Douglas, North Douglas, and Juneau. The Trail is undergoing extensive upgrades with new bridges and improvements being installed. The Trail will become even more popular and will experience even greater use by hikers, skiers, bikers as the result of the upgrades.

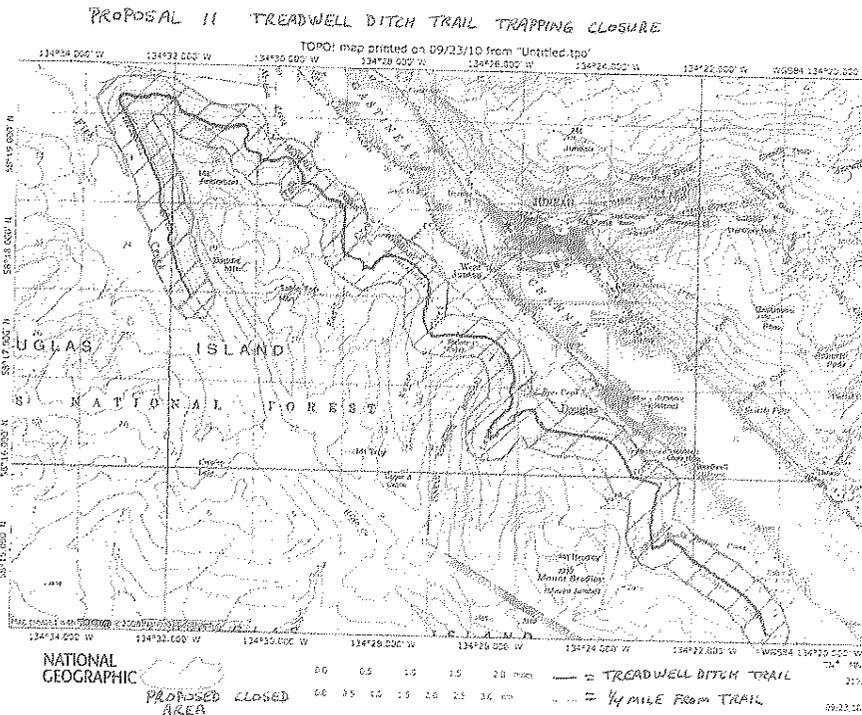
At the October, 2010 meeting of the Juneau Fish and Game Advisory Committee, it was mentioned that the Treadwell Ditch Trail receives little trapping effort due to its proximity to residential areas. Thus the closure of the Trail to trapping will not significantly affect trapping in the Juneau area; however, it will prevent casual or inexperienced, "weekend warrior" trappers from setting traps near or on the trail. 5 AAC 92.550(1)(F) provides reassurance to trail users as to where they will not encounter traps near local trails and a degree of protection to trappers from adverse encounters with other outdoor users because those other users are aware that trapping is potentially occurring in areas not listed in the regulation.

The Treadwell Ditch Trail has the same use and accessibility characteristics as the other major recreational trails currently restricted to trapping under 5 AAC 92.550(1)(F). The Trail should

Comments of George Utermohle  
Proposals 10 and 11

be included among the trails listed under 5 AAC 92.550(1)(F) in order to protect the public safety and welfare and the public's ability to access Juneau trails safely.

The location of the Treadwell Ditch Trail and the 1/4 mile closed area for ground traps is shown in the following map (the 50 yard closure area for all traps is not shown):



MAP Proposal 11:  
Areas Closed to Trapping:  
Treadwell Ditch Trail

Thank you.

Sincerely,

/s/  
George Utermohle  
Juneau, AK



**Alaska Professional Hunters Association Inc.**  
HC 60 Box 299C Copper Center, Alaska 99573  
(907) 822-3755

October 22, 2010

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

**Fall 2010 Board of Game Written Comments**

Dear Alaska Board of Game Members,

Please find the following comments for your consideration regarding proposals you will be addressing at your Fall 2010 Southeast Alaska Region meeting in Ketchikan. The professional guide industry represents a significant and important rural economy in Alaska which is dependent upon the prudent stewardship and conservation of Alaska's wildlife resources. Many of the proposals you will be considering directly affect individually operated entrepreneurships that provide long term sustainable, conservation based economics, food and social benefits to rural Alaska communities. Our membership base in SE Alaska represents great group of hunter conservationists who spend a very significant amount of their lives in the field observing wildlife, wildlands and wildwaters. Most of what they provide as professional guides is wildlife watching and quality wilderness experiences. They represent a great knowledge of the natural resources of this great and unique region. APHA encourages you to consider their individual written and oral comments as such as well as our combined comments listed within this comment letter.

**PROPOSALS THAT APHA OPPOSES: 2, 3, 4, 5, 19, 21, 22, 23, 36, 43.**

**PROPOSALS THAT APHA SUPPORTS: 7, 9, 15, 18, 24, 27, 33, 34, 35, 37, 38, 41, 44.**

**PROPOSALS THAT APHA WOULD SUPPORT WITH AN AMMENDMENT: 14, 16, 20, 32, 40.**

**PROPOSALS THAT APHA DEFERS TO THE DISCRETION OF THE BOARD: 39.**

**Comments per Proposal:****Proposals 2, 3, 4, 5, and 19: Oppose.****Regarding limiting hunting opportunities to provide for more viewing opportunities.**

We strongly oppose these proposals for a number of reasons as follows:

1. We harbor a respect for other wildlife viewing enthusiasts who respect their impact upon the lands, waters, wildlife and quality of wilderness experience factors for themselves, their clients and other user groups. **We do not feel however, that our way of life should be reduced to allow for burgeoning commercial enterprise which does not provide for these same respects.**
2. Hunting represents a valid, traditional, conservation based and long term sustainable use of a great resource.
3. Hunting has and will continue to provide a significant conservation basis for why there are viewing opportunities.
4. Hunting seasons are restricted to conservation based seasons which allow ample opportunity for viewing during non-hunting season periods of time: June, July and August.
5. As professional guides, the vast majority of the time we are in the field sharing the country with our clients, we are watching wildlife.
6. As professional guides hosting clients who hunt and watch wildlife, the economy generated from our services provides the highest value return to the State for our services and harvest as per our constitutional mandates.
7. Our sharing of the wildthings in the wildplaces for days and weeks of time with our clients carrying, rifle, field-glasses and camera helps build a better foundation of respect for personal physical health, mental aptitude and deeper conservation based roots within us, our clients and our staff. As such, our contributions to present and future conservation based respect, knowledge and management of our wildplaces and wildlife are very great.
8. We feel that hunting and viewing of wildlife are compatible uses and each of these uses requires respect and education for the other.

**Proposal 7: Support** based on its given merits.**Proposal 9: Support** based on its given merits.**Proposal 14: Support with Amendment.** We support the season extension but not the one every four year harvest.**Proposal 15 and 38: Support** based on their given merits.

**Proposal 16: Support with Amendment.** We support re-defining the hunt are but not the drawing permit and recommend staying with the registration hunt.

**Proposal 18: Support** based on its given merit.

**Proposal 19: Oppose,** please see comment for proposal number 2 above.

**Proposal 20: Support with amendment:** We prefer the additional recommendations found within proposal # 37.

**Proposals 21, 22, 23 Oppose.** We recommend proposal #37.

**Proposal 24: Support:** Based on its given merit.

**Proposal 27: Support:** Based on its given merit and we urge the Board to consider the comments from our members that have a long history of operating within this region.

**Proposal 32: Support with amendment:** We suggest opening the mainland on Sept. 1<sup>st</sup> and the island groups on Sept. 15<sup>th</sup>.

**Proposal 33, 34: Support:** Based on their given merits. . We do not like the existing regulation that allows for sale of black bear hides and skulls from GMU's 1-6 in which some of this region currently has a real conservation based concern for these bears.

**Proposal 35: Oppose:** This proposal would have minimum impact on the ongoing conservation problem and we feel that if local residents want to hunt more than one bear for food that they should be allowed to do so.

**Proposal 36: Oppose:** The drawing permit concept for guided non-resident hunters represents the kiss of death for long term established professional guide entrepreneurs that operate within a conservation basis and have not contributed to the significant increase in harvest.

The fall season by guided non-resident hunters is very definitely sustainable in many areas. By having a guide, harvest of sows and wounding loss is significantly reduced. Elimination of the fall season dates represents an unbearable burden for many of our members.

The guided non-resident hunter who harvests black bears in June once again is not the segment of non-resident hunters whose harvest has significantly increased in recent years.

**Proposal 37: Support:** Based on its given merits. Additionally, this proposal will provide the long sought after ability to more effectively allow for Department of Commerce and Department of Public Safety to address illegal transporting concerns.

**Proposal 38: Support:** (See # 15 above)

**Proposal 39: Defers to the discretion of the Board.** In general, none of our member guides participate in this manner of hunting. However, we recognize it as a useful tool for some hunters.

**Proposal 40: Support with amendment:** Our amendment would be to eliminate the salvage requirement for spring black bears in GMU 1-5. This regulation was adopted without the ability for residents and/or guides from this region to properly address the issue. Salvage of inedible bears often results in disposal of meat in public landfills. The harvested bear carcass that is left in the field provides for natural biodiversity consumption. Those hunters who harvest a bear for meat may do so.

**Proposal 41: Support:** Based on its given merits.

**Proposal 43: Oppose:** This proposal is too broad.

**Proposal 44: Support:** Based on its given merits. This is a significant issue statewide and we appreciate the Board's due consideration.

**Proposal 46: Support with possible amendments:** We encourage you to consider incorporating a policy like is proposed within proposal number 44 into this proposal to help reduce illegal use of the second degree on kindred allowance. We will bring forward our concerns in public comment at the Board of Game meeting.

**Proposal 48: Support:** Based on its given merits.

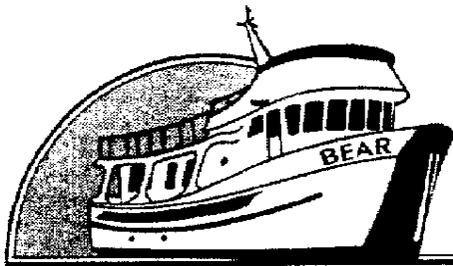
**Proposed Bear Conservation, Harvest and Management Policy:**

We encourage the Board to continue to seek public comment on this proposal and we will continue to gather and bring our comments forward to you at future meetings.

Respectfully Submitted,



Robert Fithian  
Executive Director



Brad Dennison  
Master Guide  
505 1st Street  
Sitka, Alaska 99835

# *Alaska Coastal Outfitters*

---

October 22, 2010

Alaska Board of Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: Comments 2010 Southeast Regional Meeting

Thank you for the opportunity to submit written comments relating to the proposals for the Ketchikan BOG meeting.

My wife and I have lived in Sitka for the past 36 years. Our 3 children were born and raised in Sitka and all 3 continue to reside in Alaska. I have worked as a hunting guide in SE Alaska since 1985 and currently hold a Master Guide license.

For ease of reference I will comment on the proposals in order of their proposal number instead of the order of importance to me.

## Proposals 2, 3, 4, 5, and 19

These proposals are similar in that they all ask to close areas to bear hunting in which bear viewing and hunting currently coexist. I am opposed to all of these proposals and opposed to the establishment of "bear preserves" every time someone complains of hunters in their favorite viewing spot.

Guided hunting in Southeast Alaska has a long history of positive contribution to the regions economy and guides have played an active role in promoting the responsible use of the wildlife resources of the area. Commercial bear viewing in SE for the most part is a relatively new business. Also, up until the past couple of years of poor economic conditions, SE tourism has been on the increase. This means more out-of-state bear viewers, more businesses that have added bear viewing to their trip agendas, and more concern about conflicts with hunters.

The solution to this concern is not to remove hunters from every area where some business takes people to view bears. To take a resource that has historically been responsibly used by one group and arbitrarily give it to a new group of businesses is neither fair nor logical.

The so-called concern about safety for their clients when hunting is allowed is unrealistic. Although we all know that firearms are potentially dangerous, based on my 25 years of bear guiding it is hard for me to think of a situation where a sightseeing group would be in the line of fire or otherwise put at risk when a hunter had an opportunity to take a trophy bear. Similarly the so-called concern about people from the lower-48 not coming to Alaska on vacation unless there's some kind of guarantee of seeing a black bear is equally hard to swallow. While it would be a nice bonus to show a client a black bear, it is unrealistic that clients will use this as the deciding factor in whether to vacation in Alaska or somewhere else.

I agree that neither sightseers nor hunters would find a direct encounter with each other very enjoyable. The obvious solution is to quit expanding sightseeing activities into the hunting seasons. As commercial sightseeing creeps into the shoulder seasons there is more chance of direct encounters between hunters and bear viewers. The hunting seasons are short enough that this does not need to happen. Most bear viewing takes place while the bears are fishing in the creeks for salmon. The salmon runs peak in late July or August when hunting seasons are closed. Hunting takes place in September after the salmon runs have started to decline. With proper marketing and scheduling, commercial bear viewing businesses should be able to satisfy the bulk of the demand for their services in July and August.

Several of those individuals that submitted these proposals commented on the declining numbers of black bears. I also have this concern. However, they then go on to talk about how few bears are actually killed by hunters in their areas and therefore how minimal the impact will be on overall hunting if their areas were made off-limits to hunting. It ought to be clear from this observation that the declining black bear resource has little or nothing to do with what is happening in their favorite bear viewing area. It is a bigger, region-wide problem caused simply by too many non-resident hunters. Setting aside a small bear viewing area as someone's personal preserve is not going to impact the number of non-resident bear hunters at all. They will simply go somewhere else and the problem with too few bears will continue.

#### Proposals 21, 22, and 23

These 3 proposals, as well as part of ADF&G's proposal 36, seek a reduction in hunting season for black bears. The changes to seasons will have tremendous impact on guiding operations such as mine and have a much reduced impact on other bear hunting. I am opposed to all 3 proposals.

In the spring season, because of the brown bear season in May, most guided black bear hunts take place in late April or the month of June. Some of these proposals seek the elimination of black bear hunting in June. In my spring schedule, three-quarters of my guided black bear hunts occur in June. It is impossible for me to shift these hunters into May because of conflicts with my brown bear season. Neither can I shift these hunters into April because of the limited availability of the resource in April. Transported hunters, do-it-yourself hunters, and the various other groups of non-resident hunters on

the other hand will simply shift their hunts into May. More hunters in the field in May will no doubt result in more conflict but more importantly the overall hunting impact will not drop significantly.

Similarly, eliminating September from the fall black bear season will have a great impact on my operation. My black bear hunts are conducted the first two weeks of September while there are still fair numbers of fish in the rivers. If the black bear season opened on October 1 we would be unable to offer fall hunts at all due to the low numbers of bears fishing at that time of year. If there is a need to shorten the fall black bear season then CLOSE it on October 1 but continue to open it on September 1.

### Proposal 26

I am opposed to this proposal.

I believe we currently have fewer black bears in SE than at any time in the past. In my opinion the reasons for this are many but at the top of that list is too much non-resident hunting pressure. I also believe that this problem has a solution and that with wise management we can again have the world-class black bear hunting that SE Alaska used to be known for. Until that occurs, however, I am not in favor of liberalizing any aspect of the current regulations for black bears in SE, including this proposal to ease the restriction on use of motor vehicles on the roads to hunt black bears.

In general, I am opposed to the use of the remote road systems in SE to hunt bears. This includes both the spring and fall seasons. Historically in Southeast Alaska bears were hunted along the beaches in the spring. In the fall, boats were again used to access the creek mouths for bear hunting and the bears were then hunted along the lower stretches of the streams. This left the entire interior of the islands as a huge refuge for the bears. Now, in areas with roads this refuge no longer exists. Bears are now susceptible to hunting pressure throughout their range, rather than just in the fringe areas, because of the use of 4-wheelers and pickups on the road systems.

Use of the road systems also encourages illegal harvest of bears. Regulations forbid shooting game on, from, or across roadways. One would have to be very naïve to believe that this doesn't happen on a fairly regular basis with hunters traveling the back logging roads on 4-wheelers and pickup trucks. I personally have seen evidence of this happening on Kuiu Island.

Another reason I am opposed to using 4-wheelers and pickups on these road systems is that the use of these vehicles on the logging roads by one party has a great impact on the "wilderness" aspect of another party's hunting experience. On several occasions I have been sitting quietly with a client watching a serene tidal grass flat only to hear the unwelcome sound of 4-wheelers approaching on a logging road. A big part of what we offer to hunters from the lower-48 is a wilderness hunt. Alaska is thought of as the last Great Frontier. 4-wheelers roaring by when you are watching a meadow for bears destroy this "Great Frontier" expectation.

4-wheelers have a place in hunting in Alaska. Some areas can be practically accessed only by off-road vehicle. However, Southeast Alaska is not one of these areas. Use of the remote road systems in SE is both unnecessary and detrimental. I am opposed to the use of motor vehicles on the road systems in general for hunting SE bears and am opposed specifically to Proposal 26 which would liberalize one of the few restrictions we currently have on this practice.

#### Proposal 27

I am in favor of Proposal 27 which would extend the spring wolf season in GMU3.

Over the years we have seen a significant increase in the numbers of wolves on Kuiu and Kuprenof islands. This has corresponded with a major decline in our deer sightings. I believe that the wolves are now impacting the black bear population. In the fall, the lower stretches of several salmon streams in our guide use area which used to be prime black bear fishing habitat are now the fishing domain of wolf packs.

Sport hunters don't generally go to GMU3 to solely hunt for wolves. These hunters typically are there to hunt for black bears and any harvest of wolves is incidental to the black bear hunt. The majority of spring black bear hunters in GMU3 are in the field in May and by extending the wolf season through the end of May there would be an opportunity for these hunters to harvest a wolf.

#### Proposal 28

I am in favor of Proposal 28.

DLP harvest of brown bears in GMU4 is a growing problem. Brown bears are becoming more and more of a problem in Sitka, the villages, at hatcheries and elsewhere in GMU4. The bears being taken in defense of life and property are generally sows, cubs, and juvenile bears that live in close proximity to the communities in GMU4. These bears are not what I would consider part of the huntable population of brown bears in GMU4 and yet when these bears are killed they count against the harvest cap established for brown bear harvest on the major island groups. Because of this the number of bears that may be taken by bear hunters is reduced in spite of the fact that we have healthy numbers of brown bears throughout GMU4.

The brown bear harvest caps in GMU4 are very conservative, in fact some of the most conservative in the entire state. To further restrict the harvest of brown bears by sport hunters because of the garbage problem that exists in the communities is not warranted. By removing the DLP kill numbers from the harvest cap calculations, these harvest caps would more accurately reflect game management efforts (seasons, bag limits, etc) without the interference of community "people" problems (garbage practices).

### Proposals 33 and 34

I am in favor of these proposals. The black bear population in Southeast Alaska is declining. The trapping and sale of black bear parts will put additional pressure on this resource. The Southeast Alaska black bear should be managed as a true trophy big game species, and not as a fur bearer.

### Proposal 36

I am in favor of the option of having a drawing for unguided non-resident black bear hunters and will comment further in discussing Proposal 37.

I am opposed to the option of shortening either the spring or fall seasons. Either of these would greatly impact my guiding operation. Guided non-resident hunting has been effectively controlled through the USFS special use permitting system for many years and has allowed a conservative harvest of black bears and a stable basis of operation for guides in SE. The season changes mentioned in this proposal would do much to destroy that stability.

I am in favor of extending the GMU 2 and 3 controlled use area (road hunting restriction) through October.

I am in favor of closing bear baiting in GMU 1A, 1B, 2, and 3.

### Proposal 37

I am in favor of Proposal 37. This proposal will effectively cap the non-resident black bear hunting pressure in Southeast Alaska. I firmly believe that the non-resident hunting pressure is the single greatest reason for the declining numbers of black bears in SE.

Proposal 37 also effectively controls the problem of illegal guiding for black bears by boat-based transporters and other illegal commercial use of the black bear resource in SE. We have tried unsuccessfully for years to curtail the illegal guiding that takes place on so-called "transporting" trips. The provision that exists that allows commercial lodging of clients on boats by transporters has set up such a grey area that enforcement of the guide/outfitting regulations relating to guiding of non-resident black bear hunters is extremely difficult.

In spite a number of enforcement busts over the past several years, this problem continues. Even some of those operations that were successfully prosecuted for illegal guiding are now back in business "under new ownership". Proposal 37 will effectively limit the client base for such operations to a point that this type of hunting operation is no longer viable. Although this practice will probably not be eliminated 100%, it is very unlikely for such an operation to have a significant impact on any one area.

Proposal 37 would set up a draw for non-resident black bear hunters that are unguided. There will be a concern over the issue that *guided* non-resident hunters do not need to draw. The answer to this concern is that guided non-resident hunting pressure is already effectively, and conservatively limited through the USFS permitting process. Guided non-resident hunts are stable and have been fixed for several years in all areas within SE Alaska. Guided hunts have been “fixed” since 2000 in the area that I guide in on Kuiu Island. The recent increase in black bear hunting pressure is a result of *unguided* non-resident hunting which currently has no conservation-based limitation placed upon it. Proposal 37 would finally provide such a limitation.

Such a system would be a benefit in many ways even to the unguided hunting public. A drawing such as this would probably change the overall quality of hunter that came to SE to hunt black bears. An immediate benefit would be fewer conflicts in the field between hunting groups which would result in a better hunting experience. In a few years these permits would be in high enough demand that each permit would be highly prized by the non-resident hunting community. We would no longer hear the stories about non-resident settling for small (i.e. female and juvenile) bears because “I can always go back next year for a big one”. Under a permit system hunters would be more careful to harvest a trophy male and would be more careful of their shots and less likely to wound a bear. The quality and numbers of bears available to hunters would improve over time. The reputation of SE for its black bears would eventually revert back to what we enjoyed in past years.

Proposal 37 does more to effectively address the black bear issues that have plagued us here in SE than any other proposal that I’ve ever read, including proposals to the BGCSB and ideas presented to the USFS. It not only places a limit on non-resident hunting of black bears, thus allowing the resource to recover, but at the same time it goes along way toward fixing the problems we’ve had with abuses of the guide/outfitting regulations. I would strongly urge the Board to adopt Proposal 37.

#### Proposal 44

This is the proposal that I submitted. There have been apparent abuses of the 2<sup>nd</sup> degree of kindred regulation that I believe could be taken care of by tightening up on the requirements of this provision. There have been cases on the 2<sup>nd</sup> degree relative being “in the field” but not actually physically with the hunting non-residents while they were hunting. In Southeast Alaska where much of the brown bear hunting is by boat or skiff the 2<sup>nd</sup> degree relative should be required to physically be with the non-resident hunter, not in a cabin several miles away. I believe that wording something to the effect that the 2<sup>nd</sup> degree relative would accompany and be physically present “at all times” would fix this problem.

There are also cases where the 2<sup>nd</sup> degree resident relative accompanying the non-resident hunter has not even had a hunting license, sometimes for several years prior to the hunt. I am not trying to set strict qualifications for the 2<sup>nd</sup> degree resident such as what we have for hunting guides but I believe there needs to be more of a standard applied to the 2<sup>nd</sup>

degree of kindred relative in order to avoid abuses of the regulation. As the regulation is currently written a non-resident brown bear hunter could take his elderly grandmother out of a nursing home in Juneau, put her on a comfortable yacht. And go brown bear hunting even though his grandmother had never set foot outside of town her entire life. There needs to be a higher standard than this than what we currently have and the five-year hunting license requirement is an attempt to do this. The Board may be able to develop a more appropriate standard and I would be satisfied with what you come up with.

Thank you for the opportunity to comment on these proposals. I am looking forward to also providing verbal comments at the meeting in Ketchikan. Thank you for your time and the efforts that each one of you makes as a member of the Board of Game.

Sincerely,

**ALASKA COASTAL OUTFITTERS**

A handwritten signature in black ink, appearing to read 'Brad Dennison', with a long horizontal flourish extending to the right.

Brad Dennison  
Master Guide, Sitka



TO: Alaska Board of Game

FROM: Mike Warner, owner Coffman Cove Adventures

DATE: October 22, 2010

RE: Prince of Wales Bear Proposals in general

My name is Mike Warner and I am writing on behalf of my business Coffman Cove Adventures, along with the other like businesses on Prince of Wales Island. I cater to DIY hunters on the island where I LIVE as well as fisher folks. There are many upcoming proposals for SE black bear hunting for the next regulatory year and it is my hope that good solid decisions are made for the benefit of the animals as well as the LOCAL economy. The LOCAL economy relies on bear hunter's revenue in the form of bed and sales taxes, store purchases, lodging, rentals, etc. They bring much needed dollars to a depressed area.

Issue – increased bear harvest on POW. We all know the information relating to the upswing in bear harvest on POW. It is true that the increased pressure on the system needs to be reigned in; it is our hope that NO ONE group gets preferential treatment. When the Controlled Use road less ban went into effect last year it was apparent that it hindered LOCAL business while guides went about business as usual since most used boats for their hunting. That's fine, it hurt many local businesses but if it helps the resource we are more than willing to give up revenue. The resource is our top priority.

Upcoming proposals – There was one proposal that I need to address and the reason I am flying to the meeting in Ketchikan – The APHA has included a proposal to limit all UNGUIDED non-resident hunters on POW while letting guides go about business as usual. This proposal if enacted will once again cater to the guides and create more contention here on POW. This self-serving proposal would not limit guide kills and only HURT local businesses that rely on our unguided hunters. Their information about wounding loss is anecdotal at best and at worst an outright lie – I was embarrassed for them as I read it in their proposal (I would love to see the data). Also claiming that guide harvest has remained flat is also NOT TRUE. NO ONE I have talked to is against a draw as long as it is FAIR and Equitable. HOW MUCH REVENUE DOES THE GUIDE INDUSTRY CONTRIBUTE TO THE ISLAND? HOW MANY OF THE GUIDES THAT ARE LOOKING TO LIMIT OUR HUNTERS LIVE WHERE HERE ON THE ISLAND WHERE THEY HELP KILL THE RESOURCE?

The only non guided non-resident hunters this would benefit are the hunt clubs here on the island that brings folks yearly. They would know the system and when/how to put in for tags. They do NOT help the local economy as much as the visiting hunters who come. Regular average Joe types will be stacked up against a short timeline for getting their trip planned.

I would like to make a comment that I hope resonates with the BOG:

THERE IS ONLY 1 GUIDE CURRENTLY GUIDING THAT ACTUALLY LIVES ON POW!!! (He has a Sitka address and a PO Box in Klawock so I have him the benefit of the doubt). (Information obtained through the forest service and State Licensing).

From the rest of the proposals here is what we believed would help the resource and the LOCAL economy in regards to bear hunting on POW even though it will cut revenue further for us:

1. **Institute a drawing hunt for ALL non-resident bear hunters on POW Island**
2. **Eliminate fall seasons for ALL non-residents**
3. **Cut resident harvest to 1 bear per regulatory year**

These three steps would ensure a reduction in bear harvest, a reduction in sow harvest, and give an equal opportunity for non-resident hunters to choose which route they would like to hunt our beautiful island.

I appreciate you taking the time to read my comments and it is my hope you consider the locals who depend on the resource.

Sincerely,



Mike Warner

Coffman Cove Adventures, Owner

Coffman Cove, Prince of Wales Island

**Harley E. Lewis,  
Farrel Lloyd Lewis**

Post Office Box 7575  
Ketchikan, Alaska 99901  
Phone and Fax: 907/225-8389  
Cell Phone: 907/209-8383

---

October 22, 2010

VIA FAX NO: (907-465-6094):

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

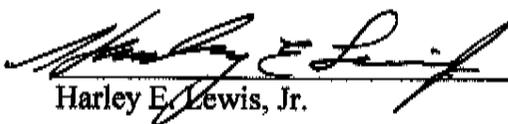
Re: November Board of Game Meeting  
Black Bear Harvest Regulations  
**In Support of Proposal No. 4 - 5 AAC 92.510 Areas closed to  
Hunting: Close the Margaret Creek Drainage Area  
In Unit 1 to Bear Hunting**

To Whom it May Concern:

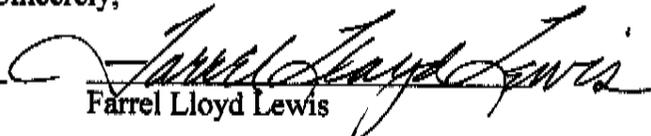
We wish to state our support of Proposal No. 4, which will be addressed at the November 5-9 Board of Game meeting which is going to be held in Ketchikan.

Explanation: One of our favorite places to visit by boat is Traitor's Cove where the bear observatory is located about two miles up the existing logging road. Simply stated, it makes no sense to allow bear hunting in the same area. The bears are used to people so it is far less of a challenge for the hunters to shoot them. Because we spend a great deal of time at the dock we are aware that this is a very popular area for bear hunting. We have also noticed that we see less bear in the area, both on the beaches and at the observatory. We have talked to people arriving on the float planes to see if they are seeing bears after they visit the bear observatory and the answer seems to be that no, they are not seeing bears. Studies indicate that the population of bears in this area is in a decline. Alaska is a huge state and there are plenty of more remote areas that hunters can use.

Sincerely,



Harley E. Lewis, Jr.



Farrel Lloyd Lewis



## Comments for the Board of Game meeting in Ketchikan, November 2010

ATTN: Board of Game Comments

- > Alaska Department of Fish and Game
- > Boards Support Section
- > P.O. Box 115526
- > Juneau, AK 99811-5526
- > Fax: 907-465-6094

From: Jack Davies, 3831 Fairview Avenue, Ketchikan, Alaska  
63 year (life-long) resident of Ketchikan  
Very frequent visitor to Traitor's Cove

### Proposal # 2          Support

Separating bear hunting from bear viewing should be accomplished where possible. Limiting the bear hunting season will also help reverse the decline\* in the bear population in the Ketchikan area.

### Proposal #3          Support

Bear viewing has become an important part of the engine, i.e. Tourism, which is currently supporting a major part of Ketchikan's economy. Local residents derive a great benefit from tourist dollars and a large portion of those dollars flows from bear viewing tours. A decline\* in the bear population in the Ketchikan area will adversely affect our economy.

### Proposal #4          Support

Conflict between user groups (i.e. hunters and bear viewers) was noted in an ADF&G memo in 2001. Separating these groups would benefit both. In addition, a decline\* in the bear population threatens to reduce the flow of tourism dollars to the local economy.

\*(This decline is evident not only anecdotally, but also by the observations of the ADF&G – see Proposals 35 & 36, and the Alaska Professional Hunters Association – see Proposal 37).

Proposal #5 Support

See earlier comments regarding the economic impact to the Ketchikan economy.

Proposal #19 Support

See earlier comments regarding Proposals #4 and #5.

Proposal #33 Support

Turning the bear population into a cash crop does not make any economic sense. In addition, it makes the State of Alaska look bad.

Proposal #34 Support

Ibid. See above re Proposal 33

Proposal #35 Support

Per ADF&G concerns, the population of black bears needs to be protected.

Proposal #36 Support

Ibid. See above re Proposal 35

Proposal #39 Support

Bear baiting should be banned. It has no place in Alaska. It is not “hunting” in any sense of the word and reflects badly on the state.

ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME  
REGULATION PROPOSAL

Place a five (5) Year Moratorium on non resident moose hunting in upper GMU 17 B

BOARD OF GAME REGULATION

GMU 17

\*\*Other

1. Alaska Administrative Code Number 5 AAC \_\_\_\_\_ Regulation Book Page No. \_\_\_\_\_

2. **What is the problem you would like to address?** The moose population in the upper GMU 17B is in a serious decline. This fall, in 2010, during the late hunting season and into the late rut both on the upper Nuyukuk River and upper Nushagak River above Harris Creek the gravel bars and sloughs were nearly void of any moose sign. These are areas that just 10 years ago were abundant with moose and moose sign. The local residents are just not seeing the moose or their sign anymore and are extremely concerned that this important traditional food resource, they depend upon, in upper 17B will soon be gone if nothing is done.

Predation by brown bear, wolves and man are decimating the moose population in upper GMU 17B. Both the brown bear and wolf populations are higher than locals have ever seen. Some measures have been taken by the state to decrease the predation of moose by the bears and wolves but the moose population continues to decline. Compounding the problem is the continued nonresident harvesting of moose and all the boat traffic associated with it in upper 17B.

It may already be too late, but something needs to be done, or this precious resource that residents who live on the Nushagak River depend upon to feed their families, will soon be gone.

3. **What will happen if this problem is not solved?** The moose population in upper GMU 17 B will continue to decline until they cannot make a come-back.

4. **What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say?** A five year moratorium will be placed on all non resident hunting of moose on the entire Nushagak River drainage up stream from its confluence with the Nuyukuk River. A five year moratorium will be placed on all non resident hunting of moose on the entire Nuyukuk River drainage beginning at it's confluence with the Nushagak River up to the Nuyukuk falls.

**Permit Conditions.**

5. **Does your proposal address improving the quality of the resource harvested or products produced? If so, how?** This proposal will temporarily end the non resident hunting pressure on the moose and all the traffic associated with it, in upper 17B, allowing the moose population to make a come-back.

6. **Solutions to difficult problems benefit some people and hurt others:**

A. **Who is likely to benefit if your solution is adopted?** The moose population will have a much better chance of increasing so that both resident and nonresident hunters will benefit in the long term.

B. **Who is likely to suffer if your solution is adopted?** Nonresident hunters and about 6 guide/outfitters who can join local hunters in their efforts to reduce the high bear and wolf populations in upper 17B.

7. **List any other solutions you considered and why you rejected them?** Continue the present course we are on, until there are no more moose left in upper 17B. This idea was rejected, because the moose population in upper 17B is already in serious trouble and something needs to be done or everyone will lose.

**Submitted By: Name**

Roger Skogen

PO Box 5014

Koliganek, Alaska 99576

ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME  
REGULATION PROPOSAL  
" BROWN BEAR CONTROL PERMIT"

BOARD OF GAME REGULATION  
GMU 17  
\*\*Other

1. Alaska Administrative Code Number 5 AAC \_\_\_\_\_ Regulation Book Page No. \_\_\_\_\_

**2. What is the problem you would like to address?**

The brown bear population in GMU 17 has skyrocketed in the past few years. Sows with cubs, lots of adolescences, and large males, are seen everywhere. The increased numbers of bears are becoming a serious problem to the moose population which local residents rely upon for subsistence food.

**3. What will happen if this problem is not solved?**

An increase in the number of brown bears is seen by locals in GMU 17B. This increased numbers of bears prey on moose and especially the moose calves. In GMU 17B the local residents are seeing very few moose calves or even moose calf tracks, but gravel bars, sloughs, and creeks are covered with bear tracks. If the brown bear population continues to increase and the problem is not solved very soon, the moose population could reach a critical point of no return.

**4. What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say?**

Permits will be issued to take brown bears for the purposes of predation control in GMU 17B.

Adopt a similar BROWN BEAR CONTROL PERMIT PROGRAM for GMU 17B that is now implemented for Black Bear, as of July 1, 2008 in GMU 16 (Control Permit ML202 and ML 212) and Brown Bear in GMU 19D (MB301) and GMU 20E (MB303)

**Permit Conditions.**

- Permits will be issued to take brown bears for the purposes of predation control in GMU 17B.
- Local licensed residents may obtain a Bear Control Permit.
- The permit and valid resident Alaska hunting license must be carried while participating in this control program.
- The permit is not transferable and applies only to brown bears.
- Cubs and females accompanied by cubs may not be taken; however there is no closed season and no limit to the number of brown bears taken by an individual permittee.
- All Hides and skulls must be salvaged and sealed by ADF&G within 30 days of take.
- After sealing, ADF&G will issue permits allowing permittees to sell untanned hides (with claws attached) and skulls, or tanned hides (with claws attached) and skulls, as long as sale tag remains attached.
- Permittees are required to complete the mail-in report section of the permit. Mail-in reports must be received at the Dillingham ADF&G office after completion of control activities. Failure to report on the permit is cause for denial of future control permits.
- Permits will be cancelled if necessary to prevent exceeding the desired predation control quota.

**5. Does your proposal address improving the quality of the resource harvested or products produced? If so, how?**

This proposal will increase the numbers of brown bears harvested in a controlled manner, to insure a quality subsistence moose harvest for local residents in the future.

**6. Solutions to difficult problems benefit some people and hurt others:**

**A. Who is likely to benefit if your solution is adopted?**

All moose hunters would benefit from an increased number of moose that would otherwise be eaten by brown bears. If nothing is done soon, the moose population will decline due to the number of calves taken by brown bears.

**B. Who is likely to suffer if your solution is adopted?**

No one will suffer. The proposal has a safeguard that will cancel the "brown bear control permits" to prevent exceeding the desired predation control quota.

**7. List any other solutions you considered and why you rejected them?**

No closed season on brown bear and no limit in GMU 17B. However, this would not have the safeguards to prevent exceeding the desired predation control quota that a control permit would have.

**Submitted By: Name**

Roger Skogen

PO box 5014

Koliganek, Alaska 99576

ALASKA BOARD OF FISHERIES AND ALASKA BOARD OF GAME  
REGULATION PROPOSAL  
Reduce hindering restrictions for the taking of brown bear by local residents.

BOARD OF GAME REGULATION  
GMU 17  
\*\*Other

1. Alaska Administrative Code Number 5 AAC \_\_\_\_\_ Regulation Book Page No. \_\_\_\_\_

2. **What is the problem you would like to address?** The moose population in the upper GMU 17B is in a serious decline. This fall, in 2010, during the late hunting season and into the late rut both on the upper Nuyukuk River and upper Nushagak River above Harris Creek the gravel bars and sloughs were nearly void of any moose sign. These are areas that just 10 years ago was abundant with moose and moose sign. The locals are just not seeing the moose or their sign there anymore and are extremely concerned that this important traditional food resource, they depend upon, in upper 17B will soon be gone if nothing is done.

Predation by brown bear, wolves and man are decimating the moose population in upper GMU 17B. Both the brown bear and wolf populations are higher than locals have ever seen. Some measures have been taken by the state to decrease the predation of moose and moose calves by the bears and wolves in upper GMU 17B but the moose population continues to decline. Local residents want to help decrease the bear population but are hindered because of the bear tag expense, the bag limit of 1 bear, and the cost of traveling to Dillingham (\$200) to get the hide sealed.

It may already be too late, but something needs to be done, or this precious moose resource that residents who live on the Nushagak River depend upon to feed their families, will soon be gone.

3. **What will happen if this problem is not solved?** The moose population in upper GMU 17 B will continue to decline until they cannot make a come-back.

4. **What solution do you prefer? In other words, if the Board adopted your solution, what would the new regulation say**

1. Two (2) brown bear per year may be harvested by residents.
2. No lock tag required for residents.
2. No closed season for residents
4. Allow brown bears that pull up and destroy subsistence salmon fishing nets to be classified as DLP bears.
5. Eliminate the burden of expense local residents must endure to have the hides sealed.
6. The above regulations can be cancelled by emergency order, so the brown bear control quota will not be exceeded.

**Permit Conditions.**

5. **Does your proposal address improving the quality of the resource harvested or products produced? If so, how?** This proposal will empower local residents to help reduce the brown bear predation on the moose in upper 17B and allow the moose population to make a come-back.

6. **Solutions to difficult problems benefit some people and hurt others:**

A. **Who is likely to benefit if your solution is adopted?** Everyone! The Nonresident brown bear hunt will not change. More moose calves will survive and the moose population will have a chance to rebound. The traditional subsistence supply of moose will make a come-back again.

B. **Who is likely to suffer if your solution is adopted?** No one.

7. **List any other solutions you considered and why you rejected them?** Allow local residents of the Nushagak River drainage to shoot, trap or snare brown bear with no limit and no closed season. This idea was rejected because it was too extreme.

Submitted By: Name  
Roger Skogen  
PO box 5014  
Koliganek, Alaska 99576

October 21, 2010

To the members of the Board of Game,

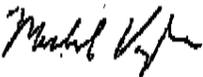
This letter is being sent in opposition to Proposal 32, which calls for changing the Southeast Alaska waterfowl season opening date from September 16 to September 1. The September 16 opener was approved by the Board during the 2008 BOG meeting, after considering the results of an ADF&G survey polling SE waterfowl hunters on their preference of season start dates. A majority of the hunters surveyed favored a delay to the traditional September 1 start date.

A number of proposals have been submitted over the past several BOG meetings, requesting a delay to the waterfowl season. The primary reason behind these proposals is the overall lack of waterfowl present in much of Southeast in early September and the resultant loss of hunting opportunities (days) due to the absence of birds. Delaying the season by two weeks allows early season migrants (teal, widgeon, and pintail) to move into SE Alaska and build to levels sufficient to support more successful hunting opportunities. Delaying the start of the season also extends the hunting season until the end of December, allowing hunting opportunities for family and friends during the holiday season, a time when late migrating mallards are abundant.

The individual submitting Proposal 32 referred to a loss of opportunity to hunt sandhill cranes due to the September 16 start date. While we oppose changing the start date of the waterfowl (ducks and geese) season, we would fully support a September 1 start date for the sandhill crane season. A September 1 opener may help maximize hunting opportunities for this species.

Thank you for your consideration

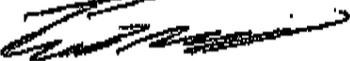
Mike Vaughn- Sitka



Dave Gordon- Sitka



Troy Thynes- Petersburg



Adam Messmer- Juneau





## **Written Comments to Alaska Board of Game Southeast Region Meeting Fall 2010**

**Proposal 2: I am in OPPOSITION of this proposal.** Although I do not guide hunters in this specific area, I believe this area holds opportunity for recreation hunters who are not able to travel far from town. Many hunters are limited in their ability to travel, due to boat size or speed and limited time on weekends or after work. I believe there is a healthy bear population in this area and plenty of bears to satisfy the needs of hunters as well as wildlife viewers.

**Proposal 4: I am in OPPOSITION of this proposal.** Recreational sportsman have been using the Marguerite Bay road system for hunting fishing since its creation decades ago. I personally started hunting bears in off of this road system in 1982. This road system provides a unique opportunity to travel by boat and then ORV to access clear cuts, standing timber and muskeg for the purpose of hunting deer, bear and wolf within a reasonable proximity to Ketchikan. The Forest Service already has a rule of "No Shooting" within 150 yards of the Bear Viewing Platform and trail. There is no risk to bear viewers from hunters. I believe a deer hunter should be able to shoot a black bear that has come to a deer call or is trying to "steal his deer" if that hunter has not already filled his annual bag limit for black bear. There are lots of bears in this drainage. I believe the decrease in sightings by summertime bear viewers may be a function of plentiful food in other areas as well as change in bear behavior due to the large numbers of bear viewers visiting the area.

**Proposal 5: I am in OPPOSITION of this proposal.** Of all the proposals, I am most concerned about Proposal 5 which describes closing all of Rudyerd Bay and Walker Cove drainages to both brown and black bear hunting. These drainages both fall into GUA 01-10 in GMU 1A.

As a registered guide permitted by the Forest Service to operate in Misty Fiords, GUA 01-10 is one of my primary areas for black and brown bear hunting. I have avoided hunting in Rudyerd Bay and Walker Cove drainages during the tourist season to reduce human interaction of any kind as well as conflict with user groups. As a guide, I strive to provide a true wilderness experience for my clients who are often interested wildlife viewing, fishing, camping as much as the actual stalking and harvest of the bear. These hunters pay a high price for the experience and are often satisfied even though they may not harvest a bear. Some of these hunters return year after year, just for the wilderness experience.

I do hunt in these areas, when I feel that there is little chance of encountering tourists or any other people. I realize that Rudyerd and Walker are popular with other hunters due to it's proximity to Ketchikan, protected anchorage, and high brown bear density. Closing Walker Cove and Rudyerd Bay would probably result in a shift in hunting pressure to more secluded drainages that I hunt and increase the amount of human interaction, hunting conflicts and all the things we strive to avoid when guiding a hunter in a

wilderness setting. A closure as suggested by Proposal 5 would effectively shrink our wilderness opportunities.

Although the writer of this proposal (5) can fly her airplane over all 2.2 million acres in Misty Fiords, the bear hunting opportunities for myself, my clients and most bear hunters are limited to just the shoreline of the bays, tideflats and those portions of the rivers that are "navigable" by jet boat, skiff or foot travel. There is already a moratorium on "guided brown bear hunts" in Misty Fiords and "Forest Wide" (TNF) freeze on guided black bear hunts. Taking away (closing bear hunting in) entire drainages is just another way to reduce our ever shrinking opportunities to make a living as guide.

**Proposal 33: I SUPPORT this proposal.**

**Proposal 36: I am in OPPOSITION of this proposal.** If the department feels that there is a need to reduce black bear harvest numbers, I suggest that the Board consider Proposal 37.

**Proposal 37: I SUPPORT proposal 37.** This proposal offers the Department an avenue to control the black bear harvest when deemed necessary.

Thank you for your consideration to my comments.

Sincerely,

Edward Toribio  
Ketchikan, Alaska

Trail Mix, Inc.,  
P.O. Box 35693  
Juneau, AK 99803

October 22, 2010

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: Proposal 11: Areas Closed to Trapping: Treadwell Ditch Trail

Dear Board of Game:

Trail Mix, Inc. (Trail Mix) supports PROPOSAL 11.

**Proposal 11** would add Treadwell Ditch Trail area to the list of similar trails closed to trapping in Juneau. Trail Mix's on-going efforts are improving the Treadwell Ditch Trail and made the trail much easier for families to enjoy. Trail Mix supports furthering the protection of the public using the trail by closing the trail area to trapping.

Trail Mix is a Juneau nonprofit organization established to improve and expand Juneau's world-class trail system.

Sincerely,



Mike McKrill, Board President



Greeting board members

My name is W.J. Eagle, Jr. I have lived in the Ketchikan unit 1A area 40 of my 48 years, 34 of those years I have spent hunting, fishing, trapping and traveling by boat aircraft and on foot.

I would like to address a number of proposals of closures before you, proposals 2, 3, 4 and 5.

They are all recommended by two operators in those areas concerned. A number of points of interest have been discussed on these proposals that I would like to address here. Bear population the concern stated in all of these areas has been that hunters have depleted the population causing less opportunity for bear viewing.

They have asked fish and game to provide population numbers for these areas concerned,

A.D.F.G. has estimate formulas for these areas but the only hand

②

data available is bears taken by hunters annually.

Understaffed and underfunded A.D.F.C. has not studied these areas and are not alarmed at the number of bears taken guided or otherwise. Another point brought up was conflict between tours and hunters, there are already regulations in place to punish illegal activities.

Good judgement, safety and courtesy cannot be regulated to the point of no conflict.

The lesser behaviour of those individuals not possessing those qualities, will be punished by standards and regulations already existing.

The population of Black bear although estimated has not been proven to be in decline either.

proposal 4 is a large deer hunting area as well as densely populated by wolves and black bear.

To take away a management tool of hunters taking predators

③

is unfair to those who hunt those road systems and drainages and have for years.

Bears kill saws, estimates vary but some data studied indicates 50% in unit 2, unit 1 has similar topography and conditions, how many deer killed by bears can only be guessed at this time.

Deer are much more targeted in those areas but much less encountered as far as safety goes more people have been killed by aircraft than any other user group in those areas. To my knowledge not one tour operator has contacted any other user groups about these conflicts.

They might be the guides and hunters more than accommodating in information and cooperation.

A, D, F & B knows this and relies heavily on information from hunters and guides. They rely on them because those user groups walk the streams, beaches and timber 10 months of the year not to proposals such as these represent a

④

stepping stone to further restriction on all user groups and are painfully hard to remove once in place, you would hope the tour operators would have the courtesy to discuss conflicts on a common resource, with those whose livelihood and lifestyle share interest.

But that is the beauty of our system everyone is entitled to be heard no matter how unjustified

Sean Nielson

Gustavus, Alaska 99826

October 22, 2010

Attn: Board of Game Comments

Alaska Dep't of Fish & Game

Boards Support Section

Box 115526  
Juneau, AK 99811

Dear Ms. Tibbles:

Please include these comments in the on-time packet for the upcoming SE Regional Board of Game meeting. Thank you.

Proposal 12

I *oppose* the proposal to re-instate wolf snaring in Unit 1C, Gustavus Forelands, for the following reasons:

I am a professional photographer, videographer and eco-tourism guide. In these positions, I make a living by shooting wildlife with a camera, as well as pointing out animals and animal sign to tourists. So for me and other photographers in Gustavus, more wolves mean more opportunities for viewing wolves which leads to more and better photos, more opportunities for showing others the animals and their sign to visitors which leads to more photo sales to my markets and higher gratuities from my clients. With this in mind, I oppose hunting and trapping of wolves in general. I understand that much, if not all of your decision in these matters revolve on sound biological science, and that my reason for opposition to not fall under this category. However, I believe that under "Who is likely to suffer" the Board should add, "People who make a living photographing and viewing wolves and guiding others to do the same. (non-consumptive users)"

Additionally, when snaring was permitted in Gustavus in the past, unethical and illegal methods were used by some trappers. Since there is no law enforcement present in Gustavus, there is little chance that anyone breaking the law would be caught. I believe that if snaring is permitted, domestic dogs, eagles and moose calves or moose caught by the nose, will be victims of by-catch.

The proposal states: "Calf recruitment in Unit 1C suffers partly from predation from wolves". I am not aware of any science behind this statement. One could argue that just as many moose calves

could be by-caught by snares as are taken by wolves. With this in mind, I do not believe that hunters will benefit from this proposal.

Finally, while only *one* hunter may directly benefit from the trapping of one wolf, *many* residents may directly benefit from being able to photograph the same wolf, on multiple occasions.

Proposals 33-37 & 40 Black Bears

I ***support*** all of these proposals for all of the reasons stated as well as the following:

In northern SE AK, the “*Glacier Bear*” or “*Blue Bear*” color phase of the black bear persists. As a professional photographer and eco-tourism guide, I am constantly seeking photos and viewing opportunities of this elusive animal. By implementing these proposals, I feel that fewer Glacier Bears will be targeted and harvested. As a non-consumptive user, these proposals would benefit me.

Proposal 43

I ***support*** this proposal for the same reasons I opposed Proposal 12. (see above)



**Grateful Dogs  
of Juneau**

**P.O. Box 20887  
Juneau, AK 99802  
www.gratefuldogsofjuneau.org**

October 4, 2010

RECEIVED  
OCT 07 2010  
BOARDS

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

Re: **SUPPORT - Proposal 10:** Juneau area Unit 1C: Discretionary Trapping  
**SUPPORT - Proposal 11:** Areas Closed to Trapping: Treadwell Ditch

Dear Sirs:

The Grateful Dogs of Juneau (Grateful Dogs) whole heartedly supports the adoption of **PROPOSALS 10 and 11**. Grateful Dogs believes that the adoption of the two proposals would benefit dog owners in Juneau and would be in the best interest of all users of the trails in Juneau. Grateful Dogs also believes that the proposals would not unduly interfere with lawful trapping activities because the potential adverse consequences on trapping activities are minimal.

**Proposal 10** would give the Department of Fish and Game authority to set trapping permit conditions and procedures in the Juneau area as necessary to prevent conflicts between user groups in the densely populated Juneau area. This proposal is needed because there is limited habitable land between the marine waters and mountains of the Juneau area. In the limited area available it is difficult for trapping activities to occur at a safe distance from dense residential areas and from heavily used recreational areas. We are aware of at least one incident in recent years in which a dog was caught and died in a lawful trap set close to a popular trail. Grateful Dogs would like to avoid similar incidents by allowing the Department to insure that trappers in the Juneau area are adequately informed of open and closed areas and other regulations and take the appropriate measures to prevent such tragedies in the future. GDOJ SUPPORTS

**Proposal 11** would add Treadwell Ditch Trail area to the list of similar trails closed to trapping in Juneau. The Treadwell Ditch Trail is being upgraded and more dog owners and other outdoor enthusiasts are using the trail. The trail parallels the residential areas along the Douglas and North Douglas Highways along the length of the trail. The safety of the public is at risk if trapping is allowed in close proximity to this increasingly popular trail and the adjacent residential areas. GDOJ SUPPORTS

Grateful Dogs of Juneau, Inc. is an Alaska nonprofit organization that promotes responsible ownership of dogs in Juneau and advocates on behalf of responsible dog owners.

Sincerely,

Aran Felix  
Board Member

Grateful Dogs of Juneau, Inc.



Oct. 4, 10

AK Dept. of Fish & Game Board Support  
P.O. Box 115526  
Juneau, AK 99811-5526  
ATT: Scott

RECEIVED  
OCT 07 2010  
BOARDS

Re: Bear Predator Control

To Whom It May Concern:

As a registered voter and concerned citizen, I want to go on record as being against the (barbaric) practices being put forth regarding bear control. If they must be hunted, I believe it should be done the old-fashioned (and more fair) way of tracking them.

I feel I was tricked by Sarah Palin into voting against what I believe regarding wolf predator control, so I definitely want to be heard on the bear issue.

It appears as if the board of game disregards the wishes of the majority of the people, so I am prepared to join with others and devote some of my time to this issue.

Sincerely,  
Della Dempsey