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Mr. Cliff Judkins

February 3, 2012

Chairman, Alaska Board of Game

Dear Mr. Judkins and Alaska Board of Game Members.

I am making a request for the board to reconsider their decision to table proposal No. 40 (establishing a non-resident take for raptors in Alaska). I request the board to remove proposal #40 (numbered from the January 2012 statewide meeting) and act on it with the amended language found in RC45. I am hoping that since the proposal was noticed for the March 2012 meeting in Fairbanks, The board can legally bring it back on the table and pass an amended proposal. The Alaska Falconers Association has submitted a white Paper for your review. This white Paper details the nonresident take issue before you in detail and recommends amended language substantially similar to what I am proposing in this request. The board can bring this proposal back on the table and pass it with out spending a significant amount of time since testimony and staff reports were presented in January. Thank you very much for considering this request and placing the nonresident take of raptors regulation behind us.

#### ISSUE STATEMENT

Proposal No. 40, amended with recommended concept language found in RC 45, if removed from the table and acted upon by the board, will put into place a simple, conservative non-resident take that will:

- In-act a drawing permit for up to five raptors. Any raptor from the approved species list found in 5AAC 92.037 would be available for take by nonresidents. This would eliminate the need to establish a quota for any individual species. (e.g. if all five permit winners decide they want to trap large falcons, then that will be biologically sound)
- Take dates of September 1 through December 31 would eliminate the need to close any area of the state to the take of raptors. These dates occur after all raptors have fledged (left the nest) and would ensure that no eyas (chicks still in the nest not capable of flight) were taken. Thereby minimizing inexperienced disturbance to long established nesting sites. These dates would also prevent conflicts with resident falconers who generally would not be taking birds during this time frame.
- These take dates allow for the take of passage birds only. Passage birds are those immature birds in their first year of life that have left the nest and are capable of sustained flight. Passage birds are easy to distinguish from mature birds by their unmistakable difference in plumage color and design. Passage birds are also very easy to



catch because they are unskilled hunters and are very hungry. A passage only raptor take would reduce any need for expending additional law enforcement resources.

- By not using a per species quota and allowing for passage bird take, we would keep permit holders out of the field during the nesting season and not give them an opportunity to take a valuable large falcon nestlings illegally. This would benefit law enforcement efforts.
- Permit holder "check in and check out" would enable the department to gather valuable information from the permit holder and would aide law enforcement efforts if violations occur.
- Nonresidents have a long documented history of removing raptors from Alaska outside of its regulations. Unlike nonresident falconers, there has never been a recorded citation issued to a resident Alaska Falconer.
- By passing proposal 40 as amended at this meeting and by placing an effective date for implementation two years from now or until a permit fee structure is acted upon by the legislature, will allow the department to finalize their approach to dealing with questions from interested members of the public. The department currently has a structure in place , which includes regional falconry representatives, who would handle applicants questions and give direction to successful permit winners
- The department would not have to compartmentalize the state if there are no closed areas for take and would not have to worry that falconers' would illegally take and remove nestlings from closed areas of the state under the cover of possessing a permitted bird.
- Placing a sunset clause in regulation will allow this conservative approach for a non resident take to be evaluated after reviewing the results over a four year window of use. Changes in regulation can then be made after evaluating the program.
- Written land owner permission would be required if a permittee desires to conduct trapping activities on private land where permission is required. This condition would prevent trespass on private lands and alleviate land owner concerns.
- Guiding a nonresident permit holder for financial or material remuneration would be illegal, but would not prevent a resident falconer from accompanying a nonresident permit holder into the field to assist that person in capturing a raptor.
- Successful permit winners will not be able to apply for another nonresident capture permit for five years.
- Tying the application process into the current drawing hunt process will take minimal time, cost, and effort by the department. The department testified that this permit process is in place and easily adapted to a nonresident falconry drawing permit process.
- The departments concern about needing time to implement this program will be moderated by postponing implementation of the first drawing for a minimum of two



years and tying it into the approval of a nonresident fee structure approved by the Alaska Legislature.

- Passing proposal 40 as amended by the concept language in RC 45 will be a valuable first step in implementing a constitutionally directed mandate to allow nonresident take. It will be a win-win situation for both resident and non resident falconers alike.
- I request that this first step be taken at this Spring 2012 meeting to implement a conservative nonresident take program and place it into regulation.



## 5 AAC 92.xxx. Nonresident Permit for Falconry

- (a) A Non-resident permit issued by the department and a valid, current non resident Alaska hunting license is required for the taking, transporting, or possessing a raptor for falconry purposes. The permit will be issued under the standards, procedures, and conditions of the *Alaska Falconry Manual No. 9* dated July 1, 2012. The *manual* is hereby adopted as reference. Only a bird defined in 5AAC 92.037(f) may be taken, held, transported, and exported from the state under a valid export permit issued by the department.
- (b) Up to five (5) nonresident permits may be issued each calendar year for the take of raptors in Alaska.
- (c) Applicants for a nonresident raptor capture permit must apply to the department prior to December 31 of the previous year. (Suggested date, date is at Department's discretion). The list of successful applicants will be published by the last day of the following February (suggested date, date is at department's discretion). Each capture permit will be valid for the take of one raptor from the approved list of raptors from *Alaska Falconry Manual No. 9*. A valid Alaska nonresident hunting license must be purchased prior to applying for a capture permit (this is the current requirement for all drawing permits).
- (d) The permittee must hold the appropriate class falconry license issued from a state with an approved falconry program to possess the species of raptor he or she plans to take.
- (e) Capture dates for nonresident take of raptors in Alaska are September 1 through December 31.
- (f) Each permittee must check-in in person with the department's regional falconry representative or his/her designee prior to entering the field to take a bird. The permit-tee must provide information to the department about the species of bird to be taken, location of take, time frame trapping efforts will be undertaken and any additional information required by the department. Permit-tees who successfully take a raptor must check-in in person with the department's regional falconry representative or his/her



designee and produce the raptor for inspection with in 7 days of the take (time frame is at Department's discretion).

- (g) Written land owner permission must be in the permittee's possession when taking a raptor on private or public lands where required.
- (h) Raptors must be banded at the time of take using the appropriate black marker if appropriate for the species taken.
- (i) A permit winner may not apply for another non-resident capture permit for a period of five years.
- (j) A person may not receive financial or material remuneration for accompanying a non-resident permit holder in the field in the attempt to locate and take a raptor for the permit holder.
- (k) This regulation will sunset on June 30 of 2016.



February 14, 2012

Mr. Cliff Judkins, Chairman, and board members, Alaska Board of Game

I am making a request that the Board of Game preserve the integrity of the current Wood River Controlled Use Area (WRCUA) and keep current regulations in place and unchanged. These regulations describe the geographical location, time frame, and vehicle restrictions that apply to the area

The WRCUA has been in regulation since its inception in 1976 and is one of the oldest in the state. The WRCUA has been changed and changed back, fine tuned numerous times over the life of the area by the Board to come up with what we have in regulation today. Today's regulation has taken into account the issues and problems that have developed over the years while maintaining the original spirit and intent of the Board when it was created in 1976.

A short summery of what has happened includes minor changes to boundaries and one major change to a boundary on the west side of the CUA. This larger change was requested by the local advisory committee and individuals on the western side of the CUA. The desired effect of the change was not realized, but in fact created a multitude of unforeseen problems, some so serious that the requesting AC asked the board to change the CUA back to its original form at the next Interior Alaska issues Board meeting .

The WRCUA effectively limits motorized access with the exception of aircraft to the area during the late August and September Caribou, Sheep, and Moose seasons. Because of this motorized restriction, hunters have been able to very successfully adjust their hunting methods to fit with in the restrictions. In addition to aircraft access, hunters successfully use foot access from boundary ATV trails, non motorized boat access, and horseback access. A large number of moose are killed and the desired number of caribou and sheep are taken keeping additional restrictions by ADFG out of the formula. ADFG uses the restrictions with in the WRCUA to successfully provide high levels of big game hunting opportunity with a minimum or user group conflicts.



If this area would be open for land based ATV access, during the late August/September big game season, there would be SIGNIFICANT user group conflicts develop between current allowed access users and ATV users. Resident hunters who have long established family hunting camps, guides, outfitters, and transporters who have tailored their operations to the current WRCUA restrictions would face considerable conflicts with ATV users and in many cases would not be able to provide their clients an opportunity to harvest a trophy animal. Remember that the general season moose bag limit in the CUA is the most restrictive in the state for both resident and non resident hunters requiring a 50" or 4 brow tine minimum for non-resident hunters and a spike/fork- 50" or 4 brow tine minimum bull for resident hunters.

Because this area is conducive to high levels of ATV use, significant habitat damage would occur by un- restricted use of, modern- aggressive technology, ATV's. Every river and creek bottom, and every ridge top in the CUA would have an access trail developed which would create chaos with the established user groups.

ATV use is currently allowed after September of each year with significant opportunity to hunt cow moose and trophy bulls under a muzzle loaded season. The very large area of GMU 20A, which is located to the east of the Wood River, is currently open to ATV use and provides a high level of harvest with a less restrictive resident moose bag limit (spike/fork or 50" or 3 brow tines) .

Big game guides who hunt this CUA, which is on state owned land are, going through a process of having their numbers reduced through a guide concession/ use program being implemented by the Department of Natural Resources. They are going to be restricted significantly and allowing ATV use in their controlled use area will further negatively affect their businesses.

The Board of Game has had many opportunities to change this area and its restrictions over the past 34 years and has found that the restrictions in place have created a very functional situation that allows a lengthy season, a high level of hunter opportunity, a finely tuned mix of resident/nonresident meat hunting and commercial activities(guides, outfitters, and transporters) which has morphed





into a good user group interaction, created a high level of harvest, and provided significant protection for Dall sheep from over harvest due to unrestricted access from a large population center. The Board has looked at these issues time and again and has chosen to keep the Wood River Controlled Use area in place to continue to provide these attributes to the hunting public. Prior Boards has found that this controlled use area is working and working well; and I request that the status quo be maintained.

Thank you for your consideration of this request.

David Lorrington  
3530 Holden Rd.  
Fairbanks, Alaska 99709  
907-687-4858



## Statewide 2012 Wildlife Proposals

### **Deferred Statewide Proposals**

**Proposal 109** 5 AAC 85.015. Hunting seasons and bag limits for black bear. By The Greater Alaska Black Bear Committee. Clarify and remove complicated or excessively restrictive regulations and ADF&G discretionary provisions to black bear hunting.

**Units 6-26 (except Unit 6C and D and 14C)( Residents and Nonresidents: No Closed Season**

**Units 6-26 (except 6D & C and the coastal areas of 15&7 as defined at the March 2011 Board of Game meeting) Residents and nonresidents:**  
**Bag Limit-3 bears**

**All intensive management areas where black bears are recognized as contributing to the decline of prey species;**  
**Bag Limit – No limit**

#### Comments:

We support Proposal 109 to allow a more liberalized no closed season for Residents and Nonresidents with a 3 black bear limit, and a no limit for black bears in intensive management areas. There are too many black bears preying upon caribou and moose calves. Black bears are healthy and can sustain a more liberalized hunting season. If too many black bears are harvested the Department can manage for this should it occur.

**Proposal 119** 5 AAC 85.015. Hunting seasons and bag limits for black bear. By The Greater Alaska Black Bear Committee. Establish a codified location for permitted black bear bait stations and establish seasons of Alaska.

(b) (xx) Bear baiting permits are valid for the following seasons.

**(A) In Units 1-5 spring black bear baiting permits will be valid April 15 – June 15 as long as there is an open black bear hunting season and unless baiting has been prohibited in an area by the Board of Game.**

**(B) In Units 6-26 spring black bear baiting permits will be valid April 1 – June 30 as long as there is an open black bear hunting season and unless baiting has been prohibited in an area by the Board.**

**(C) In Units 6-26 fall black bear baiting permits will be valid August 1- October 15 as long as there is an open black bear hunting season and the board has authorized a fall baiting season.**



Comments:

We support Proposal 119 with modification to allow black bear baiting season in April 1 – May 30, and a fall black bear baiting season from October 1 – October 15. People are out fishing and hunting and may walk up on a bait station unaware of a bait station. It would be harmful to the public to allow a black bear bait station, during the fishing and hunting season. Public should be informed where black bear bait stations will be. Department should have a map for the public to read so that they will know where bait stations will be.

**Proposal 259** 5AAC 92.010. Harvest tickets and reports; 92.165. Sealing of bear skins and skulls; and 92.220. Salvage of game meat, furs and hides. Streamline the reporting, sealing and salvage of black bears.

(l) For black bear, a person may not hunt black bear in Units 1-5 [7, 11-17, 19(D), AND 20]. Except when a permit is required, unless the person has in possession a harvest ticket for the species and has obtained a harvest report (issued with the harvest ticket); **in units 6-26 a person must first obtain a harvest report card (harvest tickets are not required).**

**5 AAC 92. 165. Sealing of bear skins and skulls.** (a) Sealing is required for brown bear taken in any unit in the state, black bear of any color variation **need not be sealed unless sealing is required in designated areas for biological purposes by ADF&G areas staff** [TAKEN IN UNITS 1-7, 11, 13, AND 20(B)], and a bear skin or skull before the skin or hide is sold. A seal must remain on the skin until the tanning process has commenced. A person may not possess or transport the untanned skin or skull of a bear taken in a unit where sealing is required, or export from the state the untanned skin or skull of a bear taken anywhere in the state, unless the skin and skull have been sealed by a department representative within 30 days after the taking, or a lesser time if requested by the department, except that

5 AAC 92.220. Salvage of game meat, furs and hides. (a) Subject to additional requirements in 5 AAC **84** – 5AAC **85**, a person taking game shall salvage the following parts for human use:

(3) statewide from January 1 through May 31, the hide [skull], and edible meat as defined in 5 AAC **92.990**, from June 1 through December 31, **either the hide or meat must be salvaged, in addition, the** skull of a black bear taken in a game management unit in which sealing is required, [AND FROM JUNE 1 – DECEMBER 31, THE SKULL AND EITHER THE HIDE OR EDIBLE MEAT OF A BLACK BEAR TAKEN IN UNIT 20(B);]

Comments:

We support Proposal 259 to streamline regulations have a person obtain a harvest report card, sealing of black bears if currently required, and uniform statewide salvage requirements. From January 1 through May 31 the hide and edible meat should be salvaged and June 1 through December 1 either the hide or meat must be salvaged. Streamlining regulations will enable more black bears to be taken. In most areas of the State black bears are not a conservation concern. Black bears are preying upon calves of caribou and moose.



**(Region III) Interior Region (Game Management Units: 12, 19, 20, 21, 24, 25, 26B, 26C)**  
**Regional Proposals**

**Proposal 134** 5 AAC Chapter 85. Seasons and bag limits. By Douglas Lammers. For Region III Units, allocate 10 percent drawing permits to nonresidents; restrict nonresident participation with less than 10 permits.

Comments:

No comments on Proposal 134.

**Proposal 135** 5 AAC 92.050. Required permit hunt conditions and procedures. By Paul Rerucci. For Region III Units, limit drawing permits to 10 percent for out of state hunters, 90 percent for residents.

Comments:

No comments on Proposal 135.

**Proposal 136** 5 AAC 85.055 Hunting seasons and bag limits for Dall sheep. By Jake Sprankle and James Von Holle. Begin the resident sheep season seven days earlier than nonresidents in Region III Units.

Comments:

We support a seven-day early hunt for residents.

**Proposal 137** 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep; and 92.057. Special provisions for Dall sheep drawing permits hunts. By Alaska Backcountry Hunters & Anglers. Convert nonresident sheep seasons to draw only hunts, require guide-client agreement and cap harvest at 15-20% of allowable harvest.

Comments:

No comments on Proposal 137.

**Proposal 138 Hunting seasons and bag limits for Dall sheep.** By Doug Lammers. Convert all sheep hunts in Region III to drawing only, 90% for residents.

Comments:

No comments on Proposal 138.

**Proposal 139** Hunting seasons and bag limits for Dall sheep. By James Von Holle. Convert all nonresident sheep seasons to drawing permit hunts and limit to 5 percent of total permits.

Comments:

No comments on Proposal 139.



**Proposal 140** 5 AAC 92.015. Brown bear tag fee exemptions. By Alaska Department of Fish and Game. Reauthorize resident grizzly bear tag fee exemptions throughout Interior and Eastern Arctic Alaska.

Comments:

We support Proposal 140 for Brown bear tag fee exemptions. Grizzly bears are abundant. Public should not have to pay \$25 tag fee to shoot a brown bear. To improve moose and caribou calves survival rates.

**Proposal 141** 5 AAC 84.270. Furbearer trapping; 92.XXX Black bear trapping requirements.; 92.051. Discretionary trapping permit conditions and procedures.; 92.080. Unlawful methods of taking game; exceptions.; 92.095. Unlawful methods of taking furbearers; exceptions.; 92.165. Sealing of bear skins and skulls.; 92.200 Definitions.; and 99.025. Customary and traditional uses of game populations. By Alaska Department of Fish and Game. Implement black bear trapping regulations as follows: (see book)

Comments:

No comments on Proposal 141.

**Proposal 142** 5 AAC 84. 270. Furbearer trapping. By Alaska Center for the Environment. Prohibit trapping of black bear in the Interior region.

Comments:

No comments on Proposal 142, currently, there isn't a trapping season of black bears in the Interior Region.

**Proposal 143** 5 AAC 92.085. Unlawful methods of taking big game; exceptions. By Thomas Scarboro. Allow the taking of black bear at bait stations (Unit 20) the same day you have been airborne.

Comments:

We oppose Proposal 143 to allow the taking of black bear at bait station in Unit 20 the same day airborne. Same day airborne to check bait station will not help to increase harvest of black bears. It will allow people who have bait stations time to arrive faster at bait stations, but not to harvest more bears.

**Proposal 144** 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By Fairbanks Advisory Committee. Allow the same day airborne hunting or black bear over bait in Region III.

Comments:

See comments under Proposal 143.

**Proposal 145** 5 AAC 99.025. Customary and traditional uses of game populations. By Science New Project. Develop a Unit specific Amount Needed for Subsistence (ANS) finding for the Interior Region. (wolves)



Comments:

We oppose Proposal 145. Alaska Board of Game determined that 90% of the allowable harvest for both furbearers and fur animals statewide was appropriate (ADF&G Recommendations).

**Proposal 146** 5 AAC 85.060 Hunting seasons and bag limits for animals; and 84.270 Furbearer trapping. By Fairbanks Advisory Committee. Open year-around coyote seasons in Region III.

Comments:

No comments on Proposal 146.

**Proposal 147** 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. By Fairbanks Advisory Committee. Allow the use of helicopters for access to trapping in Region III.

Comments:

We oppose Proposal 147 to allow helicopters for access to trap in Region III, which includes Unit 12 and Unit 20A, which is in our traditional hunting areas. Use of helicopters to access trap lines is not customary and traditional method of trapping. This will set a precedent to allow this in other areas of the State of Alaska.

**Proposal 148** 5 AAC 84.270. Furbearer trapping. By Science New Project. Close certain nonresident trapping seasons in Interior Region.

Comments

No comments on Proposal 148.

**Proposal 149** 5AAC 84.270. Furbearer trapping. By Fairbanks Advisory Committee. Extend the season for fox, martin, mink, and weasel in Units 12, 20, &25C.

Comments:

No comments on Proposal 149.

**Proposal 150** 5 AAC 85.060. Hunting seasons and bag limits for fur animals By Science New Project. Close certain nonresident furbearer hunting season in the Interior Region.

Comments:

No comments on Proposal 150.

**Proposal 151** 5 AAC 92.540. Controlled Use areas. By Fairbanks Advisory Committee. Review the conditions of the Controlled Use Areas in Region III and repeal those that are no longer meet the original intent.

Comments:

We oppose Proposal 151. We oppose changes to Wood River CUA and Yanert CUA areas. Changes to the Wood River CUA and Yanert CUA will only create trespass on private lands. Ahtna Inc. own lands near Wood River CUA and Yanert CUA. Delta Controlled Use Area in Unit 20A does not need to be changed at this time either.

Conflicts among user groups will continue to occur, impact to resources will continue, even if the Board of Game were to make changes to CUAs.

**Proposal 152** 5AAC, Chapter 85, Seasons and bag limits. By Michael Dullen. Open early youth hunt (10-17) years for all big game in Region III Units; require accompanying adult to forfeit bag limit.

Comments:

We oppose Proposal 152 to open early youth hunts for all big game in Region III, as it could lead easily be abused, which includes Unit 12 and Unit 20A. An early open season for youth isn't needed to harvest big game animals; they can hunt during the regular hunting season. There is sufficient opportunity to harvest wild game under current hunting regulations.

**Tok Area – Unit 12**

**Proposal 186** 5 AAC 85. 045. Hunting seasons and bag limits for moose. By Upper Tanana Fortymile Fish and Game Advisory Committee. Modify moose season in portion of Unit 12 and 11.

Comments:

We oppose Proposal 186. See comments under Proposal 187.

**Proposal 187** 5 AAC 85. 045. Hunting seasons and bag limits for moose. By Wrangell-St. Elias National Park Subsistence Resource Commission. Convert the any bull moose hunt to a spike-fork 50-inch or 3 more brow tines in portion of Unit 12.

Comments:

We support Proposal 187 with amendment to have season dates of August 20 to September 20 and joint-state permit, so that over-crowding issue will be alleviated and seasons will be the same for Unit 11 and Unit 12, and one permit will be distributed to hunt on federal and state lands, so that hunters will not have to go to federal and state agencies to get a registration permit to hunt. This amendment would only affect the end of the Nabesna road.

Moose populations are at low density and are stable; Moose survey indicates that there are 0.79 moose per square mile, with 34 bulls:100 cows and 27 calves:100 cows (ADF&G Recommendations). A hunting season, August 20 September 20, will not adversely affect moose population in Unit 11 and Unit 12. Hunter activity has largely remained the same over the years as well.

**Proposal 188** 5 AAC 85.055 Hunting seasons and Bag Limits for Dall Sheep; and 92.057. Special provisions for Dall Sheep drawing permit hunts. By Lance Kronberger. Allocate 10 percent of sheep drawing permits to nonresidents.

Comments:

No comments on Proposal 188.



**Proposal 189** 5 AAC 85.055 Hunting seasons and Bag Limits for Dall Sheep; and 92.057. Special provisions for Dall Sheep drawing permit hunts. By Terry Marquette. Close the nonresident sheep season in Tok and Delta drawing hunts.

Comments:

No comments on Proposal 189.

**Proposal 190** 5 AAC 85.055 Hunting seasons and Bag Limits for Dall Sheep; and 92.057. Special provisions for Dall Sheep drawing permit hunts. By Ray Huer. Close nonresident sheep season in the Tok and Delta drawing hunts.

Comments:

No comments on Proposal 190.

**Proposal 196** 5 AAC 92.044. Permit for hunting black bear with the use of bait or scent lures. By Upper Tanana Fortymile Advisory Committee. Allow brown bear baiting with same season and restrictions as black bear baiting.

Comments:

We are neutral Proposal 196

**Proposal 198** 5 AAC 84.270. Furbearer. Trapping. By Upper Tanana Fortymile Advisory Committee. Align Units 12 and 20E fox trapping season with the coyote season, including snare and trap restrictions in October and April.

Comments:

No comments on Proposal 198.

**Proposal 199** 5 AAC 85.060. Hunting seasons and bag limits for fur animals. By Upper Tanana Fortymile Advisory Committee. Extend hunting seasons for lynx and fox to April 30.

Comments:

No comments on Proposal 199.

**Proposal 200** 5 AAC 99.025. Customary and traditional uses of game populations. By Science New Project. Amend the Amount Necessary for Subsistence Uses in Unit 12 as follows

(11) Wolves

Unit 12

Comments:

We oppose Proposal 200 for the same reasons stated in Proposal 145.

**Proposal 204** 5 AAC 92. 108. Identified big game prey populations and objectives. By Ray Huer. Modify the Intensive Management Findings for moose in Unit 20A.

Comments:

We support Proposal 204 to increasing Unit 20A Moose Population Objective from 10,000-12,000 to 12,000-15,000. Increasing this will create a longer range of moose objective, and decrease intensive management effort. Studies have shown that when moose were at low



density, the nutritional status of moose did not improve in Unit 20A. If there is a decline in the nutritional status of moose the department can manage for this.

**Proposal 205** 5 AAC 85.045. Hunting seasons and bag limits for moose. By Valerie Baxter.

Change the legal animal for the Unit 20A & 20B antlerless hunts.

Subunits 20A & 20B antlerless hunts: One antlerless moose by permit. However, no person may take a [CALF OR] cow accompanied by calf.

Comments:

See comments under Proposal 206.

**Proposal 206** 5 AAC 85.045(a) (18) Hunting seasons and bag limits for moose. By Alaska Department of Fish and Game. Reauthorize the antlerless moose hunting season in Unit 20A.

Comments:

We oppose Proposal 20 to reauthorize antlerless moose hunting season in Unit 20A. Allowing an antlerless hunting season will crash the cow moose population. In Unit 13, a cow moose hunt was allowed in the 70s, which jeopardized moose population, it took years to recover.

Hunters may un-intentionally kill a cow moose with a calf.

Allowing a hunt will eventually decrease the moose population in Unit 20. Cow moose population will naturally manage itself without intervention from humans or the department.

**Proposal 207** 5 AAC 85.045(a) (18) Hunting seasons and bag limits for moose. By Dave Machacek. Revert to the original hunt area for the November muzzleloader hunt in Unit 20A.

Comments:

We oppose Proposal 207. We oppose any muzzleloader hunts.

**Proposal 208** 5 AAC 85.045(a) (18) Hunting seasons and bag limits for moose. By Dave Machacek. Establish a new muzzleloader hunt in Remainder of Unit 20A; outside controlled use area.

Comments:

We oppose Proposal 208 to establish new muzzleloader hunt in Remainder of Unit 20A. We oppose use of muzzleloader to hunt moose in any units.

**Proposal 209** 5 AAC 92.052. Discretionary permit hunt conditions and procedures. By Middle Nenana Advisory Committee. Require hunters to use a locking tag if hunting any bull drawing permit in Unit 20A.

Comments:

We are neutral on Proposal 209, locking tags was passed by ABOG at the statewide meeting. Existing regulations provide proof for the sex of moose. Antlers should not have to be visible when being transported from field. It would add another burdensome regulation to hunters to require them to do this.

**Proposal 210** 5 AAC 92.540. Controlled use areas. By Roggie Hunter. Move the boundary of the Wood River Controlled Use Area.

Comments:

We oppose Proposal 210 to move the boundary of the Wood River Controlled Use Area, so that motorize vehicles can be utilized to hunt moose in September moose season. It isn't necessary to move the boundary at this time. See comments under Proposal 151.

**Proposal 213** 5 AAC 92.540(H)(ii) Controlled use areas. By Fairbanks Advisory Committee. Allow motorized vehicle access in Yanert Controlled Use Area in Unit 20.

Comments:

We oppose Proposal 213 to allow motorized vehicle access in Yanert Controlled Use Area in Unit 20 to hunt for moose. If this proposal is passed by the Alaska Board of Game, it will cause a major trespass to community of McKinley Village area and Ahtna, Inc. lands that are near the boundaries of the Yanert CUA. See comments under Proposal 151.

**Proposal 214** 5 AAC 85.055 Hunting season and bag limits for Dall Sheep. By Middle Nenana Advisory Committee. Create "any ram" drawing permits hunt in Unit 20.

Comments:

No comments on Proposal 214.

**Proposal 233** 5 AAC 92.540. Controlled use area. Establish a new controlled use area near Denali. By Jim Stratton, National Parks Conservation Association.

Comments:

We strongly oppose Proposal 233 to "establish a new controlled use area near Denali". A newly formed controlled use area for the public to view wolves and creating "wolf townships" isn't necessary. This will have an adverse effect on the moose and caribou populations and create an impact upon subsistence users and wild game as well. There is already a public viewing area in the Denali National Park. We don't believe there is a conservation concern for wolves within this area. More CUAs with restrictions will impede subsistence users from harvesting wild game.

**Proposal 236** 5 AAC 85.020. Hunting seasons and bag limits for brown bears. By Fairbanks Advisory Committee. Allow limited harvest of grizzly bear at black bear bait stations in Unit 20A, 20B, and 25C.

Comments:

No comments on Proposal 236.

**Proposal 237** 5 AAC 85.020. Hunting seasons and bag limits for brown bears. By Fairbanks Advisory Committee. Align the brown/grizzly season in all of Unit 20.

Comments:

We oppose Proposal 237.

**Proposal 245** 5 AAC 85.045(11). Hunting seasons and bag limits for moose. By Alaska Department of Fish and Game. Re-authorize the drawing permits hunts for antlerless moose in Unit 13.

Comments:

We oppose Proposal 245. This proposal will cause the moose population to crash. Taking cow moose will cause hunters to harvest too many cows and crash the moose population. This happened in the 1970s, when there was an open season for cow moose. Unit 13 is an impacted hunting area, and too many hunters will take advantage of this proposed cow moose hunt.

**Proposal 255** 5 AAC 92.015. Brown bear tag fee exemption. By Alaska Department of Fish and Game. Reauthorize the brown bear tag fees for Region IV.

Comments:

We support Proposal 255 for Brown bear tag fee exemptions. Grizzly bears are abundant. Public should not have to pay \$25 tag fee to shoot a brown bear. More brown bears will be harvested and moose and caribou calves will survive.

Eleanor Dementi  
Eleanor Dementi  
Customary & Traditional Chair,

2-17-2012  
Date



National Park Service  
U.S. Department of the Interior

Fairbanks Administrative Center

4175 Geist Road  
Fairbanks, Alaska 99709

Phone: (907) 457-5752  
Fax: (907) 455-0601

## FAX

To: <u>ADPAG Boards Support</u>	From: <u>Marcy Okada - NPS-SRC</u>
Fax number: <u>907.465.6094</u>	Date: <u>2/7/2012</u>
Phone number: <u>                    </u>	Pages to follow: <u>2</u>

Comments: Please find comments from the Gates of the Arctic National Park Subsistence Resource Commission regarding BOG Wildlife Interior Region proposals



**GATES OF THE ARCTIC NATIONAL PARK  
SUBSISTENCE RESOURCE COMMISSION  
c/o 4175 Geist Road  
Fairbanks, AK. 99709  
(907) 455-0639 or FAX (907) 455-0601**

January 23, 2012

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526  
Fax: 907.465.6094

Dear Board of Game members,

At our most recent meeting of the Gates of the Arctic National Park and Preserve Subsistence Resource Commission on November 9 & 10, 2011 in Fairbanks, Alaska, the commission took the following positions regarding Board of Game 2011/2012 Interior Wildlife Proposals:

Proposal 151: Review the conditions of the Controlled Use Areas in Region III and repeal those that are no longer meeting the original intent.

SRC Vote: Oppose

Justification: To maintain the controlled use areas for Anaktuvuk Pass and Kanuti.

Proposal 163: Authorizes a predator control program in a small portion of Unit 24B.

SRC Vote: Support

Proposal 164: Eliminate the restriction on aircraft in the Kanuti Controlled Use Area.

SRC Vote: Oppose

Proposal 165: Close all hunting for the Galena Mountain Caribou Herd in Unit 24.

SRC Vote: Defer

Proposal 167: Lengthen wolf hunting season to the end of May for Units 21, 22, and 24.

SRC Vote: Support with 1 opposed

Proposal 177: Decrease the bag limit for caribou in Unit 26B.

SRC Vote: Support

Proposal 179: Convert the general season nonresident sheep hunt to drawing hunt in the Dalton Highway Corridor area.

SRC Vote: Support

Proposal 181: Extend brown bear seasons in Unit 26B.

SRC Vote: Defer to North Slope AC



Proposal 184: Allow the use of crossbows in the Dalton Highway Corridor Management area.

SRC Vote: Oppose

Justification: The efficiency of the cross-bow will increase harvests and the Dall's sheep population is already low.

Proposal 185: Allow the taking of small game by falconry in the Dalton Highway Corridor Management area.

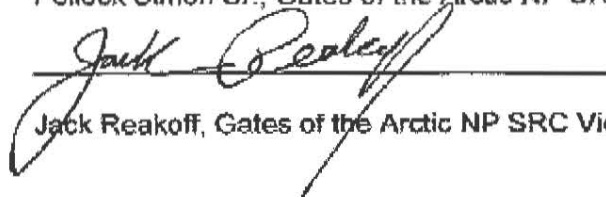
SRC Vote: Support with 1 opposed

The Gates of the Arctic NP Subsistence Resource Commission is requesting that our proposal votes are submitted as record copies (RCs).

Sincerely,



POLLOCK SIMON SR., GATES OF THE ARCTIC NP SRC Chair



Jack Reakoff, Gates of the Arctic NP SRC Vice-Chair

Pollock Simon, Sr. (Chairperson), Jack Reakoff (Vice-Chairperson), Levi Cleveland, Taqutik Hepa, Tim Fickus, Rachel Riley, Louie Commack, James Nageak, and Chris Zwolinski







U.S. Fish and Wildlife Service  
National Wildlife Refuge System  
1011 E. Tudor Rd., MS-225  
Anchorage, Alaska 99503  
Fax: 907-786-3998  
Telephone: 907-786-3354

# FAX

*Alaska Board of Game Comments*  
To: *Alaska Dept. of Fish and Game*  
*Board Support Section* From:

Fax: *(907) 465-6094* Pages: *3*

Phone: Date: *2/15/2012*

Re: *Board Support Section* cc:





IN REPLY REFER TO:  
NWRS712-147

## United States Department of the Interior

### FISH AND WILDLIFE SERVICE

1011 E. Tudor Road  
Anchorage, Alaska 99503-6199



FEB 14 2012

Mr. Cliff Judkins, Chairman  
Alaska Board of Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526  
Fax: 907-465-6094

Dear Chairman Judkins:

The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game (BOG) during its meeting in March 2012 to address Interior Region proposals. We would like to provide the following comment on Proposal 147 which could affect management of multiple wildlife populations on six of our National Wildlife Refuges (Refuges).

**Proposal 147** would allow the use of helicopters for access to trap furbearers in Region III which includes Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

The Service is **opposed** to this proposal. The legal authority to permit helicopter landings within Federal conservation units in Alaska rests with the managing Federal agency (see regulation below). Such landings on Refuges and associated special use permits are evaluated as to whether they are appropriate and compatible with the purposes of each refuge, and if so, are permitted on a case-by-case basis. Strong justifications are needed for helicopter landings anywhere on a Refuge in Alaska. Typically, special use permits are not issued for the take of wildlife by means of helicopters on Alaska Refuges.

Federal regulation governing use of helicopters on Federal lands is provided for your reference.

*TITLE 43--PUBLIC LANDS: INTERIOR*

*PART 36--TRANSPORTATION AND UTILITY SYSTEMS IN AND ACROSS, AND ACCESS INTO, CONSERVATION SYSTEM UNITS IN ALASKA--Table of Contents*

TAKE PRIDE  
IN AMERICA





Mr. Cliff Judkins, Chairman

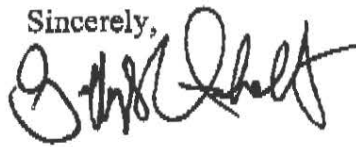
2

*Sec. 36.11 Special access.*

*(4) The use of a helicopter in any area other than at designated landing areas pursuant to the terms and conditions of a permit issued by the appropriate Federal agency, or pursuant to a memorandum of understanding between the appropriate Federal agency and another party, or involved in emergency or search and rescue operations is prohibited.*

Thank you for your time to review our comment on this important issue.

Sincerely,



Regional Director



DATE: February 10, 2012

TO: Boards Support Section  
Alaska Department of Fish and Game  
Post Office Box 115526  
Juneau, AK 99811  
Fax 456.6094

FROM: Wallace and Jerryne Cole  
Post Office Box 67  
Denali Park, AK 99755  
Tel 683.2302  
email [wally@campdenali.com](mailto:wally@campdenali.com)  
[jerryne@campdenali.com](mailto:jerryne@campdenali.com)

RE: Proposal 213: Motorized Hunt in the Yanert Valley

We wish to go on record in opposition of Proposal 213, a motorized hunt season up the Yanert Valley. We support science-based fish and game management in the state of Alaska and see no evidence that this proposal has been examined as a scientifically sound management tool. Further, as Denali residents, we know that this proposal did not originate in the local community, the area which would be most affected by its outcome.

Thank you for your consideration of our views.



DATE: February 10, 2012

TO: Boards Support Section  
Alaska Department of Fish and Game  
Post Office Box 115526  
Juneau, AK 99811  
Fax 456.6094

FROM: Wallace and Jerryne Cole  
Post Office Box 67  
Denali Park, AK 99755  
Tel 683.2302  
email [wally@campdenali.com](mailto:wally@campdenali.com)  
[jerryne@campdenali.com](mailto:jerryne@campdenali.com)

RE: Proposal 227-232: Intensive Management Unit 20C

We wish to go on record in opposition to Proposals 227-232. Proposals 227 and 229, would declare Unit 20C an intensive management area and institute a plan for maximizing the yield of moose for human harvest. Proposal 228 would institute wolf predator control in Unit 20C, and Proposals 230 and 232 would liberalize taking of both grizzly and black bears in 20C through various means, including trapping and baiting.

Scientific standards for choosing activities that set maximized harvest numbers and institute predator control efforts exist. We do not support this action without the necessary scientific justification for doing so. We support science-based fish and game management in the state of Alaska, and little science has been done to show that Unit 20C can support greater harvest numbers. Further, as Denali residents, we know that these proposals were not forwarded by our local Advisory Committee and are not supported by the committee.

Thank you for your consideration of our views.





U.S. Fish & Wildlife Service

# Yukon Flats

National Wildlife Refuge

## FAX Cover Sheet

To: BOARD of GAME ADT/C BOARD Support  
SECTION

FAX #: 907/465-6094 Voice #: \_\_\_\_\_

From: JAMES B. NEELY

Date: 02/09/2012

Subject: ATTN: COMMENT TO 306 171-173

Comments: \_\_\_\_\_

PLEASE SEE ATTACHED COMMENTS.

Yukon Flats National Wildlife Refuge  
101 12th Ave., Room 264  
Fairbanks AK 99701-6237

Page 1 of \_\_\_\_\_  
(907)456 0447 (FAX number)  
(907)456 0440 (Voice number)



PC06  
1 of 3



# United States Department of the Interior



*United States Fish and Wildlife Service  
Division of Refuge Law Enforcement  
Northern Alaska Zone  
101 12<sup>th</sup> Ave. Room 264  
Fairbanks, AK 99701  
907/455-1821*

February 8, 2012

Chairman Cliff Judkins  
Alaska Board of Game  
Boards Support Section  
Post Office Box 115526  
Juneau, Alaska 99811

Dear Chairman Judkins:

The USFW Service, Region 7 (Alaska) Division of Refuge Law Enforcement appreciates the opportunity to comment on proposals affecting Interior Alaska under consideration at the March 12, 2012 Alaska Board of Game meeting. The Division wishes to provide the following comments on Proposals 171, 172 and 173 which will affect wildlife law enforcement on the Arctic and Yukon Flats National Wildlife Refuges.

Proposals 171, 172, and 173 would establish special meat salvage requirements in GMU 25 A, B, and D by requiring hunters to retain the edible meat of the front quarters, hind quarters, and the ribs naturally attached to the bone until the meat has been transported from the field or is processed for human consumption.

*We support the proposals for the following reasons:*

Our experience shows that a meat-on-bone requirement reduces spoilage in the field, as well as diminishing waste.

Regulations that require meat remain naturally attached to bone aid law enforcement officers when conducting investigations of alleged or suspected resource violations by facilitating the accurate reconstruction of butchered carcasses.

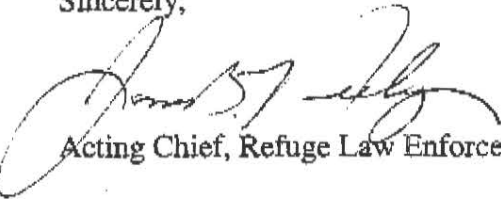
The proposals will more closely align state and federal harvest requirements thus simplifying regulatory understanding and improving public compliance. During the January, 2012 Federal Subsistence Board meeting, the Board adopted proposal WP12-63 to require meat be left on the bone for moose and caribou harvested during federal subsistence harvests in Unit 25.



Finally, I would encourage the Board of Game to further strengthen the positive conservation impact of Proposals 171, 172, and 173 by including caribou to the meat-on-bone salvage requirement.

Thank you for your consideration.

Sincerely,



Acting Chief, Refuge Law Enforcement

cc: Polly Wheeler, Deputy Chief of Refuges – Alaska Region



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

25 January 2012

From: Allen F. Miller  
PO Box 3164  
Anderson, AK 99744

To Whom It May Concern:

I would like to file my support for the following proposals:

Proposal 207, I support this measure because this is a winter hunt. As hunters we do not tear up the terrain because it is generally frozen, and in my opinion we are not a nuisance as others would profess. Hunting pressure during this time of year declines drastically and thus we are a much less nuisance on the surrounding population and the claim the terrain is torn up is not supported. I have hunted this area for years with a standard rifle, a muzzleloader, and a bow, and I don't think we cause a ruckus. I would ask that the boundaries be put back to their original coverage so hunters may benefit from this very manageable method of harvest. It is hard enough to get to these areas with snowmachines or ATVs, depending on the weather. If biology analysis supports this hunt, Fish and Game should make every effort to help the hunter meet the biological criteria for harvest and not be swayed by other agendas that do not support the need to harvest wildlife. Limited permits are issued, and what better way to manage a resource than by drawing permits? Please give the hunter a chance to support your harvest data.

Proposal 208, I support this measure because it would allow more time to harvest a moose. Weather is extreme in the interior and it is difficult at best to find a good time to hunt this area. This proposal falls in line perfectly with #207 because there will be limited permits based off of biological data. The remainder of 20A needs a good primitive hunt such as this, with a longer season so we can cross rivers after they are frozen. This hunt could also be managed based on a quota system as opposed to the drawing system, much like the caribou hunts on the Steese and Taylor Highways. This would give all muzzleloading enthusiasts a chance to hunt until a quota is reached. There are several ways this type of hunt could be managed, and it is very doable from a biological perspective.

Please give Proposals #207 and 208 a chance to benefit the hunter based on biological research and not be swayed by minority interests that do not support biological data.



If you need any other information you can contact me at 582-1820, email  
[frozeninak\\_338@hotmail.com](mailto:frozeninak_338@hotmail.com)

Thank you,



Allen F. Miller  
Interested Hunter





# Science Now Project Comments

## 2011 Interior Board of Game Meeting

---

February 17, 2012

Science Now Project  
PO Box 100965  
Anchorage, AK., 99510  
[sciencenowproject@gmail.com](mailto:sciencenowproject@gmail.com)

**RECEIVED**

**FEB 17 2012**

**BOARDS  
ANCHORAGE**

Chairman Judkins and Board,

The Science Now Project continues to be alarmed at the abuse of the Administrative Procedures Act regarding adequate public notice. The intent of the legislature when establishing the Boards of Game and Fish, was to promote effective public participation in developing wildlife management policy. The Board of Game appears to have forgotten that, instead preferring to ignore the public on issues where their preference does not present a biological concern for the board. Instead the Board of Game has used subversive techniques to reduce the public's participation as a whole, preferring to address only the narrow minded agenda of special interest groups, in particular, those promoting a policy of "game farming" in Alaska and those promoting the liberalization of commercial hunting.

The Science Now Project submits the following comments:

### **Proposal 156: SUPPORT**

The board has a long history of mismanaging small caribou herds in Alaska, the Tonzona being classic example of abuse of the Amount Needed for Subsistence Findings and resident first mandates found in the intensive management law for moose and caribou.

The board claims the USFWS ignored the plight of the Unimak Caribou herd in the late 2000's, yet the Board authorized commercial harvest of 75% of the mature bull caribou in that herd the year prior to all hunting being stopped, including subsistence harvest!

Now we have a herd that is on the brink of extinction, and neither the Board nor the ADF&G propose to do anything about it, not even collect any data on the condition of the herd.

Under the current policy of the ADF&G to ignore this herds plight, and the boards finding of ANS needs for Alaskan's, and the mandates found in the intensive management law, this board has no choice but to eliminate nonresident harvest opportunity pending this herds revitalization.

### **Proposal 142: SUPPORT:**

Black bear snaring under a general trapping license is an affront to Alaska's long history of science based management of our bear populations, the most coveted population of bears in America.



#### **Proposal 140: OPPOSE**

This proposal is intended to promote incidental harvest of black bears. This is not a socially acceptable policy and should not be adopted on state lands except under the most dire biological justification and for the shortest time necessary.

This is not appropriate for any lands managed by the Department of Interior.

#### **Proposal 141: OPPOSE**

This proposal is being amended at the ADF&G's request to include a number of GMU's not listed in the proposal book, one of those being GMU 20E.

At the October 2010 BoG meeting, testimony provided by multiple members of the public identified ADF&G moose calf mortality studies that indicated 3% of the calf mortality in Unit 20E was attributed to black bears. Pat Valkenburg admitted that the department generated proposal to snare black bears in that subunit was nothing short of embarrassing (personal discussion with Pat and Mark Richards). Yet, here we have the ADF&G proposing it again! Why, because science is not the driving reason, its political rhetoric.

The snaring of bears is a non targeted harvest that puts the public at severe risk by accidentally approaching a snared bear that may have a mother or teenage sibling free roaming in the vicinity. In addition, should a brown bears become snared with a cable only designed for black bears, upon approach by an unsuspecting citizen, the brown bear may become extremely agitated, breaking free of the snare, and injuring or killing the innocent person. The ADF&G does not propose providing the public with any information about where these bait and snare location are.

This method of harvest is not only in humane, but presents far too much public safety risk.

#### **Proposals 109, 119, & 259: OPPOSE**

These three proposals are all designed to commercialize the harvest of black bears for the implied intent of reducing the natural black bear densities statewide.

These proposals abuse the equal access clause of our constitution ensuring that black bear will be managed for the maximum benefit of ALL Alaskans and provide no special privileges to one groups, such as the commercial black bear hunting industry.

This Greater Alaska Black Bear Committee has held non public meeting where up to two sitting BoG members have attended. These are serious abuses of the Administrative Procedures Act and the intent of the BoG to promote fair and equal access to the board process. This group represents the very caucus that the BoG is supporting while throwing the residents under the bus.

#### **Proposals 227, 228, 229, 230, 2231, & 236: OPPOSE**

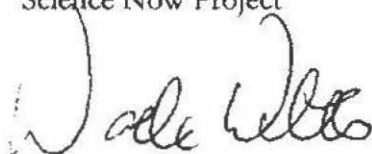
These proposals are not based on recognized scientific principles. These proposals are extreme measures intended to reduce GMU 20C to the same "desperate" situation we now have in GMU



20A, where liberal sport hunting regulations and historical intensive management of predators has led to a moose population that is in "dire" circumstances.

Under no circumstance should any of these proposals, if adopted, be allowed on NPS managed lands.

Wade Willis  
Science Now Project





# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Arctic National Wildlife Refuge  
101 12<sup>th</sup> Avenue, Room 236  
Fairbanks, Alaska 99701-6267  
(907) 456-0250



February 9, 2012

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

Dear Chairman Judkins:

The Arctic National Wildlife Refuge (Refuge) appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game during its meeting in March 2012 to address proposals that would be implemented in the Interior Region. We would like to provide the following comments on Proposals 170 and 181, which could affect management of wildlife populations on the Arctic National Wildlife Refuge.

Proposal 170 would shorten the moose season in a portion of Game Management Unit 25A (Sheenjek and Coleen drainages).

The Refuge is opposed to this proposal. A joint Arctic Refuge-ADFG moose survey is planned for November 2012, which will provide new data on the status of the moose population. The refuge recommends waiting until this information is available prior to considering a shorter season.

Proposal 181 would extend brown bear seasons in Game Management Unit 26B.

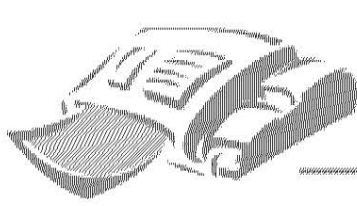
The Refuge is opposed to this proposal. Several actions have been taken recently to increase brown bear harvest in 26B, including passage of an Intensive Management Plan that authorizes take of brown bears on state lands for predator control, liberalization of general-hunting harvest regulations, and lengthening the season for Federally qualified subsistence users. The results of these actions should be evaluated prior to further liberalization of harvest regulations.

Thank you for your time to review our comments on these important issues.

Sincerely,

Refuge Manager





# faxZERO

Send a fax for free

**Recipient Information**

**To: Alaska Board of Game**  
**Fax #: 9074656094**

**Sender Information**

**From: Nina Faust**  
**Email address: aknina51@yahoo.com**  
**Sent on: Friday, February 10 2012 at 10:51 AM EST**

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59959 Skyline Drive  
Homer, AK 99603

February 9, 2012

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:

**RE: Proposals 197--Predation control areas implementation programs.**

I am opposed Proposal 197 and urge the Board to vote it down. This controversial proposal would expand the use of the repugnant, inhuman practice of snaring black bears that was not legal in Alaska since statehood. Snaring is dangerous, indiscriminate, inhumane, and unsafe. We are regressing in our management of our valuable wildlife resources when we implement such publicly unacceptable practices.

Rather than expand snaring to kill bears, a practice that jeopardizes any species that puts its body parts into the snare, including people or their pets, brown bears, cubs, and other species, the Board of Game should return to principles of wildlife management that once made Alaska's Fish and Game Department the envy of the country.

I urge you to not adopt Proposal 197.

**RE: Proposals 142--Prohibit trapping of black bear in the Interior region.**

I urge the Board of Game to pass Proposal 142. I fully support this proposal and the reasons that have been explained in the issue portion of the Proposal. Snaring bears is inhumane, unsafe, indiscriminate, and quite frankly, puts Alaska back in the dark ages of wildlife management. Professional management and taking methods of our valuable wildlife should not include a technique that creates so much suffering for the animal and unsafe situations for people and pets. Furthermore, a technique that does not discriminate what is killed should not be used. It will cause wanton waste of other species.

Please, pass Proposal 142 and make snaring illegal.

Sincerely,

*Nina Faust*

Nina Faust



150 Chickweed Lane  
Indian, AK 99540  
February 6, 2012

**RECEIVED**

**FEB 15 2012**

**BOARDS  
ANCHORAGE**

To: Alaska Department of Fish and Game  
Re: Bear Snaring

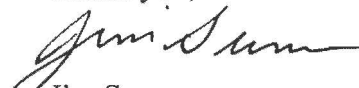
As someone who has hunted for 55 years and even taught Hunter Safety Classes, I am almost sickened by the Alaska Fish and Game Board's decision to snare bears.

This method of harvesting bears is inhumane. If this is pursued, I will attempt to see to it that the video of bears being trapped in this manner will become available on the social media and on area television stations.

I believe in predator control but not this method that lacks hunting and trapping ethics. Please send me a statement telling me why you would even consider this inappropriate action.

Please do not do extreme damage to our game management goals by pursuing this unethical and inhumane method of predator control.

Thank you,

  
Jim Sumner

Attn: Scott Cross  
BO 6 Interior Region  
Public Comment





United States Department of the Interior  
FISH AND WILDLIFE SERVICE  
KANUTI NATIONAL WILDLIFE REFUGE  
101 12th AVENUE, Room 206  
FAIRBANKS, ALASKA 99701  
(907) 456-0329 (voice)  
(907) 456-0506 (fax)



February 9, 2012

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

Dear Chairman Judkins:

The Kanuti National Wildlife Refuge (Refuge) appreciates the opportunity to comment on Interior Region proposals to be considered by the Alaska Board of Game during its meeting in March 2012. We offer the following comments on Proposals 164 and 151, which could affect management of wildlife populations on the Kanuti National Wildlife Refuge.

Proposal 164 would eliminate the restriction on the use of aircraft in the Kanuti Controlled Use Area (KCUA) and Proposal 151 requests review of the Controlled Use Areas in Region III and repeal those that no longer meet the original intent.

The Refuge is opposed to both proposals. The State-designated Kanuti Controlled Use Area (KCUA) was originally established in the late 1970's to resolve conflicts between local and non-local hunters. The Federally-designated KCUA was adopted in the early 1990's to overlap with the State KCUA. The Federal Subsistence Board (FSB) re-evaluated the KCUA during its' 2008-2009 closure review process. The Federal Board reaffirmed the need for and importance of the KCUA, finding that it provides needed subsistence opportunities to local rural residents on federal lands. The villages of Alatna and Allakaket, which lie in the center of the KCUA, have struggled to harvest adequate numbers of moose in recent years. This has been recognized by the Alaska Department of Fish and Game (ADF&G) and the Board of Game (BOG), which have supported Intensive Management (IM) actions aimed at increasing moose harvests on State and Native lands near those villages. In addition, the most current ADF&G moose management report (2010) for GMU 24 stated that a management goal is to "...minimize disruption of local residents' lifestyles" and that "Conflicts between user groups, whether real or perceived, have the potential to greatly affect future management decisions." Lastly, one of the objectives in the Koyukuk River Moose Management Plan is to maintain or increase moose populations while providing for continuation of the present moderate number of hunters and level of harvest. The plan further states that increasing the moose population in the area is desired before additional harvest can be considered.





*Biological situation.* Moose population estimates for the Kanuti NWR GSPE Survey Area, in the heart of the KCUA, have been consistently low for the past 12 years (0.22 to 0.39 “observable” moose/mi<sup>2</sup>; confidence intervals overlap, so the density estimates are not statistically different). In spite of the low population density, the estimated high bull/cow ratio determined by the surveys has been relatively high (46 – 70 bulls/100 cows). ADF&G estimates that the harvest rate for all of GMU 24B is about 3.2%, which is less than recommended in the Koyukuk Moose Management Plan for the upper management subzone (5%). This, in our view, is in part the result of past successful management strategies, including establishment of the State and Federal KCUAs.

*Regulatory issues.* If the State KCUA is eliminated, along with its aircraft prohibition, the Federal KCUA will remain in effect. The result will be a very complicated regulatory climate for airborne hunters and challenges for Law Enforcement (LE) personnel because they will need to know:

- The exact boundaries of Federal, State and Private lands in order to understand where aircraft use would be allowed;
- Which water bodies would be open for aircraft use and where mean high water marks are;
- That the closure of federal lands to aircraft for hunting and to non-federally qualified hunters within the federal KCUA will remain;

Thank you for your time to review our comments on these important issues.

Sincerely,



Michael A. Spindler  
Refuge Manager/Pilot

**Eastern Interior Alaska Subsistence Regional Advisory Council**  
**c/o U.S. Fish and Wildlife Service**  
**1011 East Tudor Road, MS 121**  
**Anchorage, Alaska 99503**  
**Phone: (907) 786-3888, Fax: (907) 786-3898**  
**Toll Free: 1-800-478-1456**

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Mr. Cliff Judkins, Chair  
Alaska Board of Game  
Attention: BOG COMMENTS  
Boards Support Section  
Alaska Department of Fish and Game  
Post Office Box 115526  
Juneau, Alaska 99811-5526

Dear Mr. Judkins:

During the Eastern Interior Alaska Subsistence Regional Advisory Council's public meeting on October 11-13, 2011, the Council reviewed and acted upon pending State game proposals. Below are the recommendations of the Council.

**PROPOSAL 170 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Shorten the moose season in a portion of 25A.

**COUNCIL ACTION:**

The Council **supports** this proposal. The recent influx of hunters from outside the area are targeting moose during the time that moose have historically migrated from summer territory in Canada back to winter territory in the high valleys of the Brooks Range, posing a potential threat to moose populations as well as impacting the ability of area residents to harvest moose locally.

**PROPOSAL 171 – 5 AAC 92.220. Salvage of game meat, furs, and hides.** Require meat-on-bone salvage for moose in Unit 25A.

**COUNCIL ACTION:**

The Council submitted this proposal and **supports** its adoption by the Board. The Council does not find that the proposal places an undue burden on users and contributes to the quality of the salvaged meat.



**PROPOSAL 172 – 5 AAC 92.220. Salvage of game meat, furs, and hides.** Require meat-on-bone salvage for moose in Unit 25B.

**COUNCIL ACTION:**

The Council submitted this proposal and **supports** its adoption by the Board. The Council does not find that the proposal places an undue burden on users and contributes to the quality of the salvaged meat.

**PROPOSAL 173 – 5 AAC 92.220. Salvage of game meat, furs, and hides.** Require meat-on-bone salvage for moose in Unit 25D.

**COUNCIL ACTION:**

The Council submitted this proposal and **supports** its adoption by the Board. The Council does not find that the proposal places an undue burden on users and contributes to the quality of the salvaged meat.

**PROPOSAL 178 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.** Close Red Sheep Creek and Cane Creek drainages to hunting for sheep.

**COUNCIL ACTION:**

The Council submitted this proposal and **supports** its adoption by the Board. The Council finds that the proposal enhances the ability of the residents of Arctic Village to pursue subsistence opportunities and may reduce incidents of trespass and resource damage. The Council recognizes that the area is culturally important to the local residents for reasons including, but also beyond, sheep harvest.

**PROPOSAL 180 – 5 AAC 84.270. Furbearer trapping.** Open wolf trapping season in Unit 25A, B and C earlier, to start October 1.

**COUNCIL ACTION:**

The Council submitted this proposal and **supports** its adoption by the Board. The Council sees the benefit in aligning Federal and state seasons, especially for those federally qualified subsistence users with traplines that cross unit boundaries.

**PROPOSAL 182 – 5 AAC 85.015. Hunting seasons and bag limits for black bear.** Increase the annual bag limit for black bear in Unit 25D.

**COUNCIL ACTION:**

The Council **supports** this proposal. The Council finds no conservation concerns in liberalizing the bag limit for black bear.



**PROPOSAL 183 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Allow hunters to take more than one brown bear by community harvest permit in Unit 25D.

**COUNCIL ACTION:**

The Council submitted this proposal and **supports** its adoption by the Board. The Council finds no conservation concerns and feels that the proposal provides increased subsistence harvest opportunity to the relatively low number of users who utilize this resource.

**PROPOSAL 186 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Modify moose season in portion of Unit 12 and 11.

**COUNCIL ACTION:**

The Council **supports** this proposal. The Council feels that this proposal will benefit subsistence users by providing a more generous season, reducing the number of permits that they will need to obtain, and by aligning the seasons and harvest limits within the Nabesna Road area.

**PROPOSAL 192 – 5 AAC 85.025 (a)(15)(20). Hunting seasons and bag limits for caribou.** Combine Fortymile and White Mountains Caribou herd seasons under 1 registration permit, remove harvest limits, lengthen the winter season for residents, and allow a new limited registration permit hunt.

**COUNCIL ACTION:**

The Council submitted this proposal and **supports** its adoption by the Board. The Council finds the proposal supports the efforts of the Fortymile planning group. It will provide managers more options in controlling harvest – both to protect it when needed, as well as to allow for increased harvest when warranted, while ensuring improved reporting and better protection of the herd as it expands into the White Mountains area.

**PROPOSAL 234 – 5 AAC 92.220. Salvage of game meat, furs, and hides.** Require meat-on-bone salvage for moose in Unit 25C.

**COUNCIL ACTION:**

The Council submitted this proposal and **supports** its adoption by the Board. The Council does not find that the proposal places an undue burden on users and contributes to the quality of the salvaged meat.



Mr. Cliff Judkins

4

Thank you for the opportunity to comment in support of these proposals. If you have any questions regarding this letter, please contact Tom Jennings at the Office of Subsistence Management at 907-786-3364.

Sincerely,



Sue Entsminger, Chair

cc: Kristy Tibbles, Executive Director, Board of Fisheries  
Nissa Pilcher, Regional Coordinator, Alaska Department of Fish and Game  
Jenifer Yuhas, Federal Subsistence Liaison Team Leader  
Eastern Interior Alaska Regional Advisory Council members  
Pete Probasco, ARD, OSM USFWS



William Regan  
Po box 208  
Naknek, AK  
November 11, 2011

Board of Game  
Kristy Tibbles  
Executive Director  
Po box 115526  
Juneau, AK 99811-5526

Board of Game  
Proposal 238 -5AAC92.125

The Naknek Kvichak fish and game advisory committee would like to put our support for the proposal to implement the Intensive management program in unit 9B.

We have a predator problem out here with too many wolves and too many bear, for years now the herd sizes have been shrinking. The Mulchanta herd that was over 200,000 strong is now down to 30,000 + or -, not all of this can be put on the predators for the hunting was very liberal for many years. Land and shoot was even allowed when the herd was actually too large, but that is no longer the case. We in the Naknek Kvichak area have not been able to hunt these caribou in a couple of years now for the animals are not coming this way any longer. The pilots in the area say that the size of the herd is way down and in the other side of their range. We need to get this IM going before the herd gets too small to rebound, Like the North and South Pen herds are. Any help on the calving grounds will do wonders and this area is prime to take wolves and bear when the caribou drop their calves. The sooner this is implemented the better, I for one would not like to see what's happening in 9c and 9e where we haven't been able to hunt in 15 years now and counting. Thank you for your time and please pass this proposal...

William Regan co-chair Naknek Kvichak fish and game advisory committee



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BOARDS

February 8, 2012

AK Department of Fish and Game, Board of Game;

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The Yanert Controlled Use Area (Unit 20A) in the Denali Borough offers hunters the opportunity to hunt using more traditional means of travel without the competition of motorized travel. Access to this type of hunting is dwindling in Alaska and elsewhere. For this reason, in addition to the concerns about relatively small moose populations in the area, I oppose Proposal 213.

Please consider the significant local opposition to Proposal 213 as you consider this potential change to the Board's regulations.

Sincerely,

*Molly McKinley*

Molly McKinley  
Healy, Alaska





Jack Reakoff Comments to the Alaska Board of Game  
Interior Region meeting 2-11, 2012

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Proposal 141 Oppose; I have trapped since a kid. Trapping is a significant source of income for our household. I am apposed to bear snaring for the following reasons.

- 1) We have had a hard enough time holding onto trapping wolves, and other furbearers over the years. Trapping fur animals when the young are grown and independent, and the fur is useable has maintained a large acceptance by the non-trapper/ hunter public. I feel this method of take will erode our current trapping perception.
- 2) Trapping bears will take sows and or cubs. The fur of a sow will be very low grade for sale, as she is lactating. When she or the cubs are caught all of the cubs and her will need to be killed, as she will defend the cubs. The cubs are poor fur and of little use.
- 3) 3) The Brown Bear by-catch will occur and also pose problems with sows and cub family destruction and waste as well. Trappers will be going to a lot of additional trouble skinning and turning in Brown Bears to ADF&G.

I do feel that there is a good population of Black Bears in Alaska. I do feel that taking Black Bears with a trapping license and the sale of good prime skins is a good use of the Black Bear resource, and an incentive for harvest. Some areas of Alaska have cultural respect for bears and do not want sale of bears. I suggest the amending proposal 141 to,

- 1) Eliminate snaring of bears or any trapping method.
- 2) Allow the sale of Black Bear taken under a trapping license.
- 3) Expand access methods to same day air born as long as a bear is taken ¼ mile or 500 yards from the aircraft after landing. This eliminates the perception that trappers are landing right next to bears to shoot.
- 4) Support proposal 143 to allow taking Black Bears at a bait station the same day air born.

Jack Reakoff Comments to the Alaska Board of Game  
Interior Region meeting 2-11, 2012

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Proposal 169 as amended by ADF&G to include GMU24, Support,

I support harvest of Lynx in GMU 19, 21, and 24 extending through March 31 for the following reasons;

- 1) The Lynx season used to run through March 31 until the price increased to over 500.00 and ADF&G became concerned with over harvest. I have first hand experience with the fur quality in GMU 24. Lynx prime late and are nice and grey and fully furred after the middle of December. They retain the long silver hair through the end of March, and actually lighten in the sun in late winter. A Lynx taken in March is actually much better for sale than the same Lynx taken in November. There are certain years when the snow will get a little wet in the day and freeze at night. Lynx sit on their rumps and can show a slight rub if that occurs. Most seasons there is no, or very little melting until very early April.
- 2) The high demand for Lynx diminished over 20 years ago. The Lynx population is trapped far below its carrying capacity in GMU 19, 21, and 24. There are much fewer trappers exponential to the current fur prices.
- 3) Trappers that would like to take Lynx while still trapping wolf, and wolverine through March 31, should have the ability to do so. Lynx are not a management concern in these management units.

Those trappers who feel that Lynx are better saved in the later part of the Lynx season, it is their prerogative to not trap Lynx.



Jack Reakoff Comments to the Alaska Board of Game  
Interior Region meeting 2-11, 2012

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**Proposal 179 Support;**

This proposal addresses the escalating guided hunter user conflicts for Dall sheep in the Dalton Highway Corridor Management Area (DHCMA).

Until recently the resident bow hunters in the DHCMA, and walkout hunters had coincided with local sheep hunters, for sustained harvest. The eastern portion of GMU 24A and 25A have had excessive guide overlap on the state and BLM lands for over 15 year. With no guiding in the DHCMA there was less affect on the Dalton users for rams. GMU 26B has shared much of the Dalton access user based harvest also.

The following reasons are why I support proposal 179:

- 1) Until 2010 there were no BLM permitted guided clients in the DHCMA. Since that time the BLM has allowed up to 17 clients from 5 different registered guides in the Corridor. Guides with aircraft to spot sheep, have a large advantage over the concentrated ground based Dalton access user group, and can effectively take almost all of the legal rams.
- 2) The sheep drawing hunts in southern Alaska have displaced resident hunters toward the Brooks Range. Resident bow and walk-out hunters have increased dramatically in the past 2 years also. This trend will continue to increase.
- 3) The Trooper wildlife enforcement is stretched very thin with high numbers of caribou hunters and other hunting activities. The number of 7/8 rams was very reduced at the end of the 2011 Dall sheep season. There were a couple of sub-legal sheep seized during sealing. But some of the inexperienced hunters kill 7/8 rams and walk away, discarding them in the mountains. The higher the competition for legal horned or antlered animals the higher the wound loss and discard rates. Wildlife protection is not going to be increased any time soon.
- 4) Until the Commercial Services Board and the DNR implement a Guide Use Areas there is a need to reduce the number of non-resident participation in the DHCMA. The number of proposed permits would allow some non-resident take but full allocation.
- 5) With so few 7/8 and adult rams in the population there is a management concern for health of the Dall sheep population. The sheep population is at near all time low status. Data is over 2 years old and this issue is exploding now.





Proposals 206 and 218 Re-authorization of antlerless moose hunts, **Support**

I have reviewed the data for the majority of 20A and 20B. The snow has been below restriction for moose for about 19 years in the Tanana and Minto flats. The browse is very degraded from a high moose population and twin rates are abysmal. There are a lot of black bear baiters and wolf trappers through out that entire region and predation is far below carrying capacity of the moose. I feel there is a huge need to take cows with out calves in most of those sub-units. I do feel strongly the moose population will crash if there is a snow pack of 4 feet or greater. The existing brows will not support all those moose packed down on the flats and off the hills in a deep snow year. We know what real snow is here in the Brooks Range, there has been over 4 feet of snow 7 of the past 20 years. The Susitna, and Copper River country moose mortality this year, is what will happen the Tanana and Minto if a deep snow year occurs.

Having said that, I do not feel that the western part of 20A near the Parks highway has nearly as high of browse problems, and a lower moose density in general. I would not be supportive of antlerless hunts in the very westerly zones or very reduced take.

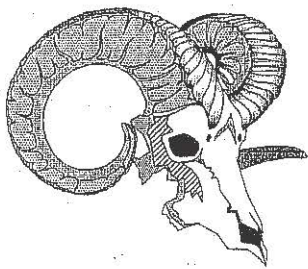
I do **not** feel that the antlerless hunts should extend past Nov. 30 to reduce bull take that have cast antlers. The bull: cow ratios are marginal and avoidance of antlerless bulls is warranted.

I have not found the Department to lie about density or bull cow ratios even though it would be to their advantage some times with moose and caribou. The ground hunters are not seeing as many cows in the fall due to the fact that the cows are getting hunted and are avoiding roads and river corridors where hunters travel. It is a facet of learned behavior. It is one reason it would be better not to be shooting at the cows when people are trying to find bulls at least through mid-September. Taking cow moose chases all the baiting cows into hills and deep timber where access is a problem.

Taking cows not accompanied by a calf would harvest older unproductive browse consumers. It also takes small stunted cows that are the result of nutritional stress; these are cows that die in 4 feet of snow. And it takes cows that are chronically loose their caves to drowning or predators. The cow harvest should actually be increased in 20A and parts of 20B to recover brose habitat and reduce deprivation further. Scientific data warns of impending doom of these valuable moose populations, if the board bends to sentimental values.



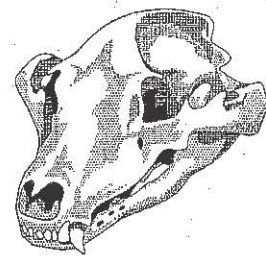




# Nin Ridge Guides

P.O. Box 1148  
Chickaloon, Alaska  
99674-1148

Karl Braendel  
907-745-4064



February 10<sup>th</sup>, 2012

Alaska Department of Fish and Game and  
Board of Game,

This letter is in response to the Board's actions and proposed actions relating to bear snaring, same day airborne bear hunting, arial shooting of grizzlies and the killing of cubs.

When the snaring of bears first surfaced 2-3 years ago I testified before the Game Board against this action giving some rational reasons why I thought this was a mistake based on my many years of hunting and guiding in Alaska, with specific experience in Unit 16 where snaring was ultimately first approved. I did not feel that the leading Board members gave my testimony any respect what-so-ever. I was blown off. I do plan to persist though in much the same manner that dogged tenacity as a hunter has made me successful in that realm.

For 11 years I guided, lived, and trapped along the Kichatna River in Unit 16 (1973 - 1984). There were many bears, both blacks and grizzlies, and there were many feet of snow. In that 11 years I twice saw 7-8 feet of "settled" snow on the ground at the end of March, the norm was about 5 1/2 feet, which in most moose range would be considered a mighty tough winter. Every year I observed winter kills, and every winter moose congregated in those lower river corridors that produced felt leaf willow.

These moose were pretty amazing. On the worst snow winters, after a fresh snow had "settled" over a couple of days time, moose would be walking around with two feet of air showing under their bellies, and in this area where there were extensive mature forests below timberline - including a lot of mature birch - they could by way of this elevated stature reach birch branches normally way out of reach. It was the one way deep snow could open another food source for moose and help them survive, what seemed on the surface unsurvivable.

During my 11 years in Unit 16 there were very few wolves, I actually went "years" without seeing any sign of them, and despite all the bears and snow, moose hunting was pretty good as witnessed by the big bulls taken by our clients. I've heard that wolves are now common in 16 and I suspect that wolves combined with some tough winter conditions knocked the moose population down; after all bears are hibernating when moose are struggling the most, while wolves are seeing a smorgasbord of opportunity. This can result in a predator pit from which moose struggle to climb out of.

Fish and Game's fixation on moose calf mortality by bears conveniently leaves out the fact that many - if not most - of the calves killed by bears would not have survived their first winter in Unit 16. Bears just got to them first, so the actual affect is not so much as it at first might seem.

Certainly State biologists know that an un-hunted grizzly population, or one with very conservative hunting seasons - like this whole state once enjoyed - results in very low cub survival and becomes top heavy with large males. This is obvious along the Katmai Coast and in Denali Park where few cubs are evident. You might think large males would be the main predators, but they are slower than smaller bears and I think there is some compelling circumstantial evidence showing females as being the more active predator, possibly because the burden of raising cubs demands a greater caloric input. Yeah, what I'm saying indicates we should be hunting bears less, not more, and I'm a bear guide.

Now, everybody from the camera clicking tourist to the subsistence hunter wants plenty of moose around; so the question becomes, is there another pathway available that could improve these wild herbivore populations? I think there is, but it would require a change of gears - which is always difficult.

I contend that if the ADF&G and the hunting community put as much energy into improving moose habitat, as they have towards predator control, we could have more moose than ever before and





vibrant predator populations too. Any knowledgeable moose hunter can see that "huge" areas of Alaskan moose range can't support many moose due to low quality habitat. Fire has always been the "cheap" habitat improver, but I think the post fire results could be greatly enhanced by man.

Fish and Game knows there are two species of willow that are extremely important to moose: diamond leaf in the summer, and felt leaf in the winter, without which you won't have many moose no matter what. It is known that these willows can be propagated and therefor possibly introduced into areas where they are largely absent. A portable hydro-axe might do wonders in an area with mixed willow and alder, where alder has dominated, since willow reacts more positively to being pruned than alders do. You can see this affect along roads where the use of hydro-axes seems to encourage the growth of willows at the expense of alders. The right aerially applied fertilizers in certain areas might allow willows to dominate over other plants. Just opening mature forests to firewood cutting could improve a local habitat a great deal. The Big Delta farming zone is an example of what clearing and the subsequent regrowth can do for moose habitat. There are high numbers of moose around that area's overgrown barley farms.

When I've expressed these ideas to people they often counter that it would be too expensive, too hard, too impossible. Please. Humans already grow every conceivable plant. This isn't rocket science, but it would require a change in direction. There would be a learning curve, but I'm sure that if Fish and Game showed the way the hunting community would jump in with a lot of the manpower and machinery. I want to emphasize that I'm not talking about fields of willows growing like some kind of farmed crop, but rather a mosaic of mixed old growth with meadows and succession plants like willows and young tree growth. Every moose hunter recognizes this high quality habitat at a glance.

Ultimately, on high quality range moose are stronger, give birth to multiple calves, and are better able to resist hard winters and predation. This emphasis on improving the habitat could be a real win win situation for everyone.

As for the muskoxen; I suspect that they were never a very viable species in northwest Alaska precisely because of grizzlies. Native peoples with newly acquired rifles, and the influx of whaling crews with rifles, have always been implicated in the extirpation of Alaska's muskoxen around 1900 but it's likely that they were already a struggling population because of their obvious lack of defense against the grizzly. I've always wanted to get a muskoxen myself, but not if it requires shooting grizzlies from the air to ensure their survival. By its' very nature this policy can never end, it will have to go on and on and on.

And this will have its' own costs, just as snaring bears and killing cubs has costs that no one has calculated just yet. And here I'm not just talking about money. So, while some may think these policies are cheaper than habitat improvements, in reality, they could be way more expensive

Unfortunately, people tend to fall into one of two camps with grizzlies: either treating them like big, fat, cuddly teddy bears or seeing them as evil competitors to be removed so humans can live their little, whiney, boring lives in pseudo safety. Bottom line is: The more you know about them the more troubled and appalled you are at their being snared, and it is the wrong thing to do at several different levels.

Thank you for your time and consideration.

Karl Braendel



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

Ron Bennett  
North Pole, AK

Oppose Proposal 170,

I shot a moose on the Colleen River this year in the early part of the season with an airplane. I don't notice much difference in moose numbers over the years unless you go back to the 70's when people were killing wolves, but I'm not a biologist.

Virtually all of the floaters hunting moose on the Colleen River are scheduled to be flown out somewhere along the river and have telephones if they need to get out sooner. I don't agree that there is that much waste of meat and if trash is an issue then that is a job for enforcement, not F&G.

I think this proposal is self serving. The person making the proposal complaining about too many hunters qualifies to hunt under federal rules that open for moose August 25 - September 25 and wrote a book promoting the area. If there actually is a moose crisis then the season should be closed until it recovers.

Thank You, Ron Bennett



Oppose Proposal 171, 172 & 173

These proposals are intended to discourage people that use airplanes to hunt moose because it makes it more difficult to carry meat in an airplane. The weight of bones in a moose I am told is 60#. That's a lot in an underpowered airplane. I bone meat and it goes directly into bags that keep it clean. I do a careful job of cutting and when I get home it gets wrapped right out of the bags and there is no waste. I've seen hams that have sat in a boat for days after rain and sand, then hung and the outside crust of the meat has to be cut off and usually scrapped. As far as waste goes, the airplane is less wasteful than a boat because you have more control over your conditions.





My question would be: What happens when someone shoots a moose a mile off the river? Is enforcement going to check boats to see if the ham is intact? A lot of us can't carry a whole ham anymore. How many moose tags are reported by pilots? Does it warrant a restriction?

I hunt in these three areas and I believe an airplane allows me to "maximize what the land has provided me" a lot more efficiently than the alternative. A person can do a crummy job of boning in town just as well as in the field.

This is a self serving proposal to eliminate competition from airplanes in favor of boats for hunting moose. There are moose on lakes all over that probably never go to the river and if people are really worried about it then they should buy an airplane.

Thank You, Ron Bennett

*Ron Bennett* 2-8-12



2/8/2012

Dear Folks,

I want to voice my strong opposition to Proposal #213, regarding motorized hunting access in the Yanert Controlled Use Area, proposed by the Middle Nenana Fish and Game Advisory Committee.

I live in the Denali area adjacent to these Game units. There will be only negative impacts to the local communities from allowing motorizing access..plus even more depletion of the local Game. This area is unique and does not need vehicle access for hunts. Parking along the highway is already bad and increasing the access would make things worse.

I would question the constant pressure to increase hunting bag limits and access. I have not seen or heard any good scientific evidence that support these proposals. I fly small aircraft for a living in this area. I have seen increased hunting pressure and decrease game in all units. I rarely see Moose like I used to flying over these areas. I believe in hunting and I ask the Board to really get some good facts and scientific surveys to see how quickly the game numbers are dropping. If we are not smart about our management we will have a state barren of game just like the other 49 states. Also putting more limits on out of state clients and guides would allow more of the remaining moose for local use. It's a shame we are selling out our wildlife stock for the profit of many outsiders, many of whom are not very ethical or legal in their hunting techniques.

Please look at the big picture.. I know you are tasked with maximizing yields. But if not properly managed there will not be much game let to manage.

Thanks for your consideration.

Gregory LaHaie



Local resident and Business  
Owner.



**KOYUKUK TRIBAL COUNCIL****RESOLUTION NO. 12-09****A Resolution Opposing Proposal 162 of the 2011/2012 Proposed Changes to Alaska Board of Game Regulations**

- WHEREAS,** the Koyukuk Tribal Council is the governing body of the federally recognized tribe of Koyukuk, Alaska, and;
- WHEREAS,** the Alaska Board of Game will be considering regulatory proposals to changes to the state's hunting and trapping regulations for the Interior Region, and;
- WHEREAS,** the Alaska Board of Game will be considering Proposal 162 to allow 10% of Koyukuk Controlled Use Area permit winners to use aircraft; allow guided permit winners to choose either boat or aircraft, and;
- WHEREAS,** the proposed change would allocate 10 percent of the Koyukuk Control Use area permits to aircraft supported hunting and make guide contracted permits optional for either boat or aircraft access, and;
- WHEREAS,** the estimated moose population for Unit 21D is near 8100 and that is below the Koyukuk River Drainage goal of maintaining a population of 9,000 to 10,000, and;
- WHEREAS,** the moose population in the Koyukuk Controlled Use area is in a stable condition, and;
- WHEREAS,** allowing any permit winners to use aircraft in the Koyukuk Controlled Use area will threaten to population in the area, and;
- WHEREAS,** the purpose of the Koyukuk Controlled Use area is to closely monitor all hunters to ensure that the regulations are met,

**NOW THEREFORE BE IT FURTHER RESOLVED:** the Village of Koyukuk respectfully request the Board of Game to oppose Proposal 162 to allow 10% of Koyukuk Controlled Use Area permit winners to use aircraft; allow guided permit winners to choose either boat or aircraft.

**CERTIFICATION**

I hereby certify that the Koyukuk Tribal Council adopted this resolution at a meeting held on this 17th day of February, 2012 at Koyukuk, AK and a quorum was duly established. This resolution was passed by a vote of 7 ayes, 0 nays, and 0 abstain.

  
Leo Lolnitz, 1<sup>st</sup> Chief

2-17-12  
Date

  
Josie Dayton, Sec/Treasurer

2-17-12  
Date



JAN 04 2012

## COMMENTS ON THE INTERIOR REGION PROPOSALS TO THE BOG

By Don Quarberg (1/2012)

<u>PROPOSAL #'S</u>	<u>ACTION</u>	<u>REASONING</u>
133 -139	Oppose	<p>There is no biological reason to support any of these proposals. These proposals all serve to limit the opportunity of the non-resident hunter. These proposals appear to be based on the theory that the non-resident hunter harvests a disproportional number of larger rams than resident hunters; and all of the larger rams are being harvested each year. Sheep populations and harvest records do not support this theory. Yes, nonresidents do have a higher success rate at harvesting rams than do residents. They also exert more effort than do residents. This may be because their sheep hunt represents a hunt of a lifetime (they pay significantly higher fees for the opportunity and many must hire a guide to hunt). They schedule a period of time (example 2 weeks and hunt the majority of that time in spite of weather conditions, etc). Few have the opportunity to reschedule their hunt. Alaskans must also realize that the non-resident hunters represent about 13% of the hunters in the State, but contribute about 71% of the ADFG budget collected from licenses and tags. Some Alaskans advocate for an increase in nonresident hunting license and tag fees. In Yukon Territory, Canada, a nonresident alien pays \$410 for a hunting license and sheep tag. In Alaska, a nonresident and nonresident alien pay \$510 and \$850 respectively for the same hunt. Other Alaskans support an increase in resident hunting licenses. An Alaskan hunter pays \$25 for the opportunity to hunt moose, caribou, sheep, deer and black bear (plus some other species). Colorado resident hunters pay about \$450 for the same opportunity (substituting elk for caribou). We Alaskans are getting a real deal. Perhaps we need to rethink our position lest we kill the goose the lays the golden eggs that pays for our Wildlife Management here in Alaska.</p>
140	Support	Retain this as a management tool for the Dept.





141	+??	I would defer to the avid trappers on the committee such as Ross and Jacob. <i>x referring to Delta AC</i>
143-44	Support	If this would disperse the bait hunters, ie the flying hunters would move out and away from the existing bear bait areas.
145	Oppose	This isn't necessary as there are more wolves available than are needed for subsistence purposes. How many wolves are taken now by subsistence trappers/hunters?
146	Support	The expanding population of coyotes is a detriment to other wildlife populations
147	Oppose	This would negatively impact the trapping industry. Extremely rough terrain that would require access by helicopter would never support sufficient fur to offset the cost of access.
148&150	Oppose	There is no biological reason to justify this action.
149	Oppose?	I defer to our trapper members - would the fur still be of good quality at this time?
151	Support	If any no longer meet the intent of their establishment, they should be repealed.
152	Oppose	Not necessary, if it is important to pass along the family tradition of hunting, the youth can obtain an excused absence from school as they do for other activities.
153	Support?	Many of these registration permit access restrictions are used to control the hunt for a specific group of users. The resource belongs to all of us.
188-90	Oppose	Same reasons as given for proposals 133-39
192 & 95	Support	This is the 40-mile caribou harvest plan developed by the coalition, which we as a committee support.
193	Oppose	See reasons for proposal 192
194	Oppose	Same reasons as for proposal 152



196	Support?	As long as there is a predator management program to reduce grizzly numbers in that area.
197	Oppose?	Snaring along popular trails could pose a serious danger to nonparticipants (recreational users) of those trail systems.
198	Oppose?	Foxes are not the target animals for the liberal trapping season. Also, are fox pelts still in quality condition at this time?
199	Oppose?	Are pelts still in quality condition at this time?
200	Oppose	Reason is the same as for proposal 145
201	Support	Gives ADFG a management tool to use when necessary.
202	Support	Will aid hunters and the Department in meeting the harvest objective for Delta bison and thereby reduce conflicts between bison and private landowners
203	Support	This is an attempt to bring some level of control to the ATV problems occurring in this area. It may serve as a model for other ATV problem areas
205	???	There is no biological reason not to include calves in the antlerless hunt. Public opinion however, has dictated that this is an unacceptable practice.
206	Support	Provides the Department with a management tool to use when necessary
209	Support?	If there is a problem with illegal harvest, this would help.
211-12	Support	This is a method of controlling the destruction of fragile tundra and wildlife habitat by ATV's as well as improving hunter ethics.
214	Oppose	There is no over population of sheep in GMU 20A
218	Support	Provided the Department with a management tool to use when necessary.





233	Oppose	Does not define what the control is and it is not necessary. The park is already a controlled use area
237	Support	Simplify the regulations with no detrimental effect on the bear population
245	Support	Provides the Department with a management tool to use when necessary



Alaska Dept. of Fish and Game Advisory Board  
P.O. Box 115526  
1255 W. 8<sup>th</sup> St.  
Juneau, Alaska 99811-5526

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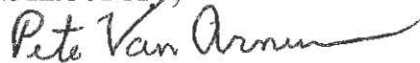
Advisory Board,

I am writing to protest your recent proposal to increase the killing of grizzly bears with aerial shooting and snaring. I find it hard to believe that members of the board are considering this proposal, when so many well known game biologist have spoken out against it.

I live in California, and own property in the Nelchina Basin of Alaska area near Lake Louise. I am a hunter, and have hunted caribou several times in Alaska over the years. The reason most people from the lower 48 come to visit Alaska is to see the wildlife, especially the grizzly bears. I would much rather have the chance to see a wolf or bear in the wild; than to see their populations drastically decreased to satisfy all of the hunters. You don't need to provide enough moose and caribou for everyone to hunt, even if this means reducing tags. I realize since I live out of state I may never be able to hunt where my property is in the Nelchina Basin, but that's ok as long as I have the chance to see grizzly bears and wolf.

The majority of people in the lower 48 don't want to see the slaughter program enacted, please reconsider your plan.  
Thank you.

Sincerely,



Pete Van Arnum

3072 Sourdough Trail

South Lake Tahoe, CA 96150

[pvatahое@sbсglobal.net](mailto:pvatahое@sbсglobal.net)



Wrangell-St. Elias National Park  
Subsistence Resource Commission

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

RECEIVED  
OCT 20 2012

October 18, 2011

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

Dear Chairman Judkins:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met in Northway and Tanacross on October 6 and 7, 2011. The SRC reviewed and would like to provide comments on two Board of Game proposals that would affect Wrangell St. Elias:

**Proposal 186: Modify moose season in a portion of GMUs 11 and 12:** The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supports the proposal, which simplifies the regulations by aligning the harvest limits for moose in Game Management Units 11 and 12 along the Nabesna Road. Implementing an antler restriction in GMU 12 at the end of the road should also help to reduce overcrowding and thus improve the hunting experience.

**Proposal 187: Convert the any bull moose hunt to a spike-fork 50-inch or 3 or more brow tines hunt in a portion of GMU 12:** The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supports the proposal, which simplifies the regulations by aligning the harvest limits for moose in Game Management Units 11 and 12 along the Nabesna Road. Implementing an antler restriction in GMU 12 at the end of the road should also help to reduce overcrowding and thus improve the hunting experience.

Thank you for the opportunity to comment.

Sincerely,



Bert Adams, Sr.  
Chair, Wrangell-St. Elias National Park Subsistence Resource Commission

cc: Superintendent, Wrangell-St. Elias National Park and Preserve  
NPS Alaska Regional Director

**Chairman:** Bert Adams, Sr.; **Members:** Dan Stevens, Don Horrell, Don Welty, Gloria Stickwan, Ray Sensmeier, Robert Fithian, Sue Entsminger, Suzanne McCarthy



## INTERIOR REGION SHEEP PROPOSAL COMMENTS 2012

RECEIVED

FEB 14 2012

BY

Wayne E. Heimer  
1098 Chena Pump Road  
Fairbanks, Alaska 99709

I am speaking for myself as a Dall sheep biologist (still) and Dall sheep manager (formerly) on all these proposals. I am also speaking for the Wild Sheep Foundation on several specific proposals. I shall identify these. I oppose Proposals 134, 135, 136, 137, 138, 139, 178, 179, 188, 189, 190, and 214.

These proposals deal primarily with Dall sheep hunting, and if implemented will generally change the management plans for Dall sheep in Interior Alaska. I have no real problem with changing management plans if the managers and public are involved in an open process. However, making radical changes to management objectives for Dall sheep on the basis of individual proposals to favor one special interest above another seems to mock the planned management system.

We recently dealt with these similar proposals to advantage resident or nonresident hunters, establish permit systems, etc. at the Statewide level. In those analyses, we showed there was neither an opportunity limit nor a harvest constraint which rose to the level necessary to justify broad-scale management changes. Those proposals were not accepted at the statewide level, and I suggest the Board reject proposals 134, 135, 136, 137, 138, 139, 178, 179, 188, 189, 190, and 214 using the same rationale, plus the recognition that changes in Regional or Area management plans should be judiciously done after carefully considered all the ramifications of these changes. This level of review and public input cannot be adequately achieved via public testimony before the Board, and simple Board deliberations do not allow for the necessary exchanges between the Board, the Department, and the public before changing existing rationally-derived management plans. Below I offer some specific comments.

**Proposals 134, 135, 138, 139, 179, 189, and 190** would unnecessarily restrict nonresident Dall sheep hunting, provide no definable benefit to residents, and limit economic benefit from nonresident revenues generated by the Interior Region Dall sheep populations. Additionally, they would unnecessarily complicate Dall sheep management without adequate public input or a reason to so. With respect to these proposals, I speak for the Wild Sheep Foundation in opposing this proposal.

**Proposal 136** makes no better sense for Region III than it did statewide. The arguments are the same. I speak for the Wild Sheep Foundation in opposing this proposal.

**Proposal 137** is a complex system designed to unnecessarily limit nonresident hunters, and lower a harvest that is biologically irrelevant and cannot be calculated unless data which debunked the folklore surrounding nonresident hunting are used. These data justified rejection





of this sort of idea at the Statewide level, and should do the same here. I speak for the Wild Sheep Foundation in opposing this proposal.

**Proposal 178** revisits the previous issue of exclusive local resident hunting on Red Sheep and Cane Creeks. I was the ADF&G sheep biologist when local residents first claimed non-local hunting for full curl rams was ruining subsistence hunting and the sheep populations. Looking at what has happened with regulations and populations in these areas all these years later shows those claims were not correct then. I doubt they are biologically correct today. Recent analyses of open full-curl ram hunting data from the last 20 years of Dall sheep hunting in Alaska have shown no changes in age structures of rams. If there were a biological effect compromising or lowering the sheep populations here, it would be more likely due to the either-sex three-sheep bag limit during the seven-month subsistence season than to hunting of full curl rams only by non-local users during 42 days in the fall. Red Sheep and Cane Creek represent Dall sheep habitats which may rationally be considered less than ideal because of their geography-influenced weather. If there are areas where harvest of ewe sheep should ever be considered most carefully, this area should be among them. Conservative hunting for rams is the best management approach for the sheep populations of this area. I urge rejection of this proposal on biological grounds. If there is a reason to accept it, that reason is simple preference for local users alleging an undocumented need and subsequent use. This is not a matter of biology for cultural survival, despite the biological data presented and the accompanying social allegations. I speak for myself as a Dall sheep biologist and experienced observer of the “Red Sheep saga” on this proposal. I do not represent the Wild Sheep Foundation here.

**Proposal 188** represents a traditional effort by special interests (in this case guiding) to secure an advantage over others. This is not economically significant to the state because the number of nonresident licenses sold will be small. There is no reason to do this except to benefit the guides involved. Relatively recently, the number of permits in the TMA was increased. Hence, the necessity for increased nonresident opportunity seems unwarranted in this circumstance. Here, I speak from my experience as a creator of the Tok Management Area and an experienced Dall sheep manager. I do not represent the Wild Sheep Foundation here.

**Proposal 214** is premature. While the allegation that some rams never reach full curl regardless of age seems empirically correct, design of a harvest system to allow or culture the harvest of these rams is more complex than allowed for in this proposal. There is no mechanism to identify these “culls,” or facilitate their harvest; and the suggestion that such a complex and unproven harvest strategy “ . . . would diversify the harvest among the various age structures in the rams groups and may positively affect breeding dynamics.” is inconsistent with the data on age structures from both hunted and unhunted populations. It also fails to appreciate the dominance behavior of Dall rams in rut. There may be a time for this sort of approach, but we’re not yet approaching the level of detailed knowledge necessary for this proposal to be more than an unnecessary complication of the harvest regulations. The benefits would be very small, the risks undefined, and the biology we do understand ignored. Hence, I argue this is not a good approach at this time. I speak for myself as a Dall sheep biologist and experienced Dall sheep manager regarding this proposal. I do not represent the Wild Sheep Foundation here.



## BOG Interior Proposals Comments: Spring 2012

### #207 – SUPPORT

I took my first moose on this hunt in 2009. Then in 2011 I drew this permit again, but did not hunt once I learned the hunt area had totally changed. I was ready to go, but day after day family and friends reported seeing nothing...I elected to not waste the time or money. My family of seven could of really used this moose to get through the winter.

Please bring back this late season primitive weapon hunt in the Wood River Controlled Use area. It is a challenging hunt in beautiful country.

I would not apply for this hunt again if held the same as it was 2011.

From: Alicia Machacek, 1115 Downwind Drive, Fairbanks, Alaska 99709





# ALASKA

## PROFESSIONAL HUNTERS ASSOCIATION, INC.

HC60 Box 299C • Copper Center, AK 99573

Phone: 907-822-3755 • FAX: 907-822-3752

Email: [office@alaskaprohunter.org](mailto:office@alaskaprohunter.org)

[www.alaskaprohunter.org](http://www.alaskaprohunter.org)

January 22, 2012

Cora Campbell, Commissioner  
Alaska Department of Fish and Game  
P.O. Box 115526  
Juneau, AK 99811-5526

Dear Commissioner Campbell:

I first want to thank you for your leadership and vision in moving the Department forward, especially at this particularly challenging time. Thank you also for your help and support on the many issues we are dealing with relating to responsible wildlife management.

I know you are currently dealing with a host of other important issues at this time, but I would like to bring two issues to your attention that have a very serious impact on the licensed hunting guides in Southeast. I ask for your help in finding solutions to these issues.

As you are aware, the brown bear harvest in GMU4 has become a concern of your wildlife conservation staff. Although there is no data that indicates we have a biological problem with GMU4 brown bears, for the past 4 regulatory years the total human caused brown bear mortality has equaled or exceeded the guideline levels given in the Unit 4 Brown Bear Management Strategy (BBMS). The harvest of female bears is a significant aspect of how the guidelines for harvest are calculated. This concern prompted an early closure of last fall's GMU4 brown bear season which was unfortunate for resident and nonresident hunters as well as the guide industry. Last Friday the guides in Southeast also received a letter from your Sitka staff informing them of potential closure of the spring brown bear season by Emergency Order if mortality guidelines are exceeded.

Since November, we have been working within the industry to develop a proposal to the Board of Game to address exceedences of the total human caused mortality guideline for brown bears in GMU4. The Unit 4 BBMS remains a very pertinent and useful management plan and we are proposing no changes to it without Department, BOG, public and industry communication and cooperation. We believe, however, that there have been some changes in how the plan was supposed to work and this is having a negative impact on all brown bear hunters continued ability to hunt brown bear hunts in Southeast.

An example of this relates to how brown bear wounding loss is now being accounted for. For approximately the past five years, any brown bear wounded but not recovered by either a sport hunter or by an officer in a DLP situation is counted as a female bear in the total human caused mortality equation. This was not the case when the Unit 4 BBMS was created. Wounding loss was well recognized at the time the management plan was written but was recognized as an



indeterminate factor and one which probably has no measureable effect on bear populations. Quoting from the plan, “*ADF&G has no credible information on the magnitude of wounding loss and so does not typically include it as a factor in management equations or population modeling.*” This new practice of counting every wounded bear and unrecovered DLP bear as a dead bear as well as a female bear is a deviation from the plan and one which unfairly raises the total human caused mortality figure. In many cases, when a hunter wounds and does not retrieve a bear, or a bear is shot and escapes in a DLP situation it survives, and was not a female bear.

Another factor which has caused an increase in mortality is a significant increase in second-degree-of-kindred guiding for brown bears in GMU4, several times more than what was written into the Unit 4 BBMS. This also needs to be addressed and will result in reduced mortality.

Changes in hunting on private lands and recent increases in DLP mortality because of poor garbage handling in the various communities have also impacted the mortality figures. It is important to note that the harvest of brown bears as defined within the BBMS is capped at four percent of the population level. This is the most conservative harvest guideline of anywhere within the state. As well, science and inventory work since the BBMS was developed has indicated much higher population densities within certain areas. This science has not been addressed within the harvest guidelines.

These and several other issues have been subjects of our discussions since November and we believe that a workable solution exists to these issues. Emergency Order season closures do not need to be a routine part of the solution, especially considering we do not think there is a biological problem. These closures are expensive and extremely disruptive to all hunters as well as the guides’ abilities to market their hunts.

Another aspect of last fall’s closure is that in several SE regions where moose is an important food source, since the BBMS was developed, the moose populations have been affected by predation factors much of which have been related to brown bear caused mortality. When the EO was issued last fall during the resident moose hunting season, it affected areas where brown bear harvest needs to occur and they could not be harvested. This caused some invalid concerns from resident hunters that ADF&G was managing the brown bear harvest to not require an EO for the guide industry during the spring season.

Based on all of these factors and more that this letter will not allow detail on, I would ask that Emergency Order season closures for brown bear in GMU4 not be implemented unless there is a proven biological concern and that we are allowed time to develop a workable proposal for the next Southeast Board of Game meeting that addresses the mortality concern.

The second issue that I’d like to bring to your attention involves the new black bear management strategy in Southeast. At the last Southeast Board of Game cycle held in November of 2010, a new system was implemented for black bear hunting opportunity in Southeast that will require unguided non-resident hunters to draw a permit prior to hunting black bears. Guided non-resident hunters would not be required to draw a tag but guiding allotments would be averaged on use levels based on calendar years 2007 – 2009. Setting of these appropriate use levels required cooperative effort between the Forest Service and the Department which was approved and requested by the Board of Game.





A different management method, one not requiring this level of cooperation between agencies, was developed within the Department based upon bear harvest data for the individual guiding operations. This alternate management method unfortunately creates serious operational difficulties, particularly for the smaller guiding operations. It also creates perpetual uncertainties for all guides in trying to figure out how many clients can be taken each year. I would ask that your staff, with guidance from the Board of Game as needed, work with the Forest Service to develop a management strategy as originally intended.

Thank you very much for your consideration. We are willing to work with your staff in any way that would be helpful.

Most Respectful Regards,



Robert Fithian  
Executive Director

cc: Craig Fleener, Dale Rabe, Doug Larsen, Christy Tibbles, Cliff Judkins, Ted Spraker, Nathan Turner, Mike Nizich



**Alaska Professional Hunters Association Inc.**  
HC 60 Box 299C Copper Center, Alaska 99573  
(907) 822-3755

February 16, 2012

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

**SPRING 2012 INTERIOR CYCLE 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 Interior Region meeting in Fairbanks. The Alaska Professional Hunters Association Inc. (APHA) has serious concerns with the scope of many of the proposals you will be addressing at this meeting. The professional guide industry represents a significant and important rural economy in Alaska which is dependent upon prudent stewardship and conservation of Alaska's wildlife.

APHA has also been at the forefront of professional guide industry advocacy working to address perceived negative social and wildlife/wildland conservation impacts generated by the guiding industry. During the past six years we have achieved substantial goals to this affect with the establishment (Dec. 2005) of the Big Game Commercial Services Board (BGCSB). This Board has developed new professional licensing standards which have set the standard for being the best in the world. There are a few aspects of professional guide licensing in differing African countries that may rate as high as the standards that Alaska has now set, but overall we have the highest. What this means to you is that because of the higher bar of licensing being established, fewer applicants are passing the test annually and those who do have to have a much better understanding of social atmosphere concerns than previously.

As well and at long last, the proposed Department of Natural Resources/ADF&G/BGCSB Guide Concession Program has been introduced and represents a great accomplishment that will substantially aid in conservation related concerns and will significantly reduce conflict in the field. Tremendous work by numerous State agencies including the Board of Game has been put into development of this program which is designed to restrict guided hunting activity on State lands. Selection criteria for this competitive program as proposed will include substantial credit given for the applicant's consideration for resident hunters and other user groups encountered in the field as well as wildlife conservation concerns within their plan of operations.

Many of the proposals you will be considering at this meeting seek to eliminate or restrict existing nonresident hunter opportunity in some manner. There are numerous reasons for APHA to urge caution and restraint in regard to support of these proposals related to *balance for the whole* considerations.

Please consider the following factors when addressing these proposals:

1. By eliminating non-resident hunters or by giving special season dates for resident-only hunters we further fragment the hunter/conservationist fraternities. The perceived conflicts will not disappear from the field, rather they will continue to be replaced and possibly escalated within different user groups. Let's turn together as hunter conservationists before we turn away from each other. Every time we turn away from each other as hunters we give success to those who work to eliminate our way of life.
2. If we can encourage the turning together and work together as the hunter conservationists we are, Alaska can and will be one of the greatest places for all people to enjoy wildlife—as subsistence hunters, as general resident hunters, or nonresident hunters we have a common bond. Wildlife conservation measures that provide for abundance, for sustained yield, and maximum benefit provide for the best interest of the whole and we encourage this board to continue to do the great job they have been doing to help provide that balance.
3. APHA has no support for any of these reduce, eliminate, or restrict nonresident opportunity proposals as written. None of them have been submitted from a conservation based concern and to consider them on a statewide basis is unreasonable and unfair.
4. Many long established professional guide businesses will be negatively impacted and/or put out of business if any of these proposals were to pass. In many cases, there are very few resident hunters that hunt in the regions where many guides operate. To impact their businesses with preferential resident hunter privileges and thus provide a commercial transporter incentive to fill the void goes strongly against our constitutional mandate of maximum benefit.
5. Several of these proposals express concern over perceived crowding of guided hunting activity on public lands. Please understand that eliminating nonresident hunting activity will not eliminate transporter or other hunting parties. The perceived conflicts will continue or even be enhanced as the transporter industry has no conservation basis as a professional guide must.
6. Alaska Statutes 08-54-720 clearly defines unlawful acts related to the guiding industry and of the 19 items listed therein, #2 states that it is “illegal for a person licensed as a guide to intentionally obstruct hinder or attempt to obstruct or hinder lawful hunting engaged by a person who is not a client of the person”.

Additionally, AS 16-05-790 defines similar protection of hunters through the Hunter Harassment Law. If there are bad things going on within this scope, let's first turn to existing law and enforcement of it before we start eliminating an important industry, hunting opportunities, meat sharing and the way of life of many people.

We would encourage you to look at the number of complaints that exist related to these two laws and the related conflict between nonresident and resident hunters to help you understand better the actual extent of the perceived problems.

7. According to ADF&G reports, approximately six percent of the annual human harvest of caribou, ten percent of the human harvest of moose and forty percent of the human harvest of Dall's sheep are harvested by nonresident hunters during general State regulated hunting opportunities. If the Federal harvest and unreported harvest factors are considered as well, the percentages of nonresident harvest drop several points even lower.
8. Nonresident license fees are added to by multiplying them times three with the matching Pitman-Robertson funds make up the majority of ADF&G Wildlife Conservation Division budget. Nonresident annual harvest percentage of moose, caribou and sheep is low in comparison with the wildlife conservation funding (approximately eighty percent) they provide. Eliminating nonresident opportunity as many of these proposals request will result in an immediate and large shortfall of important conservation funding for ADF&G which will eventually result in overall resident hunter opportunity loss as well.
9. Also important to this equation is that Alaska's annual human harvest of these wildlife resources represents something near six percent of the annual mortality of these species while predation accounts for approximately eighty-four percent.
10. Intensive management increases actual costs to achieve prudent wildlife conservation goals that provide for the best interest of our wildlife and all people who enjoy or depend on them. When you eliminate nonresident opportunity, you eliminate vital funding needed to enhance and conserve wildlife for the best interest of the whole.
11. When nonresident hunting opportunity is reduced or eliminated, a substantial part of the annual predator harvest which occurs during the ungulate hunts is also reduced or eliminated. When you eliminate this nonresident harvest, you eliminate in most cases, the most significant annual predator harvest as well.
12. Few if any of these proposals are generated from concerns related to Federal lands where guide industry *concessions* are incorporated which limit the number of guides per geographical region. Currently, the proposed DNR/ADF&G/BGCSB Guide Concession program development is in its final stages and implementation of the program will help dispel the perceived conflicts.



13. Over sixty-five percent of Alaska's lands are federal domain and nonresident sportsmen and women pay for upward of 80 percent of our wildlife conservation funding. Alaska represents by far the greatest divide between resident and nonresident licensing fees of any state. Nowhere else in the United States do residents pay so little for so much in relation to hunting privileges. Alaska needs additional funding for wildlife conservation in a very serious way and the only tool we can find support for is increasing nonresident hunting license and tag fees. As our economy and especially our rural economy needs as much bolstering as possible, it seems as though maybe we are pushing this delete nonresident opportunity envelope in a manner that could have great adverse consequences.
14. The Board of Game has a policy related to basing nonresident and resident hunter opportunity when implementing a drawing permit program. This policy requires the Board to look at the previous ten year history of effort between nonresident and resident hunters and to make the drawing permits available on that defined basis. This is a fair mechanism and should be continued.
15. It has been proven within the guide industry throughout the western states that when a limit of ten percent of hunting opportunity is provided to nonresident hunters and guides have to compete with other guides to secure the hunters as clients, a viable guide industry cannot survive. The broad overhead cost of maintaining a viable business cannot be supported on the "luck of the draw" concept.
16. Alaska is different than the rest of the US to which we are often compared. It is important to note that Alaska's "*Guide Required*" law is vitally important to the resident hunter. One of the key points is its application to wildlife conservation by restricting nonresident opportunity. Compare all of the other states that do not have this law and see what challenges exist for quality big game hunting opportunities. They are nearly 100 percent allocated by very restrictive drawing permits and many residents who live in the heart of these areas never receive a permit to hunt in these hunts.
17. Montana recently underwent a loss of nonresident hunter opportunity due to a ballot initiative that did away with landowner tags. The result was a catastrophic loss of funding to Montana's Fish Wildlife and Parks for important wildlife conservation programs. **Alaska cannot afford this.**
18. When looking at the affluence of guides in relation to user groups as a criterion for support of these proposals we would encourage you to consider the resident hunter in this group as well when comparing hunter prowess and success. Of course nonresident hunters have a higher success rate as they are required to secure the services of a professional guide and they hunt for more days than the average Alaska resident.
19. The number of resident hunters who use airplanes to find and then harvest animals, or that have mechanical means to access what used to be hard to access remote regions are growing in number. They also contribute substantially to the perceived conflicts between

resident—nonresident hunter in the field. Professional guides are already restricted by law (with the exception of some spring bear seasons) from using an airplane to find an animal with the intent to harvest that animal. Resident hunters are not thus restricted. Again, if problems do exist, allow for existing law to be applied.

20. APHA strongly supports the data and comments provided by Dr. Wayne Heimer, Mr. Joe Want and the Wild Sheep Foundation regarding many of these proposals. We urge you to review their comments.
21. APHA has concerns about the nature of these proposals which lack any proof of issue and have no biological or conservation basis. We urge you to explore the actual documented problem to define if it is real.
22. There does exist the serious question of *"Can the Board of Game in such a serious manner legally separate one user group from another."* Certainly, related to wild sheep—which are not covered under the Intensive Management Law—the question is raised about how a preference would be provided without addressing the Tier I or Tier II hunt aspect, qualify them as an Intensive Management Species and develop C&T and ANS findings statewide. These proposals will bring broad sweeping changes and have impacts on the future of hunting and wildlife conservation in Alaska, none of which we view as beneficial to the whole.
23. When you eliminate the nonresident hunting opportunity and the guiding industry you also eliminate very historical, important economy and meat sharing aspects which are important to Alaska and our future.

It is important for you to understand that as the Alaska Board of Game, you have a very important role in steering the destiny of our great state as a whole.

The proposals you have before you and the actions you take on them at this meeting have deep and far reaching consequences as to the future of wildlife conservation for Alaska as well as a very important Alaskan economy. This industry has deep roots in many of Alaska's support businesses and if any of these proposals were to pass as written, they would not only eliminate many guide businesses but also they would have a significant impact on many other businesses that depend upon the guide industry.

During this meeting, you will have to compare an American citizen who may have fought for our freedoms as a whole, who is not a resident of this state,

*a state of which sixty-five percent of its land is held within Federal domain,*

*and, in which the nonresident hunter contributes by far, the greatest amount of funding for our wildlife conservation programs,*

*and, where this nonresident hunter as a group harvests less than six percent of the annual human harvest of caribou,*

*less than ten percent of the annual human harvest of moose,*

*forty something percent of the annual human harvest of Dall's sheep*

*and, over fifty percent of our brown/grizzly bear harvest during general State regulated hunting opportunities.*

You will compare this hunter with a resident hunter who provides for a much smaller contribution to our wildlife conservation programs

None of these factors address the already existing restrictions on regions, season dates or bag limits that this nonresident is subject to, nor do they point out that the annual mortality factor from predation on our prey species continues to be in the eighty percent bracket throughout much of Alaska.

You will at this meeting, compare an Alaskan entrepreneur—many of which are second or third generation entrepreneurs—who have a history woven into the fabric of our great state, who provide for an important and long term sustainable rural economy, and have nearly one hundred years of sharing of important economy and food with rural Alaska, with a resident hunter who is quite possibly a retired public servant.

You are being asked to make decisions regarding preferential treatment between these hunters, *all of which are hunters.*

There are many comparisons being made between the way things are done in some other state or country compared to how we as Alaskans do things. We are not these other places, we are Alaska and we should be proud of it. When these comparisons are made, they rarely if ever compare these other state's tax bases on their citizens, nor do we hear the status of those states financial standing which all of us need to hope we never have.

We live as Alaskans with the rewards of our good stewardship from the great bounty of the non-sustainable and sustainable resources we have been blessed with.

As an in-state comparison, let's look at other natural resources industries: Where does the vast majority of the economic and "value added" benefit go in relation to our oil, timber, mining and fishing industries? It primarily goes to nonresident corporations, their shareholders and downstream value added employees outside of Alaska.

When a guided nonresident hunter comes to Alaska, their hard dollar economic contribution is compounded by seven times, which is the number used by economists for the actual contribution of these monies.

He or she may or may not harvest an animal, if he or she does, the edible meat from this harvest is primarily consumed by Alaskan's who depend on it, and the money generated from these hunts stays primarily in this state.

We hope you see the importance of protecting the long term sustainability of this industry and the maximum benefit Alaska receives from it. This is worth protecting and to a significant degree you are in charge of this future.

When the first human crossed the Bering land bridge to what we know as America, it was not because he or she was on an eco-tourism expedition; it was because he or she was looking for better and less competitive hunting grounds. Things have not changed much since.

By eliminating nonresident hunters or by giving special season dates for resident-only hunters we further fragment the hunter-conservationist fraternities. The perceived conflicts will not disappear from the field, rather they will continue to be replaced and even escalated within different user groups including commercial transporters who have no conservation basis.

Let's turn together as hunter-conservationists before we turn away from each other. Every time we turn away from each other as hunters we give success to those who work to eliminate our way of life.

There will continue to be regions where hunter effort is causing some conservation and social based concerns.

Responding to these concerns, you have an existing policy related to basing nonresident and resident hunter opportunity when implementing drawing permit hunt programs. This policy requires the Board to look at the previous ten year history of effort between nonresident and resident hunters and to make the drawing permits available on that defined basis. This is a fair mechanism and should be continued. You have used it and it is working.

These proposals seem to insinuate that there is a tremendous amount of conflict between nonresident hunters and resident hunters. Guides who operate on Federal lands under some type of competitive prospectus are all required to define in their business and operating plans how they will blend their operations with other hunters and user groups. Let us assure you, one or two legitimate complaints against these operators will result in them losing their permits and quite probably their livelihood in the next selection process. This is a very serious part of these programs.

Also, please let us assure you that a guide business cannot maintain economic viability by being restricted to competing for a ten percent allocation, nor can they maintain a competitive value for their services by providing resident sheep hunters with earlier seasons.

APHA is very cognizant of the history of court actions throughout the United States regarding allocation challenges between residents and nonresident hunters. During the past two decades, highly publicized court rulings ruled that the allocation of drawing permits should be dealt on a fifty/fifty basis. These decisions were appealed to the 9<sup>th</sup> circuit. At that time, Senator Stevens and Senator Reed co-sponsored what we know as the Reed amendment which was passed by Congress.

It is important for you to know that against many of our conservation partners recommendations, APHA supported the Reed amendment as we felt that the decisions that would come from the 9<sup>th</sup>

would not be in Alaska's best interest. These decisions could very well have been in favor of the guide industry and nonresident hunting in this state but not in keeping with the best interest of the state.

It is also good for resident hunters and you, the Board of Game to know that APHA is often working at the forefront of challenges related to wildlife conservation and hunting opportunities for all hunters, not just guides or APHA members. By doing this, we are often the "first line of defense" and advocacy for Alaska and all hunters

### **SPECIFIC PROPOSAL RECOMMENDATIONS**

**PROPOSALS THAT APHA OPPOSES:** 133, 134, 135, 136, 137, 138, 139, 145, 147, 148, 150, 152, 155, 156, 159, 165, 170, 178, 188, 189, 190, 197, 200, 232, 233

**PROPOSALS THAT APHA SUPPORTS:** 146, 157, 162, 163, 166, 167, 174, 175, 176, 180, 181, 192, 226, 238

**PROPOSALS THAT APHA HAS COMMENTS ON BUT DEFERS TO THE CONSIDERATION OF THE BOARD:** 141, 142, 143, 144, 158, 168, 196, 230, 231, 236

### **INDIVIDUAL PROPOSAL COMMENTS**

#### **PROPOSALS 133, 134, 135, 136, 137, 138, 139, 152: OPPOSE**

APHA opposes these proposals for many if not all of the reasoning provided on pages one through eight of this comment letter.

#### **PROPOSALS 141, 142, 168, 196, 230, 231, 236: DEFER TO THE CONSIDERATION OF THE BOARD WITH COMMENT**

As a State, Alaska has begun the long recovery of rebuilding and re-establishing our stewardship mandates regarding our precious wildlife populations. This momentum has been achieved primarily because of a number of like-minded conservation organizations involved with public policy making, helping to establish the tools enabling you to respond to important biological and conservation based concerns. Please know that your programs are working and are generating the much needed relief and better stewardship for Alaska's wildlife.

APHA feels that it is very important that you consider the whole of the achievements that have been made and what the benefits have been to our wildlife in these regions as well as what we can do to assist with these type of efforts in other needed regions. It is important to note that there have been numerous dynamics implemented on this *road to recovery* regarding our wildlife conservation enhancement and Intensive/Predator Management programs.





What we do know is that these dynamics are working and have stood the test of legal challenge and to a certain degree, public acceptance. However, APHA therefore urges caution regarding initiating methodologies that may disrupt the public acceptance of the ongoing programs.

As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing programs.

APHA asks for your support in developing expansion of management programs intended to grant relief to predator and prey imbalances. We urge your support for these initiatives where and when possible in keeping with maintaining the whole of the programs statewide. The predator management programs provide for development of our constitutional mandates of sustained yield, abundance and maximum benefit which provides for the best interest of the wildlife, and all people who depend on and enjoy prudent management.

We have concerns regarding snaring of brown bears of any age class and conservation of brown bears. We would like to recommend that the brown bear aspect of these types of proposals be handled on a strategic basis related directly to identified problem bears and that the harvest of these particular bears be conducted by ADF&G personnel.

We often hear the cry for consideration of our great wolf and bear populations, both of which we hope that all Alaskans appreciate. But we rarely if ever hear the cry for consideration of the heartbeats or the suffering that hundreds of thousands of moose, sheep, deer and caribou that have fallen as prey to be consumed alive until death overtakes them or the female survivors of these species who has to live her whole life without being able to see one of her offspring live to recruitment age, or any cry about the low cow/calf, doe/fawn or ewe/lamb ratios and overall low density equilibriums which are all due to our inability for us to be the good stewards we are mandated to be and manage for the best interest of the whole.

What we can tell you as we travel and listen to other states and other countries wildlife management challenges is that preservation and natural diversity concepts of wildlife management are not working. Conservation on the other hand, does work.

You are developing great science to help support conservation. As you do, you will be subject to additional efforts to stop this development.

Wildlife conservation measures that provide for abundance, for sustained yield and maximum benefit provide for the best interest of the whole and we encourage this board to continue to do the great job you have been doing to help provide that balance in keeping with being able to continue with these efforts as a whole.

**PROPOSALS 143, 144: DEFER TO THE CONSIDERATION OF THE BOARD**

APHA has a long standing concern over the abuse of same day airborne hunting; especially when it is allowed for one species but not another that have overlapping hunting seasons.

**PROPOSALS 145, 148, 150, 155, 165: OPPOSE**

These proposals are designed to eliminate conservation based hunting and or trapping opportunity, fracture hunter user groups, eliminate important conservation funding and ultimately to eliminate conservation based hunting as a whole.

**PROPOSAL 146: SUPPORT**

Based on its given merits.

**PROPOSAL 147: OPPOSE**

Prefer status quo, especially in that some big game species can be harvested with a trapping license.

**PROPOSAL 156: OPPOSE**

This proposal is designed to eliminate conservation based hunting opportunity, fracture hunter user groups, eliminate important conservation funding and ultimately to eliminate conservation based hunting as a whole.

The State is under no obligation to buy into the NPS concept about non-management. State primacy in this field is confirmed by ANILCA section 1314. Plus, the proposal is wrong as a matter of federal law. 16 U.S.C. section 3 (part of the 1916 National Park Organic Act) specifies that "the Secretary of the Interior shall make and publish such rules and regulations as he may deem necessary or proper for the *use and management* of the parks." The same provision also provides the following: "he may also provide in his discretion for the destruction of such animals and of such plant life as may be detrimental to the use of any said parks, monuments, or reservations." This was the authority the agency used for years to control bison numbers in Yellowstone, kill mountain lions, etc. There is no need for the Board of Game to cede the State's authority under ANILCA section 1314, disregard the 1916 Organic Act authority under 16 USC 3, and buy into NPS policy.

**PROPOSAL 157: SUPPORT**

Based on its given merits.

**PROPOSAL 158: Defer to the Consideration of the Board with Comment.**

We support this proposal based on its given merits but prefer proposal 157 for Region III.

**PROPOSAL 159: OPPOSE**

This proposal if implemented would not provide fair harvest opportunity for all user groups throughout the range of the Mulchatna Caribou herd.

**PROPOSAL 162: SUPPORT**

Based on its given merits.

**PROPOSAL 163: SUPPORT**

Based on its given merits.

**PROPOSAL 166, 167: SUPPORT**

Based on their given merits

**PROPOSAL 170: OPPOSE**

Prefer better science to support this proposal.

**PROPOSAL 174: SUPPORT**

Based on its given merits.

**PROPOSAL 175, 176: SUPPORT**

Based on their given merits.

**PROPOSAL 178: OPPOSE**

This proposal is unjustified and separates user groups, all who are hunters. We need to encourage respect for each other and not eliminate conservation based harvest opportunity for all hunters.

**PROPOSAL 180, 181: SUPPORT**

Based on their given merits.

**PROPOSALS 188, 189, 190: OPPOSE**

APHA opposes these proposals for many if not all of the reasoning provided on pages one through eight of this comment letter.

**PROPOSAL 192: SUPPORT**

Based on its given merits.

**PROPOSAL 197: OPPOSE**

As Alaska's wildland habitats vary substantially in relation to flora characteristics it is important to note that naturally, some regions will respond faster to management initiatives than others. Canopied regions will naturally respond slower than sparser habitats. APHA urges caution in going too far too fast in initiating methodologies that may jeopardize the whole of the existing programs.

APHA asks for your support in developing expansion of management programs intended to grant relief to predator and prey imbalances. We urge your support for these initiatives where and when possible in keeping with maintaining the whole of the programs statewide.

**PROPOSAL 200: OPPOSE**

This proposal is designed to eliminate conservation based hunting and or trapping opportunity, fracture hunter user groups, eliminate important conservation funding and ultimately to eliminate conservation based hunting as a whole.

**PROPOSAL 226: SUPPORT**

Based on its given merits.

**PROPOSAL 232: OPPOSE**

This proposal would quickly lead to abuse.

**PROPOSAL 233: OPPOSE**

This proposal is designed to eliminate conservation based hunting and or trapping opportunity, fracture hunter user groups, eliminate important conservation funding and ultimately to eliminate conservation based hunting as a whole.

**PROPOSAL 238: SUPPORT**

Based on its given merits.

End of APHA comments:

Submitted on Behalf of the Alaska Professional Hunters Association Inc.



Robert R. Fithian  
Executive Director





To: Alaska Board of Game Comments  
Alaska Department of Fish and Game

From: Daniel J. Coverdell, MD  
15217 Darby Rd  
Eagle River, AK 99577

Subject: Comments against Proposal 102


Dear Board Members,

I use both llamas and horses to hunt, scout, and pack in the Chugach Range. I would urge consideration of the following points:

- It is not uncommon for horses to cohabitate with llamas, sheep, and goats in domestic farms. Disease transmission among all domestic animals needs to be considered, especially considering that horse packing is much more common than other pack animals listed in Proposal 102.
- To date there is no evidence that disease carried by pack stock has impacted sheep or goat populations in Alaska.
- In the lower 48, the researchers are unable to pinpoint the source of the pneumonia that has caused massive die-off of sheep. It is not clear which pack animals, if any, are the source.
- This proposal is an overreaction in the absence of hard scientific data.
- This proposal is discriminatory against pack animals other than horses, despite the lack of proof. On the other hand we do know and have proof that horses leave a much greater impact on the Alaskan environment than other pack stock, such as goats and llamas.
- Obviously more study is need, but if there is sufficient concern that pack stock have potential to carry disease, then all pack stock (including horses) should be banned until it can be confirmed which is the source.
- Pack stock could be tested for the disease of concern which would be a more sensible and scientific approach, than outright banning with as little information as there is now.
- It appears that the proposer of this Proposal is a sheep hunting guide who uses horses in the Chugach State Park, raises questions of conflict of interest, and this is reflected in the nature of the proposal.

In summary, the proposal is premature, lacks scientific basis, is biased, and discriminatory.

Sincerely,



Daniel J Coverdell, MD



**Comment by Linda Nuechterlein – Opposition to Proposal 102**

18920 Elnora Lane, Eagle River, Alaska 99577

I am **opposed** to **Proposal 102** – 5 AAC 92.085 which would “Prohibit the use of pack animals other than horses while hunting sheep or goat” for the following reasons:

- There is no evidence that disease carried by pack stock such as llamas has impacted sheep populations in Alaska. (Proposer also admits this.)
- I have been a llama owner for more than 20 years, and find that llamas are remarkably disease free.
- The impact of llamas to the environment is significantly less than that of traditional pack stock such as horses and mules.
- Very few people use llamas (or non-traditional pack stock) to hunt sheep so the impact is insignificant from that perspective.
- Recreational use of the ordinary Alaskan citizen to enjoy non-traditional pack stock should not be restricted to further the interests of the professional guiding community.
- Daniel Montgomery (proposer and professional guide) cites extensive studies that disease, primarily pneumonia, caused major die off events for wild sheep populations in the lower 48 states. After numerous web searches, I was not able to locate the Washington and Idaho studies he cites to support this. However, I did find some information that indicates that during 1979 – 1980 big horn sheep in California contracted pneumonia after associating with domestic sheep. I am not aware of anyone packing with domestic sheep in Alaska, and cannot imagine why anyone would want to.
- The proposer, an Alaska hunting guide, appears to be misinterpreting lower 48 studies, causing unnecessary alarm, and regulation for something that may not be a plausible concern to wild sheep populations in Alaska.
- Therefore, it is imperative that studies cited by the proposer be substantiated prior to the Board banning use of pack animals such as llamas. Furthermore, if these studies exist, they may not be applicable to Alaska.
- If the Board determines this is a credible concern, the following actions should be considered prior to implementing Proposal 102: (1) Conduct a third party review of relevant studies to determine credibility and scientific rigor; and (2) Consider implementing an Alaska specific study to ascertain whether claims made in Proposal 102 are scientifically sound.



January 8, 2012

Alaska Department of Fish & Game  
Boards Support Section 907-465-6094  
PO Box 115526  
Juneau, AK 99811-5526

Attn: Board of Game Comments  
Alaska Department of Fish & Game  
Boards Support Section

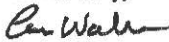
Proposal #Proposal 213

As a local resident, living near the confluence of the Yanert and Nenana Rivers, I strongly oppose Proposal #213 which would open the Yanert CUA to motorized access for these reasons:

- 1) According to the latest ADF&G survey, Zone 7, of Unit 20A has the lowest density of moose in the entire management unit. It is bad wildlife science and bad management to open this area to motorized access that would surely increase the harvest. I see very few moose in this immense area and an increase is unwarranted.
- 2) The proposal would allow the ADF&G to raise the quota(s) for antlerless moose hunting in the late autumn and winter. Accurate census data for the drainage is missing; what exists reflects no real need for increased harvest. Mechanized access would sorely impact other wildlife as well, including the small scattered bands of caribou that winter in the area.
- 3) Access is a huge issue as there is only one grandfathered BLM access route across AHTNA Corporation land that borders the highway from nearly the Denali Park boundary to near Carlo Creek. There is no roadside parking, pullouts, or facilities to facilitate the large crowds of mechanized hunters that have plagued the Rex-Ferry areas. This lack of access inevitably results in overcrowding, with negative public consequences. Currently extreme overflow on the Yanert River restricts any access to the upper region of the river. This not unusual winter condition would then concentrate hunting to areas close to the road where moose density is negligible.

For these, and others reasons, I urge the Board to reject Proposal #213.

Sincerely,

  
Tom Walker

PO Box 146

Denali Park, Alaska 99755



## KEVIN CLEMENT

Box 665  
Denali Park, AK 99755  
(907) 683-3330  
[kcalaska@hotmail.com](mailto:kcalaska@hotmail.com)

RECEIVED

FEB 17 2012

February 15, 2012

BOARDS

RE: ~~Oppose Proposal 213 - Motorized hunt in the Yanert Valley~~

Dear Board of Game,

I write to oppose the idea of a motorized winter moose hunt in the Yanert Valley, Unit 20A. This is ostensibly a move to increase access to moose for local hunters, but I can assure you that the measure has little or no support among this group. In fact, this ill-conceived idea is simply another in the recent series of proposals that reflect the Board's current monomaniacal push to liberalize hunting regulations all over the state, at the expense of all other user groups, the resource, and, ultimately, the hunters themselves, since it will lead to a degradation of the stock.

The reason local hunters don't like Proposal 213 is the very fact that they are locals. They like the fact that 20A is one of the last areas in the state with a non-motorized hunt. They don't like the idea of hunters from outside areas, with snowmobiles and four-wheelers, invading the area, tearing up the trails, jamming the small available parking areas, and seriously impacting both the environment and the lives of local residents.

There is no science to back up this proposal. It is not justified by valid game-management practices. What it does reflect is a political ideology and the desire to assert dominion over the entire state by a small special-interest group, sport hunters. Therefore, in the name of good management, fairness, and plain common sense, I urge you to oppose this measure.

Sincerely,



Kevin Clement





## KEVIN CLEMENT

---

Box 665  
Denali Park, AK 99755  
(907) 683-3330  
[kcalaska@hotmail.com](mailto:kcalaska@hotmail.com)

---

February 15, 2012

RE: Oppose Proposals 227-232 - Intensive Management in Unit 20C

Dear Board of Game member,

I urge you not to support any of these proposals which threaten to institute intensive management and predator control procedures in Unit 20C. There is absolutely no science to suggest that 20C can support larger harvest numbers. Nor is there any support locally for the measures; our local Advisory Committee actively opposes them.

The idea of indiscriminately destroying predators as a way to artificially increase prey numbers to unsupportable levels is a game management practice that was discredited long ago. Yet the Board seems bent on pursuing this 19<sup>th</sup> Century philosophy.

So egregious are these proposals that an observer has to ask why they're on the table at all. The answer seems to lie in the political struggle that is currently unfolding between Fish and Game and the National Park Service. In that context, these proposals seem very much like the Board's way of thumbing its nose at the feds. This conflict does the Board no credit, and these proposals can only harm the resource. Therefore, I ask you to oppose them.

Sincerely,



Kevin Clement



Ingrid Nixon  
PO Box 665  
Denali National Park, AK 99755  
907-683-3330  
irnixon@hotmail.com

REC'D  
FEB 17 2012  
BOARDS

February 16, 2012

**RE: Oppose Proposals 227-232 - Intensive Management in Unit 20C**

Dear Board of Game member,

I urge you not to support any of these proposals which threaten to institute intensive management and predator control procedures in Unit 20C. There is absolutely no science to suggest that 20C can support larger harvest numbers. Nor is there any support locally for the measures; our local Advisory Committee actively opposes them.

The idea of indiscriminately destroying predators as a way to artificially increase prey numbers to unsupportable levels is a game management practice that was discredited long ago. Yet the Board seems bent on pursuing this 19<sup>th</sup> Century philosophy.

So egregious are these proposals that an observer has to ask why they're on the table at all. The answer seems to lie in the political struggle that is currently unfolding between Fish and Game and the National Park Service. In that context, these proposals seem very much like the Board's way of thumbing its nose at the feds. This conflict does the Board no credit, and these proposals can only harm the resource. Therefore, I ask you to oppose them.

Sincerely,



Ingrid R. Nixon



Ingrid Nixon  
PO Box 665  
Denali National Park, AK 99755  
907-683-3330  
irnixon@hotmail.com

---

February 16, 2012

**RE: Oppose Proposal 213 - Motorized hunt in the Yanert Valley**


Dear Board of Game,

I write to oppose the idea of a motorized winter moose hunt in the Yanert Valley, Unit 20A. This is ostensibly a move to increase access to moose for local hunters, but I can assure you that the measure has little or no support among this group. In fact, this ill-conceived idea is simply another in the recent series of proposals that reflect the Board's current monomaniacal push to liberalize hunting regulations all over the state, at the expense of all other user groups, the resource, and, ultimately, the hunters themselves, since it will lead to a degradation of the stock.

The reason local hunters don't like Proposal 213 is the very fact that they are locals. They like the fact that 20A is one of the last areas in the state with a non-motorized hunt. They don't like the idea of hunters from outside areas, with snowmobiles and four-wheelers, invading the area, tearing up the trails, jamming the small available parking areas, and seriously impacting both the environment and the lives of local residents.

There is no science to back up this proposal. It is not justified by valid game-management practices. What it does reflect is a political ideology and the desire to assert dominion over the entire state by a small special-interest group, sport hunters. Therefore, in the name of good management, fairness, and plain common sense, I urge you to oppose this measure.

Sincerely,



Ingrid R. Nixon



DENALI BOROUGH, ALASKA  
RESOLUTION NO. 12-01

RECEIVED  
JAN 24 2012  
BOARDS

A RESOLUTION BY THE DENALI BOROUGH ASSEMBLY IN SUPPORT OF CONTINUING  
TRADITIONAL NON-MOTORIZED HUNTING WITHIN THE YANERT CONTROLLED USE  
AREA IN UNIT 20A.

WHEREAS, the Yanert Controlled Use Area (CUA) was established and has been managed as a non-motorized hunting area since 1970; and

WHEREAS, the Fairbanks Fish and Game Advisory Committee in 2010 forwarded Proposal 232 to the Alaska Board of Game; and

WHEREAS, Proposal 232 would dramatically change the Yanert CUA from a traditionally non-motorized hunting area to a motorized hunting area; and

WHEREAS, the public testified overwhelmingly against Proposal 232 at the March 2011 Board of Game meeting; and

WHEREAS, the Middle Nenana Fish and Game Advisory Committee voted at their February 2011 regular meeting to maintain the Yanert Controlled Use Area as a non-motorized hunting area; and

WHEREAS, the Denali Borough Assembly passed Resolution 11-06 supporting the continuance of traditional non-motorized hunting within the Yanert CUA in 20A; and

WHEREAS, the Fairbanks Fish and Game Committee has now forwarded Proposal 213 to the Alaska Board of Game; and

WHEREAS; Proposal 213 would dramatically change the Yanert CUA from a traditional non-motorized hunting area to a motorized hunting area from after September 30<sup>th</sup>; and

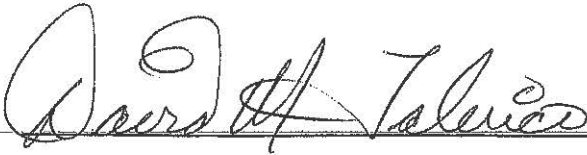
WHEREAS, there is a lack of facilities for parking vehicles and trailers, which causes significant public safety and private property trespass concerns.

THEREFORE BE IT RESOLVED; the Denali Borough Assembly requests the Alaska Board of Game to honor the wishes of the local governing bodies.

THEREFORE BE IT FURTHER RESOLVED; the Denali Borough Assembly requests the Alaska Board of Game reject Proposal 213.



PASSED and APPROVED by the Denali Borough Assembly this 11<sup>th</sup> day of JANUARY, 2012.



MAYOR DAVID M TALERICO

ATTEST: 

GAIL PIEKNIK, BOROUGH CLERK



PASSED UNANIMOUSLY  
ABSENT: ASBURY





RECEIVED  
JAN 24 2012  
BOARDS

DENALI BOROUGH, ALASKA  
RESOLUTION NO. 12-02

A RESOLUTION REQUESTING THE ALASKA LEGISLATURE REVIEW AND REPEAL INTENSE  
MANAGEMENT MANDATES DIRECTED AT THE ALASKA DEPARTMENT OF FISH AND GAME  
AND CENTERED UPON MOOSE IN UNIT 20A

WHEREAS, areas of the Denali Borough in unit 20A, which have traditionally sustained thriving population of moose, are now without herds, and recent wildfires have concentrated many remaining moose populations in smaller, accessible areas; and

WHEREAS, trails in the Denali Borough have received greatly increased pressure from these hunts, resulting in destruction, impassability, and regulation of many of these trails; and

WHEREAS, increased hunter pressure has resulted in a substantial negative environmental impact both from ATV damage to pristine wilderness ecosystems and large amounts of litter and trash; and

WHEREAS, hunts created for and by intense management dictates have created substantial trespass on private property; and

WHEREAS, general moose harvest opportunities have decreased for residents of the Denali Borough, causing the quality of life for residents of the Denali Borough to be adversely affected by the continuation of these practices; and

WHEREAS, overall health and viability of moose populations, and populations of other species which are inextricably tied to moose, are now in question due to hunts created specifically to meet mandates of intense management; and

WHEREAS, questions and concerns of both private individuals and the Middle Nenana Fish and Game Advisory Committee, and resolutions of the Denali Borough Assembly, have gone largely untended by both managing officials of the Alaska Department of Fish and Game and the Alaska Board of Game; and

WHEREAS, these issues have resulted in divisions between the Alaska Department of Fish and Game, the various interior Fish and Game Advisory Committees, bodies of local government, and private citizens groups and individuals, creating a lack of trust and inability to work together; and

WHEREAS, the ultimate origin of each of the above issues is found in the flawed concepts of intense management of moose for food production mandated by the Alaska Legislature, and the solution to these issues lies in the discontinuation of these same practices.



THEREFORE BE IT RESOLVED; that the Denali Borough Assembly requests the Alaska Senate Resources Committee to review the actions of the Alaska Department of Fish and Game concerning mismanagement of wildlife resources within the Denali Borough, most specifically those which deal with the intense management of moose in unit 20A.

BE IT FURTHER RESOLVED; the Denali Borough Assembly requests the Alaska Legislature to repeal AS 16.05.255 (E-G).

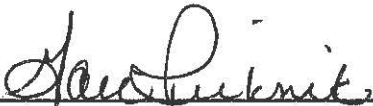
BE IT FURTHER RESOLVED; that the Denali Borough Assembly requests the Mayor send copies of this resolution to the Governor of Alaska, The Alaska legislative representatives of the Denali Borough, all members of the Alaska Senate Resources Committee, all members of the Alaska Board of Game, all management authorities of the Alaska Department of Fish and Game concerned with the Denali Borough, all members of the Middle Nenana, Minto-Tanana, Delta, and Fairbanks Fish and Game Advisory Committees, and any other groups or individuals he sees fit.

PASSED and APPROVED by the DENALI BOROUGH ASSEMBLY this 11<sup>TH</sup> day of JANUARY, 2012.

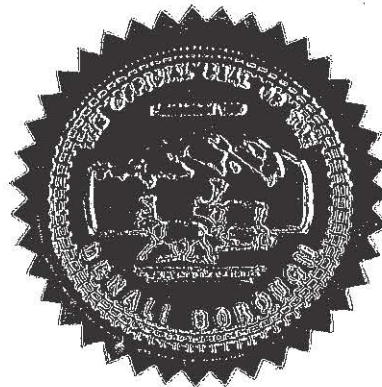


Mayor David M Talerico

ATTEST:



Gail Pieknik, Borough Clerk



PASSED UNANIMOUSLY  
ABSENT: ASBURY



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

February 11, 2012

Kenneth L. Bingaman  
PO Box 2163  
Soldotna, Alaska 99669  
35yr Resident of Alaska

Dear Sirs,

I am sending in this public comment with the knowledge that it is accepted until February 17<sup>th</sup> 2012. I am strongly in support of the following:

**Proposal #207---Move DM766 Muzzle Loader Draw Hunt, any Bull Moose, back to it's original boundary within the Controlled Use Area** where it was located prior to the 2011 change. With the same November 1<sup>st</sup> to November 30<sup>th</sup> hunt dates, the same bag limit and the number of 40 permits awarded.

This is where the hunt has always taken place except in 2011 and DM766 should be returned to this same traditional area.

Important Notes: I was a successful Draw Awarded applicant for the 2008 and 2011 Muzzle Loader season for DM766. I applied for this hunt based solely on what my wonderful experience was during the 2008 season, (I did harvest a nice Bull Moose that year). So I reapplied for the 2010 season which by rule was the first season I qualified and did not receive a permit. I reapplied again for the 2011 season. I based that application on the 2011 Alaska State Hunt Supplement displayed. It displayed the DM766 hunt in the normal location, with a limit of 40 Draw Awarded Permits. I can not begin to express my dismay to find out at a later date that not only had the entire DM766 area been changed, that it had also had the number of permits increased to almost double the 40 advertised in the supplement.

I did do the hunt with a pardoner. I spent 6 days and 5 nights in the new area in temps that average -30 degrees and never saw a Moose, be it a cow or a bull. The new area was low ground and completely devoid of moose. Lots of wolf prints, no moose. The original DM766 was higher ground with fewer trees, better winter moose habitat. If the DM766 Muzzleloader hunt is not returned to its original area, I will not ever apply for it again. You can have it. I felt much cheated with concerns to this 2011 DM766 hunt. Now I have to wait till 2013 in order to reapply for this most coveted hunt again, provided it is returned to its original area.



**Proposal #208---Establish a 2<sup>nd</sup> Muzzleloader Hunt in the remainder of 20A with a longer season.** The boundary for this hunt would be similar to the hunt held this past November 2011. Proposal would also extend the season through December, allowing more time for the rivers in the region to freeze and time to actually hunt the area. Even with the unusually cold November of 2011, access to this area from the Richardson Hwy across the Tanana River near Birch Lake was not feasible until the last week of November 2011. There was only 5 days left in the season at that time. Most years this access would not have been an option to this new area. It is a 60+ mile one way snowmachine ride from the Parks Hwy using the Rex Trail as the only other option to the boundary of the new area.

Also Proposal #208 asks for “any Moose”, I would request that this proposal be amended to “Bulls Only”.

Thank You for reading my Public Comments concerning these two Proposals,

Kenneth L. Bingaman.



John Welsh  
P.O. Box 284  
Kake, Alaska 99830

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

Sept. 23, 2011

Dear Board of Game,

Not only is Proposal 99-5AAC-92.085 © (i), which would make it unlawful to harvest big game on the same day a hunter uses a licensed transporter, a wrong-headed proposal, it is illegal.

Proposal 99 violates Federal Equal Opportunity laws by creating two classes of citizens, and two sets of standards for the use of public lands by those citizens. This is illegal, as all citizens have equal rights to access to public lands for legal purposes, such as hunting. In this case, self guided hunters who choose to use transporter services would be penalized by being restricted from hunting on the same day they are transported, while clients who choose to use guide services would not be restricted or would be restricted only by same day airborne limitations. To be legal, the same day no hunting restriction would have to apply equally to all hunters who travel by any paid means, whether provided by a transporter or by a guide. This is a blatant effort by guides to make hunting feasible only for those who choose their high priced services, and to curtail the rights of access by those who prefer self-guiding experience, who have been misguided in the past, and who resent the guide lobby's efforts to make public lands a private reserve accessible only by the wealthy.

In addition, Proposal 99 is illegal defamation of the character of transporters, as shown the following unfounded assertions:

1. That there are individuals who already are violating the intent of the current statutes. Infact, there are numerous hard working and ethical transporters who serve hunting clients who prefer the self guided hunting ethic over the corrupt practices of overbooking and wanton waste that are the result of the guiding lobby's efforts to restrict self guided hunters who use transporters.
2. That transporters pursue wild game with clients or overlook any illegal practices by clients. It already is illegal for a transporter to hunt with clients or to be in the field with them for any purpose except transportation and in some cases safety, as in rescues.
3. That populations of game will increase if this proposal is made law. In fact, transporters will have to solicit even more clients in order to compensate for the limitations imposed on the number of trips and the price for services.

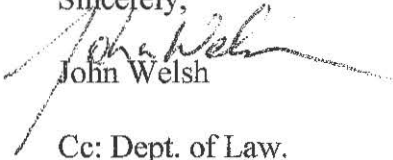




Now, a transporter can take a client to more than one destination in a day, for instance one destination before noon and another destination afternoon. A client also may go to various destinations of his choosing over the period of his hunting vacation in Alaska. This justifies the transporter in charging a fair price that covers the value of his services. Under the proposal, the hunting client has his freedom of choice limited, the number of his destinations limited, and the transporter can not move the client, in accordance with the client's wishes, as frequently. Thus the transporter, unable to compete by raising the price per trip to cover the loss in number of trips, must increase the number of clients he serves in order to remain in business. The quality of the big game resource and of the overall hunting experience therefore will be negatively impacted.

4. Proposal 99 also is illegal because it limits fair competition. The corrupt guide lobby wishes to curtail transporter operations, rather than take responsibility for its own impact on the current reductions in clients that some guides are experiencing. This reduction has nothing to do with transporters, but is caused by the over-all economic downturn, affecting hunting clients ability to pay bloated guide prices. This also has to do with the widely voiced dissatisfaction among the nation's hunters with the poor quality of guides in general. Hunters do not want to have their hand held by a guide, and to have their experience hampered by overbooking and by the secretiveness, jealousy and bad temper of those in guiding who overcharge and under serve their hunting clients. Many hunters prefer to use a transporter in order to reach self-chosen locations where they can conduct a hunt in a more ethical and authentic way than they found possible while hampered by a greedy and controlling guide service. Transporters provide a fair alternative to guides and do so both honestly and in compliance with the law. It is for guides to reap what they have sown and to change their ways and their prices if necessary, that is, to take responsibility for their own faults, leaving transporters to their own legitimate business.

Sincerely,

  
John Welsh

Cc: Dept. of Law.



John Welsh  
P.O. Box 284  
Kake, AK 99830

John J. Burns  
Alaska Dept. of Law  
P.O. Box 110300  
Juneau, AK 99811

Sept 23, 2011

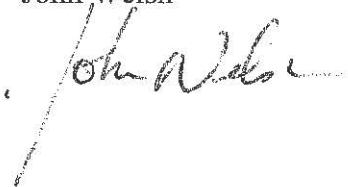
Dear Mr. Burns,

The Board of Game and Alaska Dept. of Fish and Game have included an illegal proposal in their 2011/12 Proposed Changes to Regulations Prospectus. I enclose my letter to the Board of Game on this issue.

Another illegal regulation is the requirement that for 2012, in some units, non-resident self-guided hunters must participate in a lottery for black bear tags, while guided hunters can obtain their black bear tags over the counter. This regulation violates state and federal equal opportunity laws by creating two classes of citizens in regard to the standard for their right to use public lands. One class of citizen hunter may not have its access to public land use restricted while another class of citizen hunter is not restricted.

Thank you for your attention to these matters.

John Welsh



29 September 2011

RECEIVED

OCT 12 2011

BOARDS

Mark W. Gordon

7950 Duchess Drive

Palmer, AK 99645

ATTN: BOG Comments

ADFG

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Ladies and Gentlemen:

Please accept these comments on the proposals to be considered during the Cycle B, Alaska Board of Game meetings scheduled for November 2011 through March 2012:

**Proposal #48; Prohibit the sale of bear parts harvested on National Park Service lands:**

I oppose this proposal. The proposer states that: "Such manipulation is contrary to the management policies of the National Park Service and cannot be allowed on park service managed lands." This is self-contradictory. If hunting is allowed, hunting management must be allowed, and the sale of bear parts is a management tool used to achieve a management goal. More, the proposer (Mr. Jim Stratton, now representing the National Parks Conservation Association) has a history in Alaska of leaning toward the goals of environmental organizations or lobbies even when a state official. He now obviously represents an environmental organization; which will advocate more toward preservation than comprehensive, macro game management. This issue also merges into the questions brought forth by GMU Area Biologist Bob Tobey in the 2007 Brown Bear Management Report regarding the immigration of brown bears from both Denali National Park and Wrangell St. Elias National Park into GMU 13. A study of the immigration of predators from no-hunting areas like the national parks into hunting areas is due before more preservation measures in national preserves is allowed. I believe this is an attempt to severely restrict or end hunting on national preserves.



**Proposal #51; Allow the ADFG to require the latitude and longitude of kill locations on a harvest report for drawing and registration hunts:**

I do not oppose this proposal. I fully understand the reason why the department would want this information and agree that it would be a great help for all hunts, general as well as drawing, registration, and subsistence. My problem is that when the department first posted harvest look up data on line, the drainage harvest data was included. It is no longer a look up query option. I suspect it was removed because of pressure from a few hunters who thought their "secret spot" would be revealed. That is public data, and researchers might want that information for a variety of reasons. It should be included as a query option again.

**Proposal #54; Expand the definition of bow to include crossbows:**

I strongly support this proposal. There is no reason why to exclude the use of crossbows from archery only hunts. They are just as well suited for hunting as compound archery equipment. They would also allow many persons listed by the proposer (disabled, young, aged, etc) to participate in archery only hunts. Crossbows are considered archery equipment and archery history. The only difference is that they are mechanically drawn.

**Proposals #53 & 55:**

I support these proposals. Since I support Proposal #54, which would include crossbows as legal archery equipment, I support the need to adopt crossbow standards which would define which crossbows would qualify.

**Proposal #56; Adopt crossbow standards and allow disabled hunters to use crossbows in archery hunts:**

I oppose this proposal. While I support the adoption of crossbow standards, I oppose the limitations on their use for only "disabled" hunters. All should be able to use them.

**Proposal #62; Restrict the number of drawing permits a resident may apply for:**





I support this proposal, although I will concede to Proposal #63 from the department to increase the number of application options to 6 rather than 5 as this proposal suggests.

**Proposals #64 & 65: Limit drawing permits to only two permits per year:**

I support this proposal as long as Tier 1, Tier 2, and registration permits are not included in the limited number of total hunting permits a person can acquire.

**Proposal #77: Require hunters to use only one type of method; either firearm or bow; require a tag:**

I strongly oppose this proposal. This attempt to classify humans is going too far. I'm uncomfortable with all the proposals that suggest that are setting non-residents so far aside, as if we haven't learned from the subsistence morass and what it has done to Alaska. Now this? "Continued increase of people who are not dedicated to bow hunting will continue to hunt with bows"? No kidding? As more of these limitations exclude others, they will evolve with the exclusions. If you require people to hunt with pointy sticks, people "not dedicated to pointy sticks" will begin to hunt with pointy sticks. It is getting to the point where I'd like to propose that ridiculous proposals should be illegal to submit.

**Proposal #92: Allow only the use of traps and snares for taking wolf and wolverine and prohibit the use of firearms except for dispatching trapped animals:**

I strenuously oppose this proposal. The proposer states that: "Allowing a trapper to use the same methods to harvest wildlife as a hunter (i.e. free roaming wolf or wolverine harvested with a firearm) essentially invalidates the harvest management strategy established to manage harvest by sustained yield principles with a hunting license. Allowable methods and means regarding the legal take under a trapping or a hunting license must be separate and distinct to be effective. Especially regarding the harvest of wolverine, which can sustain virtually no human harvest pressure without nearby refugia that provides no hunting or trapping pressure at all."

This is utterly false. Trapping methods and means in no way "invalidates the harvest management strategy established to manage harvest by sustained yield principles." Shooting instead of trapping is harvest. Period. The trapping license essentially adds





the methods and means of traps as well as allows the sale of the fur. Indeed, bears need to be added to trapping regs as furbearers, especially brown bears, since so few brown bears are harvested for meat. They are harvested for their fur, thus they are a furbearer.

The proposer, Science Now Project!, is not utilizing science at all in their proposal. They're using the emotion typical of environmental zealots.

**Proposal #93: Prohibit the use of artificial light for taking game on all lands managed by the National Park Service:**

I strenuously oppose this proposal. The proposer states that: "Such manipulation is contrary to the management policies of the National Park Service and cannot be allowed on park service managed lands." This is self-contradictory. If hunting is allowed, hunting management must be allowed. More, the proposer (Mr. Jim Stratton, now representing the National Parks Conservation Association) has a history in Alaska of leaning toward the goals of environmental organizations or lobbies even when a state official. He now obviously represents an environmental organization, which will advocate more toward preservation than comprehensive, macro game management. It is clear that Mr. Stratton and/or his organization have teamed up with the like minded environmental group "Science Now Project!" in this crusade to narrow the methods and means of trapping, even with the term common with Proposal #92: "free roaming wolf and wolverine." I believe this is an attempt to severely restrict or end hunting on national preserves.

**Proposal #98: Prohibit the use of hand held electronics in taking game:**

I strenuously oppose this proposal. It is unnecessary and ideological in nature. The proposer answers the question "what will happen if nothing is done?" with, "hunters will depend more and more on electronics to do their hunting". So what? We also depend on weapons. Shall we do away with them, too? No guns, bows, crossbows, pointy sticks, etc? This is ridiculous. If the proposer wishes to hunt like a pre-Neanderthal, so be it. He should have no authority to demand everybody else to do so as well.

**Proposal #100: Allow the use of laser sight, electronically-enhanced night vision scope, or artificial light for taking coyotes:**



I strongly support this proposal. Coyotes aren't even originally native to Alaska, I believe they have significantly displaced foxes in many parts of the state, and they have the potential to expand their range and density even more if harvest is not increased. Indeed, I believe laser sights, electronically-enhanced night vision scopes, and artificial lights should be allowed for all species under a trapping license due to the fact that trapping seasons in Alaska are during the long, dark winters when there is little to no daylight throughout the day.

**Proposal #107: Eliminate the statewide bag limit for black bear:**

I support this proposal. Black bear should be managed by the unit, not statewide.

**Proposal #108: Prohibit the harvest of cubs and sows accompanied by cubs on National Park Service lands:**

I oppose this proposal. The proposer states that: "Such manipulation is contrary to the management policies of the National Park Service and cannot be allowed on park service managed lands." This is self-contradictory. If hunting is allowed, hunting management must be allowed. More, the proposer (Mr. Jim Stratton, now representing the National Parks Conservation Association) has a history in Alaska of leaning toward the goals of environmental organizations or lobbies even when a state official. He now obviously represents an environmental organization, which will advocate more toward preservation than comprehensive, macro game management. I believe this is an attempt to severely restrict or end hunting on national preserves.

**Proposal #112: Eliminate the evidence of sex regulation:**

I presently neither support or oppose this proposal, however I believe it has merit. It deserves careful and thoughtful consideration by the Board.

**Proposal #113: Remove the reference to federal fish and wildlife agent under the transfer and possession regulation:**

I strongly support this proposal, and I thank the Fairbanks Advisory Committee for proposing it. The feds have rudely inserted themselves into dual management. Let them do so without unnecessary and perhaps even illegal reference or assistance by the state.



**Proposal #124: Require trap identification for all Units on lands managed by the National Park Service:**

I strongly oppose this proposal. The proposer states that: "Current state trapping regulations, which are adopted for use on federal lands by federal regulation, don't require trap designation. To ensure that state trapping rules are adhered to on lands managed by the National Park Service, trap identification needs to be adopted for lands managed by the National Park Service." This makes no sense. If trap identification was necessary on federal lands to ensure that state trapping rules are adhered to, it would also be necessary on state lands. More, the proposer (Mr. Jim Stratton, now representing the National Parks Conservation Association) has a history in Alaska of leaning toward the goals of environmental organizations or lobbies even when a state official. He now obviously represents an environmental organization, which will advocate more toward preservation than comprehensive, macro game management. I believe this is an attempt to severely restrict or end trapping on national preserves.

**Proposal #126: Prohibit the trapping of black bears in all National Park Service managed lands:**

I strongly oppose this proposal. The proposer states that "the indiscriminate nature of any potential trapping/snaring of black bears is solely to increase the overall harvest of black bears and does not contribute to the fair chase hunt of animals for food or trophy purposes." First, trapping has nothing to do with "food or trophy purposes", and never did. Its historical purpose has been for the acquisition of fur for resale. Also, nothing is done on national preserve lands that is not being done on any other lands classified for trapping. More, the proposer (Mr. Jim Stratton, now representing the National Parks Conservation Association) has a history in Alaska of leaning toward the goals of environmental organizations or lobbies even when a state official. He now obviously represents an environmental organization, which will advocate more toward preservation than comprehensive, macro game management. I believe this is an attempt to severely restrict or end trapping on national preserves.

**Proposal #127: Prohibit the taking of a black bear by trap or snare:**

I strongly oppose this proposal. Bears are furbearers. Black bears are harvested as much for their fur as for their meat, and brown bears are almost universally harvested for their fur alone. Their fur sells well and for substantial prices. As the department



learns that bear harvest can rise with no threat to a sustained yield, taking them by trap or snare in appropriate areas should be allowed. The proposer is an environmental organization. I believe this is just another attempt to limit or end the harvest of bears.

**Proposal #141; Implement black bear trapping regulations as follows:**

I strongly support this proposal. Bears are furbearers. Black bears are harvested as much for their fur as for their meat, and brown bears are almost universally harvested for their fur alone. Their fur sells well and for substantial prices. As the department learns that bear harvest can rise with no threat to a sustained yield, taking them by trap or snare in appropriate areas should be allowed. Trapping and the sale of hides can be an effective management tool, and this experimental proposal at the request of the department is a good start.

**Proposal #142; Prohibit trapping of black bear in the Interior region:**

I strongly oppose this proposal. Bears are furbearers. Black bears are harvested as much for their fur as for their meat, and brown bears are almost universally harvested for their fur alone. Their fur sells well and for substantial prices. As the department learns that bear harvest can rise with no threat to a sustained yield, taking them by trap or snare in appropriate areas should be allowed. Trapping and the sale of hides can be an effective management tool. The proposer is an environmental organization. I believe this is just another attempt to limit or end the harvest of bears.

**Proposal #147; Allow the use of helicopters for access to trapping in Region III:**

I strongly support this proposal. Trapping is a commercial, not a sporting activity. The most efficient tools should be allowed.

**Proposal #151; Review the conditions of the Controlled Use Areas in Region III and repeal those that are no longer meet the original intent:**

I strongly support this proposal, and I thank the Fairbanks Advisory Committee for suggesting it. Indeed, this should be done statewide on a recurring basis. I believe many of the controlled use areas were created through pressure by specific users to keep competition out of an area, and this should never have been allowed to begin with.





**Proposal #233: Establish a new controlled use area near Denali:**

I strenuously oppose this proposal. This is a back door attempt to enlarge national parks/preserves in defiance of the "no more" clause of ANILCA. More, the proposer (Mr. Jim Stratton, now representing the National Parks Conservation Association) has a history in Alaska of leaning toward the goals of environmental organizations or lobbies even when a state official. He now obviously represents an environmental organization, which will advocate more toward preservation than comprehensive, macro game management. This is a recurring theme both near Denali National Park as well as Yukon/Charlie River National Preserve. It is, essentially, an attempt to claim "ownership" of "park animals" even when those animals leave the park. It needs to be nipped in the bud immediately.

**Proposal #236: Allow limited harvest of grizzly bear at black bear bait stations in Units 20A, 20B, and 25C:**

I strongly support this proposal in the proposed units. This is especially conservative if there is a one bear per four year limit. Brown bear baiting was already allowed in the southern portion of GMU 20E a few years ago, and success rates were very low. In those three years that it was allowed, only five bears were harvested. Clearly, bears are not being overharvested in this way.

I thank the Board of Game for accepting and considering my comments on the 2011-2012 proposals it is to consider.

Sincerely,







**Miki & Julie Collins**  
**ALASKAN FREELANCE WRITERS/PHOTOGRAPHERS**  
**LAKE MINCHUMINA, ALASKA 99757**

Attn: BOG Comments  
Alaska Dept. of Fish & Game  
Boards Support Section  
PO Box 115526  
Juneau  
AK 99811-5526

October 5, 2011

Hi all,

Regarding your 358-page volume of Proposed Changes 2011/2012. I only read the proposals for Unit 20, especially 20C which I am most familiar with. It would be very helpful to know where the person submitting each proposal was from.

Prop. 211 (and others): I support this one. From what I hear, ATV use has resulted in long-term destruction of habitat and even reduced accessibility by destroying existing trails in some areas. While restricting ATV use will result in hardship for many hunters, I don't see any other way to protect the source of all our game---the land---which I believe is more important.

Prop. 215: Support? I haven't heard the other side of the argument but it does sound like the Minto Flats area does have a management issue. I am not sure this would resolve it, but I'd like to see something done. Prop. 219: Oppose. I am opposed to the use of airboats for moose hunting because I believe the noise levels can stress moose and damage marshlands, and may give some hunters an unfair advantage. However I'd like to know how local residents feel about this issue.

Prop. 218 (and others): Support; as long as these populations are surveyed regularly and can benefit from antlerless seasons, I support reauthorizing them.

Prop. 220 and others: Support if the population would benefit or not be harmed by increased harvest and user conflicts are not a problem. Prop. 222: Support if the locals are correct in their concerns for the moose population.

Prop. 225: You'd better find out from local trappers whether the statement that "areas that need aircraft access are very seldom used by others." I am not sure what area is NOT accessible by snow machine, dog team or foot trappers. Also, while beaver populations at least in our area are strong and growing, perhaps it would make sense to see the results of liberalized harvest (season, firearms, increased limits, no sealing requirements) before making it even more liberal.



Prop. 226: Oppose. I feel that resident Alaskans SHOULD have an advantage over non-residents, even at the cost of loss of fees.

Prop. 228 & 229: I oppose shooting wolves (or anything else) from moving vehicles (except for aircraft when required for predator control) because it is unsafe and unsporting and leads to missed shots, injured and harassed prey. Also, I am not sure what he means by "north of the Kantishna." Is that the Bearpaw/Roosevelt area (north of the west-east flowing section)? Or the Tanana River area (north of the main NNE-flowing part of the river)? Also, we have not been seeing many wolves in the western 20C area, which coincides with Denali Park biologists documenting dropping wolf populations. I personally could "suffer" from wolf control as we haven't trapped many since the population dropped in our area. I'd like to know what the Turners and other Kantishna river area residents think about this. Just in general I oppose predator control when it costs the State money to carry out, when it deprives trappers of their catch, and when it floods the market with pelts, driving prices down. I do support more liberal reg's when wolf/bear populations are strong, especially if they are impacting moose/caribou. For instance, I don't think that tickets should be required for black bear. I do support state-sponsored predator control in more extreme situations (such as the McGrath area) when well-documented studies strongly suggest it will boost a depressed big game population. I also support studies to determine the cause of depressed populations...if we can afford to do this in all areas which I doubt. People need to take the cost of implementing these programs into consideration.

Prop. 232: While I don't have a strong yea/nay opinion I would like to point out that in our area (western 20-C) we see more grizzlies moving through during heavy fire years, and sometimes the next year as well, especially in the fall. This I believe does not indicate an increased population, but rather the movement of bears displaced by fires, and does not in itself justify more liberal seasons. Regarding cabin-bear conflicts, while grizzlies are capable of doing more damage to our trapline cabins, it seems to be black bears that tend to try to get into everything, taste everything, break everything, scatter everything, and throw the stove out the door and the stovepipe under the bed. Black bears don't ask "Why should I?" Instead they ask themselves, "Why shouldn't I? There *might* be an ant or two under the drum and plastic *does* taste rather amusing." Grizzlies don't seem to quite have that curious attitude, in my experience.

Prop. 233: Not sure where they hope this goes so I am not sure if I oppose or not, but the statement "Mitigating excessive negative impacts to a particular user group" makes me wonder if they want to see negative impacts shifted from recreational users to hunter/trappers, in which case I do oppose this.

Prop. 234: I do support this if people are coming out of there with spoiled meat. Or maybe antlers should be confiscated if the meat has spoiled through negligence/ignorance.

Prop. 235: Support if black bears are numerous. I don't expect many people will shoot 5 of them, so I doubt this will have a big impact but may help moose populations a bit.



However when they say "no one will suffer," they may be overlooking the guy and his kid who really wanted to get a black bear but couldn't because someone else took 5 instead of 3.

And a few comments on Prop. 238: I haven't heard much from the Lake Clark area so don't know if this is justified or not, but this seems to target wolves while suggesting that bears [(4) (C) (iii)] are the root of the problem/bears tend to be the culprits in poor young calf survival, also leading to (4) (F) not making a lot of sense. See my comments on Prop. 228 & 229 and proceed with caution!

The fact that I did not comment on the rest of this tome does not mean I don't have perhaps strong opinions but merely that I did not take time to read it. If you have finished my own tome, thanks for doing so.

*Misi Collins*



Comments on Proposed Changes to Regulations  
I am Dan Ilgenfritz, 4362 York Ave, Fairbanks, Alaska

I would like to comment on several proposals corresponding to GMU 20C where my family is a property owner + we spend considerable time + have first hand specific area experience since 1980.

Proposal 226- 5 AAC 85.045 - I am against this proposal - I do not believe that an area with low moose density should the non-resident hunter have an equal time to take a moose as area residents. The area has a heavy resident moose harvest and I don't believe the moose population is high enough for an increased non-resident harvest. It often takes us several weeks to harvest a moose. We don't need additional non-resident <sup>RECEIVED</sup> and taking the very limited # of available moose.

OCT 11 2011

BOARDS

Proposal 229- 5 AAC 92.125 I am for this proposal if the intensive management plan for 20C would include increasing wolf + bear (both black + brown) hunting opportunities + control. I would not be for this proposal if it means cow hunts and antler size restrictions. Bear baiting during spring and fall seasons ~~also~~ should be considered. The same day air borne regulation needs to be eliminated to encourage baiting in the more remote areas of the unit. Anything that would encourage increased bear harvest should be considered - except bear trapping as addressed in proposal #231.

Proposal 231- 5 AAC 84.270 - I am opposed to this proposal - I believe bears may be controlled by increasing baiting opportunities such as elimination the same day airborne regulation for baiting. I don't feel it would be necessary to trap bears to reduce their population #'s

Proposal 232 5 AAC 92.085 - I would be in favor of this proposal - to reduce brown bear #'s by allowing baiting in 20C. This would be a good method to increase brown + black bear harvest increase moose numbers.



subject: opposition to Proposal 213

John Jodwal's  
1749 Bellvue St  
Fairbanks, AK  
99709

To the Game Board:

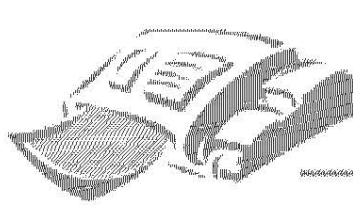
I am giving this comment in order to inform you that I am very much against Proposal 213. This proposal if enacted would open the Yanaht Controlled use area to late fall and winter motorized hunting.

I have winter hunted the Yanaht area since the mid 1970's. First I hunted caribou, more recently antlerless moose. I do not own a snowmachine or a ATV. I hunt using my small dog team and big ski and snowshoe. Allowing machines to be used for winter hunts would greatly reduce my chance of bringing home meat as I and others like me would be out competed. We need to retain the non motorized designation in the Yanaht area. There are many opportunities for motorized hunts already existing in 20A. ~~shady~~. Please keep one for the those of us who can not or ~~perfe~~ prefer not to hunt on a machine.

Thank you  
John Jodwal's







# faxZERO

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**Recipient Information**

**To: Alaska Department of Fish and Game, Boards Support**  
**Company: Boards Support Section**  
**Fax #: 9074656094**

**Sender Information**

**From: Larry Landry**  
**Email address: larry@robinssong.net**  
**Sent on: Friday, February 17 2012 at 6:24 PM EST**

**ADF&G, Boards Support Section**  
**Re: ADFG Proposals 141**

As much as I dislike this proposal, in a way I kind of hope you pass it. It is such an expression of an extreme ideology lacking any sense of ethics towards wildlife that I think it will provoke a backlash. Snaring bears is obnoxious enough, then to throw in same day airborne provisions laughably prone to abuse, a two day checking requirement, and opening it up to nonresidents, what is ADF&G thinking? Most Alaskans are not so callous.

**Larry Landry**  
**2240 Railroad Dr**  
**Fairbanks AK 99709**

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**Submitted By FAX:** (907) 465-6094

**To:** Scott Crass, ADF&G Boards Support

**From:** Theresa Fiorino, Defenders of Wildlife

**Date:** February 17, 2012

**Time:** 9:50am

**Number of Pages:** 5 – including coversheet

**Notes:** Please find Defenders of Wildlife's comments on the Alaska Board of Game Proposals for the March 2-11, 2012 meeting in Fairbanks, Alaska

Thank you,

Theresa Fiorino  
Alaska Representative  
Defenders of Wildlife



**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)

February 17, 2012

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:

Defenders of Wildlife, appreciates the opportunity to submit written comments on proposals that will be considered at the March 2 -11, 2012 Board of Game (BOG) meeting in Fairbanks, Alaska. Several proposals for which we submitted comments for the January, 2012 meeting in Anchorage were deferred to the March meeting. We are therefore resubmitting these comments for your consideration. We will also be providing additional written comments prior to the beginning of the meeting.

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. Our Alaska field office addresses conservation issues affecting wolves, black bears, brown bears, wolverines, Cook Inlet beluga whales, sea otters, polar bears, Pacific walrus and impacts to wildlife from climate change. Our program seeks to increase recognition of the importance of, and need for the protection of, entire ecosystems and interconnected habitats; recognizing the role that predators play as indicator species for ecosystem health. Defenders represents more than 3,000 members and supporters in Alaska.

**COMMENTS ON ALASKA BOARD OF GAME PROPOSALS**

**Proposal 44. We *oppose* this proposal and urge the BOG to *reject* it.**

Passage of this proposal would allow hunters who win governor permit tags to hunt out of season with modifications to methods and means of harvest.

**National Headquarters**

130 17th Street, N.W.  
Washington, D.C. 20036-4604  
tel 202.682.9400 | fax 202.682.1331



We do not support measures that would allow harvest of game either out of season or by using methods and means not allowed by other users. Allowing those with the means to purchase expensive harvest tickets special privileges to hunt game defies the very principles on which the United States' egalitarian hunting system was founded.

**Proposal 109. We oppose this proposal and urge the BOG to reject it.**

The proponent of this proposal the "Greater Alaska Black Bear Committee" (GABBC) is a committee unknown to us prior to seeing their proposals outlined in the November proposal book. According to the proponents, the proposal consists of several consensus items from a black bear resource user's group held at the March 2011 BOG meeting. However, the proposal does not identify who organized the committee, who its members are, how its members were selected, and whether meetings held by the committee were open to the public. This information would be valuable for lending transparency to the public BOG process.

The committee's evaluation of "those likely to suffer" under this proposal is oversimplified and a bit antagonistic. According to the proposal, those likely to suffer include, "those opposed to bear hunting, those opposed to unlimited take in Intensive Management areas, those that prefer complicated regulations." We posit that those opposing the types of regulatory changes outlined in proposal 109 also include – *those who believe that hunting should be based on sound science and sound wildlife management principles and thus be consistent with maintaining healthy populations of all species as well as healthy ecosystems.*

Proposal 109 puts forward several overarching regulatory changes for black bear management in Alaska including:

1. No closed season for much of the state.
2. Increasing the statewide bag limit for residents and non-residents to 3 bears.
3. No bag limit for all intensive management areas where black bears are recognized as contributing to the decline of prey species.

The GABBC claims that this proposal clarifies and removes complicated or excessively restrictive regulations and ADF&G's discretionary provisions pertaining to black bear hunting. The proponents apparently aim to allay concerns over the wide-ranging implications of the regulatory changes by stating that "All of these suggestions were approved by all members of the group." However, as stated previously, we do not know the origins or membership of this group and therefore we do not believe that such wide-ranging liberalizations necessarily represent the wise management of Alaska's black bears.



Regulations for black bear harvest differ in part due to differences in population densities, differing access to hunters, historical harvest level and conservation concern. While it may or may not be true that populations can sustain increased level of harvest across all units, the ADF&G has not presented robust evidence which supports the GABBC's presumption. Indeed bear population data remain inadequate throughout the majority of the state due to the difficulty of censusing bear populations. Population estimates are often based on anecdotal evidence, extrapolations, and harvest composition data – none of which are appropriate substitutes for well designed research and monitoring programs.

Because hard data does not exist in much of the state, the proposed liberalized regulations could have negative consequences for the sustainability of regional bear populations. Further, the fact that the BOG has already relaxed sealing requirements in parts of the state – further thwarting the collection of valuable population data – complicates the ability of ADF&G to recognize and address regional signs of overexploitation.

In addition to concerns over black bear population sustainability, automatically allowing for year round harvest of bears with no bag limit in areas where bears have been implicated as having an impact on prey species abundance circumvents the process by which predator control programs are proposed and adopted. The BOG historically adopts predator control programs through a public review process whereby the public has the opportunity to weigh in on each plan through the comment period and through formal testimony. While extensive experience has demonstrated that this process unfairly favors a certain sector of the public, we oppose the erosion of the general process.

Defenders also questions whether black bears harvested during certain times of the year can be fully utilized and what effect year round harvest would have on dependent young. During parts of the year, cubs are completely dependent upon the sow for survival. Allowing the take of bears during such times will result in the indirect death of dependant cubs – regulations that can result in the death of young animals is not considered sound wildlife management. In addition, bear hides and meat are not of high quality during all seasons. Therefore, allowing year-round harvest of black bears could result in the waste of a valuable resource.

Blanket regulations which allow year round bear hunting throughout the majority of the state, unlimited harvest in certain areas, and increased statewide bag limits perpetuates the viewpoint that because black bears are predators their populations are in need of reduction. We do not share this perception. Rather we view black bears as a valuable wildlife species that play an integral role in maintaining ecosystem health and function.





**Proposal 119. We *oppose* this proposal and urge the BOG to *reject* it.**

This proposal aims to establish a codified location for permitted black bear bait stations and to establish seasons for all of Alaska.

Bear baiting is a contentious issue. It does not meet the principles of fair chase and can cause public safety concerns. Defenders of Wildlife does not oppose wildlife harvest methods that are biologically justified and adhere to principles of sound wildlife management and fair chase. However, we continue to oppose practices that do not adhere to these principles.

**Proposal 131. We offer the following comments on this proposal.**

This proposal, if passed would add black and brown bear predation reduction to the Unit 19A predator control program.

This program proposes adding bear control to a predator control program aimed at increasing the moose population in Unit 19A. According to the proposal, bear predation would be controlled through a variety of means including aerial control and snaring. As outlined in our comments to the BOG for the meeting January 2012, Defenders continues to be concerned over the expansion of controversial methods and means employed to take predators in the state. In the fall of 2011 we also summarized our unease over the recent changes to the bear management policy. The policy was subsequently approved by the BOG.

Thank you for considering our comments.

Sincerely,

Theresa Fiorino  
Alaska Representative  
Defenders of Wildlife



**Fax to: 907-465-6094**

**From: Valanne Glooschenko, M.Sc. , 6017 Doncaster Dr., Anchorage, AK 99504**

---

February 16, 2012

**To: Alaska Board of Game**

**Re: Proposal Number 35: Intensive Management in GMU 15- Aerial Shooting of Wolves**

I OPPOSE THIS PROPOSAL AND STRONGLY URGE THE BOARD TO REJECT IT.

As was presented to the Board one year ago by the Alaska Department of Fish and Game, the moose population objective set by the Game Board for northern Kenai Peninsula moose should be lowered. This is because habitat is limited due to mature forest conditions and a large moose population could not be supported in this landscape. The Board then requested that the Department provide an intensive management plan to improve habitat and produce more browse. However this year the Board rejected the Department's plan and instead requested another plan, this one designed to reduce wolf numbers. Your recommended plan for aerial wolf shooting will cost the taxpayers \$700,000!!

Elimination of wolves from the northern Kenai Peninsula is not the answer- in fact it defies the scientific information upon which the decisions of the Board of Game should be based! I strongly object to the approach of the Board of Game on this issue- you are in the process of shoving aside the opinions of the biologists who work for us, the taxpayers. We don't WANT more aerial killing of wolves in the Kenai Peninsula – listen to your biologists, improve habitat for moose and keep our landscape wild, with wolves and bears!! That is the very reason why many of us choose to live in, and love Alaska!

**Re: Expanded Snaring of Brown Bears**

Unfortunately due to family reasons, I was unable to attend the January 2012 meeting where the public expressed outraged opposition to this practice. But I will add my voice now. Stop this barbaric practice and RESPECT that most magnificent animal, with whom we share Alaska!! As expressed by Karl Braendel, lifelong Alaskan and big game guide for 43 years, in his Compass Piece dated February 5, 2012 "You don't snare the King, or shoot her from an airplane, and you don't kill her cubs"..

**Re: Proposal Number 142: Prohibit Black Bear Snaring**

I strongly support this proposal to prohibit black bear snaring in selected areas of Interior Alaska. These locations would include lands bordering Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring of black bears in these areas would lead to decline of bears within the National Parks and reduce viewing opportunities which attract many visitors and are a boost to the local economies.

Snaring within 1/4 mile of homes and roads could also lead to dangerous conditions for persons who may encounter an adult bear or sibling which accompanied the snared animal. Snaring of bears is also inherently cruel and unethical – because of this, it has been banned for decades elsewhere in many states.

Respectfully submitted,

*Valanne Glooschenko M.Sc.*  
Valanne Glooschenko, M.Sc.

6017 Doncaster Dr., Anchorage



**Fax to: 907-465-6094**

**From: Valanne Glooschenko, M.Sc. , 6017 Doncaster Dr., Anchorage, AK 99504**

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Respectfully submitted,

*Valanne Glooschenko, M.Sc.*  
Valanne Glooschenko, M.Sc.

6017 Doncaster Dr., Anchorage





LOREN E. GILBERT  
4222 London Circle  
Anchorage AK 99504-4537  
907-337-0698

February 15, 2012

ATTN: Board of Game Comments  
Alaska Dept. of Fish & Game  
Boards Support Section  
P> O> box 115526  
Juneau, AK 99811-5526

Re: Proposals #207 and #208  
Fax: 907-456-6094

To Whom It May Concern:

After reviewing, I support both Proposal #207 and/or Proposal #208. With access from the west via the Rex Trail—the Totatlanika River and/or the Tatlanika River may not be frozen preventing access or inviting trouble or disaster if trying to cross.

I would like to propose an early muzzle loader hunt for seven (7) days prior to the regular season in Unit 20A which is similar to the bow and arrow hunts in Units 15A/B and 16A. This would allow river crossings without the ice.

Best Regards,



Loren E. Gilbert

AK Resident and Registered Voter

Cc: Dave Machacek



Gina Soltis  
P.O. Box 255  
Healy, AK 99743  
February 13, 2012

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 998811-5526

Comments for the Alaska Board of Game meeting March Fairbanks

As a resident of 20C I am greatly concerned about and opposed to some of the proposals regarding 20C and the Yanert. I am also a past member of the Middle Nenana Advisory Committee and have a degree in biology. My husband has hunted in these areas.

"Who would be hurt?" I would be hurt by these proposals that change some of the very reasons why I live on my homestead in 20C. I live here because I am in a wilderness, not some manicured, over-managed, and unbalanced rural area in the Lower 48. How many residents in the areas you are discussing came here for just those reasons? My "consumptive use" of 20C is enjoying the mostly natural balance of nature that exists here. The meat locker mentality that drives the Board of Game drives me crazy. Do Alaskans like me have any say in these matters?

It is so interesting that Ray Heuer submitted most of these proposals. NIMBY is alive in well in Fairbanks when it comes to hunting. Send them down to Healy. Have you seen the circus at the Ferry bridge during hunting season? A time dreaded by local residents.

Since I live in 20C adjacent to 20A, I can see the success in the cow moose hunting in the number of motherless calves going through our property.

Now you want to start the madness in 20C. Expand the madness with bear trapping and aerial hunting!

Grizzly bear baiting - wow, I really want to live in an area with grizzlies habituated to bait stations! We see grizzlies come through our property that show no interest in our human habitation. That just might change.

Leave the wolves alone. Allow the ebb and flow of the natural cycles. What did what is now called Alaska do before we arrived? Seems like when we first arrived we found an area that was full of wildlife.

Sincerely,



Gina Soltis

**I am against proposals 213, 227, 228, 229, 230, 231, 232**



February 15, 2012

From: Debra Waugaman Curnow

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 Members of the Alaska Board of Game:

I am representing myself although I am also a member of the Fairbanks Advisory Committee.

**PROPOSAL 210 - OPPOSE**

**Move the northern boundary of the Wood River Controlled Use Area (WRCUA) .**

This long standing controlled use area has worked well for decades and while proposals to change this controlled use area come up frequently, the Board of Game has wisely upheld the WRCUA regulation. The WRCUA is heavily accessed by plane, horseback, mule, raft and on foot and I ask that you maintain the WRCUA with no changes.

I am a lifelong Alaskan who owns property in the WRCUA and has been accessing this area by plane, horseback and on foot since the 1960s for recreation, hunting and guiding. My family has a long hunting history in the Healy Creek and Wood River drainages since the 1940s. While I support responsible use of motorized vehicles for hunting access; ATV use for hunting in this area would be devastating for the following reasons:

1. Habitat - the area contains much brush, tundra and swampy ground. Widespread destruction of the countryside would occur in the first season. Reversing the destruction of habitat would likely not occur in our lifetime.
2. Traditional Hunting - the WRCUA is the primary area used by resident hunters and guides who prefer more traditional hunting methods and means.
3. Social Issues - impacts to the Rex Trail area would increase since this is one of the few access trails into the area. User conflicts and access abuse would escalate and additional private property and social issues would occur in new areas. Guide conflicts would also increase.
4. Commercial Use - most traditional guide operations, commercial flight services, recreational and touring companies would be severely impacted and likely go out of business.

From: Debra Waugaman Curnow

**PROPOSAL 210 - OPPOSE (continued)**

5. Big Game Guide Concessions - the concession process would be handicapped by any changes to the WRCUA. Guides vying for areas within the CUA would be impacted greatly by moving WRCUA boundaries.

My father, Bill Waugaman, was a big game Master Guide and I am a Registered Guide. Changes to the status of the WRCUA would be detrimental to Big Game Guides, the Resident Hunter and Non-Resident Hunter. The vast majority of our big game clients chose my parents guiding operation because of the remote wilderness access and traditional hunting opportunity and this stands true even more so today.

Please uphold the Wood River Controlled Use Area designation as it stands and **do not adopt Proposal #210.**

**PROPOSAL 151 - OPPOSE**

**Review the conditions of the Controlled Use Areas in Region III and repeal those that are no longer meeting the intent.**

I do not support this proposal because it is too general. If there are specific Controlled Use Areas that are in question the issues and changes should be identified and provided to the public for their input. Please allow for public comment by creating proposals on the next cycle if the Board of Game chooses to address this proposal.

**PROPOSAL 147 - OPPOSE**

**Allow the use of helicopters for access to trapping in Region III.**

I oppose the use of helicopters for trapping. This makes no sense economically or ethically. The variations and overlapping of hunting seasons and trapping seasons would increase the chance for illegal spotting and other abuses. The Board wisely did not adopt the same Statewide proposal, please do not adopt in Region III.

Thank you for allowing me the opportunity to comment.

Respectfully,



Debra Waugaman Curnow



## **Luree Dell-Bryan**



#6 - 2180 Renfrew Road ◆ Shawnigan Lake, B.C. ◆ Canada V0R 2W1

Email [luree@islandnet.com](mailto:luree@islandnet.com) ◆ Phone 250-743-3187 ◆

Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section

February 17, 2012

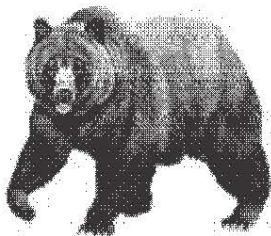
Honorable Sirs:

**It was with absolute shock and horror that I read of the cruelty towards brown bears that your people seem to find acceptable. It is difficult for civilized countries to imagine such barbarity towards bears as baited snaring, where the animal doesn't stand a chance. This is a primitive and savage act that reflects badly on Alaska and its citizens.**

**Snaring is a most cruel and inhumane way to capture any animal. Baited snaring attracts bear cubs and domestic pets, neither of which should be subjected to such obscene pain and fear.**

**I hope that there are educated and compassionate people in Alaska who will work towards making life more tolerable for the bears and other wild creatures. These beautiful, rare animals should be cherished and protected. This would give your country considerable more respect in the eyes of the civilized world.**

**Sincerely:**



***Alaska's newest wildlife experiment: Snaring and shooting brown bears***

**[http://www.anchoragepress.com/news/alaska-s-newest-wildlife-experiment-snaring-and-shooting-brown-bears/article\\_70f96850-3d76-11e1-8de2-001871e3ce6c.html](http://www.anchoragepress.com/news/alaska-s-newest-wildlife-experiment-snaring-and-shooting-brown-bears/article_70f96850-3d76-11e1-8de2-001871e3ce6c.html)**



**SALCHA RIVER PROPERTY OWNERS ASSOCIATION  
3115 Totem Drive  
Fairbanks, AK 99709**

January 14, 2012

Attention: 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,

The Salcha River Property Owners Association, a group of approximately 150 Alaskans who reside, hunt and recreate on the Salcha River would like to formally go on record in support of Proposal 222 by the Fairbanks Advisory Committee and Proposal No. 223 by Leonard Jewkes to modify the muzzleloader hunt area to prohibit the harvest of antlerless moose in the Salcha River drainage and more preferable move the entire hunt off the Salcha River drainage.

The moose population in the Salcha River drainage is the lowest density of moose in the entire 20B GMU. We respectfully ask the Board of Game to move the muzzleloader any moose hunt off the Salcha River drainage.

Sincerely,



Ellen Dickson

President

Salcha River Property Owners Association



February 17, 2012

Anne Beaulaurier  
PO Box 67  
Denali National Park, AK  
907-683-1033

**Regarding opposition to to 2011/2012 proposals 213, 227-232**

Members of the Alaska Board of Game:

Thank you for offering this opportunity for public comment on Interior issues to be considered at the March meeting. I am a resident of the Yanert Control Use Area (Yanert CUA), with property and a home located off mile 224 of the Parks Highway. I am very familiar with the portions of the Yanert CUA located adjacent to the Parks Highway and would like to express my strong opposition to changing the longstanding policy on motorized use in the area. I also object to the proposals (227-232) declaring nearby Unit 20C an intensive management area and authorizing liberalizing predator harvesting methods without adequate scientific backing.

**Proposal 213**

First, there is a structure established in the state to use local Advisory Committees (AC) to advise the BOG on issues. The local AC is naturally in a position to be more intimately familiar with issues and concerns in their local region and can thus appropriately advise the BOG. It should be noted that the Middle Nenana AC, for the second year in a row, has objected to the proposal, **submitted by the out-of-area Fairbanks AC**, to change the long-standing, balanced policy on motorized use in the Yanert CUA. In addition, the Denali Borough Assembly, for two years running, has passed a resolution in opposition to Proposal 213, representing local sentiment, concerns for public safety (see comments on the lack of parking, below) and their knowledge of the inappropriateness of the proposed change. As final proof of the widespread opposition to the proposal submitted by an out-of-area AC with little knowledge of the particulars of the affected region, last year, when the same proposal was brought forth as Proposal 232 at the Spring 2011 Board of Game Meeting, more than 30% of comments on *all* 233 proposals were regarding changing the non-motorized policy in the Yanert CUA. These comments were **unanimously** in opposition to the proposal.

Also importantly, the proposal falsely minimizes the anticipated negative affects of a change in the law to the Yanert CUA. The only potential negative affect recognized by the Fairbanks AC in their proposal is to "other winter recreation." This shows a lack of understanding as to: the lack of facilities (no parking, which leads to crowding in the shoulders and public safety concerns for residents turning out of their driveways; no





parking option in winter with snow, except for illegally in private driveways; no restrooms) and extremely limited legal access; the nature of the terrain in the area and certain devastating degradation to soft trails and wetlands; the limitations imposed by the late-freezing and unpredictable Yanert River, steep & treacherous terrain; and the current use of the area by non-motorized hunters. Many of these concerns are covered thoroughly in other public comments on the issue, but I would like to add that the impact to hunters who currently greatly value the opportunity to have a place to hunt via skis, snowshoe, foot or dog team would be devastating. I know and have encountered numerous hunters who come from across the state to the Yanert CUA for the opportunity to participate in the traditional non-motorized hunt. Just this winter, I have encountered both hunters on skis and via dog team, both shuttling moose out from their sites. Options for this type of hunt with road access are extremely limited and many hunters will be displaced should the ill-conceived Proposal 213 be adopted.

One of the most disturbing and false aspects of this proposal is the suggestion that the moose harvest quota could increase with more access to the Yanert, and that it would help to reach goals for Unit 20A. The Yanert CUA has traditionally had one of the lowest, if not **the lowest densities of moose** in all of Unit 20A. This assertion is supported not only by those of us who travel in this area, but also by the AKF&G biological surveys. I rarely see moose or moose sign in the Yanert Valley. I question whether the Fairbanks AC that drafted the proposal has considered the known low density of moose in the Yanert. It is telling that the local Middle Nenana Advisory Committee opposes this proposal.

It makes sound sense to leave the Yanert CUA as a completely non-motorized hunting area. There are too few moose to support increased pressure and the various negative impacts this proposal would bring. The chance to hunt via dog team is richly rooted in Alaska's history, yet is increasing being squeezed out. **The Yanert, with very few moose and tricky terrain, is the perfect place to have as non-motorized for those wishing to test their skills and pursue this traditional style of hunt.**

I urge the board to give weight to those comments that come from people who know this area intimately, to honor a diversity of interests among all the users of this state, to use sound science when changing harvest and access opportunities, and to follow the advice of the local (Middle Nenana) AC on this issue. I urge you to reject Proposal 232.

Proposals 227, 228, 229, 230, 231 and 232

With regard to the changes to Unit 20C, it is inappropriate to declare the unit an intensive management area without a more thorough scientific understand of **current** populations of moose, and predators. The results of ignorantly inflating the moose harvest quota could be devastating. In addition, the proposals (228, 230 & 232) to liberalize predator control measures, including such despicable measures as bear baiting and bear snaring is offensive to the sport of hunting, and again could be



devastating to the health of the ecosystem. These proposal have been submitted by an out-of-area committee, and are opposed by the local Middle Nenana Advisory Committee. Again, I urge the board to let scientific data guide decisions, along with advice from the local Advisory Committee that knows the area most intimately.

Thank you for your time and consideration.

Sincerely,



Anne Beaulaurier  
907-683-1033





## **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

**February 15, 2010**  
**Re: Proposals 142,141,131**

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 (ACE) and our 6,000 Alaskan members who value and appreciate wildlife. Many of our members are wildlife viewers, small business owners, and recreationalists who rely on a vibrant and diverse environment and economy for their security and well-being.

**Proposal 142:** *ACE fully supports this proposal and we urge the board to adopt it.*

Proposal 142 was submitted by ACE. This proposal would make the taking of a black bear by snare illegal. Little did I know when I wrote this proposal that less than a year later, the board would be considering proposals that would allow the taking of **brown** bear by snare, which of course we do not approve of either. I ask the board to allow for a friendly amendment to this proposal, which would include brown bears to the proposed regulation. Let's just say it would be illegal to take any bear by snare.

The practice of snaring bears has never been legal in the State of Alaska for many good reasons. You have heard from the 78 scientists at the Anchorage meeting why they do not approve. Here is their statement which we support wholeheartedly:

---



*Bears are usually snared by hanging a bucket of bait in a tree. When a bear reaches into the bucket for the bait, its front leg is caught (trapped) by a cable attached to the tree. The only way the bear can be released by the hunter/trapper is by shooting it. If a female with first year cubs is snared and killed, the cubs will most likely starve or be killed by another bear.*

*Unlike hunting, where a hunter can carefully select for large, male bears, snaring is indiscriminate. Snares catch black bears and brown bears, female bears with cubs, and sometimes even older cubs. With unlimited numbers of snares and long open seasons, snaring may kill more bears than is sustainable.*

***Snaring and killing of bears regardless of age, species, and gender is incompatible with the scientific principles and the ethics of modern wildlife management including the North American Model for Wildlife Conservation. \****

---

Not only is the snaring of bears indiscriminate, risky and not in line with scientific principles, but it is also wasteful, cruel, and not in alignment with the majority of the people. The Department simply does not have the data to insure that bears will not be overharvested by the use of snaring, especially combined with an absence of bag limits, waivers on tag fees, longer seasons, and new methods of take; including shooting grizzly bears from helicopters and killing bears in their dens.

In a recent presentation by a retired ADF&G biologist, I was struck by a slide that demonstrated that as grizzly bear harvest has been liberalized one hundred twenty four times in 15 years, the corresponding efforts to study bear populations has declined in an inverse proportion and has leveled out at zero over the past few years. Bears, and especially brown bears, have a low reproductive rate, and that is one reason why the killing of females with cubs and cubs has been frowned upon by many, including the hunting community. Put in simple language, it is irresponsible of the Board and the Department to radically increase harvest without knowing what a sustainable harvest even is.

The new Bear Management policy states that one of the top 3 goals is to "Recognize the importance of bears for viewing, photography, research and non-consumptive uses in Alaska". However, the opposite seems apparent-that every



effort is being made to reduce bear populations across the state without regard to the economic, biological and cultural importance of bears.

Bears are a valued and precious resource, important to healthy ecosystem functions, the tourism industry and part of our wild heritage.

*We fully support Proposal 142 and we recommend that the Board adopt it.*

**Proposal 141** *ACE is opposed to Proposal 141 and we urge the board to vote against this proposal.*

Proposal 141, if adopted, would open six game management units for the purpose of trapping bears.

There is so much wrong with this proposal that it is hard to know where to start. The fact that it is was written by the Department of Fish and Game is extremely disheartening.

This proposal is extreme, disreputable and appalling all at once. The experimental program was bad enough, but now the Department wants to open up bear snaring as a tool for anyone to use to kill bears; residents or non-residents over the age of 16 would be authorized to kill as many bears as they want from an unlimited number of snare sets, with the use of aircraft, allowing same day land and shoot. This sounds more like an extermination program, in direct conflict with current laws that require the state to manage our wildlife resources on a sustainable basis.

ADF&G lacks the scientific data including accurate scientific population estimates to justify these proposed methods. Additionally, it is unlikely the department will make it a priority to conduct accurate population estimates or devote the resources to effectively monitor intensive management of bears.

Without this fundamental scientific data and ability to monitor such aggressive techniques as those being proposed, ACE feels that the long term integrity of the bear populations is at great risk if Proposal 141 is approved.

Because snares are indiscriminate, we know that brown bears and black bears will be caught as well females, females with cubs, and cubs. The Department has not identified how many brown bears will be allowed as an "incidental" take in any of the GMU's. Because there is no scientific data to work from





ADF&G doesn't know what amount of harvest is sustainable. If you don't believe we could overharvest and threaten our populations of wild bears, just look at a map of the historic range of grizzly bears and compare it with the current range.

There are public safety issues associated with bear snaring as well as scientific, and ethical questions. The current proposals by the Alaska Department of Fish and Game promoting bear snaring would allow snaring stations to be set up as close as ¼ mile from a trail, road or trailhead. A 16 year old could get a permit for snaring, and bring his or her younger sibling along to watch the fun. A bear could linger for days before someone comes along and puts it out of its misery. Though the board and department claim that the rules are suspended under a predator control program, making an animal suffer just for the sake of killing is abhorrent to most.

Bear snaring is highly controversial and not in alignment with values that most Alaskans hold dear. It would be a sad day for Alaska if bear snaring is approved.

**Proposal 131** *ACE opposes this proposal and we urge the board to vote against this proposal.*

Deferred from the Anchorage meeting, this proposal also submitted by ADF&G originally contained language that would allow the snaring of bears. The amended version has removed that provision but has added aerial killing of any sex and age of bear, including black and brown bears.

We applaud the removal of language that would have allowed the snaring of bears, and appreciate the Department's recognition that the snaring of bears is controversial for the many reasons outlined above. However, we do not condone shooting bears from aircraft or land and shoot.

At the January meeting the board adopted measures that will allow for the first time ever, shooting grizzly bears from aircraft, including females with cubs. The board made this decision quietly, by amending a proposal at the last minute and changing regulations that prohibited killing bears from aircraft. There was no public process to determine if this was a method the public would approve of. Just because there wasn't the uproar that the snaring issued caused, does not imply consent for shooting bears from aircraft.



The language is ambiguous and still allows for ground based lethal removal of any sex or age of brown bear, which to us looks like a back door way into bear snaring in the future. Though the Department's recommendations include the removal of bear snaring language, it needs to be explicit in the text of the proposal for it to have any meaning.

**Proposals 260 and 261** ACE opposes both of these proposals and recommends the board vote against both proposals

First I have to say that last minute proposals are clearly not in the public's interest. The fact that the Advisory Committees and the Department of Fish and Game can submit proposals under an agenda change request at the last minute while the rest of us had a deadline of **last year** is yet another breach of the public trust and illustrates that this process is broken.

Both of these proposals will impact resources on federally managed parks and preserves (Lake Clark and Katmai) making these proposals controversial and worthy of a broader discussion. The Katmai bears are already under a NEPA review and it would be prudent for the board to work with federal land managers rather than working to undermine the process.

Remember that one of the top three goals in the Bear Management Policy is to "Recognize the importance of bears for viewing, photography, research and non-consumptive uses in Alaska". This would be a good place to start: by voting no on both of these proposals.

Before the board liberalizes harvest of brown bears again, let's do some studies. Better yet, let's wait for the environmental impact statement to be published and make some informed decisions based on scientific principles.

Thank you for your consideration.

Sincerely,

Valerie Connor  
Conservation Director  
Alaska Center for the Environment  
(907)274-3632  
[valerie@akcenter.org](mailto:valerie@akcenter.org)



**CHUGACH STATE PARK CITIZENS' ADVISORY BOARD**

HC 52 Box 8999, Indian, Alaska 99540 Phone: 907-345-5014 Fax: 907-345-6982

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

February 15, 2012

Re: March 2012 Board of Game Proposals

I am writing on behalf of the Chugach State Park Citizens' Advisory Board regarding new statewide regulatory proposals that will affect Chugach State Park. Two proposals that affect Chugach State Park were deferred from the January 2012 meeting in Anchorage. Please consider these comments during the spring 2012 Alaska Board of Game meeting.

The Chugach State Park Citizens Advisory Board assists park staff in an advisory capacity with park management and development issues. As an advisory board, our decisions are guided by the five primary purposes established in creating the park:

1. To protect and supply a satisfactory water supply for the use of the people;
2. To provide recreational opportunities for the people by providing areas for specified uses and constructing the necessary facilities in those areas;
3. To protect areas of unique and exceptional scenic value;
4. To provide areas for the public display of local wildlife; and
5. To protect the existing wilderness characteristics of the easterly interior area.

At approximately 495,000 acres, Chugach State Park is among the four largest state parks in the U.S. and comprises nearly half of Alaska's Game Management Unit (GMU) 14C. Most of the big game animals that inhabit GMU 14C use the park at least part of the year. The 15-member advisory board is appointed by the Director of State Parks and Outdoor Recreation. The Board intentionally represents a wide variety of park users. With over 1.3 million visits to the park annually, we are interested in Board of Game regulation changes that may affect park resources and visitors.

We have carefully reviewed the spring 2012 Board of Game regulatory proposals that will affect the park's wildlife and users. The wildlife harvest and population estimates referenced in our comments are based upon input from the Alaska Department of Fish and Game. Our comments and recommendation for each proposal follow below. These recommendations passed unanimously during our December 19, 2011, meeting.

Proposal 44 – Oppose. The statute that authorized the Alaska Department of Fish and Game to issue up to two big game harvest tags through auction or raffle (AS 16.05.343[c]) does not address seasons, methods or means. Thus, the department already has discretionary authority to





define seasons and methods and means for recipients of Governor's tags. However, the department's policy has been to limit any recipient of the Governor's tag to the seasons, methods, and means available to hunters without the special tag. The value of the tag is that it may be acquired without participating in the annual lottery like everyone else and the recipient is not limited to a single hunting period, he or she may hunt during the entire open hunting season.

Allowing the recipient of the Governor's tag to hunt during a period closed to other hunters or, for example, allowing the recipient to use a rifle in an archery-only hunt area may increase the value of the tag to a person wealthy enough to outbid other hunters, but it will devalue the permits of all other hunters who hope to pursue the same species in that area. The Governor's tag recipient will have the first and best opportunity to shoot the largest Dall sheep ram or other trophy animal. Adopting this proposal may also cause conflicts with other users of the same resource. For example, hikers in Chugach State Park do not expect to encounter hunters outside of regular hunting seasons. Giving successful bidders for big game permits the advantages contemplated in this proposal would be unfair to others who hunt and recreate in the park.

Proposal 109 – Oppose. This proposal would increase the bag limit for bear hunters in GMU 14C from 1 to 3 black bears per year. In recent years, black bear hunting has been expanded into previously closed areas in GMU 14C and the number of hunters has increased dramatically. As a result, more bears are being shot in Chugach State Park and surrounding areas. Hunters reported taking 201 black bears in GMU 14C during the last 4 complete regulatory years (from 2007-08 to 2010-11), an average of 50 each year. At least 60 more black bears were shot in defense of life or property or killed by vehicles during the same period, an average of at least 15 each year. GMU 14C has an estimated 200-300 black bears, so the annual human-caused mortality in recent years is 22-33%. The Alaska Department of Fish and Game has recommended not adopting similar proposals in recent years because the increasing black bear harvest in GMU 14C may be at or above a sustainable level.

Most of the hunting opportunity for black bears in GMU 14C is in Chugach State Park. Black bears are a desirable species in Chugach State Park. We do not support an unsustainable harvest of black bears in the park.

Proposal 249 – Support. This proposal would reauthorize the antlerless moose hunt in Anchorage Management Area, which includes portions of Chugach State Park. We support ADF&G's management of antlerless moose in Chugach State Park and adjacent portions of GMU 14C.

Proposal 250 – Support. This proposal would reauthorize the antlerless moose hunts in the remainder of Unit 14C, which includes portions of Chugach State Park. We support ADF&G's management of antlerless moose in Chugach State Park and adjacent portions of GMU 14C.

Proposal 251 – Support. This proposal would reauthorize the antlerless moose hunt in the upper Ship Creek drainage, which is in Chugach State Park. We support ADF&G's management of antlerless moose in Chugach State Park and adjacent portions of GMU 14C.



Thank you for the opportunity to respond to the regulatory proposals submitted for the spring 2012 Board of Game meeting. Please let me know if you have any questions regarding these comments and recommendations. I can be reached at 907-227-4125. Thank you for your consideration.

Sincerely,



Judy C. Caminer  
Chair

cc: Jessy Coltrane, ADFG





To: The Alaska Department of Fish and Game, Boards Support Section  
Re: ADFG Proposal 141, and Proposal 137

From: Jen Landry  
PO Box 82323  
Fairbanks AK 99708

To Whom It May Concern:

I am writing to express my serious concerns about proposal 141. I find many aspects of this proposal alarming.

1. I strongly oppose same day land and shoot of bears.
2. I strongly oppose a 48 hour time period for checking snares. I have spent time in the bush setting traps; seems to me that a bear in a trap for 48 hours could bring trouble. Along these lines, I don't think aircraft is a reliable way to check snares, I would like to see trapping be done the traditional way...on the ground.
3. I resent the idea that non-residents are proposed to participate in this. If non-residents should for some reason participate in this, I strongly believe they must be required to be certified in trapping, skinning, and ethics classes as well as bear safety. They should pay fees and there must be oversight of their activities (ie-permits, tags, skulls for seals). My perception is that most Outsiders don't have the skills, experience, or patience to perform under the rigors this proposal may expose them. But it's a great experiment, might make great grist for the media!

Overall, I would like to see much more involvement and oversight by ADF&G in this matter. Bear snaring in grizzly country should not be an anything goes free for all. This proposal puts members of the public who are in the bush at risk to injured grizzlies roaming about. We don't need more reasons for our children to be scared or dissuaded from spending time in the outdoors, it's already a difficult enough task to get kids outdoors these days.

I would like to see ADF&G do it's job: MANAGE the hunters and trappers and our public resources. How can you monitor without management tools in place? I want to see limits on snare sets, and have the public be accountable with permits and seals required. Even when these regulations are in place people disregard them, so what will happen when the rules are so loose? I for one, don't want to find out, please manage hunters, trappers and the public resource as these powers have been granted you.

Lastly I would like to express support for Proposal 137, I would like to see more limitations on non-resident hunters for dall sheep hunts, ensuring a better hunt for all in the end.

Thank you,  
Jen Landry



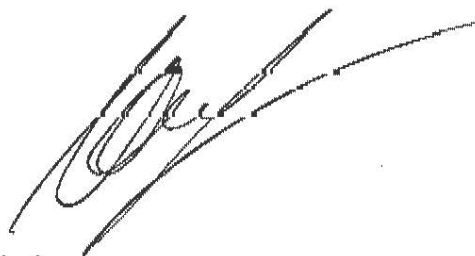
February 15, 2012

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-552

**I strongly urge your support for Proposal 142, to prohibit bear snaring.**

Thank you for considering my views,

Irene Bartell  
P.O. Box 17855  
Arlington, VA 22216



(frequent visitor to the State of Alaska)





# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Tetlin National Wildlife Refuge

P. O. Box 779  
Tok, Alaska 99780-0779



February 15, 2012

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

Dear Chairman Judkins:

The U. S. Fish and Wildlife Service (Service) and Tetlin National Wildlife Refuge (Tetlin Refuge) appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game during its upcoming meeting. We would like to provide comments on Proposals 146, 149, 196, 198 and 199, which could affect management of wildlife populations on Tetlin National Wildlife Refuge and adjacent lands in Units 12 and 20E.

Proposal 146 creates a year-round coyote season in Region III. Tetlin Refuge is opposed to this proposal. The existing season provides adequate opportunity to harvest coyotes when pelts are prime and of greater value.

Proposal 149 extends the season for fox, marten, mink, and weasel in Units 12, 20, &25C. Tetlin Refuge is opposed to this proposal because these species' pelts are past prime in late March and April. In addition, trapping marten late in the season may suppress recruitment, which would hurt trappers and hunters who rely on these valuable furbearers for a portion of their income.

Proposal 196 would allow baiting for both black and grizzly bears in Units 12 and 20E. Tetlin Refuge is opposed to this proposal because there is no quantitative population or demographic information for grizzly bears for the area indicating that an increase in harvest is warranted or sustainable. A grizzly bear population study conducted in Unit 20E using DNA hair snaring techniques in a Predator Control Area (PCA) concluded that the grizzly bear population was lower than previously believed and recommended the elimination of the PCA in 2009 (ADF&G report to the BOG, 2009: 6-7, Division of Wildlife Conservation Report to the BOG). In addition, implementing an increase in the harvest of grizzly bears on refuge lands must be biologically justified and conform to the Service's Policy on Maintaining Biological Integrity, Diversity, and Environmental Health.

TAKE PRIDE  
IN AMERICA 

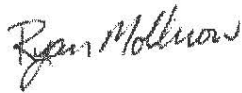


Proposal 198 would align the fox trapping season with the coyote trapping season in Units 12 and 20E, running them both through the end of April. Tetlin Refuge is opposed to this proposal because fox pelts are past prime in late March and April. We suggest aligning the state fox and coyote trapping season dates with the Federal subsistence trapping seasons (Nov. 1 – Feb. 28) to reduce regulatory complexity and because this is when these species' pelts are prime.

Proposal 199 extends the lynx and fox hunting seasons to April 30. Tetlin Refuge is opposed to this proposal because fox and lynx pelts are past prime in late March and April. We suggest retaining the existing season.

Thank you for the opportunity to comment on these proposals, and thank you for taking the time to consider our comments.

Sincerely,



Ryan Mollnow, Refuge Manager  
Tetlin National Wildlife Refuge





February 10<sup>th</sup> 2012

RECEIVED  
FEB 17 2012  
BOARDS

Attention: Board of Game Comments  
Alaska Department of Fish and Game  
Board's Support Section

To Whome it may concern,

I am writing this letter to effect Proposal #213 regarding Motorized Hunting access in the Yavert Controlled Use Area.

My opinion is that I believe that non-motorized hunting is important to our local economy, our way of life and (from what I've ~~heard~~ come to understand) helps maintain a ecological managed wildlife system. I will explain a little more.

The local hunting economy depends on not motorized access because it makes it harder to access the animal hunted & to bring in resources. For this reason the animals are hunted less, which increases their numbers, driving the price down for Alaskans to maintain sled dogs or horses yearly.

Out of state and City hunters want and will pay more to hunt in more wild ~~places~~ places. Roadless makes access harder which ~~also~~ makes people see it as wild regardless of management practices. In Alaska non-motorized hunting protects ~~protects~~ the hunting economy by increasing the experience for the paying Customer/hunter, while decreasing the cost to those who maintain their own sled dogs or horses, our Community members.

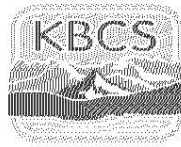
Again Keep Non-motorized hunting, No to Proposal #213. Thanks for listening and doing the right thing.

Caleb Johnson  
Yerm Yavert Rd Cabin #2  
Blueberry Subdivision  
P.O. Box 342  
Denali AK 99755

Caleb Johnson







Kachemak Bay  
Conservation Society

February 10, 2012

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:

The Kachemak Bay Conservation Society's mission is to protect the environment of the Kachemak Bay region and encourage sustainable use and stewardship of local natural resources through advocacy, education/information, and collaboration

RE: Proposals 197—Predation control areas implementation programs.

KBCS opposes Proposal 197 and urges the Board to reject it. Expanding the use of bear snaring is not acceptable. It is inhumane, dangerous, indiscriminate in what it kills, and unsafe. This is also a wasteful method of killing our valuable wildlife resources.

Rather than expand snaring to kill bears, a practice that is indiscriminate in what species it kills, such as brown bears, cubs, wolves, wolverines, and other species, the Board of Game should reinstate respected wildlife management methods based on science. Bringing back such a barbaric way of killing bears is unreasonable.

It is also worrisome that unknowingly, backcountry users could encounter wounded animals that have chewed off paws or just other animals that have been attracted to the bait station. Public safety is an issue with snaring and baiting bears.

Please, reject Proposal 197.

RE: Proposals 142—Prohibit trapping of black bear in the Interior region.

The Board of Game should pass Proposal 142. KBCS fully agrees with the explanation by the proposing group, Alaska Center for the Environment, explained in the issue portion of the Proposal. Snaring bears is cruel and inhumane, unsafe for the public, and indiscriminate in that it will increase waste of wildlife by killing unintended species.

This sort of wildlife killing is a severe black eye for Alaska's wildlife management. Most people find snaring, particularly of bears, very distasteful. Snaring bears should be prohibited in the State of Alaska, as it was until very recently.

Please, pass Proposal 142 and make bear snaring illegal.

Sincerely,  
Roberta Highland, President



Feb. 15, 2012

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-552

**I strongly urge your support for Proposal 142, to prohibit bear snaring.**

Thank you for considering my views,

Stephen G. Bartell, Esq.  
President, Clear Conscience  
P.O. Box 17855  
Arlington, VA 22216  
(frequent visitor to the State of Alaska)



December 28, 2011

Commissioner Cora Campbell, Alaska Department of Fish and Game

and

Commissioner Daniel S. Sullivan, Alaska Department of Natural Resources

I am enclosing a proposal for an emergency closure of trapping for beaver in the Shaw Creek Flats-Quartz Lake area (GMU 20D). The purpose of the closure being to allow beavers, through their dam construction on several of the lakes within the Shaw Creek Flats, as had been the case in the past, to increase water levels in the Flats allowing for increased flow of water from the Flats into Quartz Lake. The net benefits are primarily restoration and improvement of both fish and wildlife habitats in the Shaw Creek Flats and Quartz Lake. Successful dam building and maintenance by beavers in the Flats will not be possible without restrictions on use of airboats in the Flats, a practice that was initiated in recent years. Fish and wildlife habitat management responsibility within the Quartz Lake-Shaw Creek Flats wetland complex falls within the jurisdiction of both the Alaska Department of Fish and Game and the Alaska Department of Natural Resources. Implementation of this proposal will necessarily require action by both ADF&G and ADNR.

More detailed rationale, including relevant scientific and ecological background information relative to the proposal, is included as an appendix to the attached proposal.

Sincerely,



David R. Klein  
2027 Weston Drive  
Fairbanks, AK 99709-6515  
Phone: 907-479-3288  
<dklein7@alaska.edu>

RECEIVED

JAN - 3 2012

DEPT. OF FISH  
COMMISSIONER



December 28, 2011

## **Proposal to the Commissioner of the Alaska Department of Fish and Game and Commissioner of the Alaska Department of Natural Resources**

### **Request for emergency closure of beaver trapping on the Shaw Creek Flats and adjacent Quartz and Lost lakes (GMU 20D)**

#### **Objectives**

- 1) To restore fish and wildlife habitats at Quartz Lake and adjacent Shaw Creek Flats
- 2) To increase beaver density in the Shaw Creek Flats sufficiently to restore dam building activity there. The beaver dams will capture and hold melt water in spring, increasing water levels in the dammed lakes as well as the water table throughout the flats. As a consequence a greater portion of the annual precipitation in the Shaw Creek Flats and headwater drainages will be shunted to Quartz Lake as is evident to have been the case in the more distant past when beaver dams were common throughout the upper flats.

Successful dam construction by beavers will not be possible without restriction on the use of airboats in the Shaw Creek Flats. Controlling or limiting airboat use on state lands to restore or protect fish and wildlife habitats or to enhance productivity of fish and wildlife habitats also falls within the jurisdiction of the Department of Natural Resources and will require coordination with and action by DNR in this regard.

#### **Rationale:**

Beavers in the past, through their building and maintenance of dams, have played a major role in maintaining higher water levels in the Shaw Creek Flats and adjacent Quartz Lake. In recent decades, associated with increasing trapping effort in the Flats, beaver populations have been suppressed to levels below that necessary for maintenance of the extensive dams that previously existed at the outlets of many of the larger lakes and on associated streams. Restoration of beaver populations to former levels through a moratorium on beaver trapping in the Flats is expected to result in a return to former dam building activity by the beavers. The dams will slow the flow of spring melt-off water through the wetlands complex once again resulting in an increase in water levels throughout the Flats, sustaining higher water flow in Shaw Creek and its tributaries throughout summer. This will benefit grayling, burbot, salmon and other fish that spawn and feed in Caribou and Shaw creeks as well as in other drainages in the Shaw Creek watershed. In the early 1970's when water levels were four feet or more higher in lakes in the Flats immediately adjacent to the northwestern portion of Quartz Lake, water



flowed directly into Quartz Lake from the Flats and water levels in Quartz Lake were over four feet higher than at present. Restoring water depths in Quartz Lake, will reduce the frequency of over-winter loss of fish from oxygen deficiency which has been a problem during the low lake levels of recent years. Rising lake levels will also restore former lake surface area and the extent of lake edge, both of which are key to the high invertebrate productivity of the lake that is the basis for the rapid growth of the stocked char, silver salmon, and rainbow trout in Quartz Lake, formerly considered the most productive road-accessible fishing lake in interior Alaska. Restoring levels of beaver activity in the Flats, with associated dam construction, should result in habitat improvement for nesting swans, geese, ducks, and other wetland birds, as well as for most fur bearers, and by recycling of riparian and deciduous forest habitat, for moose as well.

Included below as an appendix to this proposal, is background information from ecological, hydrological, and archaeological investigations in the Quartz Lake-Shaw Creek Flats area, as well as from information provided by long time Quartz Lake cabin owners.

We appreciate your consideration of this proposal.

David R. Klein  
Emeritus Professor (UAF)  
Quartz Lake cabin owner  
2027 Weston Drive  
Fairbanks, AK 99709-6515  
<dklein7@alaska.edu>





## APPENDIX

### **Background ecological investigations:**

The rationale for this proposal largely stems from ecological, hydrological, and archaeological investigations initiated in 2007 and continuing at Quartz Lake and in the Shaw Creek Flats by faculty and students of the University of Alaska Fairbanks (*Tracking Ecological Change from Earliest Human Arrival to the Present: The Quartz Lake Shaw Creek Flats Project [QL-SCFP]*). Encouragement, advice, and assistance has been received from personnel of the Alaska Department of Fish and Game (Divisions of Sport Fish & Wildlife Conservation) and Natural Resources (Division of Parks and Outdoor Recreation & Office of History and Archaeology). Quartz Lake cabin owners, inclusive of hunters, fishers, and trappers, have been informed of project activities through the annual meeting of Quartz Lake Property owners and they have also provided information on historical patterns of use of the study area and have provided assistance on specific field projects. Results of the QL-SCF Project investigations are disclosing the pronounced levels of fish and wildlife productivity that have characterized the area from the time of the first arrival of humans into the area more than 14,000 or more years ago up to the present. Archaeological work at Quartz Lake (Figs. 1 & 2) has shown that a previous period of low water levels at Quartz Lake correlates with intensive beaver trapping during the peak of the fur trade over 100 years ago.

Lowering of the water level in Quartz Lake and loss of lake surface area in recent decades has resulted in lowered over winter survival of the stocked char, silver salmon, rainbow trout, and lower overall lake productivity. This has resulted in major deterioration of fish habitat in this area of Interior Alaska of importance to both sport and subsistence fisheries.

### ***Quartz Lake-Shaw Creek Flats Multidisciplinary Project:***

The University of Alaska Fairbanks Quartz Lake-Shaw Creek Flats Multidisciplinary Project seeks to track ecological changes that have taken place in the Quartz Lake-Shaw Creek Flats wetlands from the present back in time to at least the end of the last glacial period. The ecological changes which have occurred over at least the last 14,000 years correlate with the earliest arrival of humans in Alaska and the Americas. Archaeological investigations in the Quartz Lake area and adjacent to the Shaw Creek Flats confirm that people from the earliest human cultures have been dependent on the high biological diversity and productivity of these wetlands and adjacent lands (Potter 2008, Gelvin-Reymiller, et al. 2011). Historically and prehistorically, it has apparently been the biological productivity of these wetlands that attracted peoples to this area. Natives of the Athabaskan culture, who live in Interior Alaska today, and were the people present in the Tanana River drainage when Western explorers first arrived, have traditionally harvested resources of the area through hunting, trapping, fishing, and gathering activities. Subsistence and recreational hunting, trapping, fishing, and other outdoor recreational activities continue to be the major uses on these state lands and waters.



### ***Lake coring and sedimentation:***

Scientific investigations in and around Quartz Lake and adjacent Shaw Creek Flats are part of the QL-SCF Multidisciplinary Project. Their primary focus is on geological history and present and past ecology of the area. Cores obtained from 22 feet of lake sediments have been obtained from the deepest portions of Quartz Lake. The accumulated sediments in the cores represent at least 11,200 years of lake history (Wooller et al. in press). Sediment cores were also obtained in early April this year from 'Upper Shaw Lake', a smaller lake about 7 miles northeast of Quartz Lake. The cores are preserved in refrigerated coolers in the laboratory of the Water and Environmental Research Center at UAF where analyses are being initiated on lake water characteristics, aquatic life, and pollen that can be correlated with specific periods in the history of the lake. Chemical and microscopic analyses of the cores yield information on changes over time in water characteristics and lake productivity that can be correlated with specific periods in the history of the lake. Chemical and microscopic analyses of the cores yield on changes over time in water characteristics, lake productivity and provide a record of associated climatic conditions. Identification of pollen present in the sediments and determination of changes in their proportions over time will indicate changes that have taken place in plant communities in the aquatic vegetation of the lake, as well as in the surrounding land areas. Heavy deposition of sand in the distant past on the southern portion of the Flats has resulted in a distinctive landform with fewer lakes than in the northern portion of the flats. This effect is evident in Google Earth satellite images (Fig. 1). The high variability in physical appearance and associated biological productivity of the numerous small lakes within the Flats reflect their differing geological history.

### ***Geological history, hydrology, and ecology of the wetlands:***

Studies are underway of the geological history, hydrology, limnology, water chemistry, and biological productivity of some of the small lakes in the Shaw Creek Flats. Test drilling for permafrost presence was initiated in April 2011 in the Shaw Creek Flats adjacent to Quartz Lake to determine its characteristics and influence on wetland hydrology. A primary ecological focus of our investigations in the Flats has been on how changes in the hydrology of the lakes and associated wetlands have affected plant community structure and thus the overall quality of the area as fish and wildlife habitat. Conversely we are seeking to understand the role played by specific wildlife species, such as beavers, moose, and snowshoe hares, in bringing about ecological change. Beavers, when at higher densities in the past, through their dam building and cutting of deciduous trees and shrubs had a much greater effect on the hydrology of these wetlands than they do at present (Figs. 2-4). Dam building activity by beavers throughout Alaska generally has resulted in habitat conditions favorable for moose, waterfowl, fish, and other furbearing mammals typical of wetland lake systems as was shown by early University of Alaska graduate thesis studies (Hakala 1952, Libby 1955, Murray 1961, Boyce 1974). Similar findings result from investigations in Canada and the 'lower 48' states (Collins 1974, Naiman et al. 1986). We now have evidence that beaver damming activity in the small lakes and small streams throughout the Shaw Creek Flats was of primary importance during the mid 1900's in slowing the flow of water, especially water





from spring snow melt, through the flats during summer, thus maintaining a higher water table in the Flats than has been the case in recent decades. In the past when water from melting winter snows in the flats and surrounding hills has been held in the Flats by the widespread presence of beaver dams, water flowed into Quartz Lake from the Flats during spring and summer accounting for the higher lake level that existed in the 1970's when the access road to the lake was constructed, and surveyed lots around the lake were auctioned off to the public by the state as recreational cabin sites.

***Quartz Lake water quality and lake level:***

The Quartz Lake-Shaw Creek Flats Multidisciplinary Project studies have disclosed unique characteristics of Quartz Lake and its immediate surroundings which place emphasis on the need for close management oversight of the Quartz Lake and Shaw Creek Flats waters and surrounding lands to assure their continued high quality and productivity of the lake waters and adjacent wetlands. For example, Quartz Lake sediment cores and water analyses reflect the high biological productivity of the lake at present, as well as in the past, and disclose that Quartz Lake, with no defined outlet and a limited watershed is an "evaporative lake". It therefore has essentially no turnover or flushing of water as is true for most Interior Alaska lakes with defined outlets and incoming streams. Quartz Lake, owes its high productivity to the extensive western two thirds of the lake which is shallow with abundant lily pads and other aquatic vegetation. This "weedy" portion of the lake in turn supports the aquatic insect larvae and other invertebrate fauna that provide food that enables the amazing growth rate of rainbow, char, and silver salmon that have been stocked there by the Sport Fisheries Division annually. The decreasing lake level in recent decades (nearly five feet in the past 40 years) has had greatest effect on the western portion of the lake, decreasing the total surface area of the lake as well as its potential productivity for the fish. The lowered water level in the shallow western portion of the lake, with high aquatic plant productivity, much of which decomposes under the ice in winter, likely accounts for low oxygen availability for over-wintering fish in this portion of the lake.

***The Quartz Lake State Recreation Area:***

The present Quartz Lake State Recreational Area of about 600 acres at the southeast corner of the lake is managed by the State Division of Parks and Outdoor Recreation. The Parks personnel have been both encouraging and helpful in our work at Quartz Lake and in the adjacent Shaw Creek Flats. State Parks, with very limited funding, has done a creditable job of managing the Quartz Lake Recreation Area during the increasing use that the area has seen in recent years. Increased use of Quartz Lake and its surroundings in recent years is associated with population growth in the Delta Junction area, new cabin construction around the lake, increased visitation by RV tourist traffic in summer, and increased visitation by Alaska residents from North Pole, Delta, Fairbanks and other communities on the road system. Primary public uses of the area are fishing, hunting, camping, hiking, boating, cabin access and use in summer, and in winter ice fishing, hunting, trapping, skiing, dogmushing, other winter sports, and associated cabin use.

***References noted in text:***



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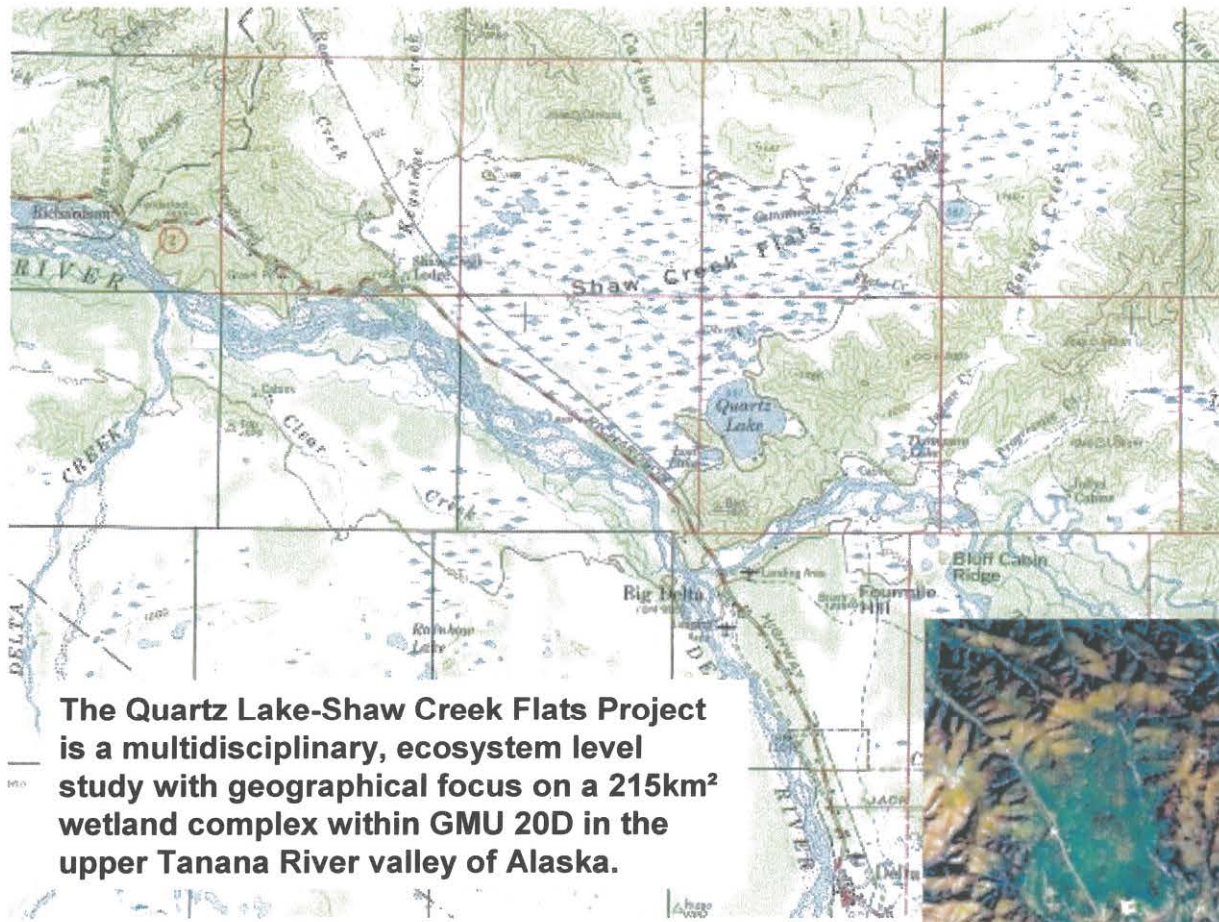


Fig. 1. Location of the Shaw Creek Flats and Quartz Lake. The triangular portion of the lower Flats without defined drainages visible in the satellite image is geologically much younger than the upper portion of the Flats.

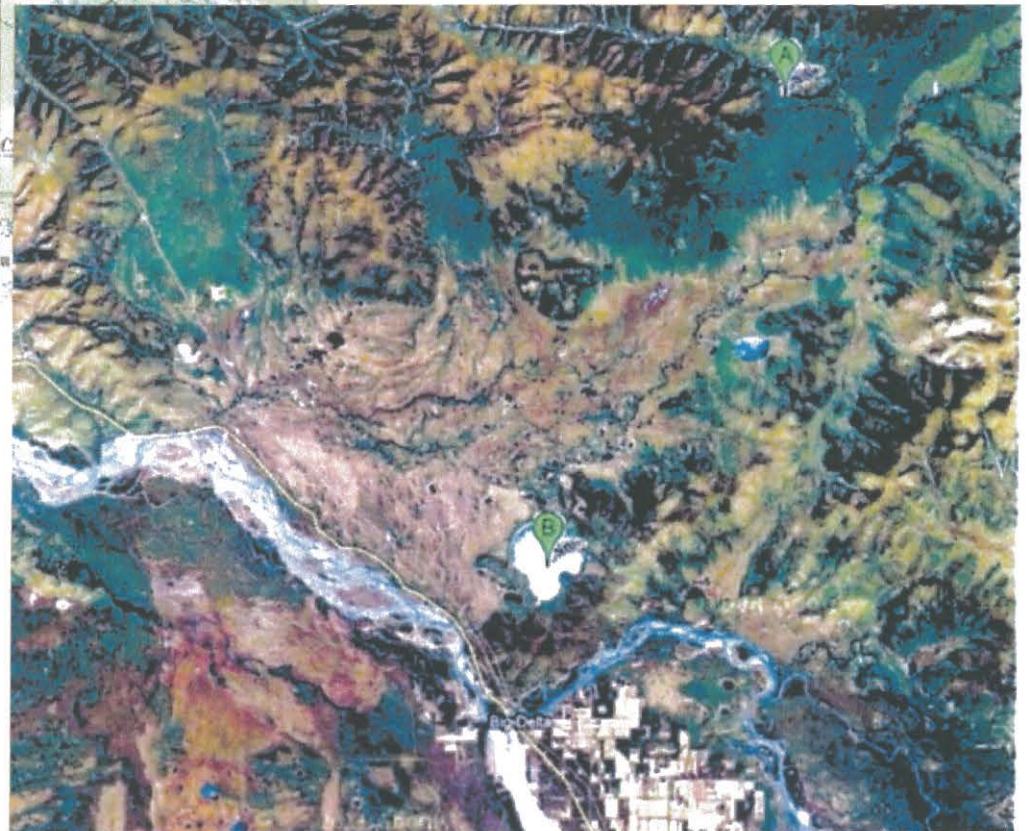






Fig. 2. Looking East with Quartz L. in the distance; lake bottom is exposed along western edge of lake. Beaver Lake in foreground, when dammed by beavers in the past, allowed water from the Flats to flow to Quartz L. Note airboat trail at the marshy head of the lake on the left.





Fig. 3. Arrow shows where beaver dam existed more than thirty years ago between Beaver L. and the adjacent lake on the Flats to the southwest.





Fig. 4. Location at the east edge of the outlet of Beaver L. that was last dammed about 50 years ago by beavers. The birch trees on the right have grown on the remnants of the old beaver dam. The largest standing tree is ca. 40years of age.





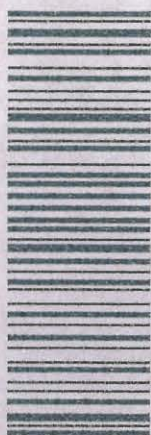
Fig. 5. Effect of airboat traffic on marsh vegetation, accelerating drainage from Beaver L. to the lower Shaw Creek Flats.





Dr David R Klein  
2027 Weston Dr  
Fairbanks AK 99709

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLDED AT DOTTED LINE  
**CERTIFIED MAIL™**



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Commissioner Cora Campbell  
Alaska Dept. of Fish & Game  
PO Box 115526  
1255 W. 8th St.  
Juneau, AK 99811-5526



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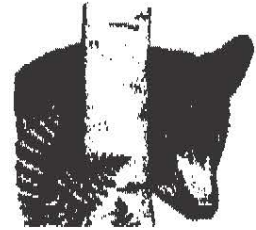
## ***Wild Watch LLC***

39200 Alma Ave., Soldotna AK 99669

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***"Making Good Conservation Good Business"***



Attention: BOARD OF GAME COMMENTS

Alaska Dept. of Fish & Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Fax 907/465-6094

**Re: Proposals 141 and 142**

I urge the BOG to reject proposal 141 and to implement proposal 142.

My reasons are four: ethical, economic, legal and scientific.

### **ETHICS**

#### **Hunting Ethics: Should harvesting bears be "fair chase"?**

As the BOG well knows, bears were once treated as vermin throughout North America. It took decades of effort by wildlife biologists educating the public about bears to win for them the status of game animals. This was done for many reasons.

First, many hunters consider bears the supreme North American trophy animal due to their physical prowess, reputation for defensive fierceness, and keen intelligence. Even though black bears are less respected than brown bears in Alaska and other areas where the two species are sympatric, most of our continent has only black bears. So most hunters in most states have high regard for black bears as trophy animals. The pride they take in harvesting a bear is directly related to the status of bears in the public mind. Degrading bears back to vermin status, as is represented by snaring, degrades bear hunting and bear hunters. Killing bears, except in DLP, should be strictly limited to fair chase methods.

Second, bears are North America's ecological equivalents of great apes. They are among the most intelligent of all land animals, and among the most ready to peacefully coexist with humans in situations where they do not perceive us as competitors for prized foods. This, along with their reputation for defensive fierceness, makes bears particularly attractive to viewers – who often find close viewing one of the most rewarding experiences of their lives. Treating bears as vermin is especially loathsome to viewers, and degrades the experience of viewing even in spots where snaring is not known to be underway.



**Is Snaring Intolerably Cruel?**

Yes, this kind of snaring is, especially if the snare is elevated so far that a snared bear would be held at least partly upright by the snare. It is cruel to the snared bear; and if this animal is accompanied by its mother or offspring, this animal's plight is cruel to them too. Anyone who doubts the cruelty should put him/herself in the bear's place and hang there for several days until someone comes along to "put you out of your misery" (by freeing you).

Contrary to statements that snared bears just sit quietly, I have seen serious wounds to the legs of snared bears, and the bears became "calm" only after violent efforts to free themselves failed and the animals succumbed to "despair" and "depression." Furthermore, when a snared bear is approached by a human, that "calm" bear can erupt in panicked aggression, as I saw numerous times when I snared bears for research purposes.

**ECONOMICS AND LEGALITY****Would Snaring or Any Other Form of Intensive Management Maximize Non-Hunting Benefits to Alaskans, In Accordance With Our State Constitution?**

No. Quite the contrary.

The US Fish & Wildlife Service estimates that wildlife viewing generates around \$700 million per year for Alaska's economy, a big (but unspecified) fraction of which is for wolf and bear viewing (USFWS 2007). My own estimate, based on very fragmentary information, confirms a benefit of at least \$50 million annually for bear viewing. Even my own smaller estimate represents a major boon to numerous Alaskan communities, a boon that is especially important as other resource-based industries are declining. Wildlife viewing supports not only tour companies, but airlines, water taxi services, gas stations, restaurants, lodging services, and numerous other businesses.

According to Alaska's Constitution (as stated by one of its signers, Vic Fisher), wildlife should be managed for diversity as well as productivity, for the benefit of all Alaskans. There is no provision in the Constitution for maximizing benefits for one segment of Alaskans to the detriment of other segments – which is precisely what Intensive Management does, whether the method of harvest is shooting or snaring or using jawed traps.

The needs and preferences of viewers are just as important as the needs and preferences of hunters. Even those of us who prefer eating moose and caribou are keenly aware that we can't pay bills with meat. So we object to the BOG promoting Intensive Management in areas, times, and ways that seriously impact our businesses or those of our employers. So far, the BOG has neglected to sit down with representatives of the ecotourism industry involved in wildlife viewing to determine how moose and caribou numbers can be increased without decimating populations of wolves and bears. Ideally, our clients should be able to view both ungulates and large carnivores, in addition to smaller predators, birds, and marine mammals.



## SCIENTIFIC

### How Would Snaring Bears Affect the Health of Moose Populations?

***Which moose are targeted by bears?:*** Black and brown bears sometimes kill moose, especially calves, adults debilitated by age, pathogens, injuries or exhaustion from rut. Reducing the number of bears in an area could potentially reduce the number of moose dying of natural causes and thereby increase the number of moose potentially available for harvest by humans.

***How do losses to hunters differ from losses to predation?*** Humans normally don't harvest calves, and our harvests don't focus on debilitated adults. Instead of culling out the poorest individuals, we tend to select the best. Furthermore, our harvests are concentrated in areas with easy access, whereas predation is more uniformly spread across the habitat. Hence, even if we harvested the same number of moose formerly taken by wolves and bears, impacts on the moose population would not match what the ungulates have evolved to withstand; so the impacts could be much heavier.

***Do wolves and bears feed moose?*** Yes. Both wolves and bears transport large amounts of marine derived nutrients onshore where these nutrients enrich moose browse, particularly that in riparian zones, including zones in or near moose winter habitat. This occurs, of course, via wolves and bears consuming salmon, then depositing scraps of salmon and salmon-rich dung on shore. The BOG should evaluate how much reducing numbers of bears and wolves would reduce abundances of these nutrients, and how that in turn would affect birth weight and survivorship of moose calves, as well as how it will affect future productivity of the salmon fishery. (Nutrients stored in terrestrial plants and soil eventually end up back in streams.)

I have seen no indication that the BOG has considered how drastically reducing numbers of black bears (or brown bears or wolves) is likely to affect long term carrying capacity of moose habitat. This oversight should be corrected immediately, before numbers of bears (or wolves) is further reduced. The BOG should show how the nutritional benefits predators provide to moose compare with the impacts of predation at each density of moose, wolves, and bears, and then strive for the optimum densities, not minimum densities of wolves and bears.

### Is Carry Capacity the Optimum Density for a Moose Populations?

No. Carrying capacity is maximum sustainable density, which is much higher than optimum density. Ideally, the term refers to long-term sustainability. However, it is all too often used to mean short-term sustainability, even if a population that large over-browses and thus damages its habitat, thereby lowering CC in future years.

The BOG has repeated emphasized its goal of keeping ungulate populations as close as possible to carrying capacity of their habitats. Why? As BOG Vice Chair Ted Spraker can explain to anyone unfamiliar with the term's technical definition, "carrying capacity" refers to the maximum number of animals that can be sustained on a given area of habitat. This is analogous to cramming as many clowns as possible into a phone booth or automobile. Driving down the





road with people sitting two or three deep in a car is a sure way to crash. Wildlife populations crowding their habitat are also vulnerable to crashing, because their members tend to be small in body size, malnourished, diseased, and infested with parasites. Hence, they have poor rates of reproduction and offspring survival. At carrying capacity bulls may also have small antlers. Is that really the kind of moose population that the BOG thinks that Alaskans want? It's the kind of population we currently seem to have on the Kenai Peninsula, and nothing the BOG has proposed so far is likely to improve the situation.

Why not aim for a population density where the health, vigor, reproduction, and survivorship of moose are maximized? As Mr. Spraker would presumably agree, this occurs at densities well below carrying capacity. Classical management theory estimated that populations are most vigorous at roughly 50% of CC. But more recent studies suggest that optimum density might be closer to 70% to 80% of CC.

#### **Can Sustainable Yield From a Moose Population Be Maximized at Carrying Capacity?**

No. Just the opposite. As Mr. Spraker knows, sustainable yield is not maximized, but minimized at carrying capacity. For at CC, 100% of reproduction goes to replacing losses to natural mortality and to non-hunting human-caused mortality.

#### **At What Density is Sustainable Yield Maximized"**

This is called "optimum density" – which, as mentioned above, seems to occur at 70% to 80% of CC.

#### **Does Intensive Management Really Maximize Sustainable Yield?**

Although "maximizing" sustainable yield sounds good on paper, it's not the title that matters so much as its real world meaning. The term's conventional meaning in the field of wildlife biology is the highest number of animals that can be harvested after accounting for all losses to natural causes, which includes predation, and to other human impacts such as vehicular collisions. It does *not* mean the highest harvest after eliminating predation and other sources of natural and human-caused mortality. Given that the BOG's goal apparently is minimizing predation and perhaps other sources of natural mortality, it should coin a term for harvest under those specific conditions. For the BOG to instead usurp and corrupt "maximum sustainable yield" with a critically different meaning could be misinterpreted as duplicity or ignorance – which I trust would not be accurate.

#### **What Do Carrying Capacity and Sustainable Yield Have to Do With Snaring Bears?**

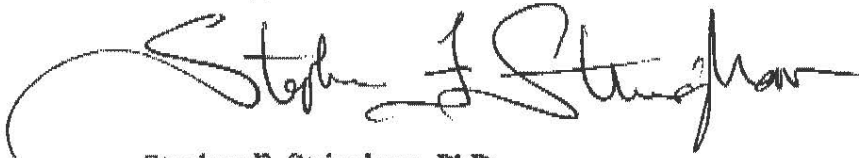
Mistaken notions of CC and sustainable yield are the justification for Intensive Management, and thus for snaring. The BOG should demonstrate that IM justification still exists when the issue of low moose numbers is rephrased in terms that are valid both semantically and empirically.



Comments to the Board of Game on Proposals 141 and 142 from WildWatch 17 Feb 2012

5

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen F. Stringham". The signature is fluid and cursive, with a large initial "S" and a long horizontal stroke at the end.

Stephen F. Stringham, PhD  
President

#### REFERENCE CITED

US Fish and Wildlife Service National Survey of Fishing, Hunting, and Wildlife-Associated Recreation (published online 18 June 2007)

<<http://federalassst.fws.gov/surveys/surveys.html>> accessed 1 August 2007.



17 Feb 2012

To whom it may concern:

I moved to Alaska in 1972 and lived for years near the entrance to Denali NP. I have run dogs and winter camped extensively in the Yanert River drainage. I have also flown throughout that area in all seasons. As long as I have lived here the Yanert Controlled Use Area has been closed to motorized hunting and for good reason. The moose density there has persistently been low and limited access has allowed a sustainable harvest while also providing a traditional hunt for those who desire it.

For the last 10 years I have lived and flown out of Talkeetna. When returning from flights to Mt. McKinley we would almost always be able to point out moose and/or bear to our passengers. However the hunting pressure has increased to the point where it is now an exception to spot any of these animals. At the same time I see a growing influx of motorized hunters and watch them hunting areas seldom if ever accessed on foot. I also observe the damage they do to the terrain as they attempt to get higher and farther afield. I would hate to see the same thing happen to the Yanert CUA. It has been a non-motorized hunting area for 40 years and should remain so. Those who desire a traditional hunt will not be denied and those who use the many local trails recreationally will not have their experience or the terrain degraded.

In the strongest terms possible I urge you to retain the non-motorized status of the Yanert CUA.

Respectfully,



Bill Post

PO Box 271

Talkeetna AK 99676



February 16, 2012

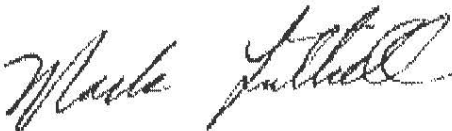
Board of Game  
Via fax

**Re: Support of proposal 142**

Board members:

I oppose bear snaring and urge you to support proposal 142.

The technique of snaring for predator control should be the last used for several reasons. First, it is tortuous. It condemns a bear to a slow and frightening death by terror and starvation. Second, a snare is indiscriminate and may doom other animals. Third, the strategy of abundance management, of which predator control is a part, is not scientifically valid. It is only actively pursued because of tilted political influences in Alaska. Fourth, the ADFG does not have adequate scientific baseline data to make reasonable management decisions in unit 16B. Fifth, ADFG wildlife biologists are under orders not to express their opinions, which promotes bad management and public mistrust. Sixth, bear snaring damages Alaska's public image.



Mark Luttrell,  
Seward  
prufrock@arctic.net





February 14, 2012

Dear Game Board Members,

I am both a local hunter and a snowmachiner and I would like to express my opposition to Proposal 213, opening the Yanert CUA to motorized hunting. I have hunted moose and caribou in the unit in question for several years. My wife and I hunt on foot, and the Yanert CUA is one of the few areas in the state where non-motorized hunting opportunities exist. The overwhelming majority of game units within the state are already open to motorized hunts. I feel strongly that the quality of the hunting experience would be diminished by allowing motorized access.

Additionally, I do not believe the moose population in the Yanert CUA justifies the increased hunting pressure. I have spent considerable time flying over unit 20A, in the course of my employment as a helicopter manager on a firefighting aircraft. My observations, both from the air and on the ground, indicate that the moose population density is concentrated on the north side of the Alaska Range in the Tanana flats. I also spend a considerable amount of time accessing the Yanert CUA on skis and snowmachine during the winter months. While moose populations may justify an antlerless hunt in unit 20A, increasing hunting pressure in the Yanert CUA specifically is not justified given where the moose population is actually concentrated. I urge you to base decisions that will increase hunting pressure in this unit on sound scientific population estimates.

In conclusion, I am a hunter and snowmachiner, not just some preservationist greenie, and I believe you would be making a mistake by opening the Yanert CUA to motorized hunting. Please keep a few places for those of us who like to hunt on foot and carry our game on our backs.

Sincerely,



Robert D. Merrow

PO Box 176

Denali Park, AK 99755



February 14, 2012

Dear Game Board Members,

Thank you for taking the time to hear my comment.

I am a local hunter and snowmachiner and I am strongly against opening up the Yanert Controlled Use Area to motorized hunting as suggested in Proposal 213. My husband and I hunt on foot or by boat for moose and caribou in this area. We spend a lot of time traveling through the Yanert CUA year-round, but especially by snowmachine and skis during the winter. It is a rare day when we see a moose or moose sign. We feel lucky to harvest an animal from this area when we do. Adding additional hunters to this area simply does not make sense.

There are still a good number of us who enjoy hunting without the use of motorized vehicles. Since there is only one legal access trail, the trailhead is congested and the Yanert CUA already feels crowded with hunters on horse and foot. The harvest numbers are low in this area because game numbers are low, not because there is a lack of hunters.

Please leave the Yanert Controlled Use Area as is. Most of the game units in the state are already open to motorized hunting. Please leave this area for all of us non-motorized hunters who are faced with fewer and fewer options for where we can hunt.

Sincerely,



Cynthia D. Merrow

PO Box 176 Denali Park, AK 99755



ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section

Comment for Proposal 213 and 227-232

FROM:

Shannon P. Coykendall

PO Box 194

Denali, Alaska

99755

coykendallshannon@hotmail.com

907-683-3383

907-888-9723



February 16, 2012

To the Board of Game regarding Proposals 213 and 227-232.

I am writing in opposition to motorized vehicle access for hunting in the Yanert Controlled Use Area in Unit 20A as per Proposal 213. I am writing in opposition to predator control measurements and other intensive management strategies introduced under Proposals 227-232 for 20C.

I have been a year-round resident of the Denali area since 2001 and live directly across from the sole legal public access to the Yanert Valley at Mile 228 Parks Hwy. My husband and I also own property at Carlo Creek. We are avid and responsible year-round users with a vested interest in the quality of user experience for the area. We hike, ski, and ski-jor; harvesting berries and occasionally meat.

The easement access through the Ahtna gravel pit at mile 228 is already extremely inadequate for out-of-area users and without any established, safe trailhead parking. Vehicles and trailers currently park in the ditch along the Parks Hwy, creating unsafe conditions on the highway and roadside. There are no facilities, leaving trash, campfires, and piles of human excrement and toilet paper around the easement area. To increase use without a safe trailhead for the additional trailers and vehicles would be negligent and shortsighted.

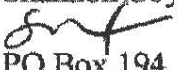
This is one of the last areas within the state where people can hunt in a quality wilderness setting via traditional, non-motorized transport and without motorized competition. There is intrinsic value in this opportunity and I request the Board of Game to maintain this quality non-motorized hunting experience. It is an unsubstantiated and assumptive idea that Proposal 213 would alleviate the crowding and over-use of the Rex and Ferry trails area. It is just as likely that the proposal would merely replicate the conditions found at these other areas.

The Yanert Valley does not receive much snowfall through the year, is highly avalanche prone due to a very unstable snow pack, is subject to open water late into the winter, and sees a lot of serious overflow on the Yanert River and its major drainages. As October can often be snow free and the snowpack thin, the increased impact and traffic via ATVs, OHVs, and snow machines would negatively affect the habitat for the very animals that are being hunted and tear up the few trails in the area. The overflow, open water on the Yanert, and avalanche prone slopes would pose dangerous situations to an increased number of users throughout the winter. In short, the intentions for opening 20A to motorized hunting do not seem justified.

The current maximum harvest perspective does not seem to be based solely in scientific research. We need to have longer term studies on the impacts of such intensive management strategies before implementing them further. The possible negative ripple effects are too unknown and too far reaching to make any short-term benefits worthwhile. In addition, the proximity of Unit 20C to Denali National Park could negatively affect the economic health of the surrounding communities which rely heavily on tourism.

Thank you so much for your time and consideration. As a resident, I hope my voice will count.

Sincerely,  
Shannon Coykendall

  
PO Box 194  
Denali National Park, Alaska  
99755





**Alaska Department of Fish and Game, Boards Support Section  
Fax (907) 465-6094**

**Please do not approve Proposals 227-232**

I am an 8 year member of the Middle Nenana Fish and Game Advisory Committee and I strongly oppose Intensive Management in Unit 20 C. There is no justification for these proposals and no scientific data to base these proposals on. Our Committee voted against these proposals and as a long time resident of the Denali Borough, I feel Intensive Management deprives an area of its natural balance and requires management methods that are far too disruptive.

**Please APPROVE Proposal 233:** I support Proposal 233, to establish a Controlled Use Area in the Wolf Townships. These State lands within the Denali Borough and surrounded on 3 sides by the park are important for wildlife populations of Denali National Park and for a multitude of recreational users and hunters and trappers. A CUA would provide management of an area that has seen a vast increase in use make for better long term management of its valuable resources.

Thank you for your time and consideration

Nan Eagleson  
PO Box 114  
Denali Park, AK 99755

Feb. 16, 2012





## CAMP DENALI & NORTH FACE LODGE

DENALI NATIONAL PARK  
WILDERNESS CENTERS, LTD.

Post Office Box 67  
Denali National Park, AK 99755  
Tel: 907-683-2290 • Fax: 907-683-1568  
E-mail: info@campdenali.com

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

February 16, 2012

To Whom it May Concern:


I am writing as a local resident and small business owner of the Denali area to voice my opposition to Proposal 213 which would open up the Yanert Valley to late season motorized hunting.

The McKinley Village/Denali Park area has been my home for 38 years. I grew up at Milepost 227.5 of the Parks Highway at Deneki Lakes, and currently make my home, with my husband and two young children, at Milepost 228. Our home is located very nearly opposite the gravel pit access to the Yanert Valley. My husband and I own and operate Denali National Park Wilderness Center, Ltd, dba Camp Denali and North Face Lodge, two wilderness vacation lodges on private inholdings inside Denali National Park. The base for our winter operations is at Milepost 229.5 with our year-round staff of six.

I highly value that the Yanert Valley of Unit 20A has been a non-motorized hunting area. While the area is heavily used for hunting every fall, the use is quiet, traditional, of an appropriate scale, and has relatively little impact to area trails. If snowmobiles and ATVs were allowed for fall hunting, it would negatively impact our lives in many ways. Trails would become widened, ribboned and rutted. The scale of use could increase manyfold. I would seriously worry about the personal safety and privacy of my children at play outside our home. Because our driveway is only a few hundred yards away from the gravel pit access, I worry that we would have vehicles parked in our ditch and road shoulders and exploring up our driveway at odd hours.

I returned to this area to acquire land, make my home, and raise a family here because of its peace and quiet, its remoteness and wilderness character, and its excellent formal and informal trail access to the surrounding backcountry. I loathe that the integrity of this area be compromised by introducing motorized hunting access. I loathe that I may have to start worrying about our personal safety and privacy. I urge the Board of Game NOT to support Proposal 213. Please retain the traditional, non-motorized access to Yanert Valley.

Sincerely,

  
Jenna Hamm  
Executive Vice President

*An Unparalleled Setting • An Uncommon Experience*



Maria Berger  
Box 81985  
Fairbanks, AK  
99708

Alaska Dept of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, Alaska

Fax (907) <sup>465</sup>~~436~~-6094

February 16, 2012

1) I oppose Proposal 213

I am writing to add my voice to those opposing Proposal 213 of the local Wildlife Management Issues being considered by the Board of Game in Fairbanks, March 2-11, 2012. I believe that the status quo should be retained for the Yanert controlled use area and no changes should be implemented.

Although I am a Fairbanks resident, I have enjoyed recreational opportunities in the Yanert Valley for 15 years. I also have friends and acquaintances who hunt this area and revel in the rare opportunity for a "fair chase" hunt, in which habitat remains intact and unmarred by off-road vehicle ruts, and animals are less disturbed than in easily accessible, more crowded hunting areas. Opportunities like this are rare and should be preserved for those willing to do the work to gain access. There are already plenty of locations for those who want to hunt from motorized vehicles.

2) I support Proposal 233

The development of a controlled use area plan for this popular recreational area is past due. These lands sustain heavier use each year as hunting and recreational pressures increase. This area adjacent to Denali National Park also provides vital winter habitat for caribou and their predators.

With both caribou and wolf numbers down within the National Park during summer 2011, it is important to monitor uses of their wintering ranges. The presence of healthy populations of these species in and around the park helps maintain a thriving tourist industry.

3) I oppose Proposals 227-232, inclusively.

As a former wildlife biologist who now works as a naturalist, I am familiar with wildlife biology and wildlife management practices, and with population dynamics of predators and prey. I am alarmed by the State of Alaska's widespread "intensive management" practices, mandated in areas classified as important for human consumptive use of ungulates. Therefore I oppose Proposals 227 and 229, which would declare Unit 20C, north of the boundary of Denali National Park, an intensive management area.

To elaborate on my opposition to Proposal 228, instituting wolf control in Unit 20C, I would like to point out that wolves are a huge draw to tourists in Denali National Park. Their numbers have wavered in recent years, from a 20 year average of 100 wolves in the park to only 65 to 70





wolves in the past 2 years. Since wolves follow their prey (caribou and sheep) out of the park in winter, we should not endeavor to take more wolves on these lands to the north of the park.

Proposals 230, 231 and 232, liberalizing the take of grizzly and black bears in unit 20C are also ill-founded. Current grizzly bear management practices in liberalized hunt areas are not based on scientific principles, nor have any long-term research studies on grizzly populations in these areas been undertaken since 2000. Present management of predator populations in these hunt areas is inconsistent with recommendations of the National Research Council's (NRC) 1997 report on predator management in Alaska. This report was commissioned by The Alaska Government in 1995 as a scientific and economic review of the management of wolves and bears in Alaska.

The NRC unanimously concluded that all previous predator reduction and control operations were poorly designed and even if results had been monitored, it would have been impossible to assess the relative contributions of several factors to observed population changes in either the predators or their prey. The report did offer recommendations which could improve the scientific basis for management, but these have been generally ignored.

Maria Berger

MARIA BERGER

P.O. Box 81985

FAIRBANKS, AK

99708





Members of the Board of Game:

For the following reasons, I strongly support Proposal 142, which would prohibit trapping of black bears in the Interior region.

1. Like most other Alaskans, I am extremely concerned over the decision to list black bears as furbearers. The manner in which this was done by the BOG did not allow for sufficient public testimony.
2. Permitting a black bear trapping season in the units listed in this proposal would have a tremendous negative effect on the bear populations in our national parks and preserves. It would have a negative impact on tourism and residents alike. Wildlife viewing is growing at 6 to 8% annually and is providing a lot of jobs to Alaskans
3. I strongly disagree that bear snaring is humane.
4. Bear snaring as close as 1/4 mile from public activity, residences, etc., is irresponsible and dangerous.
5. Bear snares do not only snare the targeted animal. All bears would be at risk, as would other wildlife.

I urge you to support Proposal 142.

Thank you again for the opportunity to comment.

Sincerely,

Gregory Brown

19400 Beardsley Way

Juneau, Alaska 99801

209-4221 (C)





# 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:

N12 (AKRO-ARDR&S)

February 17, 2012

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) appreciates the opportunity to comment on the proposals being considered by the Alaska Board of Game (BOG) at the Interior Region meeting on March 2-11, 2012 in Fairbanks. There are a number of proposals before the BOG that affect or have the potential to affect NPS areas. We appreciate your consideration of our comments.

As you have heard from the NPS in the past, our mission and mandates differ from the State of Alaska and other Federal agencies, and may require different management approaches consistent with NPS enabling legislation and the Alaska National Interest Lands Conservation Act (ANILCA). We recognize and support the State's fundamental role in wildlife management while at the same time we must ensure that the laws and regulations of the National Park Service are upheld.

Our specific comments on proposals follow:

**Sale of Big Game, Big Game Trophies: Proposals #44, 46-47**

**(Deferred from January 2010 Statewide meeting) (do not adopt)**

Proposals 46-48 request changes to 5 AAC 92.200, the purchase and sale of game. The development of a cash economy associated with the sale of big game has often been shown to be detrimental to the species involved. Brown bear populations are usually small in number, have low population growth rates, higher commercial value, and are easily over-harvested. The commercial sale of big game animals provides economic incentives that may lead to wanton waste and illegal trafficking outside of Alaska. Should the Board adopt regulations that allow the sale of big game, NPS lands need to be excluded in order to prevent conflict with NPS regulations. NPS regulations prohibit the sale or commercial use of natural products taken from NPS areas. (Title 36 Code of Federal Regulations, 2.1(c) (3) (v))



**Sealing and Bag Limits: Proposal # 109 (Deferred from January 2010 Statewide meeting) (do not adopt)**

Proposal 109 would eliminate the statewide bag limit for black bear. The proposed regulatory change has the potential to create a conservation concern, especially in many areas where black bear populations have not been surveyed or studied. Consistent with past letters to the Board, NPS lands need to be excluded from any regulations where the intent is to reduce one population for the benefit of other species.

**Black and Brown Bear Baiting: Proposals #119 (Deferred from January 2010 Statewide meeting), 196, 232, 236 (do not adopt)**

The NPS is concerned about the expansion of bear baiting and has a long history of efforts to prevent habituation of bears to food rewards both to protect bears and for visitor safety. The NPS also has concerns about bait stations attracting non-targeted species, site restoration and bait site cleanup when the hunt is completed. These proposals would expand bear baiting and allow the take of brown or grizzly bears over bait. Interior grizzly bears are known to have low reproductive rates. Data does not exist to support the assertion that a conservation concern could be avoided. These actions are proposed as part of an intensive management program, not appropriate on NPS lands. Should the Board adopt regulations allowing the expansion of black bear baiting and the taking of brown or grizzly bears over bait, NPS lands need to be excluded.

**Black Bear Trapping: Proposals #141-142 (do not adopt)**

The NPS in past letters to the Board has consistently stated that black bears should not be classified as furbearers and NPS lands need to be excluded from any regulations allowing black bears to be snared or trapped. For many years, general wildlife conservation practices prohibited this method of taking black bears. This method can result in the taking of other non-targeted wildlife species. In addition to conservation concerns, bear trapping in National Park areas may lead to visitor safety issues. Also, where the intent of regulations is to reduce black bear populations for the benefit of other species, these regulations are inconsistent with NPS statutes and policies and exceed Congress's authorization in ANILCA. Should the Board adopt any proposal that expands the trapping of black bear, NPS lands need to remain excluded from this practice.

**Implement Predator Control Programs: Proposals #157-159 (Mulchatna Caribou Herd), 163 (Unit 24B), 197 (Unit 20E), 238 (Unit 9B) (do not adopt)**

Should the Board adopt any of these proposals, NPS lands need to be excluded from these regulatory changes. NPS policies prohibit unauthorized predator control programs on Preserve lands. Implementation of predator control programs adjacent to NPS lands should be carefully coordinated with the NPS so members of the public and others participating in the program are not put at risk of violating regulations.

**Intensive Management Programs: Proposals # 146, 227-231, 260 (do not adopt)**

As previously stated, intensive management practices including predator control activities, are not allowed on NPS lands. Native predator populations may not be manipulated, controlled or eradicated for the purpose of increasing harvestable species on



NPS lands. Should the Board authorize intensive management programs or predator control programs in Game Management Units containing NPS lands, these lands need to be excluded from these intensive management or predator control plans and regulatory actions.

**Extend Seasons and Increase Bag Limits to Control Wildlife Populations: Proposals # 167, 181, 199, 235, 237** (do not adopt)

These proposals would extend seasons and bags limits for wolves, brown bear and black bear in attempts to control wildlife populations or increase prey species abundance. These proposed changes are not appropriate on NPS lands. Native predator populations may not be manipulated, controlled or eradicated for the purpose of increasing harvestable species on NPS lands. Should the Board adopt these or similar proposals, NPS lands need to be specifically excluded from these activities in order to prevent conflict with NPS statutes, regulations and policies.

**Same Day Airborne Hunting of Black Bears over Bait: Proposal #143, 144**

(do not adopt)

This proposed regulatory change would affect same day airborne hunter activities. NPS regulations prohibit same day airborne hunting in NPS areas. Should the Board adopt any proposals that allow same day airborne hunting, NPS lands must be excluded from these activities to avoid conflict with NPS regulations.

**Use of Helicopters for Trapping in Region III: Proposal #147**

(do not adopt)

The use of helicopters is generally prohibited on NPS lands except in emergencies involving public safety or serious property loss (36CFR 2.17(a)(3)). Should the Board adopt this proposal, NPS lands need to be excluded from these activities.

**Extend Seasons for Sheep and other Big Game: Proposals #133,136, 152**

(do not adopt)

These proposals should be evaluated on a unit-specific basis to ensure conservation of specific populations rather than applied to all of Region III as in proposal 133. Changing seasons could interfere with long established state and Federal subsistence priorities. Proposal 136 adds 7 days to the resident Dall sheep season. The proposed regulation change opens the resident season 7 days before the nonresident season. Proposal 152 establishes an early youth hunt (ages 10-17) for all big game species in Region III. Due to declining sheep population trends, not all areas can support extended seasons. There appear to be conservation concerns for some of Alaska's Dall sheep populations. Yet the proposed regulatory changes would extend the open season in areas that traditionally experience high hunting pressure. Further, extending hunts into the warmer summer season may result in increased meat spoilage and salvage problems. Should the Board adopt these proposals, NPS lands need to be excluded from these changes in regulation.

**Furbearer Trapping – Extend Seasons: Proposal #180, 198, 199**

(do not adopt)





Proposal 180 would add 31 days to the wolf trapping season in Units 25A, 25B and 25C. The proposed regulatory change establishes an earlier open season, October 1- April 30 and aligns wolf trapping seasons in Unit 25. Proposal 198 would align the fox trapping season in Units 12 and 20E, including the snare and trap restrictions in October and April, with the coyote season. The proposed October 15 – April 30 opening extends the season by 62 days. Proposal 199 would extend the closing date for both lynx and fox, in Units 12 and 20E, to April 30, to allow for additional harvest opportunity. We oppose extending the trapping season into months when animal are denning and raising their young and when pelts are in less than prime condition. Allowing furbearers to be trapped when their pelts are not prime is likely to result in lost economic opportunity for trappers who require prime pelts for sale. Should the Board support this proposal, NPS lands need to be specifically excluded.

#### **Salvage of Game: Proposals #172, 234**

(adopt)

Proposals 172 and 234 would require moose taken in Units 25B and 25C to have special meat salvage requirements. We support these changes to reduce the likelihood of spoilage and prevent wanton waste of moose meat transported from the field. The proposed changes are consistent with recently adopted Federal Subsistence Board regulations.

#### **Establish a controlled use area north of Denali National Park, Proposal #233**

(adopt)

Proposal #233 would establish a controlled use area on a small area of state land commonly referred to as the “wolf townships”. This is an area of high use by a variety of user groups. The NPS supports this proposal. It would develop a controlled use area and a process to bring various user groups together in developing a plan to address the numerous issues raised in the proposal.

#### **Close the nonresident season for caribou in parts of Unit 19, Proposal #156**

(adopt in part)

The NPS is concerned about reported low harvest rates and apparent low population of caribou in the Tonzona herd near the western boundary of Denali National Preserve. We support the recommendation that a survey be conducted that will help to determine the health of this herd and any management actions needed.

#### **Modify Moose Hunting Regulations along the Nabesna Road: Proposals #186 and #187 (adopt)**

These proposals address the moose hunting regulations for the portions of Units 11 and 12 that are accessible from the Nabesna Road. Based on a recent NPS-ADF&G moose population survey of the affected area, the NPS supports ADF&G's modification of Proposal 186. This modified proposal would establish a single joint state-federal registration permit for the area and would align seasons and harvest limits along the length of the road for each user group. The resident season would be August 20 to September 17 and the nonresident season, August 24 to September 17. The bag limit for residents would be one bull with spike-fork or 50-inch antlers or antlers with at least 3 brow tines on one side and for nonresidents, one bull with 50-inch antlers or antlers with



at least 4 brow lines on one side. Establishing a joint state-federal registration permit for the area should result in improved harvest information that can be used for management. It is also consistent with recent action on a parallel proposal approved by the Federal Subsistence Board at its January 2012 meeting. We recommend taking no action on Proposal 187, based on our recommendation to adopt the modification of Proposal 186.

**Increase Bag limits and Seasons for Brown Bear in Unit 9C: Proposal #261**

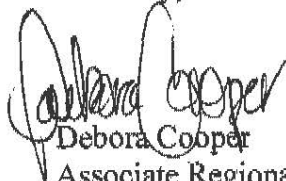
(do not adopt)

The NPS has four concerns with this proposal. 1) It expands a hunting season and bag limit that was limited to the Naknek River drainage to all of Unit 9C including Katmai National Preserve and the Alagnak Wild River. 2) It allows one brown bear per year rather than one bear every four years for residents and nonresidents. 3) We have concerns over increased harvest potential in the preserve. 4) It changes the bear hunting season so there is increased overlap with sport fishing and bear viewing activities that may result in increase conflicts with these user groups.

The intent of the proposal is to "correct the predator situation in Unit 9C". Where the intent of regulations is to reduce bear populations for the benefit of other species, these regulations are inconsistent with NPS statutes and policies and exceed Congress's authorization in ANILCA. Should the Board adopt this proposal, NPS lands need to be excluded from this regulatory change.

We appreciate the opportunity to provide comments on these important regulatory matters. Should you or your staff have any questions please contact Debora Cooper at (907) 644-3505.

Sincerely,



Debora Cooper  
Associate Regional Director  
for Natural, Cultural and Subsistence Resources  
National Park Service

cc:

Cora Campbell, Commissioner, ADF&G  
Kristy Tibbles, Executive Director, ADF&G  
Pat Pourchot, Special Assistant to the Secretary for Alaska  
Geoff Haskett, Regional Director, FWS  
Chuck Ardizzone, FWS Liaison to the BOG  
Joel Hard, Superintendent, Lake Clark NP&P  
Ralph Moore, Superintendent, Katmai NP&P  
Paul Anderson, Superintendent, Denali NP&P  
Rick Obernesser, Superintendent, Wrangell-St. Elias NP&P  
Greg Dudgeon, Superintendent, Yukon-Charley Rivers NPRES/Gates of the Arctic NP&P  
Chris Pergiel, Chief Law Enforcement Officer, NPS-Alaska Region



RECEIVED

FEB 14 2012

2/14/12

To The Alaska Board of Game:

**RE: PROPOSAL 203 – 5 AAC 92.004. Policy for off-road vehicle use for hunting and transporting game; and 92.540. Controlled use areas.** Restrict the use of all motorized vehicles in portion of 20D.

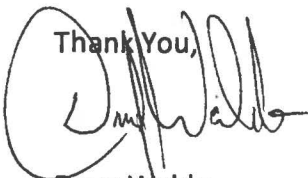
I oppose this proposal. If passed, this proposal will restrict ATV access to a significant portion of Southern 20D. While proposal 203 may have been submitted with good intentions, I feel the impact to sheep and moose hunting access is unacceptable. I also believe the issues outlined in Proposal 203 are the result of an unintended consequence of a recent regulatory change.

What has changed? Beginning in 2008, caribou registration hunt RC835 was extended by two days to correspond with the first two days of the opening of the Delta Controlled Use Area to motorized access.

The result? During a short two-day window a large number of ATVs diverge into an area of high caribou concentrations in the McCumber and Jarvis drainages. Although the area in question shows signs of ATV impact, it is important to note this has only become a serious issue in the past four hunting seasons. The area now sustains significantly more ATV traffic in two days than previously occurred during the entire 26 day moose/sheep season. This has greatly enhanced trail damage by ATVs and reduced the quality of the corresponding sheep hunt.

**The solution? Simply don't pass this proposal and encourage the Delta Advisory Committee and the local ADF&G office to work on amending RC835.** They could recommend the BOG shorten the RC835 by 2 days and re-open the area currently closed to hunting west of the Jarvis. I believe the RC835 harvest objective could still be achieved , the environmental impact by ATVs mitigated, and the motorized access historically enjoyed by moose and sheep hunters preserved.

Thank You,



Dave Waldo

Fairbanks

davewaldo@gmail.com

(907) 322-3116



This letter is to oppose opening game unit 20A, specifically the Yanert non-motorized area, to motorized use. The forethought decades ago of Lynn Castle Master Guide, using his knowledge gained from a UAF degree in wildlife biology, protected this important resource area. There are still hunters like me who believe in the tenet of "Fair Chase", the board may want to revisit this premise as it seems to be trending toward maximum harvest with gross impacts to the quality of the hunting experience for those that truly respect the animals and the land.

20A needs consistent future protection from the assault that areas opened to motorized hunting have faced. This area has been incredibly exploited already after exclusive guide areas were found to be unconstitutional. This flooded the Yanert River valley with transporters, for hire horse hunting guides from out of state and fly in hunters and guides. I can speak of this personally after witnessing this while living in a cabin 4 miles from the terminus of the Yanert Glacier year round from 1993 to 2000. After moving to the mile 229 area of the highway in 2001, I have continued to watch the quality and quantity of sheep, moose and bear go down hill, as what used to be strong genetic lines have been hunted harder and harder.

I would urge The Board of Game to listen to the people who live day to day with the land and the animals. The Yanert Valley cannot sustain any more pressure than it already receives, just the stress these animals undergo during the summer from helicopter and airplane tourism already pushes them off prime habitat and burns precious calories needed to build reserves to withstand the winter months. This area lost the ability to freely hunt caribou with the closure in the 1990's, the locals depend now on being able to get an occasional moose for the winter as it has become nearly impossible to qualify to hunt caribou in Unit 13 with the mess in Tier II and subsistence. Furthermore, the thought that the Yanert is a safe river for travel is absolutely ridiculous. I have personally witnessed many people stuck in overflow or broken through thin ice with their machines at the bottom of the river. Our community does not have the resources to rescue those who get in trouble in this unpredictable landscape. This area also contains AHTNA native lands which should be respected. In addition this motion is being brought forward not by anyone in this area, but by those who have no idea of the true implications.

I expect those in charge of policy to make good decisions based on input from those who live in the area affected and who have a history of harvesting game over long time frames.

My guess is my letter will be one of many against motorized hunting in 20A, I urge you all to listen.

Cathy Lieser  
Box 167  
Cantwell, Alaska 99729





I SUPPORT PROPOSAL 207, AND WOULD PREFER THE BOG DIRECT THE DEPARTMENT TO HOLD THE HUNT IN ITS ORIGINAL HUNT LOCATION OR CHANGE THE REGULATION TO LIMIT THE HUNT TO THAT LOCATION.

Signature

Print

City



JOHN W. SONES III

North Pole, AK



John W. Sones III  
P.O. Box 57154  
North Pole, AK 99705  
907-978-8523

16 FEB 2012

To Whom it May Concern,

Please note my "SUPPORT" for the following proposals. Significant consideration should be given to return these very traditional hunts to an Alaskan core group of hunters, wildlife conservationist and resource users.

**I SUPPORT Proposal 207.**

This is a traditional hunt amongst many of my hunting family, friends and coworkers. It allows the draw of a muzzleloader tag and hunt outside the traditional Sept 1 to Sept 25 moose seasons. Difficulty securing time away from work to get extended time off in Sept to hunt can be limiting. Kids are headed back to school and Sept may be a terrible time to miss a chance at a good start in the school year. This hunt had been a safety valve to allow possibility to put meat in the freezer when time to hunt in Sept scarce. It allows hunting from snow machines for access most years and places hunters in some of the most beautiful hunting areas in the state. This hunt allows family and friends to spend time and work together to harvest a moose. This family time can be just what parents and children need to bond as a family while advancing traditions towards our hunting heritages. Access to the previous established hunting area is convenient and safe for families to be outdoors in winter and enables them to seek shelter if the weather turns bad.

**I SUPPORT Proposal 208.**

Allowance for the use of exclusively primitive weapons for hunting in Alaska is long over due. These types of hunts allow skills to be developed that provide for increased well rounded outdoor knowledge. It is difficult to pass on traditional primitive weapon skills to children when hunts specially aligned for the use of primitive weapons are not provided for. Sure you can use primitive weapons on hunts in regular open seasons but when the only way to hunt for a particular season is with primitive weapons then it provides this opportunity outside normal season hunting pressures.

Sincerely,  
John W. Sones III



FROM: JAMES VAN BEBBER  
M.P. 220 PARKS NWY.

FEB 16 2012

ATTN:  
TO: ALASKA BOARD OF GAME. CONSIDERING PURPOSE # 213

I APPOSE # 213 REGARDING MOTORIZED HUNTING  
ACCESS IN THE YANET CONTROLLED USE AREA

REASONS: ① IMPACT ON THE ENVIRONMENT AND  
ADDED PRESSURE ON THE GAME.

ITS A HORSE TRAIL MADE BY HORSES &  
DOG TEAM'S 2' WIDE.

② CONFLICTS WITH THE PACK STRINGS  
AND HORSES & DOGS, OUTFITTERS & HIKERS!

③ LIMITED ACCESS, ONLY 2 TRAILS TO  
THE YANET, THE HIGH & LOW CROSSING  
AHTNA NATIVE CORP LAND - NO PARKING

④ THE MOTORHEADS HAVE ALL ALASKA TO  
RUT UP! LEAVE IT BE!  
WE ONLY HAVE THE YANET - WOOD  
AND CLEAR WATER AREAS.

THE STATE OF ALASKA OPPOSES THIS AND SO DO I

James M VanBebber  
A 42 yr RESIDENT OF THE AREA



4069 Cedar Avenue  
Palm Beach Gardens, FL 33410

February 17, 2012

Alaska Dept. Of Fish and Game  
Boards Support Section  
P. O. Box 115526  
Juneau, AK 998141-5526

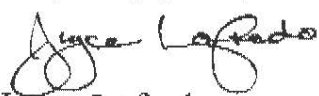
**ATTN: Board of Game Comments**

I strongly urge you to **Support Proposal 142** .

It is unconscionable Alaska permits the use of the snare trap. A  
primitive device - vicious in action.

The snares are indiscriminate catching and injuring humans,  
companion dogs, cats, and other wildlife.

Very truly yours,

  
Joyce Lofredo





**From:** tmbrown3 <tmbrown3@aol.com>  
**To:** TMBrown3 <TMBrown3@aol.com>  
**Subject:** Support Proposal 142  
**Date:** Fri, Feb 17, 2012 11:05 am

### Members of the Board of Game:

For many reasons, I strongly support Proposal 142, which would prohibit trapping of black bears in the Interior region.

1. Like most other Alaskans, I am extremely concerned over the decision to list black bears as furbearers.
2. Permitting a black bear trapping season in the units listed in this proposal would have a tremendous negative effect on the bear populations in our national parks and preserves. It would have a negative impact on tourism and residents alike.
3. I strongly disagree that bear snaring is humane.
4. Bear snaring as close as 1/4 mile from public activity, residences, etc., is irresponsible and dangerous.
5. Bear snares do not only snare the targeted animal. All bears would be at risk, as would other wildlife.

I urge you to support Proposal 142.

Thank you again for the opportunity to comment.

Sincerely,  
Tina M. Brown  
19400 Beardsley Way  
Juneau, Alaska 99801

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



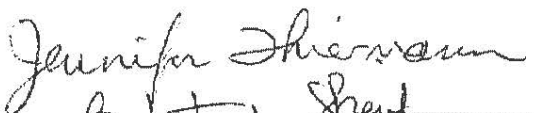
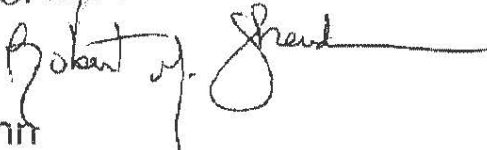
Board of Game Comments  
Alaska Dept. of Fish and Game  
Boards Support section  
PO Box 115526  
Juneau, AK 99811

Dear Board Members,

I write to ask you to support proposal 142, which would prohibit bear snaring.  
It was well researched by the Alaska Center for the Environment and I know the reasons for it have all been put before you.

Please know that there are many of us in the lower 48 who care deeply about the wildlife of Alaska, and bears in particular. We have traveled in Alaska and hope to do so again in the bear country of Katmai.  
We feel it is dangerous to attract bears to snares, and that they could injure animals of other species as well as bears.

Thank you for your consideration of our views.

Sincerely,   


Jennifer Thiermann  
Robert Sheridan  
3909 Rugen Road  
Glenview, IL 60025



### **Please do NOT approve Proposal 213**

First off, I would like to thank you for not passing this proposal in the past. I am writing you to ask you to please NOT pass the Proposal 213. I am a resident of Denali, and have lived at mile 230 Parks Hwy since 1999. There are so many reasons to keep this area non-motorized for hunters.

- This is the last area along the parks Hwy that is left as non-motorized.
  - There are a number of hunters who use this area via horseback, foot, etc Because of this quality.
  - Lets keep at least one area for hunters to be able to hunt this way without All of the mess and distraction of motorized vehicles.
- Motorized vehicles will make a mess out of our trails
  - The trails in this area are in great shape and are not torn up
  - opening this up to motorized hunting will lead to an increase in use and An increase in destruction
- The trails and terrain in the area can be hazardous. There are creek and river crossings, steep mountains, etc.
  - This is not an area for just anyone to be using, you can get hurt out there.
- There are no facilities nor parking area off of the highway for the increase of Activity that would come with opening this area to motorized hunting.
  - this leads to litter on and off of the highway near parking areas, and also on our trails.
  - this litter also includes human feces and toilet paper everywhere. Who is going to clean this up?
  - a huge pile up of vehicles right on the Parks Hwy
  - this can easily lead to more accidents on the Hwy in this area
- This area does not have the numbers when it comes to moose. There is just not that many in this area.



-These trails are used by many of the locals who live around here; the approval will congest these trails as well.

-There are so many other places for motorized hunting off of the Parks Hwy already.

-There are many homes right along this area with families and children using these trails

Please, please consider all of these reasons to NOT pass proposal 213. Thank you





Attention: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-456-6094

My name is NJ Gates and I live in McKinley Village. In my past I've done some hunting, but currently I am a recreational user of Game Unit 20C. I recreate in this area on a year-round basis either by hiking, berry-picking or skiing.

I am in opposition to Proposal 213 for the following reasons:

1. I have not seen any scientific data that indicates there are significant numbers of moose to entertain an extended "winter" hunt and antlerless hunts. This is questionable game management. From my own anecdotal evidence, I see sign of moose throughout the year yet rarely see moose in the area.
2. Historically, this is a pristine valley that has not been opened to motorized hunting, and many locals, including myself, would prefer to keep it that way. Motorized hunting would change the whole character of the valley with its impact to the trails and the delicate taiga and tundra. The Yanert valley is currently one of the last areas statewide where a non-motorized hunt is still in place. Let's not trash it and leave it for hunters who prefer a true wilderness hunt.
3. As it is now, there is no off-highway parking to accommodate the current number of hunters let alone an addition of motorized hunters, their vehicles, and their trailers. Currently, vehicles park along the highway, in the ditches, and occasionally in driveways. This is an unsafe situation that will only be exacerbated and extended with a "winter" hunt.

I am in opposition to Proposals 227 and 229 which would declare Unit 20C an intensive management area and institute a plan for



maximizing the yield of moose for human harvest. Once again, show me the science that indicates that this area needs protection from ecological harm from a natural game population.

I am in opposition to Proposal 228 which would institute wolf predator control in Unit 20C. The Board of Game has stated that any predator control program will be based on scientific data. This proposal provides no scientific justification regarding its claim or proposed outcome. Respected biologist Bob Hayes has this to say about the effects of lethal wolf control on ungulate prey populations in the Yukon for 18 years... broad scale wolf control "has limited benefits to prey populations, it does not last, and should be relegated to the past along with poison and bounties" (Hayes 2010) Also, the Intensive Management Act (Alaska statutes 16.05.255e-g) allows for alternatives to lethal predator control, including habitat enhancement, which the Board of Game can and should apply in Unit 20C.

I am in opposition to Proposals 230 – 232 which would liberalize taking of both grizzly and black bears in Unit 20C through various means, including trapping and baiting. Trapping and snaring of bears have long been prohibited in most of Alaska. There are many reasons to continue this ban. Steel leg-hold traps large enough to hold bears are a serious danger to humans and likely would be fatal to pets. Snares for bears would be set during the non-winter months when bears are active. These are not the months when furbearer snares are set. Snares set for bears would likely catch many non-target species including moose and caribou. I doubt that significantly more bears would be taken by trapping and snaring if it was legal, and doubt that additional ungulates would be available to hunters as a result of adopting this proposal. The benefits would likely be small compared to the costs and risks to human safety. Using traps or snares to kill brown or black bears raises serious ethical and humane issues. Catching and holding large powerful and potentially dangerous animals presents a situation where wounding loss and injury can occur and bears can escape resulting in



prolonged suffering as well as becoming a threat to the human population. Baiting bears, or essentially feeding bears, habituates them to humans and may lead to increased human injury and increased property damage. Snaring brown bears has been proven ineffective in the past in a brown bear capture program conducted by the Alaska Department of Fish & Game in southeast Alaska. With regulations such as these, public acceptance of hunting will be tarnished and adversely impact the responsible and ethical hunters.

Thank you for all your hard work. I hope that my comments will offer up insights that may have been overlooked by the members of the Board of Game.

NJ Gates  
McKinley Village Resident



February 15, 2012

Alaska Dept of Fish and Game  
Board Support Section  
PO Box 115526  
Juneau, AK 99811

Fax - 907-465-6094

Dear Board,

I am writing to oppose a couple of different proposals that I am most interested in that will come up at the Board of Game meeting in Fairbanks in March.

I lived for years in Ferry, just a little north of Healy. I still own my property there and try to make it back several times a year. The area has a special place in my heart, even though I live on the south of side of the Alaska Range these days.

When I first moved to Alaska, I lived not far from the Yanert Valley, to the east of Denali National Park. I used to recreate there. And I am friends with several hunters who enjoy(ed) the non motorized hunting opportunities there. It was a chance for them to go horsepacking and not have to deal with ATVs. I enjoy having moose in the freezer as much as anyone, but some of these proposals introduced have nothing to do with science.

I am appalled that there would be a proposal (proposal 213) to introduce motorized hunts in the Yanert. Even worse, in the last few years I have heard more and more reports of airplanes flying over the hunting area, basically doing land and shoots. This is not hunting. Please leave one area in central Alaska void of ATV's. The amount of damage done to the tundra by ATVs and snowmachines would be great. There is no trailhead, or not much of one. It is rare for hunters to actually experience what hunters used to experience all the time. Quiet, fresh air and peace. Oppose proposal 213.

That brings me to Ferry, which is none of the above during hunting season. One reason I left was what would occur in the fall. More than once I cleaned up human feces and wads of toilet paper on my property as well as moose guts, left by those who had no respect for where they were and apparently had no respect for hunting. I have always opposed the intensive management area there and I oppose the idea of declaring 20C intensive management area and subsequent liberalized hunting of predators. ( proposals 227-232). Only in Alaska would one introduce the idea of predator killing in the area surrounding a national park that brings in thousands of people from around the world to view wildlife. Before approval of this proposal I would like to see the scientific and economic basis for this decision. Economic, meaning, would the state of Alaska REALLY want this proposal to be broadcast around the world for all of those people who want to come to Denali for their one and only chance to see a bear or a wolf? And



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scientific -- are there any numbers to support the idea that greater harvest could be supported? The area is large, but will be accessed via the highway and the area near Stampede Road and other popular places. It is highly unlikely game in the far reaches of the unit will be touched. I was around when ADF&G thought it was a great idea to 'relocate' black bears that were to the west of Denali. They were dropped close to my home, walked thru my backyard and across Denali back to their home past McGrath. That, like this idea, was a really bad idea that didn't work. While a number of proposals merit great consideration, some ideas need to be opposed . Please oppose proposals 227-232.

Thanks so much for all the work you do. Pay attention to science and the numbers.

Most sincerely

Sue Deyoe  
PO Box 324  
Talkeetna, AK 99676

Feb. 17, 2012

Dear Board of Game members:

I am a 30 year resident of Alaska and will always call Alaska my home. I have lived and worked in Denali and Healy for 4 years. This area is one of the most impressive and attractive to visitors and to residents alike.

Denali National Park is so glorious because it is still relatively WILD. People who only wear white shoes have a chance to glimpse REAL LIFE wildlife interaction.

PLEASE DO NOT TAKE THAT AWAY FROM ALL OF US!!!!

Your proposals 227,228,229 will create huge losses for not only the huge tourist industry, but from our grandchildren as well. The animals viewed in the Park are not hunted and so can be viewed and photographed. They are the magnet.

I heard the local Advisory Committee OPPOSES these suggestions.

These people have their boots on the ground. How can you not listen to them?

PLEASE OPPOSE PROPOSITIONS 227, 228,229, 213.

PLEASE SUPPORT PROPOSITION 233 so we can fully understand the impacts.

Thank you.



Lenora Morford  
P.O.Box 672263  
Chugiak, Alaska 99567



**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**

Subject: Opposition to Proposal #213 and Proposals 227 to 232; Support for Proposal 142, 233

To whom it concerns:

**Proposal 213:** I support maintaining non-motorized access only for hunting in the Yanert Controlled Use Area (Yanert CUA). For this reason I oppose Proposal 213. I have concerns about public safety, negative impacts to trails, non-motorized hunters and other users, and the lack of other solutions considered.

I live just north of the Yanert CUA, and have noticed an increasing number of vehicles parked at main access points. Proposal 213 discusses impacts from access at other sites (i.e. Rex, Ferry), but does not address the fact that the main access point to the Yanert CUA is already overcrowded, with no true parking areas other than alongside the highway, and is beginning to see the effects of overcrowding with litter and human waste that is left behind. Opening the area to motorized access would increase the safety issues and impacts to this already-impacted trailhead.

While the Fairbanks AC suggests there is a need to increase antlerless moose harvest, it is stated in the proposal that no other solutions were considered for the issue raised. I have many friends who take advantage of, and appreciate, the non-motorized hunting experience in the Yanert CUA. Considering the area's importance to non-motorized hunters that do use the area (in increasing numbers as pointed out above), it seems more appropriate to instead work on improving access (i.e. trail conditions, parking, waste removal) for these non-motorized hunts.

Department comments on this proposal state that the "strategy is to spread the harvest spatially and temporally to reduce localized overharvest and social conflicts (e.g., trespass, parking and roadside camping issues, garbage and human waste issues, access issues, and hunter crowding)." The Board should seek solutions related to the problems with other access points directly, rather than expanding these impact into the Yanert CUA.

This proposal received overwhelming opposition when it was introduced last year (then numbered Proposal 232). It was not then and is not now supported locally, and the Middle Nenana AC and Denali Borough Assembly have voiced opposition alongside a large number of Alaskan residents. Please vote no on Proposal 213 and maintain a quality, non-motorized, hunting opportunity in the Yanert CUA.

**Proposals 227-232:** I oppose Proposals 227-232. Scientific backing does not exist for these proposals, and the intensive management protocols and increased predator harvest these



proposals introduce is inappropriate and potentially very damaging. Considering the larger ecosystem, and the value of lands adjacent to Unit 20C specifically *because* of the presence of wildlife, including predators, it is unreasonable for the state to adopt an intensive management in Unit 20C. The November 2011 surveys reported much higher bull and calf to cow ratios, and a higher yearling to cow ratio than in adjacent Unit 20A. Access to unit 20C has been cited numerous times by the Department as a reason for lower harvest numbers in 20C (as compared to the adjacent 20A). Killing predators will not change this. All of this demonstrates a lack of need for intensive management, predator control, or increased grizzly bear take at baiting stations in this area. The Board of Game should vote no on these proposals, or at the very least defer proposals (as recommended by the Department) until the January 2013 meeting or until significant scientific evidence is provided (including continued population surveys, and habitat quality and carrying capacity determination. Overwhelming public opposition to this proposal should be given due consideration.

**Proposal 142:** I support Proposal 142, and encourage the board to eliminate trapping of black bears, or the incidental take of grizzly bears at baiting stations in the Interior.

**Proposal 233:** I support Proposal 233, and ask the Board of Game to consider approving this proposal now, or deferring action until the January 2013 meeting if the Board needs more information. The increasing divide between different user groups is demonstrated over and over by the controversy surrounding recently proposed and eliminated wildlife buffers, intensive management proposals, and conflicts between users. A local resident I spoke with, who grew up hunting and trapping within the proposed Denali CUA, has expressed concerns about the increasing network of trails into areas typically not used by motorized vehicles, and increased conflicts with hunting parties. Many users, both consumptive and non-consumptive, echo his concerns. As a resident along the Stampede Road, a year-round user of the area, and a recreational dog-musher, I am concerned that these types of conflicts will increase. They will increase if no action is taken. Establishing a controlled use area could help to manage these conflicts between different users and promote collaborative solutions between the different user groups. Resolving conflicts between user groups (both consumptive and non-consumptive) is something that the Board of Game could, and should, work towards.

/s/ Hannah Ragland

Physical Address: Panguingue Subdivision, Stampede Road near Healy

Mailing Address: PO Box 657, Denali Park, AK 99755

907-687-2403





## Alaska State Board of Game

February 16, 2012

To whom it may concern:

**I OPPOSE bear snaring.**

My name is Matthew Paul Eagleton. I have over 40 years' experience in the taking of big and small game animals and fish.

I am an Alaska State Resident. I am an Alaska Registered Hunter and Fisherman.

The Eagleton family is a hunting family. We pride ourselves with having traditionally taken game for food in North America since the 1700's. Our family labored to construct the ALCAN HWY and has called Alaska home for three generations. I was taught by my father and grandfather (and theirs before them) to honor and respect the hunting tradition and maintain the moral virtues of taking game and wasting not. I value my hunting traditions as 'priceless'. A TRUE outdoorsman is just that; TRUE to the outdoors and its holdings. I instill tradition in my family and others that wish to be part of their natural environment. To date, I maintain the highest respect for our environment, the pursuit of game, and principles. Principles affirmed by the hunt, the company, the respect of the land, and most of all, the belief any animal harvested is a coveted treasure. A treasure meant to serve as testimony to the commitment of hard work and family; a commitment that demands respect of our natural surroundings and all the creatures beholden within.

My opposition is simple. I oppose bear snaring because the bear should not be subject to undue cruelty and prolonged suffering. A swift, ethical kill is not equated with snaring.

Additionally, I feel the name of 'hunter' is being disrespected by the proposed bear snaring regulation. This affects me because I am fearful that hunting overall is compromised by the negative attention resulting from this snaring issue. Extremist non-hunting groups can then draft tactics targeting all hunters, focusing on the one or two publically sensitive issues, such as snaring bears. This causes me great concern, as their lobbies are strong and have deep pockets. I ask you to consider any such effects or trailing circumstances this action may have on future game resource actions.

I write to you as a concerned outdoorsman, hunter, and as a father wishing to maintain respectful game management and harvest for future generations. Please fully weigh my opposition to cruel and unusual taking of our shared, natural game resources. You are trusted to manage state resources for the good of all public use, not just those that have the loudest voice at the table. Please listen to the words I have provided. Feel free to contact me regarding my comment.

Sincerely,

  
Matthew Eagleton

Biologist

m.eagleton@gmail.com



Attn: Board of Game Comments  
Alaska Department of Fish & Game  
Boards Support Section

Opposition to Proposal 213, 227, 228, 229, 230, 231, and 232:

As a resident of Denali, a land owner at Carlo Creek, and as a hunter, I would like to express my strong opposition to Proposal 213, which would open the Yanert Controlled Use Area to motorized hunting during the winter months. I would also like to voice my opposition to Proposal 227, calling for intensified game management through predator control in Unit 20C, Pproposal 228, instituting wolf predator control in Unit 20C, and Proposals 230-232 liberalizing the hunting of both grizzly and black bears in 20C. This opposition to 213 has also been voiced by our Middle Nenana Fish and Game Advisory Council and through a resolution passed by the Denali Borough Assembly a for the second year in a row, echoing public sentiment.

As October is a month rarely graced with snow in Denali, ATVs and OHVs (not snow machines) would be used to gain access under the proposed plan. If the current restrictions are not continued the destruction of trails and vegetation would be inevitable, most likely disrupting and harming the populations of the very animals that we hope to harvest and their habitat.

Currently, public trail head access to and parking for the trail system within the CUA is limited at best. The additional traffic virtually guaranteed by this proposal will only add to the existing problem, creating dangerous conditions for motorists and leaving excess trash and waste.

The elevation of big game population through predator control is scientifically unsubstantiated and lacks the necessary scientific justification to be implemented in Unit 20C. And as the ADF&G publications admit that "there is still much to learn" about the effectiveness of wolf and bear control, the proposed intensified management plan could very well be unduly aggressive and adversely affect wolf and bear populations. They also indicate that "It is not expected that one single management approach will satisfy everyone. Therefore the Board of Game directs ADF&G to use different management strategies in different parts of the state to provide for different values and demands". If this *is* the case, please let



Unit 20C use a "different strategy" and be the model for an un-intensive predator control management area.

Like many others who live here, I hunt and recreate in the Yanert throughout the year. One of the most appealing aspects of this area to me and many others is the fact that motorized hunting is expressly forbidden in the CUA. If hunters choose to hunt here, they must be willing to do so on foot, by horseback, or by dogsled, free from the noise of motorized vehicles. Please do not follow through with the proposals to transform this very special place into another loud and crowded, trail-ravaged hunting area. Let us hunt, let us walk.

Regards,



Benjamin Toth

Mile 228 Parks Hwy  
PO Box 194  
Denali, AK 99755



Comments Regarding Proposal #213  
Antlerless Hunt in district 20-A

Bill Madsen  
PO Box 2  
Denali National Park, AK 99755  
(907) 683-4441  
[Madsen.bill@gmail.com](mailto:Madsen.bill@gmail.com)

Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-486-6094  
465

Faxed: 2-17-12 11:00 AM

Regretfully, I have not found the time to study the information provided by the Alaska Fish and Game to the extent I had hoped. And with the deadline for comments today, I need to send mine now, none-the-less.

What I did take from what I read, was that the purported problem of over-grazing, it seems, is proven and well-documented. However, it also appears that the problem is almost exclusively isolated to the Tanana Flats area and is exacerbated by migration of moose in the foothills to the south of the flats onto the flats in winter. I don't see the problem elsewhere in the district.

I also highly question the interpretation or software program used to make assumptions of moose populations based on nearby actual surveys. A casual look at the chart shows many instances of claimed higher densities near actual surveys that show lower densities. Those are big assumptions that I don't buy into.

So, my comments are these:

- 1) Fish and Game have made many subdivisions of the game unit over the years to address specifically unique habitat or populations, which is good. With that thought in mind, The Southwestern portion of 20-A should NOT be included in any antlerless hunt. I'm speaking of the area south of the intersection of the Nenana River and Parks Highway at the border with the Park and up the Yanert to some point and south. There isn't an over population or any other need for it.





- 2) As a hunter, I don't think it is proper or ethical to hunt down pregnant cows on snow machines while they are in the middle to final stages of surviving or not surviving winter. That is not fair chase and should not be legal. You can say it isn't, but if you put people out there on snow machines, it will happen.
- 3) I think an antlerless hunt is poor management to begin with. If you want to kill cows, kill cows. You demand hunters know whether a bull has a 50-inch spread or a 49-inch. So what is so hard to have them identify a cow over a bull? It seems very incongruous science to make it a crime to kill a 35 inch bull in September, but just fine in February.

Items you could consider.

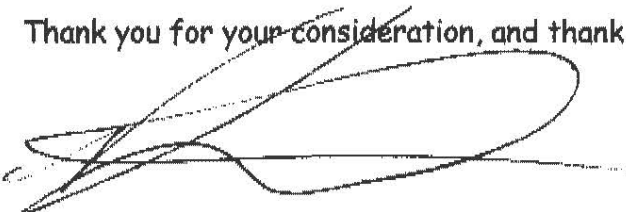
I understand the biggest problem is access to the area of the problem.

- 1) These are modern times why not allow more hunting during the normal hunting season in the problem area and allow or restrict the harvest to cows. A successful hunter could be required to give the coordinates of the kill and take digital photos 8 directions from the gut-pile which could prove the accuracy of the location of the kill. Perhaps coordinate with the military to help move the carcasses out by helicopter until the numbers dwindle? It could be done as a large group hunt one time as needed. The meat could be given to charities or the prisons.
- 2) There are places F&G believes has too many wolves. Instead of killing them from aircraft, dart them and move them to the area of too many moose. That doesn't help the hunters, but it helps the wolves and the habitat, and hunters aren't able or willing to control the herd anyway.

In closing I hope you will consider my complaints and suggestions. I also strongly ask that you DO NOT consider opening up the trails leading from the Parks Highway, south of the national park to winter hunting of antlerless moose nor any motorized hunting.

I'm sure my neighbors will provide you with ample information as to why the trails themselves are not suitable to this as well.

Thank you for your consideration, and thank you for your hard work and public service.



Bill Madsen  
Mile 224, Parks Highway (Carlo Creek)





## CAMP DENALI NORTH FACE LODGE

DENALI NATIONAL PARK  
WILDERNESS CENTERS, LTD.

Post Office Box 67  
Denali National Park, AK 99755  
Tel: 907-683-2290 • Fax: 907-683-1568  
E-mail: info@campdenali.com

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

February 16, 2012

To Whom it May Concern:

I am writing as a local resident and small business owner of the Denali area to voice my opposition to Proposal 213 which would open up the Yanert Valley to late season motorized hunting.

The McKinley Village/Denali Park area has been my home for 38 years. I grew up at Milepost 227.5 of the Parks Highway at Deneki Lakes, and currently make my home, with my husband and two young children, at Milepost 228. Our home is located very nearly opposite the gravel pit access to the Yanert Valley. My husband and I own and operate Denali National Park Wilderness Center, Ltd, dba Camp Denali and North Face Lodge, two wilderness vacation lodges on private inholdings inside Denali National Park. The base for our winter operations is at Milepost 229.5 with our year-round staff of six.

I highly value that the Yanert Valley of Unit 20A has been a non-motorized hunting area. While the area is heavily used for hunting every fall, the use is quiet, traditional, of an appropriate scale, and has relatively little impact to area trails. If snowmobiles and ATVs were allowed for fall hunting, it would negatively impact our lives in many ways. Trails would become widened, ribboned and rutted. The scale of use could increase manyfold. I would seriously worry about the personal safety and privacy of my children at play outside our home. Because our driveway is only a few hundred yards away from the gravel pit access, I worry that we would have vehicles parked in our ditch and road shoulders and exploring up our driveway at odd hours.

I returned to this area to acquire land, make my home, and raise a family here because of its peace and quiet, its remoteness and wilderness character, and its excellent formal and informal trail access to the surrounding backcountry. I loathe that the integrity of this area be compromised by introducing motorized hunting access. I loathe that I may have to start worrying about our personal safety and privacy. I urge the Board of Game NOT to support Proposal 213. Please retain the traditional, non-motorized access to Yanert Valley.

Sincerely,

Jenna Hamm  
Executive Vice President



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

Micah Miller  
4015 Murphy Dome Road  
Fairbanks, AK 99709  
(907) 750-4765

Letter in Opposition to Proposal 219 – 5 AAC 92.530(8)(B) Management Areas. Eliminate the Minto Flats Management Area restrictions on airboats.

I would like to express my opposition to Proposal 219, which would remove the restriction on airboat use in the Minto Flats Management Area (MFMA) and therefore make access unlimited for all uses. This must not occur. Access to the area is currently limited to conventional motorboats (including jet-, mud-motor-, and prop-driven boats), and should stay this way. Moose hunters have plenty of access to the region without additional use of airboats and airplanes.

The authors of Proposal 219 cite an overpopulation of moose in the MFMA, yet this is unwarranted. While a healthy population does exist, in no way does the evidence support this claim. The ever-popular any moose registration hunts for this area are an effective, though controversial, means of limiting the population size to a biologically viable and sustainable level. The authors also neglect to consider non-moose hunters using the area, such as waterfowl hunters, fishermen, and other recreational users, all of whom would suffer significant drawbacks from unlimited airboat access.

As a waterfowl hunter first and a moose hunter second, I feel that the access to the MFMA is already sufficient using conventional motorboats. I spend a great deal of time throughout the management area, and while water levels drop significantly over the hunting season, I feel this does not prevent hunters from accessing hunting areas, but makes a hunt far more worthwhile and rewarding. Only in extreme low water years is access limited, but it affects the entire interior, not only the MFMA. I have hunted from September 1 to freeze up for the past four years in the MFMA, and while access does become more challenging, it is not an issue if properly prepared.

The use of the most heavily travelled areas of the MFMA, including the Big Minto Lake complex, the Chatanika, Tatalina, and Tolovana rivers, and the wetland complex near the village of Minto, is alone reason enough to restrict airboat access. The rivers tend to be narrow, and must be travelled cautiously. I personally have had multiple close calls on Goldstream creek with airboats being operated at high speed without respect for other boaters, and know of multiple incidents where airboats were involved in collisions in this very spot. One such accident involved ADF&G biologists, and could easily have been fatal. Airboats need lots of room to turn at high speeds, cause undue stress to wildlife via excessive



noise pollution, and in my experience, are operated in such a way that it detracts from the ability of other hunters to enjoy their hunt experience and succeed in either waterfowl or moose hunting.

The other side of the access issue is that airboats are legal for use on the Tanana flats, where access by other craft is limited due to shallow water. The MFMA is very accessible to other boats, and if airboats are allowed for hunting, will seriously degrade hunt quality for all other hunters. Airboats also allow access into areas without water at all, creating an unfair advantage, and potentially preventing other hunters from filling their tags (and therefore, their freezers).

Current airboat access on the Tanana Flats, which in fact does have an overpopulation of moose, has not succeeded in negating population growth, and I would argue has contributed by reducing the success of hunters not using airboats. The noise pollution created causes animals to avoid adequate habitat adjacent to areas accessible to conventional boats, thereby reducing the number of moose hunters are likely to take. Airboats access areas far from open creeks, often going into areas other hunters already have accessed on foot, and severely affect the quality, success, and enjoyment of moose hunting. Flying over the Shaw Creek flats, I once observed an airboat over 1.5 miles from the nearest open waterbody, and an obvious path where the boat operator had pushed over trees, brush, and vegetation to reach an otherwise inaccessible hunt area, and then sat on top of the airboat cab with a rifle. This unethical behavior detracts from public perception of hunting and degrades wildlife habitat.

To summarize, the authors of the proposal negligently disregarded the effects of airboat use on wildlife, their habitat, other hunters, and the efficacy of a hunter-mediated population management tool. Airboats pose an undue risk to other boaters, provide an unfair advantage to hunters in terms of accessing areas, and must not be allowed for use on the Minto Flats for moose hunting. Do not support Proposal 219, or else all other hunters and the wildlife they pursue will suffer.

Sincerely,

Micah Miller





**LAW OFFICE OF KNEELAND TAYLOR, P.C.**

425 "G" Street, Suite 610  
Anchorage, AK 99501  
907-276-6219 telephone  
907-258-7329 FAX  
e-mail: kneelandt@alaska.com

February 17, 2011

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

Re: March Meeting, 2012

Dear Board Members:

Proposal 142. Bear Snaring. I support proposal 142 because it would prohibit the trapping of black bears. I would broaden this proposal to include brown bears.

I oppose all snaring and trapping of bears in the State of Alaska, that is, unless done by ADF&G professional employees for research purposes, or by ADF&G professional employees to deal with a very small number of problem animals.

Snaring of bears for the sole purpose of increasing hunter success in taking moose or caribou populations is policy which I find appalling. This policy should bring shame to all hunters.

Very truly yours,

  
Kneeland Taylor



Dear BOG: I want to go on record as **STRONGLY** opposing Proposal 213, and also Proposals 227 through 232, inclusive. Proposal 213 is of particular interest to me as I live in McKinley Village area, and use the Yanert and surrounding drainages extensively.

On the other hand, I very much support Proposal 233. Thanks for your attention, Alan.

Alan Seegert  
Box 203  
Denali Park, AK  
99755



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

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

**February 16, 2012**

**Dear Chairman & Members of the Board:**

**On behalf of the nearly 1000 members of the Alaska Trappers Association, we wish to share our opinions on several proposals, which you will be considering during your March 2012 Region III meeting in Fairbanks.**

**We SUPPORT Proposal #141**

**We support this proposal to allow more opportunities for bear snaring. The Board of Game has demonstrated leadership regarding snaring of bears in Alaska. We believe that this method should be extended to additional areas, when and where it is justified.**

**We OPPOSE Proposal #142**

**The Board of Game has demonstrated leadership in the use of snares for black bears. We recommend that the BOG process be allowed to proceed and be evaluated. USFWS uses foot snares for capturing bears. If it is acceptable for the USFWS to use snares to capture bears, it should be acceptable for citizens of the state, as well.**

**We OPPOSE Proposal #145**

**We believe ANS numbers on wolves are unnecessary. This proposal is nothing more than a tactic being used by some organizations to try and close wolf seasons around the state.**

**We OPPOSE Proposal #146**

**Coyotes should only be taken by trapping when the fur is prime and has value.**

**We OPPOSE Proposal #147**

**We are opposed to the use of helicopters to access traplines.**

**We OPPOSE Proposal #148**

**By the rationale presented in this proposal, all non-resident hunting and fishing**



seasons should be closed, as well. This proposal is nothing more than a tactic to close non-resident seasons.

**We OPPOSE Proposal #149**

We do not want to offend our fellow trappers by opposing this proposal, but at this time we feel the need a more coherent system to manage furbearers. We would like to work with the ADFG and the BOG to come up with a more standardized approach in setting guidelines for how furbearers should be managed, and seasons set accordingly. We would like to see the seasons stay the same for the time being, until this process can be implemented.

**We OPPOSE Proposal #150**

We believe ANS numbers on furbearers in these units are unnecessary, and a tactic being used by some organizations to try to close furbearer hunting opportunities to non-residents around the state.

**We OPPOSE Proposal #160**

We do not want to offend our fellow trappers by opposing this proposal, but at this time we feel the need a more coherent system to manage furbearers. We would like to work with the ADFG and the BOG to come up with a more standardized approach in setting guidelines for how furbearers should be managed, and seasons set accordingly. For now we would like to see the seasons stay the same until this can happen.

**We OPPOSE Proposal #169**

We do not want to offend our fellow trappers by opposing this proposal, but at this time we recognize the need a more uniform system to manage furbearers. We would like to work with the ADFG and the BOG to come up with a more standardized approach in setting guidelines for how furbearers should be managed, and seasons set accordingly. For now we would like to see the seasons stay the same until this can happen.

**We OPPOSE Proposal #180**

We do not want to offend our fellow trappers by opposing this proposal, but at this time we recognize the need a more uniform system to manage furbearers. We would like to work with the ADFG and the BOG to come up with a more standardized approach in setting guidelines for how furbearers should be managed, and seasons set accordingly. For now we would like to see the seasons stay the same until this can happen.

**We OPPOSE Proposal #198**

We do not want to offend our fellow trappers by opposing this proposal, but at this time we recognize the need a more uniform system to manage furbearers. We would like to work with the ADFG and the BOG to come up with a more standardized approach in setting guidelines for how furbearers should be managed, and seasons set accordingly. For now we would like to see the seasons stay the same





until this can happen.

**We OPPOSE Proposal #199**

We do not want to offend our fellow trappers by opposing this proposal, but at this time we recognize the need a more uniform system to manage furbearers. We would like to work with the ADFG and the BOG to come up with a more standardized approach in setting guidelines for how furbearers should be managed, and seasons set accordingly. For now we would like to see the seasons stay the same until this can happen.

**We OPPOSE Proposal #200**

There is no biological need for ANS numbers on wolves in unit 12. This is simply another way for a non-consumptive user group to try and stop the use of resources.

**We SUPPORT Proposal #225**

We support this proposal to remove the prohibition on aircraft use for beaver trapping in the Minto Flats Management area.

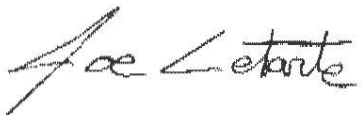
**We SUPPORT Proposal #231**

We support this proposal to allow more opportunities for bear snaring. The Board of Game has demonstrated leadership regarding bear snaring in Alaska. We believe that this approach should be extended to additional areas, when and where it is justified.

**We OPPOSE Proposal #233**

There is currently no biological or scientific data to support creating a new controlled use area at this location.

Sincerely,



Joe Letarte, president



Dear Board of Game,

I am writing to express my opposition of Proposal 213, a motorized hunt in the Yanert Valley. The Yanert is my backyard. I ski here in winter and hike, bike, and run the trails as much as possible in spring and fall. This past weekend I skied with a friend from the powerline out to the Yanert River and back. Despite being a Saturday, and using local mushing trails, we encountered not a sole. But the area is beginning to be degraded by 4 wheelers, and muddy ruts occur in the more popular sections. A motorized hunt in the area would bring more people, more vehicles, more noise, and alter the quality of the areas scenic and audio landscape. There are very few game management units left in the interior where areas are non-motorized, and traditional values reign. It takes stamina, planning, and time. As a resident, I embrace the uniqueness of this. Denali, my home community, is economically driven by the pristine quality of its wilderness with tourism. Let this area continue to remain somewhat sacrosanct in this regard.

In addition, moose and caribou have had an especially difficult winter with deeper than average snowpack and cold temperatures. The population and individual moose are challenged this year, and all pointers lead to a lower than average calving season this spring. This would be an especially difficult season to justify a motorized hunt.

Please continue to listen to local residents, who are the ones who will be most impacted by your decision.

I oppose Proposal 213.

Best regards,



Jan Tomsen  
BS Wildlife Biology, UAF 2007  
Resident at Mile 229 Parks Hwy



Message

Page 1 of 1

**Andy****Subject: FW: Re: Bear Snaring**

Alaska Board of Game  
C/O Alaska Department of Fish and Game  
PO Box 115526  
Juneau, Ak 99811-5526  
fax # 907-465-6094

Re: Bear Snaring

My name is Andy Hawk, I am a 21 year resident of this state. As a lifelong outdoorsman, I have trapped fur-bearing animals, fished for anything with scales and fins, and been an avid hunter of both large and small game. I work as a Class A Assistant Guide ( Kodiak Brown Bear), and also as a custom gunsmith. As such, I encounter all manner of outdoorsmen/sportsmen and women from all over the state of Alaska.

For the past couple years, I have been more or less ignoring the "Bear Snaring" policy issues. Mostly because the idea seemed SOO absurd, that it couldn't possibly pass into reality...? As a result of the ongoing discussions and potential implementation of these insane policies, I have decided to become more involved. I am engaging with my customers, all of my friends and family, and am encouraging them to speak out! So far, I have been unable to locate a single individual who is NOT disgusted by the idea of snaring a bear! .....Regardless of the reasons for doing so! These people are not "Greenies", they are hunters, trappers, fishermen and professional guides!

I fear that "we" hunters will be judged by the general population, as responsible for most, if not all, intensive management policies. Sooner or later, there will be a price to pay for these extreme measures of management! I worry the price paid will be by me and my fellow hunters, in the form of lost hunting privileges!

My concern is genuine, so much so, that I have contacted Valerie Connor, of the Alaska Center for the Environment, to acquire petitions. The email link is spreading rapidly, and I am working overtime to encourage signers! Please pay attention to this petition, many of the signers are not "Greenies". We are hunters, trappers and guides who do not agree with the policies of a few "slob" hunters, whom have apparently hijacked game management of the state of Alaska!

Please consider exploring options of game management less obscene as the indiscriminant snaring of bears.

Andy Hawk  
644 Fischer Ave.  
Anchorage, Ak 99518  
907-562-0881

*Andy Hawk 2/15/12*

2/15/2012

PC88  
1 of 1

# Facsimile Transmission Form

**To:**

**FROM:** FAI SSC, Fairbanks AK

**Message:**





## **BOG – BOARDS SUPPORT SECTION**

### **Comments for 2 March 2012 Meeting in Fairbanks, Alaska.**

**NOTE:** I mailed in comments this week that may not arrive in time. IF you receive both copies, Please use these faxed comments and not the mailed copy.

**Thanks**

**Dave Machacek**



**#171, 172, 173 - OPPOSE**

Requiring meat-on-the-bone discriminations against all hunters based on age. As you age and can no longer lift/carry full quarters you forced to stop hunting due to regulations like this. It does nothing to increase amount salvaged, it is strictly a tool to reduce hunters, especially elderly and those who must travel greater distances.

From: Dave Machacek, 840 Pickering Drive, Fairbanks, Alaska 99709

**#178 - OPPOSE**

There is no biological reason to consider closing Red Sheep Creek. There is only a handful of fly in hunters using this area, otherwise it is mostly not hunted which I believe is why it was opened back up a few years ago. If any change is considered it should be to expand the open area.

From: Dave Machacek, 840 Pickering Drive, Fairbanks, Alaska 99709

**#190 - SUPPORT**

We have extremely limited permits available for Tok and Delta drawings. These highly sought permits that should be reserved for residents who mostly do not have the cash, airplanes, or time to travel to the far corners of Alaska for Sheep. Non-resident hunters have already traveled thousands of miles; a few more miles for a bush flight should be of little impact. Reviewing the number of applicants for these drawings, you can quickly see there are insufficient permits to meet the needs of Alaskans now.

From: Dave Machacek, 840 Pickering Drive, Fairbanks, Alaska 99709

**#193 - OPPOSE**

Moving the Caribou season opener back to August 10<sup>th</sup> has proven to create a quickly closing season while the Bulls are still in Velvet. Please stay with the later season so hunters have an opportunity to find Bulls in their prime with all velvet rubbed off.

From: Dave Machacek, 840 Pickering Drive, Fairbanks, Alaska 99709

**#203 - OPPOSE**

Area is already closed to ATV's August 5<sup>th</sup> to 25<sup>th</sup>, allowing anyone who desires to not see ATV's a perfect time to go. We have 1000's of Sheep hunters applying for the 2<sup>nd</sup> Delta Sheep Hunt because they want to use an ATV for access. The practice of using ATV's in this area has gone on for decades and is a huge part of the demand for these Sheep Tags. Closing this area to ATVs just creates another PARK, which we already have plenty of! In addition to Park lands we're lost much of unit 13 due to BLM, unit 11 with most of the Nebesna Trails closed due a law suit, Haul Road restrictions, Rex Trail limitations, etc. Approval of proposals like this also discriminates against all those Alaskans who can not longer hike long distance. We have very few areas like this, please don't take anymore away.

From: Dave Machacek, 840 Pickering Drive, Fairbanks, Alaska 99709



Intensive Game Management Moose population goals for 20A need to be increased. Few, if anyone find the current estimate of about 12,700 moose to be acceptable. Please increase the goal and ask for a continued push for habitat improvements. We can not give up because conditions in past years prevented burning. We need to keep working for habitat enhancements so 20A can support a higher density of moose. Natural Resources performed a controlled burn near Harding Lake last Sept/Oct, so conditions must have been right. Maybe we could have burned selected areas in 20A at same time if we haven't given up?

From: Dave Machacek, 840 Pickering Drive, Fairbanks, Alaska 99709

#### #206 - AMEND

Unit 20(A),  
the Ferry Trail Management Area,  
Wood River Controlled Use Area,  
and the Yanert Controlled Use areas

1 antlerless moose by  
Registration permit only:

August 25 to October 31

A person may not

Take a calf or a

Cow accompanied by

A calf

#### Remainder of 20(A)

1 Antlerless moose by  
Registration permit

August 25 to December 15th

Only; a person may not

Take a calf or a

Cow accompanied by

A calf

Timing of these hunt end dates is critical! Without the 15 days in December for Zones 5 & 6 you will totally eliminate any harvest due no access. Also ending hunts in Controlled Use Areas in October potentially allows some type of Muzzleloader Hunt to continue, while still providing access. Please do not allow later winter Antlerless Hunts to continue in order to stop the shooting of Bulls that we could not shoot in September and our largest Bulls. Since the smaller Bulls carry their antlers longer, they are somewhat safer, but our 50, 60, 70" Bulls don't stand a chance. Since there is no requirement to prove your Bull was Antlerless, some of the smaller Bulls are likely shot too. This seems to be a big loophole hunt.

Do not allow any winter Antlerless Registration Hunts in the Wood River Controlled Use area. If you open all of 20A, everyone will go to those foothills and devastate the herd like they did in 2006, & 2007. Complaints have piled in since at least 2006 on the shooting of all these Bulls. We told the Department has clearly heard this, but here it is February and the season is still open to shoot bulls we had to pass up in September. Please shorten the time window in regulation so the temptation to continue the shooting of these bulls does not continue. 300 Big Bulls is enough.

From: Dave Machacek, 840 Pickering Drive, Fairbanks, Alaska 99709



## #207 – SUPPORT

Obviously the process was used to change this hunt 2 years ago, but unfortunately most of those impacted were not aware and thus not involved. Many miners, property owners, and hunters of the Gold King area support moving this hunt back and did not support it being moved from the foothills where it has always been.

I trapped several years in unit 20 and mine in the Gold King area. Past complaints have always been targeted at Antlerless Hunts conducted in that area. Just the fact that few, if any, complaints were received in the decade prior to antlerless hunts implies this Muzzleloader Hunt was not the real cause of most complaints. As a trapper, others running my line was never much of an issue, if they left my sets alone. After all, it is public land. We have laws on the books to deal with those that might disturb sets. Considering that that, it is worth a lot to have someone else do all the hard work of opening your trails and then to leave a few moose kills sites would be grand. Sometimes a few weeks disruption early in the trapping season is worth the benefits. A season held in the foothills can be held in November and does not need to extend into December, although sliding it to 15 November to 15 December would help ensure access, year after year.

November 2011 Moose surveys conducted in the foot hills of the old DM766 hunt area indicate some of the highest population counts in all of 20A. This seems to imply the science is there to reinstate this primitive weapon hunt.

For a quality November Muzzleloader Hunt you need #1 Snow machine access during the season, which narrows 20A down to West of the Wood River. #2 Good distance vision, which means the Wood River Controlled Use area, and Ferry Management Area. This area allows for longer range spotting, allowing time to put your whites on and to conduct your all day stalk.

Please keep in mind in November/December you can not call, it's often -30 or colder, so taking a stand is not an option for long. It involves using a whole of techniques different from fall hunts.

In the end, this is 99% public land and 100% public resource that the department should be able to provide opportunities for Late Season Primitive Weapon Hunters.

Proposals to roll back Drawing & Registration Hunts to November 30<sup>th</sup> will end all quality Winter Muzzleloader hunting in Alaska Interior unless this Proposal is adapted. Two thirds of the remainder of 20A will remain in accessible and hunt will become like DM782 where the Department has a difficult giving permits out and success rates dive to near zero.

NOTE: 5 Jan 2012 Fairbanks Advisory Sub-Committee Meeting on Interior Proposals, the Department spokes person stated: "The Department will NOT consider holding a hunt in this area without clear guidance from the BOG." So no matter how dense the Moose Population is, how ideal the area is for this type of hunt, or how intense the public wants it, the Department will not hold a hunt on this public land without your guidance. I do not believe the full AC was aware of this statement. Request your guidance to the Department whether they have the authority to hold a biologically sound, low impact Muzzleloader season, on public land within the Wood River Controlled Use Area.

From: Dave Machacek, 840 Pickering Drive, Fairbanks, Alaska 99709

## #208 – SUPPORT

This proposal is to create a 2<sup>nd</sup> 20A Muzzleloader Hunt, outside the Controlled Use areas, with boundaries similar to the 2011 season. Should this hunt continue, it is essential for it to run well into December? Most years, 80% of the area is inaccessible during November. Not necessarily longer, but later, allowing time for more rivers to freeze. We broke trail across the Tanana near Birch Lake after Thanksgiving, but it was an exceptional cold November and most years that would not happen. That left only a few days of the season after rare November weather conditions.





After spending 15 days and covering 1000 miles in this newly created hunt, I believe you could also make it either sex and not increase the harvest much. This hunt does not even compare in quality to the previous area. When you get a glimpse of moose, they take one step and they are gone. Rarely is there sufficient time to prep and fire a muzzleloader. For the most part you have very little distance vision, trails are few and narrow. Due to years of Antlerless hunts, now moose have changed their habits, they no longer stand there @ 100 yards. Some hunters may like this new hunt area and should have an opportunity to do it again. Eight were successful in 2011, although the success rate is not what it appears. Many drawn hunters did not go after they learned the hunt area had moved. So the success rate data is skewed.

This could be a 2<sup>nd</sup> Muzzleloader hunt in unit 20A outside the Controlled use areas where the Department could play with the boundary's to focus the hunt where they want the herd reduced. Should Antlerless Hunts continue this could be another tool for the department to meet their goals in a more challenging and likely, more acceptable hunt to the public? Using this tool, may allow for increasing the quantity of drawing permits.

Some will say you can already hunt Cows with a Muzzleloader under the registration permit, which is true! Except, like last November, the Open Antlerless area within 20A, was not accessible. So in reality it often doesn't work out that both permits align within same area. Now it is February and the Antlerless Hunts are still open, if the November Muzzleloaders could have taken a few last November, maybe the Antlerless hunt could close and less Antlerless Bulls would be shot.

From: Dave Machacek, 840 Pickering Drive, Fairbanks, Alaska 99709

#### #210 – OPPOSE

Opening these drainages to ATV's in September would likely wipe out the herd in one season. These hills and drainages are very accessible in September with nothing but the Controlled Use Area Rules to protect it. Most of the Moose in these drainages migrate North of the Rex during the Rut anyway, so you're talking about the same animals that are already hunted North of the Rex. It's just once they come out of the foothills, they have heavier timber to disappear in.

Those drainages have Cub Air Strips scattered everywhere, so there already is fair pressure within the existing Controlled Use Area.

If you open it up, I'd be right there with hundreds of others. It would be great for one season and then nothing in or out of the foothills. Unfortunately too many hunters would participate in a change like this.

From: Dave Machacek, 840 Pickering Drive, Fairbanks, Alaska 99709

#### #211 – OPPOSE

Closing this area to ATVs just creates another PARK, which we already have plenty of! In addition to Park lands we're lost much of unit 13 due to BLM, unit 11 with most of the Nebesna Trails closed due a law suit, Haul Road restrictions, etc. Approval of proposals like this also discriminates against all those Alaskans who can not longer hike long distance. We have very few areas like this, please don't take anymore away.

Proposal does not address those that go in and carve out runways above 2500 feet. It also creates an exclusive area for those who have already changed the terrain by cutting in runways or those that will in the future. It also has no impact on mining operations that likely would continue and not fall under these rules.

From: Dave Machacek, 840 Pickering Drive, Fairbanks, Alaska 99709



Closing this area to ATVs just creates another PARK, which we already have plenty of! In addition to Park lands we're lost much of unit 13 due to BLM, unit 11 with most of the Nebesna Trails closed due a law suit, Haul Road restrictions, Rex Trail limitations, etc. Approval of proposals like this also discriminates against all those Alaskans who can not longer hike long distance. We have very few areas like this, please don't take anymore away.

Proposal does not address those that go in and carve out runways above 2500 feet. It also creates an exclusive area for those who have already changed the terrain by cutting in runways or those that will in the future. Mining operations will continue to leave their footprint on the landscape.

From: Dave Machacek, 840 Pickering Drive, Fairbanks, Alaska 99709



# Comments Opposing Proposal 213

February 16, 1012

Joseph Clay Walker  
P.O. Box 31  
Denali Park, AK 99755

To The Alaska Board of Game:

I have built a home and am raising a family within the Yanert Controlled Use Area Game Unit 20A. I live and hunt here. The bull caribou we packed out last fall is still providing our family healthy nutrition. I personally love such a high quality non-motorized hunting experience which is also highway accessible. I see other hunters enjoying this essentially wilderness hunting experience as well. There are not many similar opportunities available elsewhere.

I understand that Proposal 213 targets winter hunts for motorized access. I personally know of two antlerless moose taken in the past few weeks. People are successfully hunting the area.

The local governing body, the Home Rule Denali Borough has now twice unanimously passed resolutions supporting continued non-motorized hunts in the Yanert CUA. (Resolutions 12-01 and 11-06)

The Denali Borough also passed a resolution opposing the antlerless moose hunts in 20A. (Resolution 09-22).

Public testimony has overwhelmingly opposed Proposal 213.

I respectfully ask the Board of Game join the local community and local government opposing this deeply unpopular Proposal 213. Simply, it is not wanted, nor needed.

Finally, on a more personal note, I look forward to my growing son (and maybe even daughters) enjoying the high quality non-motorized hunting experience the Yanert offers. Please don't take that away from them and future generations.

Thank you for your time and for your service,

J. Clay Walker



Mark and Deborah Moderow  
P.O. Box 185  
Denali Park, AK 99755  
(907) 683-4235

February 17, 2012

RE: AK Board of Game, Opposition to 2011/2012 Proposal 213

Members of the Alaska Board of Game:

My name is Mark Moderow. Our property, house and family sled dog kennel are located just off mile 228.9 of the Parks Highway, within the Yanert Controlled Use Area ("Yanert CUA") which is the subject of this proposal. Our mailing address is P.O. Box 185, Denali Park, AK 99755. I would plan to attend your spring meeting, however as a Director of the Iditarod Trail Committee, I must attend the events in Anchorage and Willow.

#### Summary

I must strenuously object to Proposal 213, proposed by the Fairbanks Advisory Committee. The proposal, changing a long-standing and balanced policy on motorized vehicle use in the Yanert CUA, a discrete local area, should not be adopted. The alleged benefits and improvements advanced in support are virtually non-existent and the negative impacts are greatly understated by the out-of-area committee's proposal. The appropriate advisory committee to consider the proposal, the Middle Nenana Advisory Committee, based on extensive testimony and comments and its local knowledge of the actual conditions in the Yanert CUA, voted to oppose the proposal. The Denali Borough adopted a resolution opposing the proposal. The Board of Game should also vote against it.

#### Background

Proposal 213, as advanced by the Fairbanks Advisory Committee, is based upon its representations of conditions existing in the "Rex Trail", "Ferry Trail", "Gold King", and "Yanert CUA" areas. You must recognize that all of these areas lie outside of the area where the statutes presume that the Fairbanks committee members are "well informed on the fish or game resources of the locality."<sup>1</sup> In fact, the Middle Nenana Committee, is established as the "appropriate advisory committee" to possess such local knowledge of these areas.<sup>2</sup> It goes without saying that the appropriate committee is also in the best position to facilitate effective notice and review appropriate input from affected residents. The Middle Nenana Committee has done so and based their decision to oppose the Proposal on such input. To the extent that many more area residents were unable to attend the Middle Nenana Committee's meetings this cycle, you should

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<sup>1</sup> See AS 16.05.260.

<sup>2</sup> See AS 16.05.260. and 5 AAC 96.021.





also look to their comments filed before the Board of Game at its last meeting, which were unanimous in opposition, and any further comments filed in this comment round.<sup>3</sup>

#### Overstated Benefits and Improvements

The Fairbanks Advisory Committee's justification for Proposal 213 is vague as to the effects on the "quota(s)" for antlerless moose hunting.<sup>4</sup> It appears to be referring to the direct effect on the intensive management quotas for the entirety of Unit 20, but in actuality it is obvious that it would affect only the balance between the quota and the current moose population in an extremely small and discrete area of the Unit, the Yanert CUA in subunit 20A, and as discussed below, only a very small area of the CUA adjacent to the Parks Highway. Artificially increasing the quota in a small and isolated area of the Unit will not serve to enhance any original data-driven intensive management goals for the entire Unit. It is my understanding that a moose population estimate for the entirety of subunit 20A showed a decrease in moose and that no current population data has been generated for the Yanert CUA in support of this proposal. It is just a thinly veiled attempt to open further areas to destructive practices without any real data-driven wildlife management benefit.

An analysis of the access benefits advanced by the out-of-area committee demonstrates a similar lack of local knowledge. The Fairbanks Committee cites "open water" and "late-freezing" rivers along with "trail access" problems as leading to "overcrowding and concentrated hunting" in other areas which would be improved by upsetting the long-standing policy on motorized vehicle use in the Yanert CUA, and merely transferring the negative effects there. The bare assertions of the Fairbanks Committee are not entitled to particular weight as to the conditions at the Rex and Ferry Parks Highway access points. The same is true as to the relative river and trail conditions. As is discussed below based upon local knowledge, the facts relating to the limitation imposed by rivers, wetlands and terrain and the facts relating to initial access demonstrate that the claimed benefits are essentially non-existent.

In fact, the access in the Ferry and Rex areas seems superior to that in the Yanert CUA. I believe there is legal parking and adequate legal easements to access the existing hunts.<sup>5</sup> I have personally parked and mushed from Rex to Gold King and found the lodge owner at the time accommodating and the frozen trail adequate. By contrast, there is only one legal access to the Yanert Valley proper, at what is locally known as the Horse Trail at approximately Mile 228 of the Parks Highway. There are no recognized

<sup>3</sup> It should be noted that this proposal, advanced as Proposal 232 at the Spring 2011 Board of Game Meeting, received 31% of all of the comments submitted at the meeting on all of the 233 proposals, despite the presence on the agenda of vastly more controversial issues. All of the comments submitted on the proposal were in opposition.

<sup>4</sup> As the Yanert CUA is within Unit 20A, there is a substantial question whether the recent interpretation by the legal counsel assigned to the Board by the Department of Law as to the meaning of A.S. 16.05.780 will allow the Board to authorize any antlerless hunt in the subunit. Without an antlerless hunt, this proposed justification is meaningless and cannot serve to support the proposal.

<sup>5</sup> 1979 Public Access Easement (ADL 401880); ADNR R.S. 2477, No. 119.



R.S. 2477 easements offering access to the valley.<sup>6</sup> The entire highway frontage for the Yanert Valley is held in private ownership and unavailable for public access except for the Horse Trail access. This single access is posted against trespass, hunting and parking and consists of only a 25 foot wide "17b" easement which is limited to use by foot, dogsled, animals, snowmobiles, 2 and 3 wheelers, and small ATVs.<sup>7</sup> The size and legal limitations of this trail are in contrast to the well documented legal access at Ferry and Rex.

It is also a matter of local knowledge that this trail was utterly destroyed by trespass access of heavy equipment brushing the Intertie in 2010.<sup>8</sup> Upon apparent complaint by the BLM and Ahtna, the contractors did bulldoze the remaining muck back to a uniform grade, but as the vegetation mat was compromised over large portions, it will still take time until the trail can take traffic again at any level above casual local use without total freeze up. One incident this past fall had a hunter's horse break its leg in one of the muck holes and have to be put down. Casual trespass trails to avoid the damaged trail have already developed. It simply cannot take additional ATV use before complete freezeup.

In addition to trail access issues, there is no easement or area for legal parking, causing extreme congestion from trucks and horse trailers in the ditches during the existing pre-snow season(s). The ditches and road shoulder of course are not available once snow plowing commences on the Parks Highway.<sup>9</sup> While the Yanert River management intent for Unit 4C of the Tanana Basin Area Plan included that "[a] trail head and parking area for the Yanert River Valley will be identified by the Division of Parks and Outdoor Recreation and be retained in public ownership" this was never been done and there is no 17b site easement reserved for parking under Federal law.<sup>10</sup> The gravel pit owned by Ahtna has consistently been posted against trespass and hunting and was re-opened last season for gravel extraction, leaving its future status unclear. This lack of parking has been cited by the Denali Borough as potentially creating "a significant public safety concern" in its recent Resolution 12-01 opposing the Proposal.<sup>11</sup> There is simply no legal parking and limited legal access to the Yanert Valley proper to accommodate any additional motorized use.

Further, the only legal access to the Yanert River from this 17b easement occurs after the intervening Ahtna landholdings (and any current selections, upon conveyance) are crossed to State land, approximately 1 ½ to 3 ¼ miles, and then North to the river on

<sup>6</sup> See ADNR R.S. 2477 case file on McKinley Village Trails, No. RST 1793.

<sup>7</sup> Ahtna 17b Easement 21L, and proposed easements 114L and 212D9 if additional Ahtna selections are conveyed. In contrast to state regulations which also would allow highway vehicles, such as 4wd vehicles and pickups, on state lands, the Federal law does not allow these vehicles or larger ATVs on the 25 foot wide 17b easements. See and contrast 11 AAC 96.020(a)(D) and 43 CFR 2650.4-7(b)(2)(i).

<sup>8</sup> See blog: Yanert River Trail- Completely destroyed! at <http://blog.wiekopomne.pl/?p=10362>

<sup>9</sup> See 13 AAC 02.340.

<sup>10</sup> See 43 cfr 2650.4-7(b)(3).

<sup>11</sup> See Denali Borough, Alaska Resolution 12-01, adopted January 11, 2012.



the local Tang Creek Trail.<sup>12</sup> This trail is only a winter trail due to the many ponds and swamps that lie on the trail. ATV use of the Tang Creek Trail, or any attempts to by-pass this trail before complete freeze-up would destroy the trail and adjacent wetlands and habitat, thus violating the State regulation against causing "significant rutting". Locals, including myself which initially put in and maintain the Tang Creek Trail for winter recreational and mushing use, do not attempt to put this trail in until the ponds and swamps are completely frozen and covered, usually well into November or December. This winter, the trail was not put in until December due to lack of snow cover. Hunters on foot, showshoes and skis routinely use this trail once it is frozen. Areas to the East and further up the side hills of the local mountains are well known to be avalanche prone with several local residents trapped by slides in the recent past. This is also true of the short 17b easements at Carlo and Slime Creeks, which do not actually access the Yanert Valley proper.

Even if the Board were to overlook the complete lack of legal parking, limited 17b access off the Parks Highway, potential trespass access to the Yanert River and extreme habitat destruction by ATVs before complete freeze up of the Tang Creek Trail, it is obvious that the proposing committee does not understand the true nature of the Yanert River. It is, in fact also a "late freezing" river due to its diverse nature, at times shallow and braided and at others constricted and deep.<sup>13</sup> Dramatic overflow, from the river itself and adjacent streams, keep even locals familiar with the river off it until well into the winter. Even then, rapidly changing conditions can, as happened to my wife and handler last winter, cause a dry river trail to turn to flowing water several feet deep in a matter of hours. The actual conditions on the Yanert River are obviously not known to the Fairbanks committee and their bald assertions should not trump the knowledge and facts known to the Middle Nenana Committee based on extensive local input and due consideration. As of December, there was still flowing water in portions of the lower river and no one attempted access to the upper portion of the river near Revine Creek until mid-December.

Until well into the winter when the Yanert River is accessible by legal access and more predictable river ice conditions, the local conditions restrict motorized use by locals to areas bounded on the East by Revine and upper Moose Creeks. As such, if the Board were to recognize posted hunting restrictions by private landowners, including Ahtna, the total area accessed by motorized vehicles by Proposal 213 would consist of only 10-12 sections of land- which would be further reduced by an additional 6 sections if the land selections of Cantwell/Ahtna are conveyed. It is hard to see how the addition of four to 12 sections of land to motorized use before a complete freeze up of the trails and the Yanert River, with the associated problems, would solve "overcrowding and

<sup>12</sup> The local trail(s) under the intertie leading from the Horse Trail to other portions of the valley lie entirely upon Ahtna lands and is not public access.

<sup>13</sup> Even if the Board allows antlerless hunting in subunit 20A contrary to the advice from the DOL, this justification advanced by the Fairbanks Committee must also fail due to its recent compromise closing the hunts on November 30. The Yanert River does not freeze for travel by that date.



negative social aspects" issues in other areas of the Unit.

Further, as a factual matter, while grooming the sled dog trails this winter and last, I have personally encountered several hunters on skis and by foot who were literally able to cover this entire area for moose without the benefit of motorized transport. Just this last month we utilized our dog team to aid a local hunter in retrieving his moose after a successful hunt. If the purpose of this proposal is to ensure adequate hunting coverage of the accessible area, this is already being accomplished. It once again demonstrates that the out-of-area committee does not understand the actual conditions relative to the portions of the Yanert valley accessible from the Parks Highway. The Board should recognize that the bald assertions of the Fairbanks Committee do not withstand scrutiny of the true facts by the local Middle Nenana Advisory Committee after due consideration, and should not carry the day with you.

In conclusion, the quota and access benefits and improvements advanced in support of this out-of-area proposal are virtually non-existent and, as explained below, the negative impacts are greatly understated.

#### Understated negative impacts

The Fairbanks Advisory Committee's justification for Proposal 213 ignores significant negative impacts and seriously understates others. It simply ignores the creation of additional trespass issues with private property holders along the Parks highway as well as the access and parking issues discussed above that would be created by additional uses and pressure. Comments before this Board last spring emphasized the parking and waste issues on the highway and the destruction and trespass issues. The Ahtna Tene Nene BOG, representing the largest land-owner in the area, specifically opposed the proposal on the basis that it would "cause erosion to the soil, impact the resources, make additional trails and encourage trespass on Ahtna, Inc. lands."<sup>14</sup> It is anticipated that the Ahtna Committee will again oppose the current proposal, but its meeting is scheduled for the date these individual comments are due. Significantly, the Denali Borough, which opposed the Resolution last year, has also passed another resolution against the proposal and in support of continuing traditional non-motorized hunting within the Yanert CUA.<sup>15</sup>

Remediating destruction of wetlands on winter trails caused by even current casual recreational use of ATVs before total freeze up occupies a significant amount of my personal time and other residents of the valley. The vast majority of local use of ATVs and snowmachines occurs after freeze up because of the prevalence of wetlands, ponds and lakes straddling the local trails. Many of us cooperate in filling holes created through the vegetation mat on the trails and maintaining trails throughout the Yanert Valley proper. The out-of-area committee does not have any knowledge of the unique local wetlands terrain issues in the valley or the limited area that can be accessed legally until total freeze up. It seems that rather than simply transferring the problems caused

<sup>14</sup> BOG Record Retention Log 64, 03 08 11, Ahtna Tene Nene comments Part II.

<sup>15</sup> Denali Borough, Alaska Resolution No. 11-08, approved March 9, 2011. Denali Borough, Alaska Resolution No. 12-01, approved January 11, 2012.





by destructive use to another area, emphasis should be placed on efforts to preserve and remediate the Rex area trails that is being undertaken by the Alaska Department of Natural Resources pursuant to a recently awarded grant to study the reconstruction of the Rex Trail. Trespass issues in the western Yanert CUA accessible off the Parks Highway, discussed above, and the habitat and local trail destruction potential are either unknown to the out-of-area committee or are simply ignored.

The only negative impact recognized by the out-of-area committee and discussed in the proposal is to "other winter recreation... because of the need to share trails and back country with motorized vehicles." This impact would present itself in an amplified manner in the extremely limited area actually available from the Parks Highway access. While I must candidly state that I have rarely experienced negative interaction with local and recreational motorized users when either maintaining trails, running our sled dog teams or otherwise out in the valley, the additional ATV and snowmachine volume placed in the limited area would present an out of proportion impact. The interaction impact on the existing locally maintained trail system of ski-only trails would also be significant, as presently certain trails are utilized only by non-motorized users by tacit agreement. This is entirely consistent with the recreational balance called for in the Yanert River Management Unit 4C of the Tanana Basin Area Plan.<sup>16</sup> As discussed above, however, the impact of additional ATV or ORV traffic prior to total freeze up would be devastating to the local trails of any nature.

Following brush clearing under the Intertie in last year, we spent significant time until well after freeze up repairing extreme damage to just the local trail system. Intervening habitat on these corridors suffered damage that will take years to recover. Spreading this type of off-road use to the entire valley before total freeze up would present an absolutely tragic impact on habitat and the local, limited trail system used by hunters and recreators alike and the adjacent wetlands. My personal observations of the ATV and ORV impacts off the Denali Highway to the South give me serious doubts as to the continuing recreational value of the Yanert Valley proper if the out-of-area proposal is adopted. The recreational balance called for by the Tanana Basin Plan would be destroyed.<sup>17</sup> In this respect, the Board should not rely the bald assertions underpinning the Fairbanks Advisory Committee's proposal. The negative aspects of this proposal are apparent in light of the actual facts.

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<sup>16</sup> It is odd that the Fairbanks Committee was willing to compromise to close antlerless hunts early so as not to conflict with trappers, but is entirely dismissive of the illegal habitat damage that would occur prior to freeze-up and in the conflicts with the recreational goals of the Department of Natural Resource's Tanana Basin Plan.

<sup>17</sup> See footnote 16, immediately above.



Conclusion

Proposal 213, changing a long-standing and balanced policy on motorized vehicle use in a discrete local area, must not be adopted. The benefits and improvements advanced in support are virtually non-existent and the negative impacts are greatly understated or ignored. Stated simply, for the reasons detailed above, Proposal 213 should not be adopted by the Alaska Board of Game.

Thank you for your time and commitment.

A handwritten signature in black ink, appearing to read "Mark and Debbie Moderow", with a long horizontal flourish extending to the right.

Mark and Debbie Moderow



## National Parks Conservation Association<sup>®</sup>

Protecting Our National Parks for Future Generations<sup>®</sup>

Alaska Regional Office . 750 W. 2nd Avenue . Suite 205 . Anchorage, AK 99501  
(907) 277.6722 . FAX 907.277.6723 . [www.npca.org](http://www.npca.org)

February 17, 2012

Cliff Judkins  
Chair  
Alaska Board of Game  
Rest of the address here

Re: March 2012 Board of Game opposing proposals #109, #119, #141, #146, #147, #167, #181, #196, #227 to #232, #236, #261

Dear Chairman Judkins,

Wildlife is one of America's great resources. Nowhere is wildlife more protected and encouraged to exist in a natural condition than in our national parks – especially here in Alaska. Unfortunately on national preserve lands, the National Parks Conservation Association (NPCA)<sup>1</sup> continues to recognize and draw attention to a disturbing trend in the state of Alaska's management of predators, especially wolves and bears, that runs counter to sustaining natural conditions. This trend favors liberalizing sport hunting harvest methods and means, as well as liberalizing seasons and bag limits, to promote an increased take of wolves and bears with an anticipated result in higher populations of moose, caribou and other wildlife for the purpose of human consumption.

While the state can implement its Intensive Management strategy to place human consumption as the top priority for wildlife use on its own land, the state's Intensive Management and Maximum Sustained Yield mandate directly conflicts with National Park Management Policies that disallow the manipulation of one wildlife population to benefit the population of another, hunted, species<sup>2</sup>. Furthermore, state lands bordering National Parks and Preserves in Alaska are critical to the long term ecological health of National Park Service managed wildlife populations. A level of cooperation must occur between the state and the federal government to effectively manage wildlife on an ecosystem or landscape scale. The need for such management strategies and cooperation is widely recognized in scientific literature and in the 1982 Master Memorandum of Understanding.

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<sup>1</sup> The National Parks Conservation Association (NPCA) is America's only private nonprofit advocacy organization dedicated solely to protecting, preserving, and enhancing the U.S. National Park System. Founded in 1919, NPCA has more than 340,000 members of which 1,000 reside in Alaska.

<sup>2</sup> Management Policies at 4.4.2 "*The Service does not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species (i.e., predator control), nor does the Service permit others to do so on lands managed by the National Park Service.*"



## A Review of Federal Legal Mandates

Wildlife's importance to our park system is embodied in the 1916 National Park Organic Act that includes in the purpose of the park system the direction to

"....conserve the scenery and the natural and historic objects and the wild life therein...."

Protecting and preserving wildlife is reinforced in the Alaska National Interest Lands Conservation Act of 1980 (ANILCA) which states in Section 101(b):

"It is the intent of Congress in this Act to... provide for the maintenance of sound populations of, and habitat for, wildlife species of inestimable value to the citizens of Alaska and the Nation, including those species dependent on vast relatively undeveloped areas;"

Providing for wildlife populations and habitat in Alaska's parks is further defined in Section 815 (1) with specific language directing that national parks and monuments will be managed to sustain "*natural and healthy*" wildlife populations and national preserves managed to sustain "*healthy*" populations.

Maintaining healthy wildlife populations, however, does not preclude the Park Service from providing for both sport and subsistence hunting opportunities in national preserves, as directed by Congress in ANILCA Section 203<sup>3</sup>. Yet hunting in national preserves is allowed only when it is consistent with other purposes of the park system as set forth in ANILCA Section 1313:

"A National Preserve in Alaska shall be administered and managed as a unit of the National Park System **in the same manner as a national park** except as otherwise provided in this Act and except that the taking of fish and wildlife for sport purposes and subsistence uses, and trapping shall be allowed in a national preserve **under applicable State and Federal law and regulation.**"

The key words here are "administered and managed as a unit of the National Park System in the same manner as a national park...under applicable State and Federal law and regulation." ANILCA makes it clear that, while Alaska has some unique provisions, its parks are to be treated like other units of the park system across the country. Management direction for the national park system in Alaska is firmly grounded in the 1916 Organic Act as reinforced in ANILCA Section 203<sup>4</sup>. How Park Superintendents are to manage park wildlife pursuant to the Organic Act is found in the National Park Service Management Policies.

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<sup>3</sup> "That hunting shall be permitted in areas designated as national preserves under the provisions of this Act."

<sup>4</sup> "the Secretary shall administer the lands, waters, and interests therein added to existing areas or established by the foregoing sections of this title as new areas of the National Park System, pursuant to the provisions of the Act of August 25, 1916 (39 Stat. 535), as amended and supplemented"





Of primary importance to our discussion today is Management Policy 4.4.2, which makes it abundantly clear that the manipulation of wildlife populations on lands managed by the National Park Service is not allowed:

The Service does not engage in activities to reduce the numbers of native species for the purpose of increasing the numbers of harvested species (i.e., predator control), nor does the Service permit others to do so on lands managed by the National Park Service.

The express ban on predator control was further clarified in a letter from the Assistant Secretary of Fish, Wildlife & Parks to Gerald Nicholia, Chair of the Eastern Interior Alaska Subsistence Regional Advisory Board on December 19, 2005:

*"...undertaking intensive management practices, including predator control activities as conducted by the state of Alaska, is not allowed on NPS lands."*

In summary, preserves in Alaska are bound to the Organic Act as well as to ANILCA and they are managed under the same Management Policies as parks in the Lower 48. Direction in ANILCA, the Management Policies, and from the Secretary's Office make it clear that while harvesting wildlife in national preserves can occur, it cannot deplete healthy populations or unacceptably impact natural processes, natural distributions, densities, age-class distributions and behaviors, and harvest cannot be done for the purpose of increasing the numbers of harvested species (i.e. predator control).

### **Alaska Hunting Regulations Must Be Non-Conflicting with Federal Legal Mandates**

NPS management direction for implementing the legal mandates of the Organic Act and ANILCA for harvesting wildlife in National Preserves in Alaska is found in 36 CFR 13.40(d) which states:

**"Hunting and trapping are allowed in national preserves in accordance with applicable Federal or non-conflicting state law and regulations"** (emphasis added).

In managing hunting on national preserves, we are confident that the National Park Service fully understands that its mission is to protect healthy wildlife populations in accordance with the direction set forth in ANILCA, the Organic Act, the Management Policies, DOI direction and other applicable laws and regulations, as reviewed above. As such, when the state of Alaska proposes new hunting laws or regulations for Game Management Units (GMU) that include all or portions of national preserves, the standard by which the Park Service evaluates these proposed new laws and/or regulations is one of "non-conflicting" with the Management Policies, ANILCA or the Organic Act as amended and supplemented.

To ensure that there is no conflict, the Management Policies call for consultation with states on harvest policy. In Section 4.4.2,

the policy calls on the Service to consult with state agencies on certain fish and wildlife management actions and encourages the execution of memoranda of understanding as appropriate to ensure the conduct of programs that meet

mutual objectives as long as they do not conflict with federal law or regulation.

Key words in this policy are “mutual objectives” that “do not conflict with federal law or regulation.” Under the terms of the existing Management of Understanding between the NPS and the State of Alaska, we believe the Park Service has attempted to ensure that mutual objectives are met by submitting timely and detailed comments on proposed regulation changes to the Alaska Board of Game. However when the state of Alaska does not live up to its side of the agreement by ignoring Park Service protests over proposed new hunting regulations that **do conflict** with federal law or regulations, the Park Service is forced to take action within its own regulatory regime, creating confusion for the hunter while doing what it must to protect park resources.

At the January 2012 Board meeting, NPCA attempted to address several conflicting hunting methods by proposing that lands managed by the National Park Service be exempt. Five of these proposals, which had NPS support, were voted down. These proposals would have exempted NPS lands from baiting, killings cubs and sows with cubs, use of artificial light, trapping wolves when pelts are not prime and prohibiting the use of firearms to trap wolves. A sixth proposal to ban snaring on NPS lands was not acted on because there were currently no seasons set – a decision that was postponed from the January meeting to this meeting in March. It is clear to us that the state has no interest in addressing these questions on a comprehensive level, so we must continue to object to specific proposals in meeting after meeting that authorize hunting methods that conflict with NPS policies. We do so again at this meeting.

NPCA supports all requests by the Park Service to modify proposals and/or exempt NPS lands from proposed new hunting regulations. Specifically we have comments on the following proposals:

**Proposal #261 – Oppose.** This GMU 9C proposal is out-of-cycle which of particular concern for those members of the public and Advisory Councils with a long and established concern for brown bear management in this area. This proposal was never distributed statewide in the proposal book, making it incredibly difficult for the public to even know this proposal exists. We found it deep in the Board Support webpages.

Our concern about bear harvest numbers in this area is long and documented with the Board. Our comments on the March 2005, 2007, and 2009 BOG meetings reference numerous proposals that would reduce the existing season lengths in order to reduce the target harvest of brown bears in Katmai National Preserve. The concern was a spike in bear harvest numbers in 2003 and 2005 that was more than double the harvest levels of the previous 16 years. From 1986 to 2002, the average annual regulatory year harvest was 14 bears. That number jumped to 34 and 35 respectfully in 2003 and 2005. The number of brown bears observed by brown bear viewing guides dropped at the same time as these harvest levels increased. NPCA’s concern was the Park Service’s ability to meet Katmai’s Congressional purpose of protecting “high concentrations of brown/grizzly bears<sup>5</sup>.”

NPCA, the National Park Service, bear viewing guides and bear photographers all engaged the Board with numerous proposals and ideas for reducing this harvest back to the historic 1986-2002 levels – none of which were adopted by the Board. However, recognizing this significant public

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<sup>5</sup> ANILCA, Section 202(2)

concern, the Board did not further liberalize season length or bag limits during this time period and we hope they won't this year as well.

This proposal would significantly alter both the season length and bag limit. The season would shift from an every-other year three week fall and two-week spring season to NO CLOSED dates for residents and a two-month spring and two-month fall non-resident season. Bag limits would be changed from one bear every four regulatory years to one bear a year. We urge the Board to oppose this proposal.

**Proposal #141, Proposal #231 – Exempt NPS lands or oppose.** Black bear trapping has no place in a national preserve. The only reason for trapping black bears is to “primarily alleviate predation on moose calves...as a management tool for black bears and grizzly bears where hunting is not sufficiently effective to achieve population management goals.” This is manipulation of the black bear population conflicts with NPS Management Policies. Should this proposal pass, all NPS lands must be exempt. This proposal impacts Denali National Preserve, Lake Clark National Preserve, and Yukon-Charley Rivers National Preserve.

**Proposal #146 – Exempt NPS lands or oppose.** No season on coyotes in all Interior GMUs. This proposal was submitted to “improve the survival probability for other species, namely Dall sheep and caribou.” This manipulation of coyote populations conflicts with NPS Management Policies. Should this proposal pass, all NPS lands must be exempt. This proposal impacts Denali National Preserve, Lake Clark National Preserve, Wrangell-St.Elias National Preserve, Gates of the Arctic National Preserve, and Yukon-Charley Rivers National Preserve.

**Proposal #147 – Exempt NPS lands.** Helicopters are not allowed to land on NPS managed lands

**Proposal #167 – Exempt NPS lands or oppose.** Extending the wolf season to May 31. The purpose of this proposal is solely to increase the take of wolves to allegedly benefit moose populations. This conflicts with NPS Management Policies. Should this proposal pass, all NPS lands must be exempt. This proposal impacts Bering Land Bridge National Preserve and Gates of the Arctic National Preserve.

**Proposal #181 – exempt NPS lands or oppose.** The only reason for this liberalization of the brown bear season to a make it year around is to reduce populations allegedly to provide for an increase in musk ox populations. The decline in musk ox in unit 26B cannot simply be linked to brown bears. NPCA made this argument in our comment letter on August 20, 2010 when this issue was addressed at an emergency meeting of the Board.

The biological data does not support the State's claim that brown bears are the cause of the current muskoxen population decline. The issue is far more complex than simply removing brown bears from the equation. For example, very high rates of pathogens have been found in the NE Alaska muskoxen population, suggesting that a copper deficiency may be a leading cause of calf mortality and low recruitment rates, not brown bears<sup>6</sup>. This copper deficiency was discussed at the March 2010 BOG meeting, where ADF&G stated that the leading effects of copper deficiency in the

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<sup>6</sup> RC 50, March 2010 Board Meeting, NEAK Muskoxen Overview from ADF&G staff

muskoxen include weak calves, reduced fertility and still births<sup>7</sup>. At the March 2010 meeting the department was optimistic about the calf survival rates and hypothesized that the decline in the NEAK population was due to: "A combination of predation, disease, and mineral deficiency triggered by unfavorable weather events<sup>8</sup>."

Furthermore, the assumption that brown bear predation on muskoxen calves is the cause of the overall population decline is based on inadequate science. ADF&G testified that the condition of Muskoxen calves prior to the "assumed" death by brown bears is unknown. And a calf mortality study conducted by the ADF&G from 2007 to 2009 on NE Alaska calves found a spring/summer calf survival rate of 77% in 2009. And the very harvest of large, mature bulls and the resulting disruption of herd protective behavior is not fully understood and may also be a significant factor. Without mature bulls to direct the herd into a protective circle, young muskox are at an increased risk of predation. The historic high harvest of mature bulls that occurred in 26B up to 2005 may very well be a significant contributing factor to the population decline.

This is a complex issue. Simply killing more brown bears may have absolutely no impact on the decline in musk ox population.

We are also concerned that high rates of brown bear harvest on state lands bordering NPS managed lands pose a substantial risk of negatively impacting brown bear populations within the Gates of the Arctic National Preserve. High harvest rates in the headwaters of the Atigun River and Galbraith Lake area may create a population "sink", attracting bears from the preserve to fill the unnatural low population on state lands. We know this has happened in other areas and are concerned this may happen here.<sup>9</sup>

**Proposal #196, Proposal #232, Proposal #236** – exempt NPS lands or oppose. Beyond the obvious public safety concerns about the potential acclimatization of grizzly bears to bait in a national park unit, the purpose of this proposal is solely to increase the harvest of interior grizzly bears to facilitate their population manipulation in hopes that it'll increase moose in the Upper Yukon Tanana Predator Control Area. This conflicts with NPS Management Policies. Should this proposal pass, all NPS lands must be exempt. These proposals impact Denali National Preserve, Yukon-Charley Rivers National Preserve and Wrangell-St. Elias National Preserve.

**Proposal #227, Proposal #228, Proposal #229, Proposal #230** – While NPS lands are typically exempt, we are opposed to establishing an Intensive Management Area for Unit 20C, an area that includes Denali National Preserve, and the subsequent adoption of both wolf and bear control programs. We have seen the impacts to predators from other park units that are bordered by Predator Control Areas, such as the impact on the Yukon-Charley wolf population. We see the potential for similar impacts to both wolves and bears in Denali National Park and Preserve from much of northwestern border becoming adjacent to a new Intensive Management Area.

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<sup>7</sup> Ibid

<sup>8</sup> Ibid

<sup>9</sup> From the 2007 Brown Bear Management Report at page 149: "Immigration of bears from lightly hunted areas in GMU 13 or from adjacent Denali and Wrangell St. Elias National parks, may be another reason high harvests of brown bears may not have the predicted impact on bear numbers"



**Proposal #109, Proposal #119** – exempt NPS lands or oppose. The Board of Game has a long history of liberalizing black bear harvest for Intensive Management purposes. These proposals further this trend and are counter to NPS Management Policies. All National Preserves in Alaska would be impacted by these proposals and should these proposals pass, all NPS lands must be exempt.

Thank you for the opportunity to comment.

Sincerely,



Jim Stratton  
Alaska Regional Director

FROM: DOYLE WILLIAMS

Feb 17, 2012

P.O. Box 32  
CANTWELL, AK 99729  
907-229-8545

ATTN: Board of Game -  
concerning Proposal # 213

I OPPOSE # 213 regarding motorized access  
for Hunting in the WOOD/VANERT controlled  
use area.

I am familiar with the area since 1979.

I think the area is far too accessible by ATVs.

I worry about the impact on the Area from rutted  
up trails, ATVs on the mt. tops, race tracks  
on the gravel bars, depletion of game,  
too much traffic.

Half way between Anchorage and Fairbanks,  
no parking area, increased need for  
law enforcement, reduced bag limits

please note my opposition to any change  
in the way it is now. Leave a few spots  
for a really wild and good hunting experience  
while you still can



**RE: Proposal #213**

Denny Capps  
PO Box 215  
Denali Park, AK 99755  
(907) 683-3683

Greetings to the members of Alaska Board of Game,

Please accept this letter in my absence. My wife and I own a home near mile 230 on the George Parks Highway where we are year-round residents and active members of the community.

I am intensely opposed to proposal number 213, which would open the Yanert Controlled Use Area to motorized hunting. I am aware of numerous members of our community a few people that travel hours from other communities to hunt in the Yanert Controlled Use Area specifically *because* it is closed to motorized hunting. Let us protect this remaining resource for those that choose more traditional means of transportation for their hunting.

As a geologist and a regular user of this corridor, I am concerned about the impact of increased motorized traffic at a sensitive time of the year. The main trail that hunters use to access the area already has thigh deep ruts in wetlands created by ATVs. By opening the trail to motorized hunting, the wetlands will suffer more degradation.

In summary, proposal 213 seeks to "improve the antlerless moose hunts". Improvement does not necessarily mean more; the quality of the hunt must be taken into account as well.

Your consideration of these comments is appreciated,

Denny Capps  
Geologist  
McKinley Village, AK 99755  
907-683-3683



February 16, 2012  
Alaska Department of Fish and Game  
Boards Support Section  
P. O. Box 115526  
Juneau, Alaska 99811-5526  
FAX: 907.465.6094

**Subject 1: Opposition to Proposal 213 - Motorized Hunt in the Yanert**

I am a resident of Denali Park, AK. During the last 10 years of living here, one of the greatest benefits is the absence of motorized hunts. In other parts of Alaska, where such hunts exist, the entire area gets destroyed. In places where you could once hike, there are wide areas full of ruts, trash and animal carcasses left in the wilderness. The noise pollution and disruption of personal tranquillity destroys the wilderness living experience. In our area, people still hunt by foot and by dog team leaving literally no evidence humans have ever been there. Why can't the Department of Fish and Game preserve an area for such hunting. It is great for the hunters who desire this experience. It is great for the residents who are able to enjoy their personal tranquillity and it is great for the environment. People engaging in motorless hunting seem to respect the environment more. They are not after trophy antlers but food for the family. I totally oppose Proposal 213. Please preserve their rights for such experiences.

**Subject 2: Opposition to Proposals 227, 228, 229, 230, 231 232 - Intensive Management of 20C**

In Alaska, we have the opportunity to manage wildlife differently. The historical precedent in the lower 48 where many animal species were destroyed are now being reintroduced, is that intensive game management and destruction of predators has totally changed the ecosystem forever. What needs to be controlled is the decisions of man, not destruction of wildlife. One of the main reasons people come to Alaska is to enjoy the wilderness and wildlife. I believe that what is driving intensive game management is the greed of commercial hunters who do not care about the uniqueness of the Alaskan environment. The greedy operators and their rich clients come to Alaska, get their rack of antlers and never return again. For the rest of us left behind, there is a destroyed wilderness and change in our living experience where not only consumption of meat from harvest is part of the lifestyle for Alaskans but the enjoyment of wildlife in our environments is part of why we are all here. 20C needs Intensive People Management, people free from greed, people who look at science and not money when making public policy and people who are intelligent and looking at the future and not making a buck today. Decisions to wipe out bears and wolves is idiotic. Replacing Board members makes much more sense.

What is the current Board thinking of? Is there a war on wildlife so commercial hunters can make a killing, destroy the environment and ruin Alaska forever. Why should they care. They will become rich while they are alive and naturally don't care about the future. I suggest looking beyond the end of your nose. Think of the future and preservation of a way of life that has existed for thousands of years. Is the current Board evaluating the science for making decisions or just caving to pressure from special interest groups? Alaskans have enough moose to eat. There is no evidence to suggest that the carrying capacity of the land will support more moose than already live in the area. Natural predators keep this in check.

By declaring this an Intensive Management area resulting in wreckless slaughter of bears and wolves only confirms the lack of intelligence now but lack of thinking about preserving the future of moose populations but a way of life. A way of life is being destroyed by people who can't think about the future and the future matters to us all. Tourism in this state will decline if people can't actually see grizzlies and wolves any more. If the Board continues on its current path, Alaskan wildlife will forever be endangered. While it is great sport for people to stop their cars and get in airplanes and shoot our wildlife for sport, it is destruction of a way of life in Alaska. Please THINK about what you are doing to this State.

Jerri Roberts, P. O. Box 158, Denali Park, AK 99755, 907.322.3823

*Jerri Roberts*





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From: 907-683-1361

Board of Game Comments

Fax to: 907-465-6094



February 12, 2012

RE: AK Board of Game, 2011/2012 Proposal 213

Members of the Alaska Board of Game:

I strongly oppose Proposal 213.

The Middle Nenana Fish and Game Advisory Committee unanimously voted in opposition to Proposal 213, for the 2<sup>nd</sup> year in a row.

The Denali Borough Assembly passed a Resolution against Proposal 213, for the 2<sup>nd</sup> year in a row.

Proposal 213 is proposed by the Fairbanks Advisory Committee, an out of area AC, which would allow motorized vehicle access in the Yanert Controlled Use Area in Unit 20 A for hunting. I have been on the Middle Nenana Fish and Game Advisory Committee for 8 years and for the 2<sup>nd</sup> year in a row we have unanimously opposed this proposal. The Middle Nenana Committee is established as the "appropriate advisory Committee" to represent this locality. There has been large opposition to the proposal by area residents. Last year, over 30 % of all the comments for all proposals in the 2010/2011 Proposed Changes were in regards to what was then Proposal 232, to allow vehicle use in the Yanert CUA for hunting, and there was 100% opposition to the proposal.

1. The alleged benefits are virtually non-existent and the negative impacts are greatly understated in this proposal.

2. The appropriate advisory committee to consider the proposal, the Middle Nenana Advisory Committee, based on extensive testimony and comments by residents and its local knowledge of the actual conditions in the Yanert CUA should far out way the Fairbanks Advisory Committee's position. The Board of Game should also vote against Proposal 213.

3. Proposal 213 is intended to spread the negative impacts of motorized access for hunting from the Rex and Ferry Trail Systems to the Yanert CUA. This is not an adequate way to address the situations in those areas, by compromising a whole new area subjected to the negative impacts from motorized hunting access.

4. The effects on meeting the IM quota's for antlerless moose hunts in 20 A would be negligible, given the low density of moose in the area. Past surveys done by F&G show this area has a very low density of moose. The impact on habitat and added pressure on already stressed wildlife populations in late fall, particularly for sheep, caribou and moose would be highly detrimental.

5. Area residents greatly appreciate the benefits of non-motorized recreational values of this area for hiking, berry picking, hunting by foot, skis, dog team and horseback.

6. Access to this area is limited to a single 17 B Easement across Ahtna land from the Parks Highway. The dangerous and unsafe access is already a concern for area residents. To increase this safety concern would be irresponsible.

Hunters who appreciate the opportunity to hunt in a non-motorized area in an intact ecosystem have limited areas to go. The concept of fair chase and the value of the effort made by hunters in the present Yanert CUA should be preserved.

Thank you for the opportunity to comment,

Nan Eagleson

PO Box 114, Denali Park, AK 99755

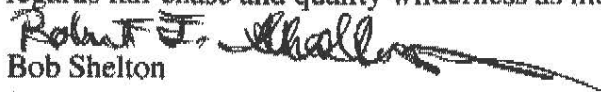


ATTN: Board of Game Comments

Alaska Department of Fish and Game Boards Support Section

I strongly oppose Proposal 213, which would allow motorized access in the Yanert Controlled Use Area for hunting.

My name is Bob Shelton and I have lived at Mile 228, Parks Highway for over 20 years. The only access to the Yanert is a 17 B Easement on Ahtna land right across the highway from the bottom of my driveway. There is no place to park and there already is a serious safety concern for hunters unloading horses and their camps during the regular hunting season along the highway because there is no staging area for loading and unloading gear. The Yanert Controlled Use Area is one of the few places where someone can have a quality hunting experience without the added pressure on wildlife by ATVs. There are very few moose in the area already and the habitat would be greatly compromised by the addition of ATVs for use in hunting. I know the Rex and Ferry Trails and other areas in 20A that do allow motorized access for hunting have lots of social problems and residents are subjected to a lot of conflict because of this. There is no reason those problems should now be brought to yet another area. The Fairbanks Advisory Committee shouldn't have any jurisdiction in this local area that is represented by the Middle Nenana Advisory Committee, which opposes this reckless Proposal. The Board of Game should recognize that there is great local opposition to this proposal because people care about wildlife and habitat and do not want to see another area trashed by ATV's. Intensive Management does not lend itself to a balanced approach for managing all wildlife resources. Leave at least one area along the Parks Highway for the sportsman who regards fair chase and quality wilderness as more important than easy access.



Bob Shelton

PO Box 114

Denali Park, AK 99755

Feb. 12, 2012



Craig Brandt  
P.O. Box 69  
Mile 230 Parks Hwy  
Denali Park, AK 99755


Dear sir or madam

Re: Proposal 213 - 5 AAC 92.540(H)(ii) Controlled Use Areas: Allow motorized vehicle access in the Yanert Controlled Use Area in Unit 20

I am strongly opposed to Proposal 213.

I am a long-time resident of the McKinley Village area, a homeowner in the area for 17 years, and I have hunted for large game in the Yanert Valley. My preferred mode of travel for hunting is on foot. By choice, I do not use motorized vehicles for hunting.

I would like to strongly express my preference for the Yanert Valley to remain a non-motorized special use area. For this reason, I oppose Proposal 213 -5 AAC 92.540(H)(ii)

  
CRAIG BRANDT





ATTN: Board of Game comments, Proposal 213

Members of the Alaska Board of Game:

I am strongly opposed to Proposal 213.

I live at mile 230 on the Parks Highway. The most recent Fish and Game moose survey found very few moose in the area considered in this proposal, which is consistent with the observations of many local people who regularly travel in the Yanert.

This proposal, which would open the Yanert Controlled Use Area to motorized hunting, was proposed by the Fairbanks Advisory Council, not a local entity, and has been unanimously opposed by our local Middle Nenana Advisory Committee twice.

Local citizen opposition is near unanimous as well, as the lack of infrastructure providing access to this area would greatly impact our community, as well as raise serious safety concerns for hunters who already park in large numbers on the shoulder of the highway.

The Yanert Controlled Use Area is highly valued by local residents and non-local hunters and recreational users. People who choose to hunt here do so because it is one of few places where the ethics of traditional wilderness hunting are still intact. Allowing motorized hunting would invite a storm of new problems, and solve none.

Thank you for the opportunity to comment.



Erica Watson  
PO Box 69  
Denali Park, AK 99755





# BACKCOUNTRY HUNTERS AND ANGLERS ALASKA CHAPTER



AK BHA

[www.alaskabackcountryhunters.org](http://www.alaskabackcountryhunters.org)

February 16, 2012

## Comments to the Alaska Board of Game Region III Meeting March 2-11, 2012

Proposals we Support: 137, 143, 163, 171, 172, 173, 179, 181, 194, 205, 211

Proposals we Oppose: 131, 141, 147, 192

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**Proposal 137** – 5 AAC 85.055. Convert nonresident sheep seasons to draw only hunts, require guide-client signed agreement and cap harvest at 15-20% of allowable harvest.

### **SUPPORT**

This is our Alaska Backcountry Hunters & Anglers proposal, refer to our proposal for rationale.

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**Proposal 141** – Legalization of black and grizzly bear trapping in interior Alaska; seasons and bag limits.

### **OPPOSE**

This is the exact same proposal deferred from the October 2010 BOG meeting, and our comments, pasted below, remain the same:

*(Note: the recent reclassification of black bears as also being furbearers in order to allow for the sale of black bear hides and parts (excluding galls) as a new incentive for hunters to harvest more bears in no way forces the board or otherwise puts the board under any obligation to authorize any bear trapping seasons anywhere in Alaska.)*

This proposal and recommendations from the Alaska Department of Fish & Game to legalize “black bear” trapping seasons in some areas of Alaska by the public is fraught with inconsistencies, 180-degree position shifts, lack of sound wildlife management



principles having to do with any real efficacy in any new bear trapping seasons leading to measurable increases in moose recruitment and densities, and offers no protections for the grizzly bears we know would also be caught in foot snares set for black bears.

It's important to recognize that nowhere else in North America is it legal to trap/snare black bears under a general trapping season in areas where grizzly bears are also present. We believe there is a good and valid reason for that, having to do with conservation concerns for grizzly populations, the ecological and economic importance of grizzly bears, the ethical and safety concerns of trapping grizzly cubs and sows with cubs, and public perception and acceptance of trapping grizzly bears.

### **Lack of Efficacy in this Proposal**

To make the point about the lack of any real efficacy (and even any concerns for efficacy and actual results) we see throughout this proposal, we point to the recommendations to allow black bear trapping in Unit 20E that is part of the Upper Yukon/Tanana predation control area.

The following quotes are from data and recommendations for this area provided by the Department in 2009:

*"Research conducted...within Unit 20(E) indicates brown bear predation on calves and wolf predation on all sex and age classes throughout the year are important factors limiting moose population size and growth; in the research study area, wolves killed 12-15 percent of neonate moose calves, brown bears killed 52 percent, **and black bears killed three percent**; in addition, wolves and brown bears accounted for 89 percent of all yearling and adult moose mortality during the study..." [all emphasis is ours]*

*"Research has shown that **wolf and brown bear predation are the primary causes of moose mortality and hence the primary factors limiting moose population growth in the area.**"*

*"Based on research data in Alaska and Canada, **a 60 percent reduction** in the brown bear population within the 4,040 square mile brown bear predation control area specified in this program is expected to result in an increase in moose calf survival."*<sup>1</sup>

#### *"Recommended Changes to the Predation Control Implementation Plan*

*Change: Delete grizzly bear predation control area (4,050 mi<sup>2</sup>) and reference to moose as a benefit species.*

*Rationale: Current methods of grizzly bear control are not effective and methods that would be effective (e.g. poison or aerial shooting) are not currently acceptable to ADF&G or the public. In addition, extensive fires in Unit 20E may have displaced grizzly*

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<sup>1</sup> Upper Yukon/Tanana Predation Control Plan Renewal 2009



*bears from major portions of the moose range, reducing this source of predation, and reducing the need for bear control"*<sup>2</sup>

We are dismayed that the department would recommended black bear trapping in this area to ostensibly help the moose population when 1) black bears only account for 3% of neonate calf predation, 2) the grizzly bear baiting control effort, in which there was no minimum check time that hunters had to check their baits in this remote area, was ineffective, 3) the extensive wildfires of 2004 "reduced the need for bear control," 4) there is an ongoing and extensive wolf control program in this same area that, along with the benefits of wildfires and regrowth, is showing increases in moose densities, and 5) every bear control implementation plan we have seen states that a 60 percent reduction of the overall target bear population is required for efficacy that results in tangible increases in overall moose calf survival and moose densities.

By recommending black bear trapping in this area, knowing all these above statistics, knowing that there can't possibly be any efficacy in black bear trapping to measurably increase moose calf survival and densities and hunter harvests, the department has thrown into serious question all the recommendations in this proposal and whether or not this is truly about efficacy in increasing moose numbers or more about simply providing a new bear hunting opportunity and method and means for hunters/trappers in some areas.

### **"Incidental" Catch of Grizzly Bears**

The only real data we have so far in Alaska as to the overall percentage of grizzly bears that may be caught in bucket snares set for black bears in areas where both black and grizzly bears are present comes from the experimental snaring program in the Unit 16B bear control area, conducted under the supervision of a paid contractor and experienced volunteer trappers who underwent an ADFG orientation course and in-the-field training.

The snaring itself was conducted by these permittees out of bear snaring camps in mostly remote locations with ADFG personnel present to tranquilize and release any grizzly bears captured. Snares had to be checked a minimum of every 24 hours. The Department was supposed to pre-screen snaring sites in order to choose areas where grizzly bears were not as prevalent.

The average take of grizzly bears under this "experimental" program was 10%. Some things were learned during the program to help better avoid non-target catches of grizzlies, one of which was decreasing the opening of the bucket snare sets so that the larger adult grizzly paws could not get through to trip the snare.

What this subsidized snaring program proved beyond a doubt was something that was already assumed, and that was discussed by the Board in 2009 deliberations – that it is impossible for even trained participants to just catch black bears and never catch a grizzly in areas where both species are present.

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<sup>2</sup> Recommended Changes to the Predation Control Implementation Plan 2009





So here we have not just the potential, but a guarantee that if "black bear" trapping/snaring seasons are ever authorized in Alaska, some grizzly bears will also be caught by independent trappers. **Legalizing black bear snaring in essence is also to legalize grizzly bear snaring**, even if the state mandates forfeiture of any grizzly killed at snaring sites, declaring the keeping of those animals to be technically "illegal."

### **Other Issues to Consider with this Proposal**

There are several concerns we have in how this proposal is worded, just what it would allow for under the new statutory language, and the possible outcomes.

- **Aircraft use:** We oppose the use of aircraft to establish and visit snaring sites unless the pilot/trappers remain at the site. The mandate to check sites every 24 hours, or even every 48 hours as the department is now proposing, is basically an ethics issue on how long we consider is ethical for a live bear to be caught in a foot snare. Given the real world reality of how fast Alaska flying conditions can change, if we allow aircraft to be used for bear snaring, it is a certainty that the minimum check time will at times not be met. And it could easily be a week at times before flying conditions improve enough to get back to check snares.
- **Same-day-airborne, spot from the air, land and shoot:** Under a trapping license according to this proposal, in areas where trapping may be authorized, is an allowance for pilots to spot black bears from the air, that aren't at snaring sites, and then land and shoot the same day. **We oppose that provision** and don't think it should be a part of any bear trapping regulations.
- **Unlimited number of snare sets:** The allowance for trappers to set an unlimited number of bucket snares in an open bear trapping area could lead to problems among some who decide to make a lot of sets in differing parts of a unit in meeting the minimum check time and in more incidental catches of grizzly bears. Even in Maine and Canada where black bear foot-snaring is allowed, there are strict limits on the number of sets a trapper can run.
- **Lack of sealing requirements in this proposal:** A new program like this should have some means of strictly monitoring harvests even in areas where sealing of bears is not required.
- **Forfeiture of grizzly bears killed at snaring sites:** We know that some grizzly bears will be caught in snares set for black bears. At times this could include a number of grizzly bears should a cub be captured and then the mother and any other cub need to be dispatched. Given the time it takes to properly skin a grizzly bear and remove the skull for sealing/forfeiture, and the likely distances involved to pack/haul the hide(s) and skull(s) out, and in some areas the lack of any ADFG personnel or office to turn these parts over to the state, and the fact that after a predetermined number of grizzlies are caught in a unit the trapping program



would be shut down, we believe there is the real potential for some to simply not report grizzly captures/kills at snaring sites.

We are not alluding or recommending at all that grizzlies should be allowed to be snared or kept by trappers, but once again this brings up yet another reason why there is nowhere else in North America that it is legal to trap black bears in areas where grizzlies are also present.

- **Nonresident participation:** AK BHA strongly opposes any nonresident participation in any bear trapping seasons. And interestingly, the department in 2009 strongly opposed nonresident participation in any aspect of the black bear control program in Unit 16B: "*The department is **opposed to the participation of nonresidents in any control program** because of the similarity in costs associated with sport hunting and control activities (i.e., non-resident license and tag fees, transportation costs, etc.). Also, the perception that hunting by non-residents is the same as non-resident control activities would blur the distinction between the two activities thereby jeopardizing the current public support for sport hunting and control programs.*" [our emphasis]
- **Permitting Requirements, Costs, and Oversight:** Participation in the black bear foot-snaring efforts in the Unit 16B bear control area requires an ADFG orientation course and in-the-field training, and participants must be experienced trappers. There is also department and paid contractor oversight of those snaring efforts and the ability for department personnel to release any captured grizzly bears.

This proposal leaves the decision on any permitting requirements for a general bear trapping season to the board's discretion. And there is no oversight whatsoever required out in the field. Does the department have the funding to conduct the same kind of orientation courses and in the field training for permittees should this proposal pass? Would applicants undergo the same level of scrutiny?

The department stated that this proposal is in part to "*experiment with bear trapping techniques as a management tool.*" Which is what the department also stated the Unit 16B bear snaring control efforts were in part about. Why then should this brand new allowance for the public to trap bears have any less scrutiny, permitting requirements, and oversight than the 16B snaring program? Or no means to release captured grizzly bears?

### **Public Perception of Bear Trapping in Alaska**

Few would deny that the notion to allow the trapping of black and grizzly bears, including sows with cubs, and cubs, in parts of Alaska under a general trapping season is highly "controversial."



The fact that such a recommendation comes from our own Alaska Division of Wildlife Conservation and thus has the ostensible backing of numerous professional biologists and managers makes it even more so.

Black bear foot-snaring is legal in Maine and a few Canadian provinces where grizzly bears aren't present. ~~The snares must be checked a minimum of every 24 hours, as this is~~ considered the "ethical" standard time period that a live bear can be caught in a snare. (The department recommends doubling that to a two-day minimum check time in this proposal.)

The claim can be made that in Maine and the few Canadian provinces where it is legal to foot-snare black bears that there is little controversy over those regulations. Whether that is true or not has absolutely no bearing on how controversial it would be in Alaska where grizzly bears are also present and would be caught.

We are certainly not alluding that the Board should base decisions solely on whether or not they may be controversial. However, it is our strong belief that the majority of hunters and trappers in Alaska do not support bear trapping seasons or the snaring of any bears outside any formal bear control implementation plans.

And we have fears we think are entirely valid that opening up bear trapping to the general public by independent trappers, that includes the allowance for trappers to kill any captured grizzly bears and other family members that may be present at a snare site – even if those bears must be forfeited to the state – has the real potential should pictures and stories make their way to the internet and media, to cause a backlash to the hunting and trapping community, to the reputation of the department and the board and in how the rest of the country views Alaska and our system of wildlife management.

### **Other Solutions to Increase Bear Harvests**

The board has tried to provide an incentive for hunters to harvest more black bears by reclassifying them as furbearers so as to allow the sale of hides and claws and skulls. This only became legal a short time ago, however, so there hasn't been time to gauge how effective this incentive will be to increase harvests.

We think the board should slow down on approving more extreme solutions like bear trapping seasons before we've even given this new incentive time to show results, and recommend that the Board also discuss and consider other possible solutions to try to get hunters to harvest more black and grizzly bears in areas where moose densities are below objectives and bear predation is a primary factor.

We have heard a number of different ideas on how to increase incentive and harvest of bears under more traditional hunting methods and means, some of which the board has already authorized in some areas, such as SDA for hunters who want to fly (fixed wing) to a bait station and be able to take a bear the same day they land, longer black bear baiting seasons, and the allowance for more bait stations.



Other newer ideas range across the spectrum, from preference points of some kind for hunters who take a predator from a certain unit, to less restrictive ways to try to hunt bears over gutpiles or carcasses in the fall, to possible bear “derbys”. And the board is continually voting on various proposals over the last several years that ask for grizzly bear baiting in certain units.

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Part of the education efforts we’d like to see is for the board and the department and groups to reinforce that black bears (and grizzlies) in the interior especially are good healthy sources of game meat all summer long. And certainly black bears throughout the state are a great source of game meat in the spring.

### **Final Thoughts on ADFG Proposal 141**

What was bear “control” yesterday simply cannot be relabeled as a new management tool today, whereby the process and requirements and monitoring and oversight by which we have in the past conducted any bear control programs is suddenly waived.

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**Proposal 143** – 5 AAC 92.085. Allow the taking of black bear at bait stations the same day you have been airborne.

#### **SUPPORT**

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**Proposal 147** – 5 AAC 92.095. Allow the use of helicopters for access to trapping in Region III.

#### **OPPOSE**

We don’t support helicopter access for any hunting or trapping activities.

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**Proposal 163** – 5 AAC 92.125. Authorize a predator control program in a small portion of Unit 24B.

#### **SUPPORT**

We support this wolf control program, and we have great respect for the Koyukon peoples’ traditional beliefs regarding members of the Ursidae family.

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**Proposal 171, 172, 173** – 5 AAC 92.220. Require meat-on-bone salvage for moose in units 25A, 25B, 25D.





**SUPPORT** (with amendment regarding aircraft and powerboat transport of meat)

Proper meat salvage is something very important to our organization, and it's primarily an education issue. Certainly meat-on-bone requirements can help with reducing spoilage on some float hunts and other hunts where the meat is kept in the field for a number of days.

AK BHA does recommend in general that moose quarters and ribs be kept on the bone until reaching the processing site.

However, we also recognize that for aircraft transportation of meat, it is much more efficient, economical, and physically easier all around to debone the meat prior to loading it in the aircraft if it is then going to be taken care of right away after being transported.

We also have similar concerns for powerboat transport, at times lightening a load by removing the bones can make a big difference between getting over shallows or not, and powerboats can make it much faster to where the meat will be processed than non-motorized rafts and canoes.

We would like to see an exemption should this proposal pass, that did not require meat to be on-the-bone when transporting it from the field via aircraft or powerboat.

The bottom line is that temperature and humidity along with meat care practices are the drivers of meat spoilage, and this is an overall education issue on best meat care practices.

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**Proposal 179** – 5 AAC 85.055. Convert the general season nonresident sheep hunt to drawing hunt in the Dalton Highway corridor area.

**SUPPORT**

This proposal makes similar points to other proposals that ask to limit nonresident sheep hunters to draw only with capped allocations, including our own AK BHA proposal #137.

“UNTIL” a guide concession program is implemented, we agree that a drawing hunt is necessary to “restrain the unlimited commercial opportunity afforded on state and BLM lands.”

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**Proposal 181** – 5 AAC 82.025 Extend brown bear seasons in Unit 26B

**SUPPORT**

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**Proposal 194** – Open a youth only hunt for Fortymile Caribou

**SUPPORT** (with capped harvest via registration permit)

AK BHA has long commented about the increasing number of hunt seasons that have been moved later in the season, and how along with the earlier start to the school term is preventing our youth and families from getting out in the field and continuing our hunting traditions.

The future of hunting is our youth, and we believe we should do all we can to provide youth hunting opportunities.

We understand there are concerns that if this proposal were to pass it could cut too much into allowed harvest levels in the later season open to all. We recommend a limited total allocation of caribou to this youth hunt, registration permit only, report harvest to Fish and Game, exactly as we currently do for the later hunt. Including emergency closures if the caribou are too close to the road(s).

We recommend allocating 30-50 caribou, bull only, total for all zones, and that the adult hunters sacrifice some of the allocation in order to give the next generation of hunters the opportunities they need to carry on our hunting traditions.

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**Proposal 197** – 5AAC 92.125 Re-implement the grizzly bear control portion of the UYTFCP in Southern Unit 20E, and allow bear snaring and same day airborne taking of bears.

**OPPOSE**

When the grizzly bear control program in a portion of 20E was suspended, the Department used this rationale, under the heading “*Recommended Changes to the Predation Control Implementation Plan*”:

*Change: Delete grizzly bear predation control area (4,050mi<sup>2</sup>) and reference to moose as a benefit species.*

*Rationale: Current methods of grizzly bear control are not effective and methods that would be effective (e.g. poison or aerial shooting) are not currently acceptable to ADF&G or the public. In addition, extensive fires may have displaced grizzly bears from major portions of the moose range, reducing this source of predation, and reducing the need for bear control.”<sup>3</sup>*

As this proposal states, the moose population in 20E is increasing after many years of wolf control. The widescale wildfires in 20E in 2004 and 2005 have already reduced

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<sup>3</sup> Recommended Changes to the Predation Control Implementation Plan 2009



grizzly bear predation, and the other habitat effects from those fires will, according to all the scientific literature, lead to moose population increases in the years ahead.

We see no supported evidence whatsoever that grizzly bear control in 20E should be reinstated at this time, no matter the method used.

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If the board were to pass this proposal, however, we recommend at the very least it be done similar to the initial Unit 16B control plan, by requiring trappers to stay in the field, and a mandatory one day check time of snares. We also recommend that absolutely no aircraft use is allowed unless trappers are required to stay in the field. The potential very much exists to fly in and set snares, then fly out, and have weather preclude returning within the required time frame.

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**Proposal 205** – 5AAC 85.045. Change the legal animal for the Unit 20A & 20B antlerless hunts.

### **SUPPORT**

We could not agree more with the rationale of this proposal to allow the taking of calf moose in areas where we have antlerless hunts and are striving to meet both population and harvest goals.

We also would recommend the board considers the other solution offered in this proposal, a party permit that would allow the taking of a cow/calf pair.

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**Proposal 211** – 5 AAC 92.004; and 92.540. Prohibit the use of ATV's above 2500 feet elevation in a portion of Unit 20.

### **SUPPORT**

We fully support the intent of this proposal as we share similar concerns. Not every area needs to have ATV access for hunting. And once ATVs reach these higher elevations, the newer machines and skills of the riders will not stop them from expanding farther into sheep country.

Eventually, we believe once ATVs gain access to these areas the board will hear ever-increasing complaints and be forced to act. We can wait until that happens or send a message now we would prefer it didn't.

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**Alaska chapter Backcountry Hunters & Anglers – AK BHA**  
**Mark Richards – Co-chair**  
**Dave Lyon – Co-chair**



[www.alaskabackcountryhunters.org](http://www.alaskabackcountryhunters.org)  
[alaskabha@starband.net](mailto:alaskabha@starband.net)

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**THE ALASKA WILDLIFE ALLIANCE**  
"LETTING NATURE RUN WILD"

February 17, 2012

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

**RECEIVED**

**FEB 17 2012**

**BOARDS  
ANCHORAGE**

Hand-delivered to Anchorage ADF&G office

To Members of the Alaska Board of Game:

The Alaska Wildlife Alliance (AWA) herewith submits its written comments on proposals to be considered at the meeting for the **Interior Region** meeting, March 2 -11, 2012 in Fairbanks.

**AWA's Mission Statement**

The Alaska Wildlife Alliance is a non-profit organization committed to the conservation and protection of Alaska's wildlife. We promote the integrity, beauty, and stability of Alaska's ecosystems, support true subsistence hunting, and recognize the intrinsic value of wildlife. The AWA works to achieve and maintain balanced ecosystems in Alaska managed with the use of sound science to preserve wildlife for present and future generations.

Thank you for considering our comments.

Yours truly,

Connie Brandel  
Office Manager



**Alaska Wildlife Alliance's Comments on the Alaska Board of Game Proposals  
Interior Region Meeting**

(Missing proposal numbers indicate "no comment")

<b>PROPOSAL #</b>	<b>COMMENT</b>
<b>109, 119, 259</b>	<p><b>OPPOSE</b> We oppose these as far too liberal a treatment of black bear hunting/baiting regulations. Current regulations allow a sufficiently high take of these populations with regard to resident hunting to meet game management requirements. Liberalizing the regulations further only leads to abuse and a greater need for law enforcement presence at a time when wildlife troopers are already overtaxed in enforcing present regulations.</p> <p>Additionally, encouraging more bear baiting only endangers the non-hunting residents (the vast majority of Alaskans) by drawing in bears along trail systems which will be used by those setting the baits. Clean-up and maintenance of baiting stations will be a headache to monitor and can result in dangerous situations for other users of our state lands.</p>
<b>141</b>	<p><b>OPPOSE</b> We oppose this proposal first on the grounds that due to the procedural actions of the ADF&amp;G the public will have little opportunity to comment on this in its final form. It should have been submitted in its entirety by the time of proposal publications and not amended at the last minute.</p> <p>Secondly, ADF&amp;G's own data indicate moose calf mortality from black bears is only 3%. As this mortality is the reason behind this proposal it seems hardly a significant number by which to justify such an egregious action. The erroneous assumption is that preventing such predation means all of those 3% will survive to adulthood, a perspective hardly supported by reality.</p>



142

**SUPPORT** We support this proposal for the simple fact that bear trapping as it is being implemented by the Board has gotten totally out of hand and exceeds both reason and wise management principles. Sufficient opportunity already exists for the bear hunter to take a black bear, and increasing such activity by allowing trapping not only puts an enforcement strain on the wildlife troopers but will inevitably lead to abuses such as trapping too near residential areas and not checking traps as frequently as may be mandated.

Bear trapping has long been viewed by the majority of Alaskans as a questionable practice and certainly taxes the definition of "fair chase", not to mention good management. It does not distinguish between gender or age and therefore is hardly a scientific approach to the situation.

Further, trapping creates potential dangers by allowing a scenario where a bear cub may be caught, yet the sow is in the area in an agitated state. Anyone, hunter or non-hunter, encountering such a moment would be seriously endangered.

156

**SUPPORT** We support this proposal on the basis that there are insufficient caribou to support both resident and non-resident hunting. It is obvious that in the face of such a fact, non-resident hunting should be suspended in favor of resident hunting. Data indicates the Tonzona herd has been heavily hunted by non-residents in the past, their take accounting for 70% of the harvest between 2003 and 2008. As this is a strongly subsistence area, there is all the more reason to suspend non-resident hunting.

196, 227, 228,

229, 230, 231,

232, 236

**OPPOSE** We oppose these proposals on several grounds. First, they establish Intensive Management programs where no studies have been done to indicate their need. In the Board's ongoing rush to activate IM programs wherever possible for the lightest of reasons, there has been a purposeful neglect of the fact IM is supposedly a response to an established emergency situation. Anymore...as these proposals indicate...anecdotal testimony is sufficient to cause the Board to implement IM, a fact the Alaskan public is becoming more aware of as time passes.

These areas are popular for hiking and other non-hunting uses. To broaden the bear baiting and snaring regulations sends a clear message to all users that only the narrow concerns of the small segment of Alaskans interested in these ethically-questionable practices are worthy of the Board's consideration.

Additionally, these proposals impact National Park Service





lands, a fact that only serves to a) complicate their management, and b) further alienate the NPS participation in these processes.

213

**OPPOSE** We oppose motorizing the Yanert Valley late season hunt for the following reasons. There is considerable local opposition to such a change due to lack of established access routes and parking. The area is one of the few non-motorized areas left in the state and as such mandates a hunting experience more akin to true ethical hunting, as opposed to drive-in-and-shoot, the method that seems predominant throughout the state.

With the increasing later snowfall, damage to trail systems and littoral habitat will be increased as ATVs would be used extensively without any real regulation or monitoring. The constant harassment the presence of these vehicles would represent towards wildlife at a time when they are moving into winter conditions further aggravates their chances of finding sufficient forage for the upcoming season.

233

**SUPPORT** We support this proposal as it works toward the broadest possible use of natural resources possible in a specific area of multiple interests. By establishing such a controlled use area early on the Board would be avoiding future entanglements and discord over usage by many and varied groups of users.

260, 261

**OPPOSE** We oppose these proposals not only due to the fact there is no scientific data demonstrating their need, but also due to a lack of moose calf mortality data and a general lack of effectiveness of such programs to reduce bear predation and thereby increase moose numbers. In short, the proposals lack any scientific basis and are presented with only anecdotal support, a highly questionable protocol to encourage.

Should these proposals be adopted we suggest NPS lands be excluded, in keeping with comments made by the NPCA and a pending NEPA report on commercial hunting in the area.

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February 17, 2012

Alaska Board of Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
via fax: (907) 465-6094

**Subject: Additional comments on Proposal 40 – Permits for Falconry - Allow Nonresidents to Take Raptors for Falconry**

Dear Ladies and Gentlemen of the Board:

The American Falconry Conservancy (AFC) understands that the Alaska Board of Game tabled Proposal 40 – Nonresident Take of Raptors for Falconry – at their January 2012 meeting and is awaiting further input from the Department of Fish and Game at the March 2012 meetings.

AFC has reviewed the entire Alaska Board of Game record associated with the January 2012 State-wide Proposals 38, 39, 39(a) and 40 and offers additional comments for the Board's consideration to respond to some of the comments and concerns contained and expressed thus far and to augment the record with additional information relevant to the subjects. AFC again respectfully requests that the Board adopt provisions allowing nonresident falconers to harvest both juvenile free-flying and nestling raptors in Alaska for falconry purposes. All of the concerns expressed by those who commented in this record were considered when AFC worked with a number of Alaska falconers to draft Proposal 40. Many of the same concerns were expressed by other states while in the process of adopting nonresident take. However, in the years following adoption, none of the issues of concern ever arose. In fact, in nearly all cases, non-resident harvest across the U.S. has occurred without incident at harvest levels well below any of the quotas some states chose to adopt.

1) None of those who commented indicated that there is any resource health issue associated with nonresident take of raptors in Alaska. AFC's proposal on numbers and species constitutes a very conservative harvest rate which will have no impact on any raptor species population in Alaska. Dr. Titus and others who commented and participated in the Board's discussions and deliberations agree with AFC's assessment. A number of those who commented suggested greater numbers and additional species beyond those suggested in Proposal 40 should be allowable, and we agree that even a much less restrictive harvest rate will have no impact on Alaska's wild raptor resource. The Kodiak Advisory



## **Additional Comment on Proposal 40 – 5 AAC 92.037. Permits for Falconry. Allow nonresident falconers to capture raptors**

Council suggested adding several other species to the Proposal 40 list and raising the nonresident allowance for goshawks up to 10 birds per year, and AFC would concur.

2) Several of those who commented suggested that nonresidents have a history of illegal activities that could tarnish the good reputation of resident falconers. One who commented suggested nonresident take would encourage “black market” activities. However, no examples of such purported illegal activity were provided. U.S. falconers at-large are a very dedicated group, who individually and collectively have worked very hard to be able to pursue our sport within a framework of what are the most complex and elaborate set of regulations among all hunting sports, especially in regards to nonresident, inter-state migratory bird activities, which bring into play even more federal laws and regulations. We are not of the belief that allowing nonresident falconers to harvest raptors encourages them to become involved in any illegal activities any more than does allowing a nonresident visitor the opportunity to fish or hunt while visiting in Alaska. In any case, the criminal activity of one person should not be a reflection of an entire group. The clean records of falconers across the U.S. support with very few exceptions, that the U.S. falconry community is an extremely reputable, law-abiding group of sportspersons.

3) A few of those who commented suggest that harvest should be restricted to passagers (juvenile birds capable of flight) and exclude eyasses (nestlings). One of those who commented suggested that passagers are readily available and so there is no need to allow eyas harvest. For a number of reasons, AFC and several others who commented continue to maintain that there is no biological or other justification for placing restrictions on either passager or eyass harvest. Furthermore, many falconers favor the behavioral disposition of eyasses; birds raised from an early age more easily and swiftly integrate into human social settings, which include family activities, hunting dogs, traffic, etc. than do their passage counterparts. Additionally, in contrast to a commenter’s assertion, for a number of reasons passagers of a desired species are much less likely than eyasses to be encountered, let alone captured. Firstly, young birds move out of their nest site areas in late summer and most of them end up residing in or migrating through remote, road-less regions of the state. Secondly, Alaska’s geographic features do not concentrate migrating raptors down predictable corridors as is the case elsewhere in the lower 48 states; this is why a number of Alaska falconers have come down to the lower 48 to harvest raptors. Finally, passager movement is associated with unpredictable weather patterns, which makes planning nearly impossible for nonresidents.

4) One commenter testified that large falcon species are known to use the same nest site for many years and insinuated that repeated harvest from a particular nest site would be detrimental. However, the commenter provided no evidence to support that such activity would affect the species population or even the falcon pair’s reproductive success. The testimony on this subject was incomplete in several important ways. Firstly, there was no evidence presented that indicates repeated harvest by residents has had such an affect. Secondly, species as a whole and individuals within a population are programmed through evolution to reproduce in order to perpetuate their kind regardless of whether a particular ledge or crevasse continues to exist. Birds, including raptors readily utilize alternate nest sites as necessary to complete their nesting cycle, and there is no indication that nesting habitat is in short supply within the vastness of Alaska. Thirdly, the literature from oological (egg-collecting) circles

## **Additional Comment on Proposal 40 – 5 AAC 92.037. Permits for Falconry. Allow nonresident falconers to capture raptors**

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approximately 100 years ago demonstrates the inaccuracy of the commenter's assumption. Finally, federal and all other state nesting raptor harvest provisions prohibit the removal of all the nestlings from a particular nesting site, a provision that was authored by falconers in order to allow a pair to complete a full nest cycle and minimize nest site abandonment. Dr. Titus provided information that indicated repeated harvest of juvenile prairie falcons had no effect on the populations.

5) One respondent stated that "there is little to be gained by the State of Alaska by allowing nonresidents to harvest raptors" and that "they can be obtained from captive breeding programs." As we conveyed in the original request, traditional falconry often does not involve purchasing a bird. It is more about a journey that begins with harvesting a raptor from the wild and continues through the pursuit of wild quarry with that raptor. Any sportsperson will agree that going to the local fish market and purchasing salmon is in no way comparable to traveling to Alaska to fish for wild salmon.

Finally, as the Board is likely aware, the proposed language in 40 would conflict with the approved compromise version of the Falconry Manual with respect to exporting birds. It appears the Falconry Manual provisions on this subject would need to be modified to allow nonresident take. Should the Board approve nonresident take and the Falconry Manual be reopened, AFC recommends that the present restrictions that prohibit Alaska resident falconers from exporting their birds be loosened up. Alaska does not prevent the export of any other fish or game legally acquired for personal use, and there is no logical or biological justification for doing so in regards to raptors.

Thank you for this opportunity to provide additional comment and clarification of the record.

Sincerely yours,

Bill Meeker  
President



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

I am writing today to give my support to Proposal 142.

Proposal 142 would prohibit black bear snaring. The Alaska Center for the Environment submitted this well-researched proposal that I am asking you to support for the following reasons:

-Hundreds of bears have been killed over the past three years after being caught in a snare, including black bears, brown bears, sows and sows with cubs in this ADF&G "experiment".

-This indiscriminate and cruel practice is spreading throughout the state, and if the BOG approves this, *anyone* will be able to apply for a permit to snare bears.

-A recent scientific report shows independent scientists are concerned that Alaska is headed down the same path as every other state which once boasted healthy bear populations.

I consider the baiting and snaring of wild bears to be unconscionable, and would not choose to spend my tourist dollars in a state that practices this horror.

Therefore, I respectfully ask that you pass Proposal 142.

Thank you for considering my comments.

Doug Lenier  
5720 Costello Ave.  
Valley Glen, CA 91401



## Proposal 142: Support

Please, do the right thing and help protect these bears. Life is hard enough for animals in a modern world. Let's not make it harder for them to exist.

Thank you,

Matthew Zola



Support proposal 142

I am writing to oppose the proposed snaring of bears in parts of Alaska.

Snaring is always indiscriminate and terribly cruel. Even if the target animal, in this case bears, is trapped, there is a particular risk to walkers as they may come across a snared cub being protected by its mother. This could lead to a perilous situation for the walker.

I was also shocked to read in your proposals that the aim is to increase the moose population - FOR HUNTERS. Not for the moose population per se. Left to itself, and without disruption from human behaviour, nature tends to look after itself and find the right population balance.

You've been shooting the wolves and now you're talking of snaring the bears. At what point will you stop the killing?

PLEASE drop this cruel and un-thought-out proposal.

Sue Baumgardt  
Hove UK



To whom it may concern:

As I understand it, Proposal 142 would prohibit black bear snaring in a large section of Interior Alaska. The Alaska Center for the Environment submitted this well-researched proposal and I ask you to **strongly support #142**.

Just a couple of reasons are:

# This proposal would protect black bears from snaring in a large area of interior and northern Alaska, including lands bordering such iconic parks as Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

# Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous. There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

# Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

Thank you for allowing me to voice my opinion, and I hope you will consider these points.

Yours truly,  
Mr. Terry L. Pitt  
5726 N.E. Detroit  
Kansas City, Missouri 64119





I support #142

There are so many things wrong with snaring of any animal, especially bears, it is disgusting this practice still goes on in the 21<sup>st</sup> century. However in Interior Alaska, knuckledraggers reign. I strongly support this proposal!!!!!!!!!!!!!!!!!!!!!!

***Susan L Vogt, CPESC  
Principal Consultant  
Independent Consultant Associated  
269 Bias Drive #B  
Fairbanks, Alaska 99712***



Members of the Board:

I urge you to strongly support Proposal 142. This sort of indiscriminate killing must stop. In the past three years, hundreds of bears have been killed: black bears, brown bears, sows, and sows with cubs. Snaring goes against ethical hunting since it does not involve a fair chase.

Furthermore, setting snares within ¼ mile of homes, roads, and trails is a reckless idea. In addition to being a cruel practice, it poses a danger to people and their pets. Once again, please support Proposal 142. Thank you for considering my comments.

Sincerely,

Ms. Helen Yi  
6211 Serena Place  
Rancho Cucamonga, CA 91737



I ask that you strongly **support proposal 142**. There is little long-term evidence that such intensive management practices actually increase moose and caribou populations. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. And it's an affront to the fair chase ethic followed by responsible hunters. Please support proposal 142. Thank you.

Catarina Yi  
1911 Overland Ave.  
Apt. 2  
Los Angeles, CA 90025



**I strongly support Proposal 142** to prohibit black bear snaring in a large section of Interior Alaska. The Alaska Center for the Environment submitted this well-researched proposal and we ask you to strongly support it.

In full, this proposal would protect black bears from snaring in a large area of interior and northern Alaska, including lands bordering such iconic parks as Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

Thank you.

Margaret Adams



Support #142

BOG,

Should the BOG choose to approve the gruesome practice of bear snaring, you will be the shame of Alaska.

No true hunters, wildlife enthusiasts, tourists, or Alaskans will honor your actions or your names, once the grisly practice is submitted to You Tube, newspapers, radio programs, and bulletin boards. Are you prepared to have your names attached to this, for your children, grand-children, and friends to see? In this day and age, where photos and actions can be submitted worldwide with the push of a button, you will own this decision for a lifetime.

Shame on you for even considering this, and shame on you Governor Parnell, for allowing this to occur. Perhaps another full page ad showing the results of your actions would be a wonderful addition to your resume', just in time for tourist season!

Ready for a change at the BOG!

Sylvia & Marius Panzarella  
Anchorage, AK





**I strongly support Proposal 142 which would prohibit black bear snaring in a large section of Interior and northern Alaska including lands bordering Denali, the Arctic National Wildlife Refuge and the Gates of the Arctic National Park. Wildlife viewing is an important part of the state's tourism trade and should not be sacrificed to the hunter.**

**Bait snaring within 1/4 mile of homes, roads and trails is dangerous to anyone or anything on foot. In addition, baited snares are an affront to the 'chase' ethic of responsible hunters.**

**Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.**

**This is a barbaric and unconscionable practice for which there is NO defense.**

**Ruth Tanner Isaks**



I want to join the people who **support Proposal 142** as snaring is a brutal and unnecessary method to manage wildlife and does not follow the fair chase ethic.

Della Dempsey



**Support 142**

**Honorable Sirs:**

**It was with absolute shock and horror that I read of the cruelty towards brown bears that your people seem to find acceptable. It is difficult for civilized countries to imagine such barbarity towards bears as baited snaring, where the animal doesn't stand a chance. This is a primitive and savage act that reflects badly on Alaska and its citizens.**

**Snaring is a most cruel and inhumane way to capture any animal. Baited snaring attracts bear cubs and domestic pets, neither of which should be subjected to such obscene pain and fear.**

**I hope that there are educated and compassionate people in Alaska who will work towards making life more tolerable for the bears and other wild creatures. These beautiful, rare animals should be cherished and protected. This would give your country considerable more respect in the eyes of the civilized world.**

**Sincerely:**

**Luree Dell-Bryan  
Volunteer for Cowichan Valley S.P.C.A.  
#6 – 2180 Renfrew Road  
Shawnigan Lake, B.C. Canada**



**Dear Sir/Madam:**

**I strongly support Proposal 142 on the following grounds:**

**This proposal would protect black bears from snaring in a large area of interior and northern Alaska**, including lands bordering such iconic parks as Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

**Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous.** There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

**Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters** and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

Thank you,  
Dr. Maria Proietti



I support proposal 142

Bear snaring is barbaric, unsportsmanlike, a war on our wildlife & just plain sick/cruel. Bears are vital to ecosystem balance. Do your job - Protect Our Public lands, waters, wildlife & health! You work for citizens, not 'sport' groups!

Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.

Thank you  
Lydia Garvey, Public Health Nurse  
429 S 24th Clinton, OK 73601





I Support #142!!

PLEASE...please...

DO NOT allow bear snaring.

We can come up with more sound scientific methods to co-exist and balance our Wildlife. In addition to the in-humaneness of this method, its sanction would dirty Alaska's Reputation... deem us followers of those who decimated the L 48 Buffalo.

Kim Stephanie Fitzgerald



Please discontinue the war on our Alaskan wildlife, in particular the bear snaring. **I support Proposal 142.**

Sincerely,

Kitty P. Benson



**I support proposal number 142**

**This proposal would protect black bears from snaring in a large area of interior and northern Alaska**, including lands bordering such iconic parks as Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

**Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous.** There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

**Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters** and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

*Janet Hoben  
1724 Peyton Ave #G  
Burbank, CA 91504-3646*



**I am writing in support of Proposal 142: and while my organization opposes all hunting of wildlife for recreation/fun/sport, the snaring of bears is even more barbaric, cruel and inhumane. Furthermore,**

- Snaring on lands surrounding the parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of Alaska's tourism trade, and brings valuable economic development to many communities and businesses around the state.
- Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous.

There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable.

- Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

Thank you for your attention to my comments.

Zelda Penzel, President  
People for the End of Animal Cruelty and Exploitation~PEACE  
NY, NY 10003



Dear Alaska Board of Game:

I am writing to **support proposal 142**, which would protect black bears from snaring in parts of interior and northern Alaska. I happen to be a naturalist and wilderness guide who relies on the presence of wildlife in Alaska for the success of my ecotourism business. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

I am very opposed to the practice of allowing baited snaring stations within 1/4 mile of homes, roads and trails. There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well.

As board members surely know, bears have a relatively low reproductive rate and taking sows and cubs seriously impacts future healthy populations. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

Thanks for the opportunity to comment.

Karen Jettmar  
2440 E. Tudor Rd. #1102  
Anchorage, AK 99507





This family household is vehemently opposed the Board of Game's bear snaring proposals. Kindly reconsider this barbarically cruel practice & support its prohibition through your **support of Proposal 142**. Thank you.

Sincerely, Rich & Ellen Bove  
Long Island, NY 11933



To Whom It May Concern:

New Jersey residents have just witnessed the second black bear hunt of Gov. Chris Christie's administration, against opinion of more than seventy percent of our population. These were voters and taxpayers whose voices were ignored in favor of not science, but a trophy hunt. Hunting of any type is nothing but sanctioned animal cruelty.

**Proposal 142** would prohibit black bear snaring in a large section of Interior Alaska. The Alaska Center for the Environment submitted this well-researched proposal and **we ask you to strongly support it.**

**This proposal would protect black bears from snaring in a large area of interior and northern Alaska**, including lands bordering such iconic parks as Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

**Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous.** There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

**Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters** and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

Sincerely,

**Merrilee Cichy**  
Legislative District Director  
League of Humane Voters of New Jersey  
PO Box 17, Manalapan, New Jersey 07726



## Support 142

I strongly oppose the use of baited bear snaring stations. It is a practice which is both cruel to the animal and dangerous to humans who could encounter a mother bear with a cub entrapped. This is a situation that happened to my brother in law, who was almost fatally injured.

Our entire family feels very strongly that these baited snares should not be allowed.

Mrs Robert Haley



I am in support of proposal #142 that is currently being proposed. I feel that the proposed snaring of bears is cruel and not a good solution. I ask you to support proposal #142. Please keep me informed on the progress of this proposal.

Thank you,

Brad Bryce  
40396 Dunlap Road  
Dunlap, CA 93621



To Whom It Concerns--

I urge you to **support Proposal 142**. Bear snaring is inhumane and unacceptable.

Sincerely,

Nikki Doyle  
839 Rosemount Road  
Oakland, CA 94610





Dear Alaska Board of Game Officials,

I am writing to you not as a concerned, fellow Alaskan, but as a concerned, fellow human being of planet earth. I live in Brooklyn, New York. I have never been in Alaska and have never hunted animals. But I wish to express **my support for Proposal 142** all the same. You may wonder, why would someone from Brooklyn, New York worry about Alaskan bears. My answer, hopefully, will change each member's mindset and thus will leave the bears alone and let them live their lives as only a bear can.

The greatest threat to all wildlife today whether it be the squirrels in Central Park (that's in New York City) to the mountain gorillas of Central Africa is one thing, and one thing only: HUMAN INTERFERENCE AND HUMAN ENCROACHMENT. I worry about squirrels, bears, and mountain gorillas just as I worry about people. I'm sure you will agree that it is not right to enslave people, or shoot people (except in self-defense). Well, guess what. It's not right to enslave animals, or shoot animals (except in self-defense). And guess what again. They feel pain, suffer and loss just as we do. Really! At this point, you all must have concluded that I'm an animal-rights freak from the Big-City. The only thing I've ever skinned was an apple. Well, the first abolitionists (those were people against slavery before the Civil War) were also viewed as freaks in attempting to put humanity one step forward. Now we must take another step forward.

I don't want to take much of your time, for there are other comments to be read, especially those that give all the reasons in the world why Proposal 142 is "scientifically valid" from the "wildlife experts." But killing, except in self-defense, or as a survival mechanism, can never be justified. Or, put another way, try to imagine that there were no human beings on this planet earth. Now ask yourselves, would there be a "moose and caribou problem." Animals have lived and died every day for the entire natural history of earth; before humankind and civilization there was no problem. There is no greater wildlife expert than Nature. It is 100% efficient (though in the short term things may look haywire). Saving the moose and caribou for the hunters to kill is as low and unnatural as it gets. Let the bears live and die. Let the moose live and die. But leave them alone. Hands off wildlife.

In the end, we will have a better earth for future generations to see, and we ourselves will become better human beings--for all.

Thank you for your attention in this serious matter.

Sincerely,

Jeffrey Kramer



142: support

The preservation of Alaska's wildlife is crucial for the renewable and highly profitable tourism industry in Alaska. I have become aware of the increasingly negative viewpoints of people who have visited Alaska or were planning on doing so concerning the disposable nature with which we regard the wildlife in this magnificent state. Moreover, the lack of hunting integrity displayed by the practice of snaring bears is frowned upon by ethical hunters. With a look to the future, I urge you to support proposition 142.

Thank you.

Paula Beneke  
2101 W. 29th Ave., #11  
Anchorage, AK 99517



Support 142

How can any responsible person condone bear snaring. It is extremely barbaric; perhaps it's a mother with her cubs standing by. They will starve to death. Put yourself in the bears' situation. How would you like to be snared and can't move and be frantic with your children there and you can't do anything to protect them? The cubs will not leave their mother; this is extremely irresponsible to do this.

I can't believe that "so-called" civilized people would do this to any animal.

Ms. Ardis Skillett  
37616 Montezuma Valley Road  
Ranchita, CA 92066



To the Board of Game:

I support Proposal 142 to prohibit bear snaring. This is a cruel practice that does not serve any practical purpose as Tony Knowles and hundreds of biologists have testified. Such inhumane treatment of bears demeans all Alaskan hunters and nonhunters.

Sharon Lowe  
Anchorage, Alaska



I am appalled at this practice and wish an immediate end to it.

I fully support proposition 142

Doris Lake





## **Support Proposal 142**

To Alaska Board of Game,

We are adamantly opposed to bear snaring anywhere, at any time, for any "reason" that anti-predator zealots, which Board members are proving themselves to be, can conjure up.

The practice is cruel, indiscriminate, unnecessary and shows the Board's total disdain for wildlife other than meat on the hoof. Alaska is not a moose ranch, and the on-going and escalating attempts to "control" Alaska's natural predators is becoming more and more shameful. If and when the moose population appears to be struggling, back off on human hunting. We have other choices. You need to look no further than to how our fisheries are managed to understand that, yes indeed, limiting the human take is an often used and effective management tool. Really, we can limit our take. You may get some loud squawkers, but most hunters get it. No, really, they do...

Alaskans and non-Alaskans alike spend a lot of time and money in the hopes of seeing bears and wolves in their natural habitat in this fabulous State. You all should be ashamed that you are even proposing a bear-snaring measure, it truly is reprehensible.

Marty and Annette Cordano  
Anchorage, Alaska



Support 142

I would like my thoughts on bear snaring registered with you.

I, along with most Americans, believe snaring of Black Bears is both unconscionable, disgusting, and merely provides sick entertainment for those who derive pleasure from such a twisted activity.

If you proceed with this reprehensible plan you will be responsible for fast forwarding the destruction of our already imperiled planet. Please don't you DARE call this conservation. Nothing could be further from the truth.

Americans are becoming more informed and are no longer as naive as they were when it comes to the government agencies who are assigned to protect our wildlife. Many now know that these agencies are merely agents of death and hunt clubs paid for with our tax dollars.

This is the 21st century. Will you continue to be relics of the past or address wildlife conflict in a way that fits today's world? Many will be watching you now.

Lane Ferrante



Dear Board of Game:

I encourage you to **support Proposal 142**, which will prohibit black bear snaring in a large part of Interior Alaska. I ask you to review the proposal (142) submitted to you by the Alaska Center for the Environment. You should support this proposal because eliminating bear baiting near heavy tourism areas will provide the type of experience that tourists who come to Alaska seek; because of the safety concerns of bear baiting a quarter of a mile from homes, residences and trails; and to demonstrate that we as a state honor the fair chase ethic,

Sincerely,

Corinne Conlon



I support proposal 142

Good Afternoon: Please **STOP** the Barbaric and **Cruel Practice** of **SNARING BEARS**. **Humans can be soooooo cruel to animals. WHY** Snaring is indiscriminate and takes sows and cubs. Attracting bears to baited areas is an inhumane way to treat bears and so **UNFAIR**.

Sincerely,

Roslyn Nadel

**Please be kind to our animals and make our planet a better place.**



February 15, 2012

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-552

I strongly urge your **support for Proposal 142**, to prohibit bear snaring.

Thank you for considering my views,

Irene Bartell  
P.O. Box 17855  
Arlington, VA 22216

(frequent visitor to the State of Alaska)





February 15, 2012

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, AK 99811-552

**I strongly urge your support for Proposal 142, to prohibit bear snaring.**

Thank you for considering my views,

Stephen G. Bartell, Esq.  
President, Clear Conscience  
P.O. Box 17855  
Arlington, VA 22216

(frequent visitor to the State of Alaska)



To Whom it May Concern:

I am writing to you in **strong support of Proposal 142**, which would protect black bears from snaring in a large area of interior and northern Alaska.

Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be fundamentally dangerous.

In addition, attracting bears to snares is a violation of the 'fair chase' ethic traditionally followed by responsible hunters.

Although I am not a resident of Alaska, I have traveled there before on extended backpacking trips, and I truly appreciate the natural beauty of the state.

Please do the responsible thing and do not upset the balance of nature.

**YES on Proposal 142.**

Respectfully yours,

Lisa Williamson  
2742 N. Fair Oaks Ave.  
Tucson, AZ 85712



## SUPPORT 142

Please do everything in your power to end this cruel and unnecessary practice. Bears are beautiful creatures and they are respected and appreciated by millions of people. To cause extreme suffering and death to a species that shares our planet is unforgivable and millions of people will be watching and will not forget that the bears must be protected by those who have the power to do so.

Please heed our requests, rather our begging for kindness and for the most humane and important thing.

Thank you in advance,

Connie Mogull  
Mamaroneck, NY 10543



## **Support Proposal 142**

**This proposal would protect black bears from snaring in a large area of interior and northern Alaska**, including lands bordering such iconic parks as Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

**Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous.** There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

**Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters** and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

**This is cruel and barbaric and these baited snares should be outlawed from ever being used again!!**

***Stefanie Kruckiewicz***



## Support 142

Please do not engage in snaring bears. It is an extremely cruel method for eliminating animals. I can't imagine a more inhumane way of controlling their numbers. I hope you will reconsider this method.

Sincerely,

Jim R. McMichael





Writing in **support of 142**, the anti-snaring proposal. I've seen enough footage of all sorts of animals caught in these traps and I think in 2012 this is an unacceptable way to manage game. I was fortunate to draw a permit for McNeil River last July and cherished every moment I spent in your beautiful state, leaving many thousands of dollars of my income behind in your state.

This year is our 40<sup>th</sup> wedding anniversary and we are planning on a trip to Alaska. As much as I loved my 1<sup>st</sup> Alaska experience, if this snaring practice and the wolf killings via 'chopper don't stop, we will not travel to Alaska. Plenty of other locations that would welcome cash from the Lower 48.

I can only hope you rethink these critical issues.

Sincerely,

Bruce Faanes



To Those it may concern -

Myself, family and friends are strongly oppose bear snaring. It is a horrifying practice and completely unnecessary. For those in support of this I am not sure how you sleep at night or explain your point of view/actions to your children.

Please end these barbaric and cruel attempts to destroy nature's balance and its creatures.

The BOG and its efforts to destroy Alaska's beautiful animals is a huge source of embarrassment for me as I work domestically and abroad.

Lets take this opportunity to turn the tide.

Please **Support Proposal 142** and help end this barbaric practice.

Jennifer Meyer

Anchorage Alaska



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

**Dear Sir or Madam,**

**Support proposal 142**

**This proposal would protect black bears from snaring in a large area of interior and northern Alaska**, including lands bordering such iconic parks as Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

**Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous.** There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

**Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters** and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

Thank you for your consideration,

Ravi S. Madapati



Please re-think this situation. The animals entrusted to our care deserve every effort on our part.

**Please support proposal 142!**

Mark Huckel



Dear Board of Game,

Please accept my comments relating to your upcoming meeting in March, 2012.

I strongly **support Proposal 142** - 5 AAC 84.270 Furbearer trapping. Prohibit trapping of black bear in the Interior region.

No animal should fall victim to a trap or snare, whether it's a bear, other wildlife, or someone's pet. It is an inhumane practice that needs to be banned.

Sincerely,

Carla Porter  
5820 Sunderleigh Drive  
Sunderland, MD 20689





**SUPPORT 142**

**To Whom It May Concern:**

**I cannot believe I am having to redo this protest because of some bureaucratic shift in presenting my complaint.**

**The purpose of this letter is to register my utter distaste, complete disgust and absolute bewilderment at this EVER being considered by what I always considered was an intelligent and caring body of individuals. How *anyone* could even conceive of this cruelty is beyond me; we constantly criticize 'barbaric' civilizations for doing the same (snaring bears for bile farming) and yet here we are in our own turf, discovering a few rotten apples wanting to do the same.**

**I cannot find the 'perfect' words to use in order to convey my amazement that this ever reached this level. I am begging you to consider assigning this concept to the appropriate file: garbage ( and NOT the recyclable bin, because this should never surface again!!!!)**

**Thank you for reading my rant; I really am totally and completely against this!**

**Yours truly,**

**Lyn Pollard**



**I STRONGLY OPPOSE Bear snaring and urge passage of  
Proposal 142.**

Snaring is no way to "get" a bear. It is unethical, unfair and a travesty  
of normal hunting practice.

SHARON STROBLE  
2246 12TH AVE WEST  
SEATTLE, WA 98119



142: Support

Dear Members of the Alaska Board of Game,

I want to let you know that I completely concur with Governor Tony Knowles who indicated to you at the Board Meeting earlier this year that bear snaring is an inhumane practice and should not be done in Alaska. It seems to me that anyone who considers himself or herself to be ethical would concur as well with Governor Tony Knowles, and thankfully most Alaskans do.

Sincerely Yours,

John Lisowski  
2160-A Lawson Creek Road  
Douglas, Alaska 99824



## **I Support Proposal 142**

Please help to prohibit black bear snaring in Alaska.

Thank you,  
Leslee Morrison



This is a message in **support of Proposal #142.**

Snaring bears, along with all the other horrible things you are doing to the bears and wolves is nothing but legalized animal torture and has to stop.

Diane Raynor  
Anchorage, AK





To BOG:

We very strongly support Proposal 142. Bear baiting has no place in Alaska.

Very sincerely,

Dr. Michael and Dr. Joyce Huesemann



To the Board of Game,

**I Support Proposal 142.**

**Bear snaring is barbaric. As a citizen of Alaska and an avid outdoors man I strongly support Proposal 142.**

**Thank you for your time,**

**Buck Curry**



**Please support Proposal 142**

Patricia Tallman, Ph.D.  
Environmental Policy Consultant



I am writing to urge you most strongly to **support Proposal 142**, which would prohibit the snaring of black bears in much of Alaska. There are much better ways to achieve prudent wildlife management.

Thank you.

Katherine Mitchell



**I SUPPORT proposal 142**

Do not make the "Last Frontier" like the lower 48.

Leave the wild -- WILD.

Cynthia Chard





Support 142

Just reading this segment in the article sickens me. How can you possibly consider allowing something like this to be practiced. How much more pain and suffering are you willing to inflict upon the natural wildlife in this area.

Also, with no regard as stated to anyone unfortunate enough to accidentally come upon a situation of a mother protecting her trapped cub, it is as stated unacceptable. What twisted mind is thinking of these horrific acts. STOP!! Plain and simple, STOP!!

Ilene Orem



Dear Board of Game,

I am urging you to rise above the political standard and vote in favor of the wild species under your charge by **supporting Prop 142**. Scientific approaches to wildlife conservation and wildlife tourism (which boosts local economies more than killing wildlife) take into account the long-range factors involved in ecologically-sound and ethical ways of dealing with human-wildlife conflict. The vast majority of constituents are NOT in favor of barbaric methods such as tempting hungry bears and their cubs into bait traps.

I welcome your feedback and thanks for considering my position on this issue.

Best,

Lesa Miller  
Sherman Oaks, CA



To Whom it May Concern,

I stand in strong opposition of the snaring of black bears and fully **support Proposal 142**. Black bear snaring should not be allowed in interior and Northern Alaska. These lands border national parks and this could result in the decline of the black bear population in the national parks.

Wildlife viewing is essential to Alaska's economy and the loss of bears may negatively affect the number of tourists that would visit that region.

Allowing snare stations 1/4 miles from roads, trail and homes poses a danger to people in that area. It is also extremely unethical to attract bears to these snares. Snaring is cowardly, inhumane and violates the premise of fair chase by hunters.

Those responsible for making these proposals have no regard for Alaska's wildlife. It is time you stop tampering with the balance of nature.

Loretta Stadler  
Franklin Lakes, NJ



I support Proposal 142 for the following chief reasons:

This proposal would protect black bears from snaring in a large area of interior and northern Alaska, including lands bordering such iconic parks as Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous and seems just plain foolish to me. There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

Thank you.

Bill Zager



Support proposal 142

I am writing to stop the bear snares. These are absolutely unnecessary and I happily submit my name.

Katarina Flynn  
14402 Hardtree Drive  
Lake Elizabeth, CA 93532





SUPPORT 142

To Whom It May Concern:

I am writing in support of captioned proposal. I have written many times before and will not go into the facts about this terrible plan. I am simply writing to ask that you search your conscience and ask yourself for the strength to do what is "right" for these wonderful creatures. Just imagine how the citizens of the lower 48 would react if you showed tremendous compassion. It is up to you, please do not decimate these animals.

Sincerely,

Jim Burris  
Seguin, TX



**Please help us support proposal 142.**

**This proposal would protect black bears from snaring in a large area of interior and northern Alaska**, including lands bordering such iconic parks as Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

**Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous.** There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

**Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters** and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

Sincerely,

Kristi Machon



Please support Proposal 142. Bear snaring is inhumane.

Sincerely,  
Dena Selby



## Support Proposal 142

Snaring of black bears is barbaric and unconscionable and should not be allowed. Why some people think it is okay to treat animals inhumanely is ignorant and without any regard to the suffering and misery that they go through. How would they like inhumane treatment like that done to them?

It is quite simple...outlaw snaring of black bears!

June Abner



**Please support Proposal 142.** The logical rational is as follows:

This proposal would protect black bears from snaring in a large area of interior and northern Alaska, including lands bordering such iconic parks as Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous. There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

Thank you for your consideration in this matter.

Truly,

Debbie Brush  
Castle Rock, Colorado





Please support Proposal 142.

I would expect that any decision on this topic would be made based on science and NOT based on the needs and wants of the hunting lobbyists!! Although I do not currently live in AK, many in my family still live there, originally as homesteaders from the 40's, and we expect that the wildlife that is part of the great state of Alaska would not suffer the same fate as that in the lower 48. It is the wildlife that makes Alaska what it is!!!!!!!!!! It is for everyone, not just a select group, the hunters, and should be managed for the benefit of wildlife and everyone.

Martha J. Wavrin  
Henderson, MN



SUPPORT PROPOPSAL 142

I stand in opposition to this horrible practice.

**"The greatness of a nation and its moral progress can be judged by the manner in which its animals are treated" - Mahatma Gandhi**

Ms. Chandler M. Ralph

President/CEO  
Adirondack Health  
2233 State Rt 86  
P.O. Box 471  
Saranac Lake, NY 12983



## PROPOSAL 142 (SUPPORT)

I am appalled at what is done to bears. Not only the methods but the whole act in itself. Why do you think, we humans, have any kind of right to destroy everything in our path. All these wild beautiful creatures live here and we do NOT own this earth. And this is profound animal cruelty. STOP bear snaring and STOP it NOW.

Sincerely,

Marianne Widmalm  
(Michigan)



## SUPPORT PROPOSAL 142

I writing in support of prohibiting black bear snaring in Alaska based on the following key points

- **This proposal would protect black bears from snaring in a large area of interior and northern Alaska**, including lands bordering such iconic parks as Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.
- **Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous.** There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.
- **Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters** and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

As a visitor to the beautiful state of Alaska and the fact that the wildlife viewing is a big reason for my visits, it would be a travesty to have the bear population decline in an already fragile environment.

Thank you

Monica Reed  
St. Johns, FL



## SUPPORT PROPOSAL 142

Proposal 142 would prohibit black bear snaring in a large section of Interior Alaska. The Alaska Center for the Environment submitted this well-researched proposal and WE ASK YOU TO STRONGLY SUPPORT IT!!

Thank you.

Linda Maslin  
Blue Bell, PA





## SUPPORT 142

To whom it may concern!

I am completely against this cruel and barbaric practice of snaring!  
Imagine the pain and agony of your child caught in one of these?  
Yes, a bear will go through the same pain and agony!  
Shame on you!

The question is not, can they speak or even do they have a soul in  
this case...but can they suffer? YES!!!!

Stop the madness!  
I am for proposal 142!!!

Rebecka Tobler  
20439 S. May Rd.  
Oregon City, OR 97045



Hello:

I have lived in Alaska my entire life and I stay here because I value our wildlife. I cannot stomach the thought of bear snaring, it is cruel to bears and dangerous to humans. I can't imagine coming across a snared bear while out hiking, the suffering is too much to handle. As humans we can do much better than this.

**I support Proposal 142** that makes at least a portion of our state safe from this unneeded disaster. Even the hunters don't want this action; they know it isn't "fair chase". Listen to the people like me who love this state and want an environment safe to travel through. Do not side with a handful of killers who get more extreme with their killing every chance they get.

April Warwick  
5716 Kennyhill Drive  
Anchorage, AK



Hello,

I'm writing in **support of proposal 142.**

Bear snaring should not be allowed for many reasons, the strongest being that bears, and other creatures in proximity to would-be snared, need to be protected and treated humanely. Snaring can also cause long term ramifications due to the fact that offspring can decline due to stress and decline in population in habitat that was once popular for breeding. Let's not forget about humans, either. Hikers and other people enjoying the outdoors shouldn't have to worry about being injured by snares- what a way to ruin an outing!

Thank you for your time.

Best,

Laura Sneddon  
Los Gatos, California



## **"Support Proposal 142".**

Apparently, this unprecedented lethal "experimental kill" plan the Alaska Department of Fish and Game has for Alaska's bears lacks any scientific justification. Except to increase moose populations (arguably creating an unnatural imbalance) to increase trophy hunter success (which would indicate a solely money making motivated plan), there seems to be no defensible argument for the targeting of black and brown bears in this area beyond normal hunting limits.

Allowing the killing of sows, as well as cubs, seems unnecessarily cruel and permits the elimination of two generations of bears. This would seem to be a glaringly obvious detrimental strategy to pursue. It exposes a profit prompted insensitivity to the natural environment of the Alaskan bush that should be foreign to the Department of Fish and Game.

The use of baited bucket snares, which has just recently been brought to my attention, is an extremely repulsive measure which does not reflect any sportsmanship nor huntsman consideration for the targeted animal. Simple bear baiting stations, without snares or traps, are questionable enough, but allowing baited bear bucket snares is nauseating. Trappers and bear baiters constantly argue "responsible" practices; it can be done responsibly. Yes, possibly it can be, but the rule in rural areas of Alaska is that it is not and there is no enforcement of regulations, after all Alaska is a big place. The "sports" hunters who partake in these practices more often than not set trap lines along roads and trails that are easily accessible to them, without much consideration for others who use the areas. It is so nice and leisurely to set traps from a car stop. And, oh, gee where did I leave those traps again, before I was called off to work? Why haven't they been checked for six months if ever again?

The outcome of such an "experiment" seems quite evident; bears and cubs get cruelly slaughtered, some self maim themselves to get free of revolting traps, cubs lose sows, sows lose cubs, the balance is tossed apart, nature gets riled up for no good reason, and ridiculous "sports" hunters return to from where ever such creatures emanate to brag about how they "hunted" bears in Alaska. Then they can return for moose season. At least the moose won't be snared in buckets, unless of course they step in a discarded and forgotten bear bucket snare and have to clomp around in more plastic back country trash. On the positive side: the Department of Fish and Game makes a bundle. Enjoy spending it.

This "experiment" reflects the way Alaska should not be headed, towards profit motivated wildlife control, and is totally unjustifiable and unnecessary.

Thanks,

Ken Green  
PO Box 776  
Cooper Landing 99572



## **SUPPORT 142**

The idea of snaring bears, black or grizzly, is repugnant to any ethical Alaskan, hunter or non-hunter. It is indiscriminate in what sex or age group it affects and by taking sows with cubs it can wipe out 2 generations at once.

Bears are slow reproducers, amongst the slowest of all Alaska's predators. They would take quite a long time to recover from the errors inherent in such a program.

Furthermore, the law enforcement resources for the area under consideration are already strained well past capacity. To add such a trooper-intensive activity such as this is an invitation to poaching and law abuse not to mention wildlife abuse.

I am strongly opposed to bear snaring and fully support proposal 142 to prohibit its use in the Interior (or elsewhere in Alaska, for that matter).

Art Greenwalt  
Fairbanks





## **SUPPORT 142**

Bear snaring is a dangerous practice that puts not only bears but also other species including humans in danger! Protecting the bears is vital!

Yours sincerely,

Heike Killet



**Support 142**

This is a horrible, inhumane, and senseless practice.

RaShelle Toppenberg



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

This email is to request the BOG to **support the Bear Snare Proposal 142.**

This is a well researched and thoughtful proposal that should be implemented. This proposal makes a lot of sense and it appears that it has been well-researched.

We need to protect black bears from snaring as wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

Further I would say that the vast majority of tourists who visit Alaska are horrified at the idea that the state of Alaska would allow this activity in any form. Just the other night I was talking on the phone to my brother-in-law about his up coming trip to AK in July (bringing 8 others), the popular cruise to Seward and train trip to Denali.

He asked me if it was true that AK allowed killing of bears by baiting and aerial shooting of wolves. He is a long time hunter; he was to say the least not very complementary about the idea. He went on and on about this, it was difficult to change the subject. I have encountered a similar reaction from other visitors we have had in previous years. No one I know has a neutral attitude about this topic and frankly I do not know anyone who thinks that bear baiting works, is really necessary, or is ethical. My mix of friends here in Soldotna includes a lot of active hunters; not one goes along with bear baiting in any form.

To say the least many of not most Alaskans and likely a large majority of AK potential visitors regard attracting bears to baited snares as an affront to the fair chase ethic followed by responsible hunters and accepted by the vast majority of Americans, regardless of whether they personally hunt.

Finally, I am suspecting that the science does not add up. I have looked at several studies about bear baiting and the results are by no means less than equivocal if not just plain non-supportive. I am hoping that the BOG will make available all reports, studies, secondary and primary data to the public so that we can further understand the data behind decisions.

Respectively,

Dick E Hoskins  
PO Box 1725  
Soldotna, AK 99669



**Proposal 142** would prohibit black bear snaring in a large section of Interior Alaska. I **strongly support it**.

This proposal would protect black bears from snaring in a large area of interior and northern Alaska, including lands bordering such iconic parks as Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous. There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

Thank you for supporting this proposal!

Take care,

Terry Traveland  
Traveland Law  
P.O. Box 865057  
Plano, Texas 75086



## **Support 142**

I have owned and operated Iniakuk Lake Wilderness Lodge since 1974. Our lodge is located six miles outside the southern boundary of the Gates of the Arctic National Park and we have two private in-holdings within the Park.

I am writing once again to object strenuously to the BOG's barbaric bear snaring plan. It is embarrassing and time-consuming to have to repeat this request to cease and desist time and time again. Just stop it. We own a wilderness lodge, focus on soft adventure, catch and release fishing, solar power and taking care of the land. It is unconscionable and impossible to justify BOG tactics about gassing and snaring bears to our out-of-state guests.

Just drop it.

Sincerely,

Patricia Gaedeke, Owner  
Iniakuk Lake Wilderness Lodge, LLC





Support 142

Dear Alaska,

As one of the most beautiful, sacred, and natural places on earth, it saddens me and others to think that Alaska is becoming less, simply due to human interference.

Money is the least compassionate and rewarding reason to do anything, let alone kill. And least of all, by cruel methods.

Alaska is one of the few remaining refuges of the Creator's perfection ... the balance of nature was created perfect. Interference by man not only distorts the State's perfection, but insults God.

How could those privileged with the care and nurturing of God's garden and his wildlife, be so callous to think that genocide of the magnificent wildlife - the reason that Alaska stands out in the world - could be beneficial to any, except those with an artificial desire for money.

Alaska is UNIQUE and THRILLING and UNTAMED - and THAT is what makes it the greatest place on this earth.

Please - do not succumb to the lowly manipulation of beauty for the sake of human desire. Exist WITH it. Adore it. Share it.

We all love Alaska for what it is NOW. If you become like the rest of the world, then your value will match that of other humanized endeavors.

It takes greatness to know God's perfection, and you have it. Recognize it. Do not kill the bears, the wolves or any creature for convenience.

You are above that.

And we all love you for it.

The Navajo have a saying that bodes well for us all ... Walk in Beauty.

Sandy Webb



## Support 142

Snaring bears is potentially dangerous to humans and pets who may get caught in the snares. Does anyone want to be caught or want their loved ones caught in a bear snare? I think not.

It is a sad thing that in America, the qualities of compassion and humanity for animals seems to have been lost. Alaska can be a shining exception to this. Bears feel pain, fear and panic just like humans when they are threatened and hurt. There is no rational excuse for causing the suffering of a snared bear. It is simply wrong.

Florence Stasch



## **I support Proposal 142**

**This proposal would protect black bears from snaring in a large area of interior and northern Alaska**, including lands bordering such iconic parks as Denali National Park and Preserve, Arctic National Wildlife Refuge and Gates of the Arctic National Park. Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks. Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

**Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous.** There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

**Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters** and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

Sincerely,  
Lee Ann Stiff



Support 142

I strongly oppose bear snaring

Snaring on lands surrounding these parks would undoubtedly result in a decline in bears within the parks .

Wildlife viewing is a vital part of our state's tourism trade, and brings valuable economic development to many communities and businesses around the state.

**Allowing baited snaring stations within 1/4 mile of homes, roads and trails would be inherently dangerous.** There is no way for the public to know where stations are set, and summertime recreationalists or tourists could inadvertently encounter a free-roaming adult or sibling of a bear caught in a snare. Cubs still with their mothers can easily be caught. The resulting scenario, a hiker suddenly encountering a sow protecting her trapped cub, is unacceptable. Snaring is indiscriminate, taking sows and cubs, and brown bears as well. Bears have a relatively low reproductive rate and taking sows and cubs is the polar opposite of prudent wildlife management. There is little long-term evidence that such intensive management practices actually produce the intended result of increased moose and caribou populations. In fact, intensive management has resulted in reduced growth of calves, reduced twinning rates and poor body condition of the ungulate species it was intended to help.

**Attracting bears to baited snares is an affront to the fair chase ethic followed by responsible hunters** and accepted by the vast majority of Alaskans, regardless of whether they personally hunt.

**Eileen Bosch**  
Saratoga, CA. 95070



I'm in support of proposal 142, personally in this day and age I can't believe snaring is allowed period.

Ruth LaBarge





To BOG:

I write to express my strong support for Proposal 142. There is no place for bear snaring, ethically, morally, ecologically or scientifically speaking.

Brad De Noble



**~I support Proposal 142~**

**Barbaric is the way to describe the actions of the men that stoop to bear snaring! Our bears are precious, beautiful, intelligent fellow creatures that deserve respect & are part of our environment that is getting wasted by outdated ways of thinking. We now need desperately to learn to live WITH the animals not kill, kill, kill.**

**Frances Martin  
Carmel, Ca.**



## SUPPORT 142

I am totally opposed to the bear snaring that is being considered in Alaska. It is time to change our whole approach to the treatment of wild animals and we can start by ending this before it starts or continues. We need to live in the wild world with the rest of creation--not the other way around.

Diane Rees  
899 Briarwoods Rd  
Franklin Lks, NJ 07417



Please register my comments in support of Proposal 142. I am against the baiting and snaring of bears. Too often, I have been hiking with paying clients, guiding them on known trails and have come upon a baiting/snaring station. I'm sure these aren't legal as they shouldn't possibly be that close to actual usable trails, but it is a terrifying situation to find oneself in as a guide. Even, bear baiting stations within miles of our trail systems presents a dangerous situation for those of us making our living from guiding people in the wilderness.

Thank you,

Brooke Edwards  
Operations Manager  
Alaska Wildland Adventures



## SUPPORT 142

FROM THE SCOTTISH TREE TRUST, GLASGOW, SCOTLAND

My organisation is an educational and campaigning one for the better treatment of the environment and wildlife. We were shocked to find that Alaska proposes to snare bears to bring down their numbers, and one reason being to stop predation on moose, cariboo so that hunters will have more kill of these species.

This is contrary to the humane way of treating animals, particularly the method of the snares proposed to be used. Even respected hunters are offended by this whole affair.

Alaska should not be looked at as some great hunting arena. The modern way forward is to respect wildlife and cut to the minimum the amount of interference certain species experience. You must begin to appreciate world opinion on such matters. We should all be trying our best to protect the environment and to maintain what wildlife remains. Bears suffer terribly in all the countries they are found, some being farmed for bile as in Asia, bear-baiting with dogs, folk medicine, performing bears etc.

We would ask that this Proposal 142 should be approved and areas set aside for bears to live without torment.

Mr. Greer Hart, President





## SUPPORT 142

Stop black bear snarling in interior Alaska.

Anthony J. Conforti



**I support Proposal 142.**

**Black bear snaring is inhumane.**

**Thank you.**

**Anne Christian**



I'm sending you this to you with the hope that you will get a feel for the injustice that has been done. There probably is no mechanism to undue the damages to the November 2011 season, but hopefully you'll consider this information while evaluating proposals for primitive weapon hunts during your spring 2012 meetings.

I've been fortunate and been able to hunt DM766 a few times in past years. This year I applied for the same hunt, which was identical to the historical area on Page 9 of Draw Hunt Supplement (Attachment 1). When I received my permit in February, there was new map of a totally different area (Attachment 2).

How this change ever got to the board without the vast majority of the public being aware is incredible. Then for a change to be made based on a handful of complaints is unfair to the vast majority. Now with this hunt change, you have hundreds of sportsmen upset. Some are Gold King miners for decades; others are property owners in the affected area, and others who have been frequent users of the area. You also have the 45 permit winners from 2010 who couldn't apply even though it was a totally new hunt, because the same hunt number was used. How could this happen? Then there are those who did not draw but, but hoped to in the future.

People are upset at the lack of Moose in 20A, especially in areas people are able to access. This is a direct result at the Antlerless Hunts running late into the winter...not the few hearty soles who hunted the November Muzzleloader season. In 2010 DM766 took a whopping 8 Bulls, the extended Cow Hunt took 37 Bulls. It seems obvious the herd damage is not from DM766.

The other problem locals have with the Antlerless hunt is that for the most part it brings in a different breed of hunter. These are usually not the seasoned sportsmen who spend all day making a stalk to get within 100 yards of a Bull and that's after the 60 mile snowmobile ride in sub zero temps. DM766 was low impact hunt for seasoned hunters that enjoyed the challenge.

The new hunt area is inaccessible during most November's. The Tanana most certainly will not be froze and most likely neither will the Wood River.

Now that is nearly time to hunt...we have a 3<sup>rd</sup> Map for DM766. Under this 3<sup>rd</sup> revision the inaccessible area is more then doubled, but a small portion of timbered low land was added. Although this small area is not blocked by big rivers, it is heavily timbered, no trails, and any moose have left for the foot hills (Wood River Controlled use area, old DM766).

The fair solution would have been for F&G to open both the old and new areas since both were advertised and permit winners were taken by total surprise. They have been unwilling to make this right mostly due to fear that the Board demanded the change. Even though the Board decision was based on very limited information, F&G is determined to hose over this group of sportsmen.

. Doesn't it seem at all odd to you that every other State in the Union provides Muzzleloader hunts to very accessible/productive and trophy areas. Alaska picks the most remote area possible, at a time of the year of the most extreme temperatures, and then makes it inaccessibly remote. WOW. I gladly took the first few challenges, but we can't work with absolutely no access.

Thanks for your time.

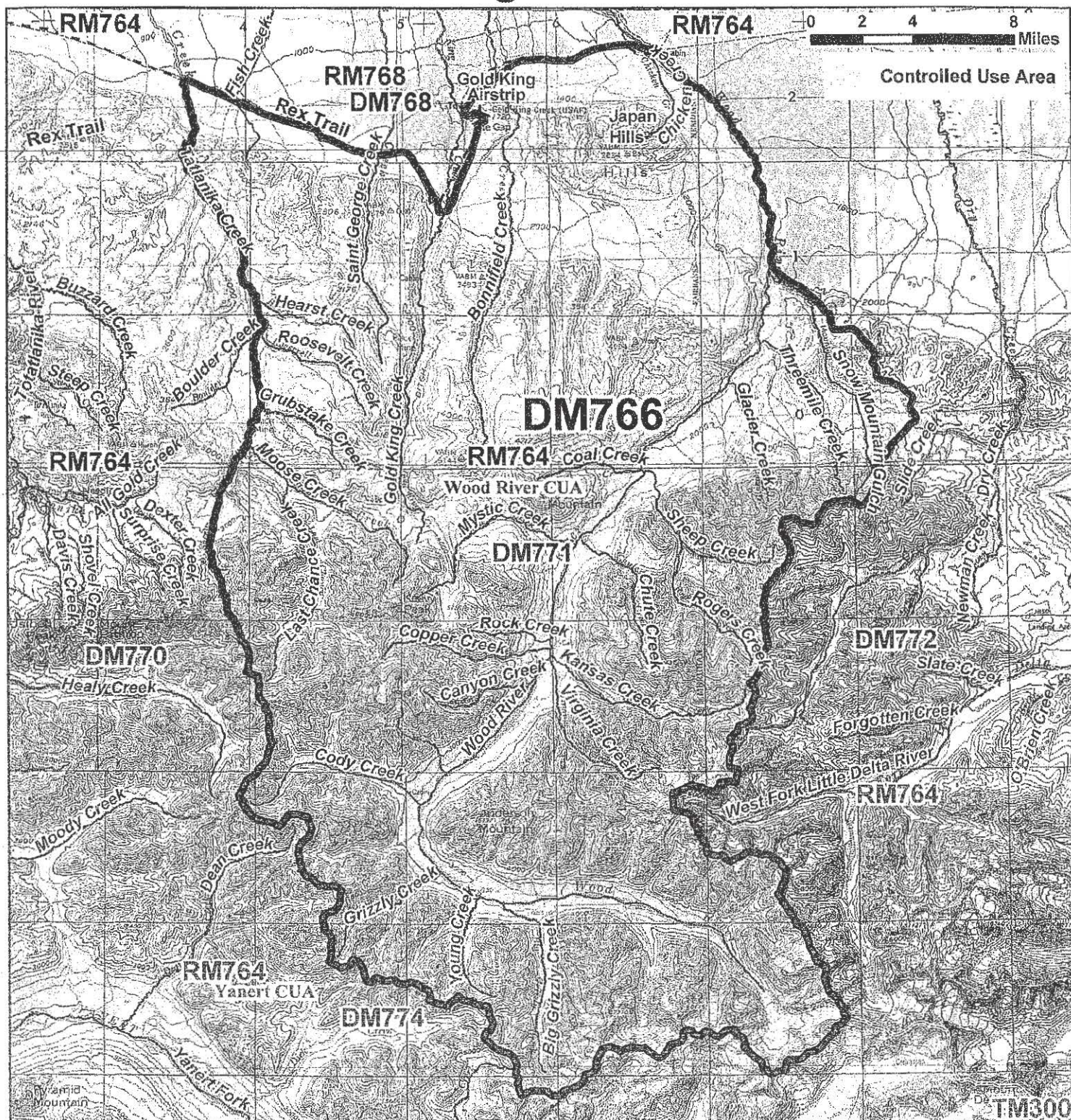
  
Dave Machacek

840 Pickering Drive  
Fairbanks, Alaska 99709





# DM766 - Moose Drawing Permit Hunt



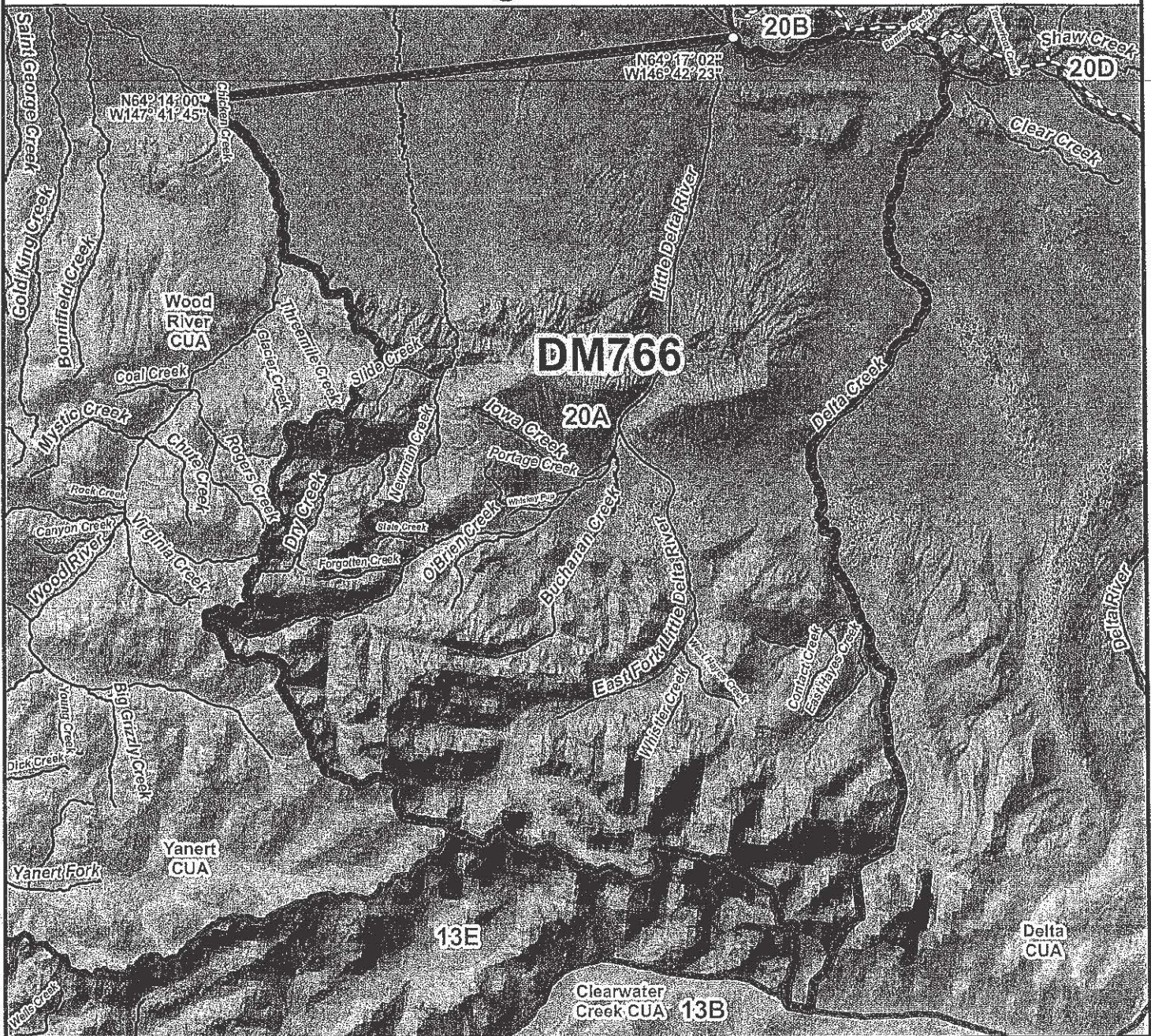
## AREA DESCRIPTION FOR DM766 - Moose - Drawing Permit Hunt

**HUNT AREA:** That portion of the Wood River Controlled Use Area in Unit 20A bounded on the north by the south side of the Rex Trail beginning at its intersection with the east bank of Tallanika Creek, then easterly along the Rex Trail to Gold King airstrip, then from Gold King airstrip along the trail's extension along the north side of Japan Hills to the Wood River; bounded on the east by the east bank of the Wood River including the Wood River drainage upstream from and including the Snow Mountain Gulch Creek drainage; bounded on the south by the divide separating the Yanert River drainage from the Wood River drainage and bounded on the west by the divide separating the Wood River drainage from the Healy Creek drainage, to the headwaters of Sheep Creek, the east bank of Sheep Creek and Tallanika Creek to the Rex Trail.

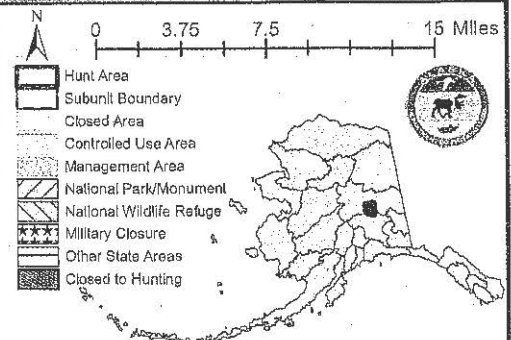




# DM766 Moose Drawing Permit Hunt



**AREA DESCRIPTION:** Unit 20A, that portion bounded on the north by the north bank of the Tanana River between Delta Creek the Little Delta River and a line from the mouth of the Little Delta River (N64° 17' 02", W146° 42' 23") to the intersection of the Rex Trail and Wood River's east bank (N64° 14' 00", W147° 41' 45"), then south along the eastern boundary of the Wood River Controlled Use Area to the eastern boundary of the Yanert Controlled Use Area, then east along the eastern boundary of the Yanert Controlled Use Area to the Alaska Range divide, then east along the Alaska Range divide to the headwaters of Delta Creek, then north along the west bank of Delta Creek to the Tanana River.





**RECOMMENDATIONS**  
**ALASKA BOARD OF GAME PROPOSALS**

**Interior Region**  
**March 2-11, 2012**  
**Fairbanks, Alaska**

**U.S. Fish and Wildlife Service Office of Subsistence Management (OSM)**



**PROPOSAL 136 – 5 AAC 85.055 Hunting seasons and bag limits for Dall Sheep.** Begin the resident sheep season seven days earlier than nonresidents in Region III units.

**Current Federal Regulations:**

**Unit 12**

*Unit 12 General Hunt—1 ram with full curl horn or larger. Aug. 10–Sept. 20*

*Unit 12 Elder Hunt, that portion within Wrangell-St. Elias National Park and Preserve—1 ram with full curl horn or larger by Federal registration permit only, by persons 60 years of age or older. Sept. 21–Oct. 20*

**Unit 19**

*1 ram with  $\frac{7}{8}$  curl or larger Aug. 10–Sept. 20*

**Unit 24**

*Units 24A and 24B—that portion within the Gates of the Arctic National Park, excluding Anaktuvuk Pass residents—3 sheep. Aug. 1–Apr. 30*

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

*Unit 24A—except that portion within the Gates of the Arctic National Park—1 ram with  $\frac{7}{8}$  curl horn or larger by Federal registration permit only. Aug. 20–Sept. 30*

*Unit 24 remainder—1 ram with  $\frac{7}{8}$  curl horn or larger. Aug. 10–Sept. 20*

**Unit 25**

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

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

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

<i>Unit 25A remainder—3 sheep by Federal registration permit only.</i>	<i>Aug. 10–Apr. 30</i>
<i>Units 25B, 25C, and 25D</i>	<i>No Federal open season</i>

## **Unit 26**

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

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

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

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

**Impact to Federal Subsistence users/wildlife:** Adoption of this proposal is not likely to increase harvest of sheep, but could increase harvest by Alaska residents. It may also lead to a decrease in harvest by Federally qualified users as a result of non-Federally qualified users harvesting sheep earlier season. However, Federally qualified users would also be able to hunt during the earlier season, but they would not be able to do so under the more liberal Federal harvest limits.

**Federal Position/Recommended Action:** While OSM is **neutral** on this proposal we would like to point out a few potential impacts this could have for Federally qualified subsistence users.

**Rationale:** Currently, Federally qualified subsistence users are provided a priority over non-Federally qualified users through less restrictive harvest regulations that include provisions for any sheep, any ram, or 7/8 curl rams and higher harvest limits. In many of the effected units the Federal sheep season dates are the State seasons. If all Alaskan residents, including Federally qualified users, are allowed to hunt a week earlier then Federally qualified subsistence users would either have to compete with non Federally qualified users for full curl rams only or they may choose to wait until the Federal Subsistence season opens and they can take advantage of the more liberal Federal sheep regulations. Waiting until the later Federal season opens could

put Federally qualified users at a disadvantage as fewer sheep would likely be available after that first week and the sheep may be displaced into areas less accessible to subsistence users.

If this proposal were adopted it may also prompt Federally qualified users to submit proposals to the Federal Subsistence Board to also modify the Federal subsistence season dates.

**PROPOSAL 140 – 5 AAC 92.015. Brown bear tag fee exemptions.** Reauthorize resident bear tag fee exemptions throughout Interior and Eastern Arctic Alaska.

(a) A resident tag is not required for taking a brown bear in the following units:

...

(4) Units 12, 19, 20, 21, 24, 25, 26(B), and 26(C)

#### **Current Federal Regulations:**

##### **§ \_\_\_\_ .6 Licenses, permits, harvest tickets, tags, and reports.**

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

##### **§ \_\_\_\_ .26 Subsistence taking of wildlife.**

*(j)(1) Sealing requirements for bear apply to brown bears taken in all Units, except as specified in this paragraph, and black bears of all color phases taken in Units 1-7, 11-17, and 20.*

*(2) You may not possess or transport from Alaska the untanned skin or skull of a bear unless the skin and skull have been sealed by an authorized representative of ADF&G in accordance with State or Federal regulations, except that the skin and skull of a brown bear taken under a registration permit in Units 5, 9B, 9E, 17, 18, 19A and 19B downstream of and including the Aniak River drainage, 21D, 22, 23, 24, and 26A need not be sealed unless removed from the area.*

*(3) You must keep a bear skin and skull together until a representative of the ADF&G has removed a rudimentary premolar tooth from the skull and sealed both the skull and the skin; however, this provision does not apply to brown bears taken within Units 5, 9B, 9E, 17, 18, 10A and 10B downstream of and including the Aniak River drainage, 21D, 22, 23, 24, and 26A and which are not removed from the Unit.*

*(i) In areas where sealing is required by Federal regulations, you may not possess or transport the hide of a bear that does not have the penis sheath or vaginal orifice naturally attached to indicate conclusively the sex of the bear.*

*(ii) If the skin or skull of a bear taken in Units 9B, 17, 18, and 19A and 19B downstream of and including the Aniak River drainage is removed from the area, you must first have it sealed by an ADF&G representative in Bethel, Dillingham, or McGrath; at the time of sealing, the ADF&G representative must remove and retain the skin of the skull and front claws of the bear.*

*(iii) If you remove the skin or skull of a bear taken in Units 21D, 22, 23, 24, and 26A from the area or present it for commercial tanning within the area, you must first have it sealed by and ADF&G representative in Barrow, Galena, Nome, or Kotzebue; at the time of sealing, the ADF&G representative must remove and retain the skin of the skull and front claws of the bear.*

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

**Impact to Federal Subsistence users/wildlife:** If this proposal is adopted, it would reauthorize the resident bear tag fee exemptions, eliminating the requirement that subsistence users must purchase a \$25 resident tag before hunting brown bears in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

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

**Rationale:** Reauthorizing the \$25 resident tag fee exemption is particularly important for users in areas where few vendors are present and local economies are in a depressed state.

**PROPOSAL 151 – 5 AAC 92.540. Controlled use areas.** Review the conditions of the Controlled Use Areas in Region III and repeal those that are no longer meet [sic] the original intent.

**Current Federal Regulations:** Controlled use areas are described in unit-specific regulations in §\_\_\_\_.26(n).

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

**Impact to Federal Subsistence users/wildlife:** Repealing CUAs under State registration permits would likely have a minimal impact on Federally qualified subsistence users. Controlled use areas on Federal public lands would not be affected, as they can only be removed by action of the Federal Subsistence Board. Access by Federally qualified subsistence users using aircraft



could be improved in some situations, as they would be able to use aircraft on non-Federal land adjacent to Federal public lands.

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

**Rationale:** Regardless of the Board of Game’s decision on whether or not to repeal State controlled use areas, similar Controlled Use Areas on Federal public land would remain under Federal regulations unless removed by the Federal Subsistence Board.

**PROPOSAL 153 – 5 AAC 85.045 Hunting seasons and bag limits for moose.** Eliminate the requirement to pick up moose registration permits weeks or months prior to the season in remote villages of Region III. Make all registration permits available in season from designated vendors.

**Current Federal Regulations:**

§ \_\_\_\_\_.6 *Licenses, permits, harvest tickets, tags, and reports.*

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

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

**Impact to Federal Subsistence users/wildlife:** Elimination of the requirement to pick up moose registration permits in rural villages prior to the season start dates could lead to an increase of nonlocal hunters into the affected areas. Increased numbers of hunters in the affected areas could result in more competition with local users, including Federally qualified subsistence users, and a higher moose harvest.

**Federal Position/Recommended Action:** The OSM is **neutral** on the proposal to eliminate the moose registration permit condition. However, if harvest opportunity for Federally qualified subsistence users is significantly impacted by increased competition or if moose populations decline due to increased harvest, the Federal Subsistence Board could take action to restrict non-Federally qualified users on Federal public lands in the affected areas.

**Rationale:** Section 802(2) of ANILCA states “when it is necessary to restrict the taking to assure the continued viability of a fish and wildlife population or the continuation of subsistence uses on such population, the taking of such population for nonwasteful subsistence uses shall be given preference on the public lands over other consumptive uses.”

**Proposal 162 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Allow 10% of the Koyukuk CUA permit winners to use aircraft; allow guided permit winners to choose either boat or aircraft.

**Current Federal Regulations:**

**§ \_\_.26 Subsistence taking of wildlife.**

(24)(ii)(C) *You may not use aircraft for hunting moose, including transportation of any moose hunter or moose part in the Koyukuk Controlled Use Area, which consists of those portions of Unit 21s and 24 bounded by a line from the north bank of the Yukon River at Koyukuk at 64°52.58' N. lat., 157°43.10' W. long., then northerly to the confluences of the Honhosa and Kateel Rivers at 65°28.42' N. lat., 157°44.89' W. long., then northeasterly to the confluences of Billy Hawk Creek and the Huslia River (65°57' N. lat., 156°41' W. long.) at 65°56.66' N. lat., 156°40.81' W. long., then easterly to the confluence of the forks of the Dakli River at 66°02.56' N. lat., 156°12.71' W. long., then easterly to the confluence of McLanes Creek and the Hogatza River at 66°00.31' N. lat., 155°18.57' W. long., then southwesterly to the crest of Hochandochtla Mountain at 65°31.87' N. lat., 154°52.18' W. long., then southwest to the mouth of Cottonwood Creek at 65°13.00' N. lat., 156°06.43' W. long., then southwest to Bishop Rock (Yistletaw) at 64°49.35' N. lat., 157°21.73' W. long., then westerly along the north bank of the Yukon River (including Koyukuk Island) to the point of beginning; however, this does not apply to transportation of a moose hunter or moose part by aircraft between publicly owned airports in the controlled use area or between a publicly owned airport within the area and points outside the area; all hunters on the Koyukuk River passing the ADF&G operated check station at Ella's Cabin (15 miles upstream from the Yukon on the Koyukuk River) are required to stop and report to ADF&G personnel at the check station.*

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

**Impact to Federal Subsistence users/wildlife:** Repealing CUAs under State registration permits would likely have a minimal impact on Federally qualified subsistence users. Controlled use areas on Federal public lands would not be affected, as they can only be removed by action of the Federal Subsistence Board. Access by Federally qualified subsistence users using aircraft could be improved in some situations, as they would be able to use aircraft on non-Federal land adjacent to Federal public lands.

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

**Rationale:** Regardless of the Board of Game's decision on whether or not to allow 10% of Koyukuk CUA permit winners to use aircraft, Federal public lands within the Koyukuk

Controlled Use Area would remain closed to the use of aircraft for moose hunting to all users under Federal regulations unless the restriction is eliminated by the Federal Subsistence Board.

**PROPOSAL 164 – 5 AAC 92.540(B)(ii). Controlled use areas.** Eliminate the restriction on aircraft in the Kanuti Controlled Use Area.

**Current Federal Regulations:**

**§ \_\_.26 Subsistence taking of wildlife.**

*(24)(ii)(B) You may not use aircraft for hunting moose, including transportation of any moose hunter or moose part in the Kanuti Controlled Use Area, which consists of that portion of Unit 24 bounded by a line from the Bettles Field VOR to the east side of Fish Creek Lake, to Old Dummy Lake, to the south end of Lake Todatonten (including all waters of these lakes), to the northernmost headwaters of Siruk Creek, to the highest peak of Double Point Mountain, then back to the Bettles Field VOR; however, this does not apply to transportation of a moose hunter or moose part by aircraft between publicly owned airports in the controlled use area or between a publicly owned airport within the area and points outside the area;*

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

**Impact to Federal Subsistence users/wildlife:** Repealing CUAs under State registration permits would likely have a minimal impact on Federally qualified subsistence users. Controlled use areas on Federal public lands would not be affected, as they can only be removed by action of the Federal Subsistence Board. Access by Federally qualified subsistence users using aircraft could be improved in some situations, as they would be able to use aircraft on non-Federal land adjacent to Federal public lands.

**Federal Position/Recommended Action:** The OSM is **neutral** on this proposed elimination of the aircraft restriction in the Kanuti Controlled Use Area.

**Rationale:** Regardless of the Board of Game's decision on whether or not to repeal controlled use areas, Federal public lands within the Kanuti Controlled Use Area would retain aircraft restrictions under Federal regulations unless removed by the Federal Subsistence Board.

**Proposal 171 – 5 AAC 92.220. Salvage of game meat, furs, and hides.** Require meat-on-bone salvage for moose in Unit 25A.

**Current Federal Regulation (adopted by the Federal Subsistence Board in January 2012):**

## §\_\_.25(a) Definitions

*Salvage means to transport the edible meat, skull, or hide, as required by regulation, of a regulated fish, wildlife, or shellfish to the location where the edible meat will be consumed by humans or processed for human consumption in a manner which saves or prevents the edible meat from waste, and preserves the skull or hide for human use.*

## §\_\_.25(j) Utilization of fish, wildlife, or shellfish.

*(3) You must salvage the edible meat of ungulates, bear, grouse, and ptarmigan . . . .*

*(5) Failure to salvage the edible meat may not be a violation if such failure is caused by circumstances beyond the control of a person, including theft of the harvested fish, wildlife, or shellfish, unanticipated weather conditions, or unavoidable loss to another animal.*

## §\_\_.26(h) Removing harvest from the field

*You must leave all edible meat on the bones of the front quarters and hind quarters of caribou and moose harvested in Units 9, 17, 18, and 19B prior to October 1 until you remove the meat from the field or process it for human consumption. You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of moose harvested in Unit 21 prior to October 1 until you remove the meat from the field or process it for human consumption. You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of caribou and moose harvested in Unit 24 prior to October 1 until you remove the meat from the field or process it for human consumption. Meat of the front quarters, hind quarters, or ribs from a harvested moose or caribou may be processed for human consumption and consumed in the field; however, meat may not be removed from the bones for purposes of transport out of the field. You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of caribou and moose harvested in Unit 25 until you remove the meat from the field or process it for human consumption.*

**Is a similar issue being addressed by the Federal Subsistence Board? Yes.** The Federal Subsistence Board recently **adopted** wildlife proposal WP12-63, which required that all edible meat of the front quarters, hind quarters, and ribs of caribou and moose harvested in Unit 25 remain on the bones until the meat is removed from the field or is processed for human consumption.

**Impact to Federal subsistence users/wildlife:** Federal subsistence users harvesting moose in Unit 25 would be required to leave the edible meat of the front quarters, hind quarters, and ribs on the bones until the meat was removed from the field or processed for human consumption. However, most Federal subsistence users would not be affected by this proposal because it

represents what is already a traditional practice. No effects on wildlife populations are anticipated.

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

**Rationale:** If the Board supports this proposal, it should help reduce spoilage and promote non-wasteful processing of moose and caribou. Given that most Federally qualified users are already employing these methods in the field as a traditional practice and because it will be required under Federal subsistence regulations starting July 1 2012, the impact to Federally qualified users should be minimal.

**Proposal 172 – 5 AAC 92.220. Salvage of game meat, furs, and hides.** Require meat-on-bone salvage for moose in Unit 25B.

**Federal Position/Recommended Action:**

See response to Proposal 171 for OSM position on this proposal.

**Proposal 173 – 5 AAC 92.220. Salvage of game meat, furs, and hides.** Require meat-on-bone salvage for moose in Unit 25D.

**Federal Position/Recommended Action:**

See response to Proposal 171 for OSM position on this proposal.

**Proposal 174 – 5 AAC 85.025. Hunting seasons and bag limits for moose.** Establish a registration hunt for moose in the Firth/Mancha River drainage in Unit 26C.

**Current Federal Regulation:**

*Units 26B remainder and 26C—1 moose by July 1–Mar. 31  
Federal registration permit by residents of  
Kaktovik only. The harvest quota is 3 moose (2  
antlered bulls and 1 of either sex) provided  
that no more than 2 antlered bulls may be  
harvested from Unit 26C and cows may not be  
harvested from Unit 26C. You may not take a  
cow accompanied by a calf. Only 3 Federal  
registration permits will be issued.*

***Federal public lands are closed to the harvest***



*of moose except by a Kaktovik resident holding a Federal registration permit.*

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

**Impact to Federal Subsistence users/wildlife:** There would be no impacts to wildlife or Federal subsistence users as the Firth/Mancha River Drainage in Unit 26C is closed to the harvest of moose except by Kaktovik residents holding a Federal registration permit. Adoption of this proposal would not change the closed status of Federal lands in the unit.

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

**Rationale:** Regardless of the Board of Game's decision this proposal, Unit 26C would retain moose harvest restrictions under Federal regulations unless removed by the Federal Subsistence Board

**Proposal 178 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.** Close Red Sheep and Cane Creek drainages to hunting for sheep.

**Current Federal Regulation (adopted by the Federal Subsistence Board in January 2012):**

*Unit 25A – Arctic Village Sheep Management Area – 2                      Aug. 10 – Apr. 30  
rams by Federal registration permit only. Federal public  
lands are closed to the taking of sheep except by rural  
Alaska residents of Arctic Village, Venetie, Fort Yukon,  
Kaktovik and Chalkyitsik hunting under these regulations.*

**Is a similar issue being addressed by the Federal Subsistence Board? Yes.** The Federal Subsistence Board recently **adopted** wildlife proposal WP12-76, which closed Federal public lands in the Arctic Village Sheep Management Area within Unit 25A, including Red Sheep and Cane Creek drainages, to the taking of sheep by all except Federally qualified subsistence users.

**Impact to Federal subsistence users/wildlife:** There will be no impact to Federal subsistence users as Federal lands were recently closed to non-federally qualified users, by the Federal Subsistence Board. There will be no impact to wildlife as sheep populations in the area are considered healthy.

**Federal Position/Recommendation:** The OSM recommendation is to **support** the proposal.

**Rationale:** As a result of the recent action by the Federal Subsistence Board on wildlife proposal WP12-76, sheep hunting in the area will only be open to Federally qualified subsistence users. Adoption of this proposal would align State and Federal regulations.

**Proposal 181 – 5AAC 85.025. Hunting seasons and bag limits for brown bear.** Extend brown bear seasons in Unit 26B.

**Current Federal Regulation (adopted by the Federal Subsistence Board in January 2012):**

*Unit 26B – 1 bear*

*Jan. 1 – Dec. 31*

**Is a similar issue being addressed by the Federal Subsistence Board? Yes.** The Federal Subsistence Board recently **adopted with modification** wildlife proposal WP12-82, which will allow a year round season for brown bear in Unit 26B.

**Impact to Federal subsistence users/wildlife:** Federal subsistence users will have increased opportunities to harvest brown bears in Unit 26B under this proposal. The impact to wildlife should be minimal as brown bear populations are thought to be healthy with a large amount of undisturbed habitat.

**Federal Position/Recommendation:** The OSM recommendation is to **support** the proposal.

**Rationale:** Extension of brown bear seasons in Unit 26B will allow for increased harvest opportunities for Federally qualified subsistence users. In addition, the proposal will align with the recently adopted Federal regulations for brown bears in Unit 26B, which will decrease regulatory complexity in the area.

**Proposal 182 – 5 AAC 85.015. Hunting seasons and bag limits for black bear.** Increase the annual bag limit for black bear in Unit 25D.

**Current Federal Regulation (adopted by the Federal Subsistence Board in January 2012):**

*Unit 25D – 5 bears*

*July 1 – June 30*

**Is a similar issue being addressed by the Federal Subsistence Board? Yes.** The Federal Subsistence Board recently **adopted with modification** wildlife proposal WP10-92, which will increase the harvest limit for black bears in Unit 25D to 5 bears.

**Impact to Federal subsistence users/wildlife:** Federal subsistence users will be able to harvest more black bear in Unit 25D if this proposal passes. Impacts to wildlife should be negligible as the black bear population in Unit 25D is healthy and capable of sustaining a higher annual harvest.

**Federal Position/Recommendation:** The OSM recommendation is to **support** the proposal.

**Rationale:** An increase in the harvest limit will allow for more opportunities for Federally qualified users to harvest black bears in the area. In addition, if passed, this proposal would bring Federal and State regulations into alignment, thereby reducing regulatory complexity.

**PROPOSAL 183 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Allow hunters to take more than one brown bear by community harvest permit in Unit 25D.

**Current Federal Regulations:**

**Brown bear**

*Unit 25D—1 bear*

*Jul. 1–Jun. 30*

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. The Federal Subsistence Board (Board) took action on wildlife proposals WP10-91 and WP12-62 at their January 2012 meeting. Proposal WP10-91, which requested a harvest limit increase from 1 to 3 brown bears in Units 25A, 25B, 25C, and 25D, was rejected by the Board following the Eastern Interior’s recommendation of addressing harvest changes in WP12-62. Proposal WP12-62 was a companion proposal to Proposal 183, submitted by the Eastern Interior Alaska Subsistence Regional Advisory Council. The Board adopted a modification of WP12-62 to increase the harvest limit from 1 to 2 brown bears in Unit 25D and took no action on WP10-91.

**Impact to Federal Subsistence users/wildlife:** The impacts of the proposal are difficult to gauge absent specification of community or community harvest limits. Presumably, however, a community harvest would result in increased harvest and reduction of the brown bear population.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** the community harvest permit in Unit 25D and to potentially support a modification to align with Federal regulations. However, increasing the harvest limit to 2 brown bears per year could lead to an increase in overall harvest, which could lead to a population decline in brown bear in Unit 25D.

**Rationale:** The Federal Subsistence Board recently increased the harvest limit to 2 brown bears in Unit 25D. Aligning State and Federal regulations is often beneficial because it reduces regulatory complexity. However, increasing the harvest limit could adversely impact the brown bear population in Unit 25D and harvest should be closely monitored. Brown bears are susceptible to overharvest because of their low reproductive rate and should be conservatively managed. Household harvest surveys in Units 25B and 25D indicate that actual harvest of brown

bears may be much higher than the reported harvest.

**PROPOSAL 186 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Modify the moose seasons in portions of Units 11 and 12.

**Current Federal Regulations (adopted by the Federal Subsistence Board in January 2012):**

**Unit 11 – Moose**

*Unit 11—that portion draining into the east bank of the Copper River upstream from and including the Slana River drainage—1 antlered bull by joint Federal/State registration permit. Aug. 20–Sept. 20*

**Note:** Permit requirement contingent on Alaska Board of Game endorsing a joint permit in March 2012. If not endorsed, then by Federal registration permit only.

*Unit 11 remainder—1 antlered bull by Federal registration permit only. Aug. 20–Sept. 20*

**Unit 12 – Moose**

*Unit 12 remainder—1 antlered bull by joint Federal/State registration permit only. Aug. 20–Sept. 20*

**Note:** Permit requirement contingent on Alaska Board of Game endorsing a joint permit in March 2012. If not endorsed, then by Federal registration permit only.

**Is a similar issue being addressed by the Federal Subsistence Board? Yes.** The Federal Subsistence Board recently adopted WP12-70 with modification to split Unit 11 into two sections while keeping the existing Federal subsistence season of Aug. 20–Sept. 20. The modification of WP12-70 also removed the split season dates in Unit 12 remainder for a continuous Aug. 20 – Sept. 20 season and removed the spike-fork restriction under Federal regulations. The action aligned moose seasons and harvest limits in Unit 11 and Unit 12 remainder under Federal regulations.

**Impact to Federal Subsistence users/wildlife:** The proposed split season under State regulations would provide 17 days of harvest opportunity for Federally qualified subsistence users without competition from non-Federally qualified users. In addition, the proposed antler-size restrictions would likely result in fewer bull moose being harvested under State regulations.

The moose population may experience less harvest pressure from hunters using a State registration permit in the portions of Units 11 and 12 specified in the proposal due to the split season. However, the split season may not be as effective as other areas of the state, as the portions of Unit 11 and 12 are accessible by the Nabesna Road. Moose populations in the affected areas are stable at low densities, but harvest pressure had been increasing in some areas, including areas along the Nabesna Road in Unit 12 remainder.

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

**Rationale:** The proposed regulatory changes would provide additional harvest opportunity for Federally qualified subsistence users in Unit 11 and Unit 12 remainder. Federally qualified subsistence users are already provided more harvest opportunity than non-Federally qualified users because they do not have antler-size restrictions in Unit 11 or a split season in Unit 12 remainder.

The proposed regulatory changes would align moose regulations in a portion of Unit 11 with Unit 12 remainder under State regulations. The moose seasons in these areas were recently aligned under Federal regulations with the intent to simplify regulations and create a joint State/Federal registration permit. The joint permit would aid in the management of the moose population in these area, by allowing Federal and State users to use one reporting mechanism.

**PROPOSAL 187 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Convert the any bull moose hunt to a spike-fork 50-inch or 3 or more brow tines in a portion of Unit 12.

**Current Federal Regulations (adopted by the Federal Subsistence Board in January 2012):**

#### **Unit 12 – Moose**

*Unit 12 remainder—1 antlered bull by joint Federal/State registration permit. Aug. 20–Sept. 20*

**Note:** Permit requirement contingent on Alaska Board of Game endorsing a joint permit in March 2012. If not endorsed, then by Federal registration permit only.

**Is a similar issue being addressed by the Federal Subsistence Board? Yes.** The Federal Subsistence Board recently adopted WP12-70 with modification to remove the spike-fork antler restriction for moose in Unit 12 remainder. Proposal WP12-73 also requested the removal of antler-size restrictions in the affected area, but the Board took no action on this proposal as the issue was addressed in the modification of WP12-70. The new regulations allow for the harvest



of any antlered bull by Federally qualified subsistence users on Federal public lands in the area.

**Impact to Federal Subsistence users/wildlife:** The proposed change to the Unit 12 remainder antler-size restriction would have little impact on Federally qualified subsistence users. If adopted, the proposed regulation would allow hunters to harvest bull moose with 3 or more brow tines, rather than 4 or more brow tines, on at least one side under State regulations. While the regulatory change could lead to some additional harvest under State regulations, Federally qualified subsistence users would still have more harvest opportunity because they can harvest any bull on Federal public land in the affected area.

The moose population in Unit 12 remainder is very low and has experienced increasing harvest pressure over the previous 5–7 years. The proposed changes to the antler-size restriction would likely have a small impact on the moose population in Unit 12 remainder, but would allow some previously protected bulls to be harvested under State regulations.

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

**Rationale:** Similar to Proposal 186, the proposed regulatory changes would align antler-size restrictions for the moose regulations in a portion of Unit 11 with Unit 12 remainder under State regulations. The moose seasons in these areas were recently aligned under Federal regulations with the intent to simplify regulations and create a joint State/Federal registration permit. The joint permit would aid in the management of the moose population in these area, by allowing Federal and State users to use one reporting mechanism.

The OSM also recommends supporting Proposal 186 which also proposes antler-size restrictions on moose in the affected area, but with different brow-tine requirements. Both proposals continue to benefit Federally qualified subsistence users because they limit which bull moose can be harvested by non-Federally qualified users.

**Proposal 192 – 5 AAC 85.025 (a)(15)(20). Hunting seasons and bag limits for caribou.**

Combine Fortymile and White Mountains Caribou herd seasons under 1 registration permit, remove harvest limits, lengthen the winter season for residents, and allow a new limited registration permit hunt.

**Current Federal Regulation (adopted by the Federal Subsistence Board in January 2012):**

*Unit 20E— 1 caribou; a joint State–Federal registration permit is required. During the Aug.10–Sept. 30 season the harvest is restricted to 1 bull. The harvest quota between Aug 10-29 in Units 20E, 20F, and 25C is 100 caribou. During the Nov. 1 – Mar. 31 season, area closures or hunt restrictions may be announced when Nelchina caribou are present in a mix of more than 1 Nelchina caribou to 15 Fortymile caribou, except when the number of caribou present is low enough that less than 50 Nelchina caribou will be harvested regardless of the mixing ratio for the two herds.*

*Aug. 10–Sept. 30  
Nov. 1–Mar.31*

*Unit 20F—east of the Dalton Highway and south of the Yukon River—I caribou; a joint State-Federal registration permit is required. During the Aug. 10 – Sept. 30 season the harvest is restricted to 1 bull. The harvest quota between Aug 10-29 in Units 20E, 20F, and 25C is 100 caribou.*

*Aug. 10–Sept.30  
Nov. 1–Mar. 31*

*Unit 25C- 1 caribou; a joint State–Federal registration permit is required. During the Aug. 10 – Sept. 30 season the harvest is restricted to 1 bull. The harvest quota between Aug 10-29 in Units 20E, 20F, and 25C is 100 caribou.*

*Aug. 10–Sept. 30  
Nov. 1–Mar. 31*

**Is a similar issue being addressed by the Federal Subsistence Board?** **Yes.** The Federal Subsistence Board **adopted** proposal WP12-74, which requested expanding the joint State-Federal registration permit to include Unit 20F east of the Dalton Highway and south of the Yukon River and Unit 25C. Season dates would be aligned across Units 20E, a portion of 20F east of the Dalton Highway and south of the Yukon River and 25C. The area covered by the joint State-Federal registration permit would be expanded to reflect the current range of the Fortymile Caribou Herd. This proposal reflects changes requested by both the Fortymile Caribou Herd working group and the Eastern Interior Regional Advisory Council.

**Impact to Federal subsistence users/wildlife:** Having both the Fortymile and White Mountain Caribou herds on the same permit would simplify regulations for Federal subsistence users and would allow for flexibility and increased harvest opportunities for these users as well. All necessary safeguards for monitoring in-season harvest of both herds would be maintained. Population and harvest objectives would comply with those identified in the 2006-2012 and 2012-2018 *Fortymile Caribou Herd Harvest Plans*.

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

**Rationale:** This proposal was vetted through the Fortymile Caribou Herd working group, a joint coalition of Eagle, Central, Delta, Upper Tanana-Fortymile and Fairbanks Fish and Game Advisory Committees and the Eastern Interior Regional Advisory Council. The Federal Subsistence Board voted to support a similar proposal at its January 2012 meeting. This proposal simplifies regulations and increases harvest opportunities for Federally qualified users.

**PROPOSAL 193 – 5 AAC 85.025 Seasons and bag limits for caribou.** Move the Fortymile caribou season start date back to August 10, close corridor within one mile of highways during fall season.

- A. Open season for RC860 Zone 1 and 3 (resident and nonresident) fall season will be from August 10 to September 20 unless closed by emergency order due to harvest goal being met.
- B. A corridor extending one mile from each side of the Taylor and Steese Highways will be closed to the taking of caribou from August 10 to September 20. (No corridor would exist during the winter December 1-February 28 hunting season)

**Current Federal Regulations (adopted by the Federal Subsistence Board in January 2012):**

**Unit 20 – Caribou**

*Units 20A, 20B, 20C and 20D*

*No Federal open season*

*Unit 20E—1 caribou; a joint State-Federal registration permit is required. During the Aug. 10–Sept. 30 season the harvest is restricted to 1 bull. The harvest quota between Aug. 10–29 in Units 20E, 20F, and 25C is 100 caribou. During the Nov. 1–Mar. 31 season, area closures or hunt restrictions may be announced when Nelchina caribou are present in a mix of more than 1 Nelchina caribou to 15 Fortymile caribou, except when the number of caribou present is low enough that less than 50 Nelchina will be harvested regardless of the mixing ratio of the tow herds.*

*Aug. 10–Sept. 30*

*Nov. 1–Mar. 31*

*Unit 20F north of the Yukon River—1 caribou*

*Aug. 10–Mar. 31*

<i>Unit 20F east of the Dalton Highway and south of the Yukon River—1 caribou; a joint State-Federal registration permit is required. During the Aug. 10–Sept. 30 season the harvest is restricted to 1 bull. The harvest quota between Aug. 10–29 in Units 20E, 20F, and 25C is 100 caribou.</i>	<i>Aug. 10–Sept. 30</i> <i>Nov. 1–Mar. 31</i>
<i>Unit 20F remainder</i>	<i>No Federal open season</i>

## **Unit 25 – Caribou**

<i>Unit 25A—in those portions west of the east bank of the East Fork of the Chandalar River extending from its confluence with the Chandalar River upstream to Guilbeau Pass and north of the south bank of the mainstem of the Chandalar River at its confluence with the East Fork Chandalar River west (and north of the south bank) along the West Fork Chandalar River—10 caribou. However, only bulls may be taken May 16–June 30.</i>	<i>July 1–June 30</i>
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<i>Unit 25C—1 caribou; a joint State-Federal registration permit is required. During the Aug. 10–Sept. 30 season the harvest is restricted to 1 bull. The harvest quota between Aug. 10–29 in Units 20E, 20F, and 25C is 100 caribou.</i>	<i>Aug. 10–Sept. 20</i> <i>Nov. 1–Mar. 31</i>
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<i>Unit 25D—that portion drained by the west fork of the Dall River west of 150°W. Long.—1 bull</i>	<i>Aug. 10–Sept. 30</i>
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<i>Units 25A remainder, 25B, and 25D remainder—10 caribou</i>	<i>July 1–Apr. 30</i>
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**Is a similar issue being addressed by the Federal Subsistence Board?** **Yes.** The Federal Subsistence Board adopted WP12-74 to align Federal season dates across Units 20E, 20F east of the Dalton Highway and south of the Yukon River, and 25C. The Board’s action also expanded the area covered by the joint State/Federal registration permit to reflect the Fortymile Caribou Herd’s current range. The Board took no action on WP12-67 because it proposed regulatory changes that were not consistent with the joint State/Federal partnership of managing the Fortymile Caribou Herd harvest.

**Impact to Federal Subsistence users/wildlife:** The proposed change to the resident caribou season in Zones 1 and 2 would negatively impact Federally qualified subsistence users by reducing the number of days at the beginning of the season without competition from non-Federally qualified users.

The corridor along the Steese and Taylor Highways would have a minimal impact on Federally qualified subsistence users hunting under Federal regulations as these areas are predominately non-Federal lands.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** the proposal.

**Rationale:** The proposed changes to the caribou season for the Fortymile Caribou Herd would have an adverse impact to Federally qualified subsistence users. In addition, the proposed changes are not in line with the recommendations of the Fortymile Caribou Herd Harvest Coalition.

**PROPOSAL 224 – 5 AAC 92.530 Management areas.** Review the boundary of the Fairbanks Management Area; focus on changing the boundary near Murphy Dome and Ester Dome.

**Current Federal Regulations:**

***§ \_\_.26 Subsistence taking of wildlife.***

*(20)(ii)(F) You may only hunt moose by bow and arrow in the Fairbanks Management Area. The Area consists of that portion of Unit 20B bounded by a line from the confluence of Rosie Creek and the Tanana River, northerly along Rosie Creek to Isberg Road, then northeasterly on Isberg Road to Cripple Creek Road, then northeasterly on Cripple Creek Road to the Parks Highway, then north on the Parks Highway to Alder Creek, then westerly to the middle fork of Rosie Creek through section 26 to the Parks Highway, then east along the Parks Highway to Alder Creek, then upstream along Alder Creek to its confluence with Emma Creek, then upstream along Emma Creek to its headwaters, then northerly along the hydrographic divide between Goldstream Creek drainages and Cripple Creek drainages to the summit of Ester Dome, then down Sheep Creek to its confluence with Goldstream Creek, then easterly along Goldstream Creek to Sheep Creek Road, then north on Sheep Creek Road to Murphy Dome Road, then west on Murphy Dome Road to Old Murphy Dome Road, then east on Old Murphy Dome Road to the Elliot Highway, then south on the Elliot Highway to Goldstream Creek, then easterly along Goldstream Creek to its confluence with First Chance Creek, Davidson Ditch, then southeasterly along the Davidson Ditch to its confluence with the tributary to Goldstream Creek in Section 29, then downstream along the tributary to its confluence with Goldstream Creek, then in a straight line to First Chance Creek, then up First Chance Creek to Tungsten Hill, then southerly along Steele Creek to its confluence with Ruby Creek, then upstream along Ruby Creek to Esro Road, then south on Esro Road to Chena Hot Springs Road, then east on Chena Hot Springs Road to*



*Nordale Road, then south on Nordale Road to the Chena River, to its intersection with the Trans-Alaska Pipeline right of way, then southeasterly along the easterly edge of the Trans-Alaska Pipeline right of way to the Chena River, then along the north bank of the Chena River to the Moose Creek dike, then southerly along the Moose Creek dike to its intersection with the Tanana River, and then westerly along the north bank of the Tanana River to the point of beginning.*

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

**Impact to Federal Subsistence users/wildlife:** Updating the boundary of the Fairbanks Management Area would likely have little impact on Federally qualified subsistence users as there is a limited amount of Federal public land in the area and residents of the Fairbanks North Star Borough do not have rural status. Federally qualified subsistence users that do hunt in the area would likely have more competition for resources as areas outside of the new boundary would not be restricted to the use of bow and arrow for harvesting moose.

Moose populations in areas no longer restricting hunters to bow and arrow only would likely be exposed to higher hunting pressure and higher harvest.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** on the proposal to update the Fairbanks Management Area boundary.

**Rationale:** Regardless of the Board of Game's decision on whether or not to update the boundary, Federal public lands within the Fairbanks Management Area would remain under Federal regulations unless removed by the Federal Subsistence Board.

**Proposal 234 – 5 AAC 92.220. Salvage of game meat, furs, and hides.** Require meat-on-bone salvage for moose in Unit 25C.

**See response to Proposal 171 for OSM position on this proposal.**

**PROPOSAL 255 – 5 AAC 92.015 Brown bear tag fee exemption.** Reauthorize the brown bear tag fees for Region IV.

**Current Federal Regulations:**

**§ \_\_\_\_.** *6 Licenses, permits, harvest tickets, tags, and reports.*

*(a)(3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are*

*superseded by the requirements in subpart D of this part.*

**§ \_\_\_\_.***26 Subsistence taking of wildlife.*

*(j)(1) Sealing requirements for bear apply to brown bears taken in all Units, except as specified in this paragraph, and black bears of all color phases taken in Units 1-7, 11-17, and 20.*

*(2) You may not possess or transport from Alaska the untanned skin or skull of a bear unless the skin and skull have been sealed by an authorized representative of ADF&G in accordance with State or Federal regulations, except that the skin and skull of a brown bear taken under a registration permit in Units 5, 9B, 9E, 17, 18, 19A and 19B downstream of and including the Aniak River drainage, 21D, 22, 23, 24, and 26A need not be sealed unless removed from the area.*

*(3) You must keep a bear skin and skull together until a representative of the ADF&G has removed a rudimentary premolar tooth from the skull and sealed both the skull and the skin; however, this provision does not apply to brown bears taken within Units 5, 9B, 9E, 17, 18, 10A and 10B downstream of and including the Aniak River drainage, 21D, 22, 23, 24, and 26A and which are not removed from the Unit.*

*(i) In areas where sealing is required by Federal regulations, you may not possess or transport the hide of a bear that does not have the penis sheath or vaginal orifice naturally attached to indicate conclusively the sex of the bear.*

*(ii) If the skin or skull of a bear taken in Units 9B, 17, 18, and 19A and 19B downstream of and including the Aniak River drainage is removed from the area, you must first have it sealed by an ADF&G representative in Bethel, Dillingham, or McGrath; at the time of sealing, the ADF&G representative must remove and retain the skin of the skull and front claws of the bear.*

*(iii) If you remove the skin or skull of a bear taken in Units 21D, 22, 23, 24, and 26A from the area or present it for commercial tanning within the area, you must first have it sealed by and ADF&G representative in Barrow, Galena, Nome, or Kotzebue; at the time of sealing, the ADF&G representative must remove and retain the skin of the skull and front claws of the bear.*

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

**Impact to Federal Subsistence users/wildlife:** If this proposal is adopted, it would reauthorize the resident bear tag fee exemptions eliminating the requirement that subsistence users must purchase a \$25 resident tag before hunting brown bears in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** the

proposal.

**Rationale:** Reauthorizing the \$25 resident tag fee exemption is particularly important for users in areas where few vendors are present and local economies are in a depressed state.



United States Department of the Interior  
FISH AND WILDLIFE SERVICE  
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February 9, 2012

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

Dear Chairman Judkins:

The Kanuti National Wildlife Refuge (Refuge) appreciates the opportunity to comment on Interior Region proposals to be considered by the Alaska Board of Game during its meeting in March 2012. We offer the following comments on Proposals 164 and 151, which could affect management of wildlife populations on the Kanuti National Wildlife Refuge.

Proposal 164 would eliminate the restriction on the use of aircraft in the Kanuti Controlled Use Area (KCUA) and Proposal 151 requests review of the Controlled Use Areas in Region III and repeal those that no longer meet the original intent.

The Refuge is opposed to both proposals. The State-designated Kanuti Controlled Use Area (KCUA) was originally established in the late 1970's to resolve conflicts between local and non-local hunters. The Federally-designated KCUA was adopted in the early 1990's to overlap with the State KCUA. The Federal Subsistence Board (FSB) re-evaluated the KCUA during its' 2008-2009 closure review process. The Federal Board reaffirmed the need for and importance of the KCUA, finding that it provides needed subsistence opportunities to local rural residents on federal lands. The villages of Alatna and Allakaket, which lie in the center of the KCUA, have struggled to harvest adequate numbers of moose in recent years. This has been recognized by the Alaska Department of Fish and Game (ADF&G) and the Board of Game (BOG), which have supported Intensive Management (IM) actions aimed at increasing moose harvests on State and Native lands near those villages. In addition, the most current ADF&G moose management report (2010) for GMU 24 stated that a management goal is to "...minimize disruption of local residents' lifestyles" and that "Conflicts between user groups, whether real or perceived, have the potential to greatly affect future management decisions." Lastly, one of the objectives in the Koyukuk River Moose Management Plan is to maintain or increase moose populations while providing for continuation of the present moderate number of hunters and level of harvest. The plan further states that increasing the moose population in the area is desired before additional harvest can be considered.



*Biological situation.* Moose population estimates for the Kanuti NWR GSPE Survey Area, in the heart of the KCUA, have been consistently low for the past 12 years (0.22 to 0.39 “observable” moose/mi<sup>2</sup>; confidence intervals overlap, so the density estimates are not statistically different). In spite of the low population density, the estimated high bull/cow ratio determined by the surveys has been relatively high (46 – 70 bulls/100 cows). ADF&G estimates that the harvest rate for all of GMU 24B is about 3.2%, which is less than recommended in the Koyukuk Moose Management Plan for the upper management subzone (5%). This, in our view, is in part the result of past successful management strategies, including establishment of the State and Federal KCUAs.

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*Regulatory issues.* If the State KCUA is eliminated, along with its aircraft prohibition, the Federal KCUA will remain in effect. The result will be a very complicated regulatory climate for airborne hunters and challenges for Law Enforcement (LE) personnel because they will need to know:

- The exact boundaries of Federal, State and Private lands in order to understand where aircraft use would be allowed;
- Which water bodies would be open for aircraft use and where mean high water marks are;
- That the closure of federal lands to aircraft for hunting and to non-federally qualified hunters within the federal KCUA will remain;

Thank you for your time to review our comments on these important issues.

Sincerely,



Michael A. Spindler  
Refuge Manager/Pilot



Paul Chanek  
21035 Country View Dr  
Chugiak, AK 99567

February 13, 2012

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

Re: Comments for your upcoming meeting, March 2-11, 2012 in Fairbanks

Put an immediate stop to all bear snaring in Alaska. This truly heinous and obscene practice has no business in our state, and certainly not in the 21<sup>st</sup> century. It is abhorrent to any ethical or feeling person, cheapens these magnificent animals (a symbol of our great state), and qualifies as animal cruelty. Bear baiting and aerial hunting should likewise cease immediately. Though not quite as heinous as bear snaring, these practices are just as unethical and irresponsible, and promote unethical, irresponsible behavior and attitudes among the public (and, again, cheapen these animals in the public eye). You should be ashamed that you are promoting any of these practices. They will be viewed by future generations as a stain on our wildlife management history.

The Board would do well to listen to and seriously consider input from ALL users of Alaskan wildlife—non-consumptive and consumptive alike—instead of primarily following the agenda of a small group of hunters and trappers with extremist views on predator management. There is a great deal of expert and unbiased opinion, from scientists, hunters, trappers, and non-consumptive wildlife users, that is completely valid, and which is completely ignored, year after year, by the BOG, to the detriment of our wildlife throughout the state. Bears and wolves, upon whom the Board seems to have declared war, are an important part of our wildlife, highly valued by all types of users (and are a particular draw for a huge tourist trade), and should be thus valued by the Board as well, not cheapened by the eradication tactics mentioned above.

By following their narrow-minded agenda of predator eradication, the Board has lost credibility with the public, and seems unable to effectively address wildlife management in this state. Mr. Judkins should resign, due to his "subsistence hunt" violations (with Rossi and Bell). He has no business overseeing the very rules he is guilty of violating. As Tony Knowles so aptly put it at the Anchorage BOG meeting earlier this year, wildlife management is headed for a train wreck in Alaska, and I put the blame firmly on the BOG. Do something now to avert the wreck—listen to input from ALL Alaskans, begin managing Alaskan resources for the benefit of ALL residents, per the constitution, and stop following a narrow political agenda which has no justification in science or in public opinion.

Sincerely,

  
Paul Chanek





# United States Department of the Interior



*United States Fish and Wildlife Service  
Division of Refuge Law Enforcement  
Northern Alaska Zone  
101 12<sup>th</sup> Ave. Room 264  
Fairbanks, AK 99701  
907/455-1821*

February 8, 2012

Chairman Cliff Judkins  
Alaska Board of Game  
Boards Support Section  
Post Office Box 115526  
Juneau, Alaska 99811

Dear Chairman Judkins:

The USFW Service, Region 7 (Alaska) Division of Refuge Law Enforcement appreciates the opportunity to comment on proposals affecting Interior Alaska under consideration at the March 12, 2012 Alaska Board of Game meeting. The Division wishes to provide the following comments on Proposals 171, 172 and 173 which will affect wildlife law enforcement on the Arctic and Yukon Flats National Wildlife Refuges.

Proposals 171, 172, and 173 would establish special meat salvage requirements in GMU 25 A, B, and D by requiring hunters to retain the edible meat of the front quarters, hind quarters, and the ribs naturally attached to the bone until the meat has been transported from the field or is processed for human consumption.

*We support the proposals for the following reasons:*

Our experience shows that a meat-on-bone requirement reduces spoilage in the field, as well as diminishing waste.

Regulations that require meat remain naturally attached to bone aid law enforcement officers when conducting investigations of alleged or suspected resource violations by facilitating the accurate reconstruction of butchered carcasses.

The proposals will more closely align state and federal harvest requirements thus simplifying regulatory understanding and improving public compliance. During the January, 2012 Federal Subsistence Board meeting, the Board adopted proposal WP12-63 to require meat be left on the bone for moose and caribou harvested during federal subsistence harvests in Unit 25.



Finally, I would encourage the Board of Game to further strengthen the positive conservation impact of Proposals 171, 172, and 173 by including caribou to the meat-on-bone salvage requirement.

Thank you for your consideration.

Sincerely,



Acting Chief, Refuge Law Enforcement

cc: Polly Wheeler, Deputy Chief of Refuges – Alaska Region



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FEB 17 2002

BOARDS

Board of Game,

Please note that I oppose Prop. 213.  
Get serious. Do your homework. Talk to  
Scientists. If you want to see what  
really happens when you approve things like  
this go to Ferry (milepost 259 Parks Hwy)  
during fall hunt. It's a mess.

Please note that I oppose Prop 227-232.  
Talk with scientists to get a comprehensive  
picture. Your current philosophy of maximum  
harvest and predator control is mis-guided  
and just generally about humans. It is  
not a balanced approach. It is not a  
long-term approach.

Sincerely  
Jeff Lebegue  
Box 324 Talkeetna AK



Jeff Lebegue  
PO Box 324  
Talkeetna, AK 99676-0324



Alaska Department of Fish & Game  
Boards Support Section

Box 115526

Juneau, AK 99811-5526

- Board of Game Comments

F.J. Adams

415 Hagabarger Ave.

Fairbanks, AK 99712

February 13, 2012

Regarding Board of Game Proposal 219:

I oppose Proposal 219 because elimination of the  
airboat restriction in Minto Flats Management Area (MFMA)  
would:

- 1) disturb staging waterfowl due to airboat noise and  
increased access to waterfowl resting areas;
- 2) disturb established subsistence and sport hunting  
patterns for waterfowl and moose due to likely higher  
hunter densities;
- 3) increase the potential for collisions with other water-  
craft due to higher hunter densities and high airboat  
speeds;
- and 4) degrade habitat due to airboats pioneering new  
travel routes.

Thank you for the opportunity to comment.

Yours truly,  
Francis Jeffrey Adams





Feb 17, 2012  
Board of Game Support Section  
ADF&G  
Juneau, AK  
**Support Proposal 142**

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FEB 17 2012  
BOARDS

Dear Board of Game:

Because of the urgency and importance of the bear snaring proposal, thank you for accepting further comments.

I have been a Family Practice Physician in Alaska for 19 years. When I heard about the bear-snaring proposal and read the description about how this would bait, trap and kill sows and cubs, I was horrified and thought immediately of the oath I took as a doctor to first "Do No Harm." This proposal is full of harm for no good reason. It is more advanced torture and trauma to our beloved bears. The thought of it is harmful to our hearts and minds and spirits.

I work with young people who are traumatized by growing up in a world with so much violence and disrespect. They are often very connected to animals as a special resource for lowering their fear. These bear-snaring descriptions would be highly toxic to them, and rightly so. It is hard for me to rest my mind after reading about how these magnificent animals react to being baited and snared. I understand that some of the F & G retired staff have also suffered from nightmares after having to snare bears as part of their radio-collar work. This proposal is deeply wrong and profoundly misguided, and it is harmful in more ways than one might think.

**It is excellent that there has been such a large outcry against bear snaring. Please search your minds and hearts and support Proposal 142 which would prohibit bear snaring in much of the Interior and in Northern Alaska.**

Sincerely,



Maureen P. Longworth, MD  
3099 Nowell  
Juneau, AK 99801



ATTN: Board of Game Comments

Alaska Department of Fish and Game Boards Support Section

I strongly oppose Proposal 213, which would allow motorized access in the Yanert Controlled Use Area for hunting.

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My name is Bob Shelton and I have lived at Mile 228, Parks Highway for over 20 years. The only access to the Yanert is a 17 B Easement on Ahtna land right across the highway from the bottom of my driveway. There is no place to park and there already is a serious safety concern for hunters unloading horses and their camps during the regular hunting season along the highway because there is no staging area for loading and unloading gear. The Yanert Controlled Use Area is one of the few places where someone can have a quality hunting experience without the added pressure on wildlife by ATVs. There are very few moose in the area already and the habitat would be greatly compromised by the addition of ATVs for use in hunting. I know the Rex and Ferry Trails and other areas in 20A that do allow motorized access for hunting have lots of social problems and residents are subjected to a lot of conflict because of this. There is no reason those problems should now be brought to yet another area. The Fairbanks Advisory Committee shouldn't have any jurisdiction in this local area that is represented by the Middle Nenana Advisory Committee, which opposes this reckless Proposal. The Board of Game should recognize that there is great local opposition to this proposal because people care about wildlife and habitat and do not want to see another area trashed by ATV's. Intensive Management does not lend itself to a balanced approach for managing all wildlife resources. Leave at least one area along the Parks Highway for the sportsman who regards fair chase and quality wilderness as more important than easy access.

*Bob Shelton*

Bob Shelton  
PO Box 114  
Denali Park, AK 99755  
Feb. 12, 2012



PO Box 240325  
Douglas, AK 99824  
February 15, 2012

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

RE: Support Proposal 142: Prohibit trapping of black bear in the Interior Region

Dear BOG Members:

As a 20 year resident of Alaska and a retired veterinarian who volunteered for 3 years as a trail vet for the Iditarod, I consider the practice of snaring bears cruel and inhumane. In truth, It is difficult for me to comprehend why the Board would sanction such an overtly cruel practice as snaring.

Having worked in the veterinary profession for decades, I have seen many cases of abuse, neglect, and cruelty to animals. If an Alaskan purposely caught a dog by a leg and left him dangling for a few days, the individual would very well be prosecuted. Why should a similar act against a "predator" be any different?

Bear snaring is neither acceptable nor understandable to me nor, I would contend, to the vast majority of compassionate Alaskans. I urge you to support Proposal 142.

Sincerely,



Susan E. Schrader, D.V.M.



**Alaska Falconers Association  
P.O. Box 55390  
North Pole, AK 99705-0390**

RECEIVED  
FEB 17 2012

17 February 2012

BOARDS

Cliff Judkins, Chair  
Alaska Board of Game  
% Boards Support Section  
Alaska Department of Fish and Game  
P.O. Box 115526  
1255 West 8<sup>th</sup> Street  
Juneau, AK 99811-5526

Dear Chairman Judkins:

At its January 2012 meeting, the Alaska Board of Game (Board) briefly considered Proposal No. 40, advocating non-resident take of Alaska raptors for falconry. Citing a lack of information and in the absence of meaningful public input, the Board deferred action on the proposal until its March 2012 meeting. The Alaska Department of Fish and Game (Department) suggested the Board would benefit from a "white paper" summarizing issues and questions regarding such a take, and perhaps including a potential scheme or schemes for implementing it. Attached is the Alaska Falconers Association's (AFA) effort to provide the Board with this information.

The AFA counts virtually all Alaska licensed falconers as members. We have served as the voice of Alaska falconry for more than 30 years. By our reckoning, a clear majority of Alaska falconers oppose non-resident take of falconry raptors. However, the U.S. Constitution apparently requires Alaska to offer some level of access to wild-taken raptors to non-resident U.S. citizens. For the record, we did not come looking for this "opportunity."

In effect, non-resident take of Alaska raptors already exists, because "passage" raptors (birds in immature plumage on their first southward migrations) are available for take across the Lower 48. Thousands of raptors hatched and reared in Alaska migrate south, where they may be legally taken by falconers. Ironically, many Alaska-reared peregrines migrate through Texas and may be readily trapped along barrier beaches and coastal zones, but because of a "reciprocity clause" in that state's falconry regulations, i.e., only residents of states allowing non-residents to take raptors in their home states may take raptors in Texas, Alaska falconers may not trap passage peregrines there, even though that opportunity is afforded residents of other states.

Finally, we note the group that submitted the proposal mentioned above alleges they prepared it in consultation with several Alaska falconers. To date, we have been



unable to identify those individuals. We are aware of no Alaska members of that group. We want the Board to know in no uncertain terms and regardless of that group's assertions, they do not speak for or represent the interests of Alaskans. One of their founding members was once caught selling gyrfalcons taken illegally and smuggled from Alaska, which has been frequently mentioned at Board hearings over the years. The group's web site declares their dedication to securing private property rights to wild-taken raptors, a stance we interpret as in direct opposition to the North American model of wildlife management and to the potential detriment of raptors and falconry. We would like the record to clearly reflect the AFA's wish to not be associated with that group in any way.

Thank you for considering our views. We stand ready to assist the Board in its deliberations in any way possible, and look forward to working with you again.

Sincerely,

A handwritten signature in black ink, appearing to read "William R. Tilton", with a stylized flourish at the end.

William R. Tilton, President  
Alaska Falconers Association





## **NON-RESIDENT TAKE OF ALASKA RAPTORS FOR FALCONRY**

Alaska Falconers Association  
P.O. Box 55390  
North Pole, AK 99705-0390

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February 2012

- 1. Biological Considerations**
- 2. Legal Considerations**
- 3. Administrative Considerations**
  - a. Logistics**
  - b. Permit Fees**
  - c. Permit Allocation**
- 4. Other Considerations**
  - a. Protection of Raptor Eyries**
  - b. Protection of Resident Privileges**
  - c. Impact on Existing Regulations**
  - d. Guiding**
  - e. Reciprocity**
- 5. Recommended Features Of An Alaska Non-Resident Raptor Take**

### **1. Biological Considerations**

The annual take of raptors by resident falconers has averaged fewer than nine birds over the past ten years; resident take has never exceeded twenty birds in any one year since falconry was authorized in Alaska. To date, no party with an interest in the welfare of raptor populations has asserted resident falconry take is unsustainable, or even detectable, at the population level.

Demand by non-residents could easily eclipse take levels by residents. A proposal recently submitted to the Board requested a total non-resident take approximately three times the average annual resident take. Biologically, allowing a non-resident take similar to or even larger than the resident take is unlikely to even register in an overall statewide assessment of raptor mortality, if such could be undertaken. This is pure conjecture, of course, but given known annual mortality from other sources, falconry is not and is not likely to become a significant or even detectable factor in annual raptor mortality.

Substantially increasing the annual take of raptors may invite scrutiny of both resident and non-resident raptor take. Individuals or groups may demand collection of population data to justify take by falconers. Some might push for a moratorium on take



until positive justification could be established. This is not unprecedented; federal guidelines for take of golden eagles is capped at six birds nationwide unless and until sufficient data exist to affirmatively demonstrate increased take would not adversely affect eagle populations. Disproving a negative assumption such as that would be time- and energy-intensive, expensive, and unlikely to be undertaken. It is highly unlikely sufficient data will ever exist to establish that level of assurance. If such a condition were imposed, falconry take could very well cease.

With the exception of certain subpopulations of the formerly endangered American peregrine falcon and, to a lesser extent, coastal goshawks, birds of prey in Alaska have never been the subjects of long-term, ongoing field research or population estimation. Now that peregrines have been completely delisted, field research on raptors is limited to sporadic and scattered studies. It is exceedingly unlikely any persons, groups, institutions, or agencies will ever collect and analyze data sufficient to accurately assess and track statewide raptor populations in Alaska.

## CONCLUSIONS

1. Wildlife professionals will never be able to base management decisions on comprehensive, up-to-date field data.
2. Resident take of Alaska raptors for falconry exerts no detectable impact on wild raptor populations.
3. A limited, conservative non-resident take of Alaska raptors is biologically defensible.
4. A disproportionately large proposed non-resident take may inspire calls for field data that are difficult or even impossible to produce.

## 2. Legal Considerations

Alaska Assistant Attorney General Kevin Saxby has advised the U.S. Constitution requires that residents of all states have access to hunting and fishing privileges extended to Alaska residents, including take of falconry raptors. This constitutional requirement applies to nonresident United States citizens only and does not apply to nonresident aliens. States may reasonably restrict such non-resident activity, but may not entirely exclude non-residents from activities allowed for residents.

## CONCLUSIONS

1. Alaska must work to provide non-resident U.S. citizens with some level of access to raptors.
2. No such requirement applies to non-resident aliens.
3. Non-resident raptor take may be restricted as the state sees fit.



### **3. Administrative Considerations**

#### **a. Logistics**

Awarding non-resident raptor take permits to interested applicants would require a fair and transparent system of collecting and tracking an as-yet-indeterminate number of applications. Whether using an existing system or inventing a new one, the department will assume new work and incur additional expense to administer a non-resident take.

No reliable prediction of domestic non-resident interest exists, but other states' experience suggests applicants would likely number no more than one hundred. Non-resident alien applications could number many more. Interest in large falcons, especially from Middle East falconers, is strong, long-standing, and likely to continue. A considerable number of practitioners in the Middle East possess the financial and logistical ability to take advantage of a non-resident take in Alaska. It is not presently possible to reliably gauge the level of non-U.S. interest in Alaska raptors, but it is potentially substantial.

A new lottery system could be created, or the existing Alaska Department of Fish and Game (department) drawing hunt system could serve as a platform for awarding non-resident raptor permits. The department should be able to provide estimates of their costs of public notice, application collection, winner selection, permittee notification, take management, and other administrative expenses in conducting a drawing for non-resident raptor take permits.

Other jurisdictions report attempts to subvert their selection systems, notably by multiple proxies entering applications on behalf of a single applicant. Several states relegate successful applicants to the end of the line in subsequent years, whether they take birds under their permits or not, to help distribute a limited number of permits more equitably among applicants.

Biological concerns sufficient to warrant emergency closures or other actions are unlikely to arise, but administrative problems may trigger a need for regulatory amendment. The Board's and the commissioner's existing authorities likely provide the legal latitude to make needed adjustments, but until it becomes well-established, a non-resident take system may demand to be revisited and examined more frequently than falconry regulations are reviewed, i.e., every four years.

### **CONCLUSIONS**

1. Any new non-resident take system should be as close to cost neutral to the department as possible.
2. The department should prevent individual applicants from dominating the selection process.
3. Alaska should anticipate considerable non-resident alien interest in raptors.





4. The U.S. Constitution does not require Alaska to provide opportunities for raptor take by nonresident aliens.
5. Alaska should retain the flexibility to curtail or alter any non-resident take scheme to respond to unanticipated problems or difficulties outside of the usual quadrennial schedule of falconry regulation review.

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#### **b. Permit Fees**

Non-residents should expect to cover administrative costs to award permits. Additionally, non-resident permits for many big game hunts in Alaska are limited in number and typically cost hundreds of dollars. Permits for non-resident take of raptors for falconry in Alaska would likely be few in number; they could easily be among the rarest of non-resident drawing permit opportunities. Issuing such permits for anything less than a substantial fee would be inconsistent with existing drawing permit protocol and could invite challenges to other permit fees (i.e., if the rarest of permits were inexpensive or even free, how could the state justify charging hefty fees for more commonly available permits?).

In light of the fees charged for other uncommon permits issued by the Alaska Department of Fish and Game, imposing a substantial fee for the falconry equivalent of a rare big game trophy would be entirely consistent with existing state policy. For example, a non-resident wishing to hunt musk oxen in Alaska pays a \$10.00 application fee to register for a permit hunt drawing, \$85.00 for a non-resident annual hunting license, and a \$1,100 fee for the requisite locking metal tag. The state issues four musk oxen tags to non-residents in a typical year. Fees for other species are substantial: e.g., a nonresident brown/grizzly bear tag costs \$500.00; Dall sheep \$425.00; and a moose tag \$400.00.

Previously, in some Alaska draw hunts, applicants were found to have submitted multiple applications under names other than their own. The Board now requires all applicants to purchase a hunting license prior to applying for the permit. The Board needed go no further, as this restriction solved most of the problems. This remedy might not work if certain nonresidents were willing to risk a substantial sum of money to draw a permit to take a raptor in Alaska.

To further limit participation to legitimate and serious applicants, the department makes permits for some Alaska hunts available only in person in sometimes remote locations. Instead of drawing for permits online, they are awarded to applicants on a first-come, first-served, in-person basis.

Any new fee structure imposed on non-residents for take of raptors for falconry would require action by the Alaska State Legislature.

#### **CONCLUSIONS**

1. Alaska charges substantial fees for drawing permits that are few in number.
2. The Board may require applicants to purchase a non-resident hunting license



- to enter a permit drawing.
3. Permits may legally be issued from local Department offices, and aspiring hunters may need to appear in person to claim them.
  4. A fee for non-resident raptor take permits would require new legislation.

---

### **c. Permit Allocation**

Other jurisdictions report setting quotas, often by species, to limit non-resident take. Some states forbid take of certain species by non-residents. Only rarely do these states possess even limited data on wild raptor populations or trends.

Alaska formerly imposed quotas on take of peregrine falcons for falconry, but eliminated them some years ago. The regulations the Board adopted last month recognize the self-limiting nature of falconry take of raptors and maintained the status quo, i.e., imposing no numerical quotas on resident wild take of falconry raptors.

Generally, non-residents are allowed some fraction – typically, no more than 20% -- of resident take. Lacking resident take quotas, Alaska must rely on annual take numbers from years past to establish typical resident take levels. While there are no biological concerns for non-resident take equaling or even exceeding (within reason) resident raptor take, we are aware of no other Alaska hunting seasons where non-residents are allowed to take more animals than residents.

## **CONCLUSIONS**

1. Any new scheme of take is justifiably set conservatively at first, with increases considered only after some years of experience with the new take regime.
2. Typically, non-resident take comprises some fraction of, and never exceeds, typical resident take.

## **4. Other Considerations**

### **a. Protection of Raptor Eyries**

Falconers take raptors in two ways: 1) removal of nestlings, or eyas, birds from nests or eyries before they are capable of flight, and 2) trapping of fully-flighted birds capable of hunting on their own and on their first migrations (i.e., passage birds). Each has advantages and drawbacks. Eyasses tend to be tamer and easier to train, but may turn out to be one of the eight or nine of ten that were not destined for survival in the wild, i.e., not effective hunters. Passage birds are strong fliers and experienced, already proven hunters, but tend to be wilder and thus more easily lost.

Many species of raptors build new nests or occupy new sites every year, but large falcons tend to reoccupy select sites repeatedly. Cliffside scrapes with features favorable





to large falcons are unusual and tend to be used and re-used over many years. One site in Greenland was determined through radiocarbon dating to have been occupied as far back as 26,000 years ago. Consequently, eyrie sites used by large falcons are far more sensitive and precious than good hunting spots or hot fishing holes.

Falconers have long held known eyrie locations closely. If eyries become known by too many people, unwanted attention and competition may result – and not just from other falconers. Wildlife photographers, birdwatchers, wilderness travelers, and others have all been known to visit large falcon eyries in Alaska with detrimental results. Additionally, in the past, individuals and government agencies have removed eyas raptors from eyries in Alaska outside the confines of existing falconry regulations.

Other states restrict non-resident take to passage birds and some place certain species off limits to non-residents.

## CONCLUSIONS

1. Alaska is justified in limiting knowledge of and access to eyries and nest sites, especially those of large falcon species.
2. One way to protect large falcon eyries is to restrict take to passage birds.

### **b. Protection of Resident Privileges**

Presently, resident falconers pay no fees beyond the cost of a hunting license, and are not limited by quotas on take by species. There are no administrative, financial, political, or biological reasons to alter this arrangement.

## CONCLUSIONS

1. Alaska need impose no fees or additional requirements on resident take of falconry raptors.
2. Alaska need impose no numerical quotas on resident take.

### **c. Impact on Existing Regulations**

The regulations adopted by the board last month include detailed restrictions on when and how a resident falconer may temporarily and/or permanently export a raptor from the state. Maintaining those restrictions while allowing permanent export of raptors by non-residents might create an incongruous or even legally indefensible discrepancy between residents and non-residents.

## CONCLUSION

1. The Board should work with its legal advisors to maintain consistency between restrictions on residents and non-residents.



#### **d. Guiding**

Many aspects of taking a raptor in Alaska are difficult for residents to understand and navigate successfully; non-residents could not reasonably be expected to negotiate the intricacies of the Alaska situation without running afoul of state, local, and Native restrictions. Professional guides assist many non-resident big game hunters and are even required for some hunts. Some suggest professional raptor guides would be useful or even necessary for non-residents taking raptors in Alaska. Others advocate requiring Alaska licensed falconers to accompany non-residents taking birds in Alaska.

Existing statute makes no provision for falconry guides; expertise to populate a falconry program does not exist within the present Big Game Commercial Services Board structure.

Attaching a monetary value, even obliquely, to the removal of an animal from the wild, invites wide-ranging challenges and problems and creates incentives for greater wild take than might otherwise exist.

#### **CONCLUSIONS**

1. Allowing the exchange of anything of value for raptor guiding services would open a large universe of challenges and problems.
2. The Board may preclude raptor guiding services by prohibiting financial or material remuneration for assisting a nonresident falconer take a raptor.

#### **e. Reciprocity**

Some states limit non-resident access to raptors in their states to residents of states that also allow non-resident take, i.e., "reciprocity." Such provisions are intended primarily to encourage all states to allow non-resident take.

Sponsors of a recent proposal requested the Board include a reciprocity clause in non-resident take regulations, i.e., they advocate restricting take in Alaska to residents of states that also allow non-resident take of falconry raptors in their states. This assertion invites examination on at least four fronts: 1) constitutionality; 2) practicality; 3) administrative logistics; and 4) benefit to Alaska falconers.

1) The same provision of the U.S. Constitution requiring states to provide non-residents access to activities allowed to their residents also renders such reciprocity clauses illegal.

2) Presently, only Connecticut and West Virginia lack non-resident take provisions (Hawaii allows neither falconry nor non-resident take). Rules preventing residents of those states from taking raptors in Alaska would affect only a very few





individuals and would accomplish little as far as exerting pressure on those states to implement non-resident take.

3) Keeping track of other states' reciprocity standing would require the Department to expend significant effort to monitor each state's regulatory status to insure up-to-date, legal, even-handed treatment of all applicants.

4) The assertion Alaska falconers would enjoy expanded access to raptors in other states is illogical. With the exception of passage tundra peregrine falcons, the Lower 48 states offer few opportunities attractive to Alaskans.

## CONCLUSION

1. A reciprocity clause in Alaska's regulations is neither legal nor desirable.

## **5. Recommended Features Of An Alaska Non-Resident Raptor Take**

- Restricted to U.S. citizens.
- Non-resident take limited to five birds total annually.
- Five non-resident take permits awarded per year by lottery, through the department's existing permit drawing system.
- A non-resident applicant winning a permit may take one bird of any species allowed to a resident falconer of a similar class of falconry permit.
- Charge an entry fee of \$5.00 per application to enter a raptor take permit drawing.
- The department should take steps to prevent individual applicants, or an applicant's proxies, from dominating the selection process.
- A successful applicant must purchase a non-resident hunting license, pay any non-resident raptor take fee determined by the department (we suggest at least \$100.00 per permit), and present proof of being legally permitted to practice falconry in his/her home state.
- A non-resident may take only a passage raptor.
- Non-resident take allowed 1 September to 31 December annually.
- A successful applicant must notify the appropriate regional falconry representative prior to undertaking trapping activities, and must report in person to the department area biologist for the area where the permittee intends to conduct trapping activities, and present his or her non-resident hunting license, falconry permit or license from his or her home state, written permission from landowners, if pertinent, and provide any other information the department may require.
- A permittee must report in person to the regional falconry representative before leaving the state, whether successful in trapping a bird or not. If successful, a permittee must present his or her hunting license, capture permit, and any bird taken, and provide whatever additional information the department may require.



- Any bird taken by a non-resident, regardless of species, must be banded with a locking, non-reusable, black nylon numbered marker band issued in person by the Department upon check-in prior to attempting to capture a raptor.
- For at least five years after take, a non-resident successfully trapping a bird must file an annual report designed to track the movement, transfer, and disposition of the bird.
- No one may offer or accept anything of value in exchange for raptor guiding services or other activities intended to assist a non-resident in taking a raptor for falconry.
- A successful applicant may not apply for another non-resident take permit for at least five years, whether or not he or she was successful in trapping a raptor.
- No new quotas or fees shall be imposed on resident falconers.
- Board review of the entire non-resident raptor take scheme is required by 31 December 2014; scheme sunsets 31 December 2016.



Honorable Board of Game Members,

I'm writing in support of my proposal #179 that would change the general non-resident sheep hunting season in the Dalton Highway Corridor to a drawing hunt with 4 tags being issued in GMU 24A and GMU 26B. This drawing would only apply within the DHC. I personally have extensive hunting and trapping experience in both units and within the DHC. I had my first birthday at Galbraith Lake and lived year round in Wiseman for many years. I worked as an assistant guide in the Gates of the Arctic National Preserve for many years and have harvested 10 rams personally in 24A. My request is based on my deep personal interest in resource conservation as well as utilization, as I am an active registered guide.

Since the mid-1990's resident sheep pressure has steadily increased in the DHC and in the lands directly adjacent to it. During this time, the guides that historically operated in 24A stayed clear of the DHC because it was used by local residents and was unattractive due to its bow hunting restrictions. Between 2000 and 2005 resident hunting pressure had more or less stabilized and local residents were still harvesting sheep in the DHC. After 2005 a few guides that are new to the area began taking hunters in the corridor and harvesting quality animals that had, essentially, been left in the "bank." Since the BLM manages these lands, no restrictions on the number of guides operating in the DHC could be imposed and the user conflicts and anger over the new guide use skyrocketed.

It is because of these user conflicts and the reduction in #s legal rams that I made this proposal. Many local residents did not feel that they had a meaningful voice on this issue and state residents have also been increasingly expressing their anger over the competition for hunting camp locations and animals. If this situation continues, the





conflicts will rise and everyone will suffer. If you adopt my proposal, tensions will decrease, local and state resident harvests will increase, less sheep will be "bothered" during the season by Supercubs and there will still be non-resident opportunity. I urge you to adopt proposal #179 to maintain non-resident harvest as well as road accessible sheep for state and subsistence users!

Thank You,

Thor Stacey

Registered Guide #1194

PS I would also request that this proposal be revisited when the new state guide area system is adopted as this type of non-resident specific drawing hunt is not appropriate statewide or regionwide but, instead, is proposed to handle this specific situation involving and local village and the ONLY road accessible sheep hunting in the Brooks Range.



Sierra McLane  
PO Box 215  
Denali Park, AK 99755  
(907) 683-3683

February 12, 2012

ATTN: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526  
Fax: 907-456-6094

Dear Alaska Board of Game,

I am writing in opposition to proposal #213. I live at mile 230 of the Parks Highway. My husband and I own our house and are year-round residents in the Denali Borough.

I strongly oppose proposal #213, which would open the Yanert Controlled Use Area to motorized hunting. Our neighbors and friends hunt in this area, and we respect their ability and desire to do so using non-motorized equipment. I recreate in the Yanert corridor, and have serious concerns about the environmental damage that would be caused by additional motorized equipment traversing the boggy areas before freeze up. I have yet to see moose or moose signs while recreating in the area, and other locals have told me that moose numbers are low. This indicates that motorized hunters would add strain to the ecosystem without parallel harvest benefits.

Thank you for considering the wishes of myself and my neighbors.

Best regards,

Sierra McLane  
PhD, Forest Genetics and Ecology



RECEIVED

FEB 15 2012

Dear Alaska Board of Game,

I live in McKinley Village along the Parks Highway very close to the confluence of Yanert and Nenana Rivers. I use the Yanert River valley for various kinds of outdoor recreation and would like to see it remain a non-motorized hunting area. Therefore I oppose **Proposal #213** regarding motorized hunting access in the Yanert Controlled Use Area.

Thank you,  
**Martha McPheeters**  
**PO Box 67**  
**Denali Park, AK 99755**  
**907.683.5444**





# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Arctic National Wildlife Refuge  
101 12<sup>th</sup> Avenue, Room 236  
Fairbanks, Alaska 99701-6267  
(907) 456-0250



February 9, 2012

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

Dear Chairman Judkins:

The Arctic National Wildlife Refuge (Refuge) appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game during its meeting in March 2012 to address proposals that would be implemented in the Interior Region. We would like to provide the following comments on Proposals 170 and 181, which could affect management of wildlife populations on the Arctic National Wildlife Refuge.

Proposal 170 would shorten the moose season in a portion of Game Management Unit 25A (Sheenjek and Coleen drainages).

The Refuge is opposed to this proposal. A joint Arctic Refuge-ADFG moose survey is planned for November 2012, which will provide new data on the status of the moose population. The refuge recommends waiting until this information is available prior to considering a shorter season.

Proposal 181 would extend brown bear seasons in Game Management Unit 26B.

The Refuge is opposed to this proposal. Several actions have been taken recently to increase brown bear harvest in 26B, including passage of an Intensive Management Plan that authorizes take of brown bears on state lands for predator control, liberalization of general-hunting harvest regulations, and lengthening the season for Federally qualified subsistence users. The results of these actions should be evaluated prior to further liberalization of harvest regulations.

Thank you for your time to review our comments on these important issues.

Sincerely,

Refuge Manager





February 12, 2012  
General Delivery  
Cantwell, AK 99729

Alaska Dept. of Fish & Game  
Board of Game Comments

I am writing to OPPOSE Proposal 213, the Yanert Controlled Use Area. Please, keep motorized hunters OUT! I live in Denali Homestead Subdivision, mile 229, and I use the trails in this area DAILY - Sept - May. The trails are maintained by local residents, who use them for dog mushing, skiing, & hiking. Hunters unfamiliar with the trails would wreak havoc with trail maintenance, not to mention trespassing, getting lost, and going through the (very unstable) ice on the Yanert. There is no parking access at the trailhead at mile 228. Historically, there has been a very low number of moose in this area, too. Please heed the advice of our Nenana advisory committee & the Denali Borough assembly, and let this area NON-MOTORIZED!





Thank you for listening to the  
residents, who know this area best.

Sincerely,

Dianne L. Herman

Dianne L. Herman

resident

&  
Cartwell teacher



RECEIVED  
FEB 21 2012  
BOARDS

Feb 17 Friday

To SOA Game Board -

I urge you to vote  
down the proposal 213  
that would allow motorized  
hunting in the Yanert Valley.

It is best left "as  
is" with only non-motorized  
access.

Thank You -  
Robert Hamner

P.O. 461 Girdwood 99587



My name is Laura Strand and I am writing in **SUPPORT of Proposal 142**. First of all, I want to let you know that I am dismayed by recent Board of Game actions in many areas such as aerial shooting of wolves and snaring of bears, all as an effort to increase moose population. All of the supporting information says that the population is limited, not by predators, but by the habitat and the lack of food. The BOG does not seem to listen to the facts.

And how about the decision to shoot grizzlies from an airplane or helicopter to boost musk oxen numbers? Again, no regard to research or decades-long bans or the processes that the BOG uses to make these decisions. The predator kill policies are disturbing.

I am writing now in support of Proposal 142. The decision to list bears as a furbearer was an underhanded way for the BOG to be able to even consider snaring of black bears. Snaring of bears is a cowardly, unsportsmanlike method of killing and it DOES not accomplish what the BOG says is a method to increase moose and other game numbers. Absurd! So the BOG is now considering allowing snares to be placed in areas adjacent to parks is unsafe and an unacceptable risk to the public. Bear snaring in areas of high use is dangerous, and it is not the best use of MY resources. **I am born and raised in Alaska** (59 years!) and feel like I have not been represented by the BOG and certainly not by their decisions. Their actions in recent years have forced me to make a statement. I feel like my opinion and those with like concerns are being disregarded. The BOG is only looking out for its own underhanded best interests. Snaring is supposedly a safe, humane way to kill bears? This is so inconceivable and absurd that I cannot believe that it is even considered. It has been banned in this state since statehood and for good reasons:

- 1) It is unsafe. How will I know where a snare is set if they are allowed near residences, roads, parks and trails? How about if I wander along and come across a bear enraged and hurting? It does not make good reasonable, safe sense.
- 2) It is not a civilized, inhumane way to control predators. Anyone that says that an animal with a wire tightly wound about its paw is not in pain is not speaking realistically. Unless someone is there immediately to kill the animal after it is first captured, the animal will be in pain, and will try any means to get free. Including gnawing off a paw. That is a no-brainer, and I don't have to be a biologist to know that they feel pain. In fact, any ADF&G official that tries to tell me that they do not, is not a credible source and should not be making decisions about the management of game in Alaska. And they are not credible to be representing the residents of Alaska.
- 3) And what about the fair chase ethic that many Alaskans abide by today? To think that most people condone killing an animal this way, with no fair chase, is not a majority opinion. To think we (humans) have our mental advantages such as reasoning and superior intellect, the advantages of having a gun, and now, to



lay a trap baited by food is disgusting and very questionable and totally unethical.

5) Snares are indiscriminate. They capture brown bears, sows with cubs and cubs. This is unacceptable means of game management.

6) What about those of us who enjoy wildlife viewing? To think that we are even having this discussion to allow such an inhumane practice, and asking for the BOG's consideration is beyond belief. By allowing snaring adjacent to parks we are impacting the wildlife viewing opportunities of visitors and residents alike who enjoy the co-existence of our resources for the enjoyment of watching and photographing. We will impact the viewing opportunities. We will impact the numbers of bears in the park by snaring in areas adjacent. Another no-brainer.

This entire method of snaring is an ineffective means of increasing moose populations. Moose are having a harder time fighting the elements, snow, and starvation. With the acceptance of Proposal 142, hunters can still hunt but take make conscious decisions about their choice of kill. I want representation (fair representation) of the BOG and I want them stop ignoring the public outcry in regards to this issue.

I believe that snaring of bears should not be legal anywhere in the State of Alaska but Proposal 142 is a step in the right direction. Please consider this proposal and approve its passage into law. I have a voice, I live in this state and the resources are mine just as much as the BOG. Stop ignoring the input and opinion of a large portion of the Alaskan population that is dismayed and concerned about this practice of wildlife management.

Thank you.

Laura Strand  
3790 Richard Evelyn Byrd St, Unit B  
Anchorage, Alaska 99517





Dear Board of Game:

Thank you for taking more comments for your March meeting.

Eager to see just one bear in the wild, tourists from all over the world visit us here in Alaska. For many it is a lifetime highlight. I watch these visitors and see how deeply their spirits are touched. Pack Creek, Steep Creek, Anan. It's a soul experience. Seeing wild bears quickens something unnamable. It's a forever gift. A bear appears, cameras click, tears of joy, families smile and hug. A profound circle of life experience. If only these tourists knew what some members of the Alaska BOG may have in store for these remarkable creatures.

**Thank you for supporting Proposal 142. It is the right thing to do and the ethical thing to do.**

Please study Bill Sherwonit's January 12, 2012 thoughtful article. And please consider the enormous citizen outcry against bear snaring.

Please review Bill's detailed minutes, hours and days of a sow snared as her cubs stand by helpless. Why would anyone dream up this unimaginable horror and cruelty? My 19 years as an Alaska resident have given me the extraordinary gift of seeing bears while hiking, learning about their special qualities and appreciating how they walk the earth with us. To any reasonable person, bear snaring appears to be an extreme measure. Why would a small group of Alaskans promote this practice? As many others are saying, it looks like politics.

And many others are also saying that bear snaring is not based on science but rather guesswork. According to Bill Sherwonit, many biologists and retired F & G scientists have spoken out clearly and declared that "Alaska's predator policies are based on guesswork and politics rather than good science."

Bear snaring only benefits the sports hunting industry. And these predator policies are another example of the 1% controlling the 99%. It is a small extreme group riding rough-shod over the rest of us using cruel animal practices that cause unimaginable trauma to these magnificent ones. Larry Aumiller, retired F & G scientist, revealed that he still has nightmares related to the snaring he did in the 1970's to radio-collar McNeil bears. We appreciate his vulnerability in expressing this aspect of the snaring. This is profound because abuse harms all around.

And what happened to the grand Alaskan tradition of sportsmanship? What happened to hunters taking great care and pride in the ethics of taking each animal? This long standing tradition appears to have been replaced by "Kill them all" and "disregard the brutality." Bear snaring is indiscriminate killing. It is also a war zone for sows and cubs despite centuries of hunting heritage that has special regard for females with young. Bear snaring goes against the circle of life.





Bear snaring proposals show what happens when some Alaskan minds and hearts are usurped by economic profit. It appears that the sports hunting industry has declared war on Alaskan bears and wolves as a way to keep their profits and to keep their BOG positions.

It is interesting that many of Alaska's elder statesmen have spoken out against baiting and snaring bears. It is also reported that some big game guides who have been supportive of past State wildlife policies have now spoken out against bear snaring, finding it too traumatic and brutal.

Just as America has been learning profound lessons about the harmful practice of human bullying, and that once a bully gets going and has a taste of power, the bullying increases. This having power over others has bled over and onto our treatment of animals. The bear snaring proponents have lost respect for these great animals and how they fit into the natural circle of life. We need to get back on track with Alaska's historical respect for our wildlife.

It is important to note that Bill Sherwonit reports that former BOG members are stunned and shocked at the bear snaring proposals, finding them too cruel, too unnecessarily cruel. And too unsportsmanlike. These former BOG members are reported to be alarmed by the current BOG's extreme measures.

As Bill points out, wait till YouTube shows a snared sow and her frightened cubs. Wait till regular Alaskans learn what bear snaring involves. Please support Proposal 142. It is the ethical way. We are counting on your wisdom in this crucial matter.

Sincerely,

Lin Davis  
3099 Nowell Ave  
Juneau, AK 99801



Ray Gary  
P.O. Box 255  
Healy, AK 99743  
February 13, 2012

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

Comments for the Alaska Board of Game March meeting in Fairbanks

I have lived in Alaska for over 35 years and have hunted all over the state including the Yanert, the rest of 20A and 20C.

I live on what may be considered a "remote" home in 20C for over 20 years. I have never been bothered in any way by a bear - black or brown nor has anyone I know been bothered.

Part of the reason I live where I do is because there are bears and wolves. I do not want to see them driven away.

As far as trapping bears is considered, I can't believe that someone would actually put that on paper. Since cubs stay with the sow for 2 or 3 years, how would we keep mom out of a trap? It is illegal to kill a sow with cubs. I think that even a "sportsman" would find the idea of a mother bear screaming in a trap while the cubs looked on abominable.

The very unsportsman-like practice of hunting from an aircraft was banned many years ago and should stay that way.

Maybe we could take the trapped bears alive and stage fights with live trapped wolves? We could charge admission and get much needed revenue. Who would be hurt? "I can't think of anyone."

**If we want to increase the size of the moose population, close hunting for a year or two.**

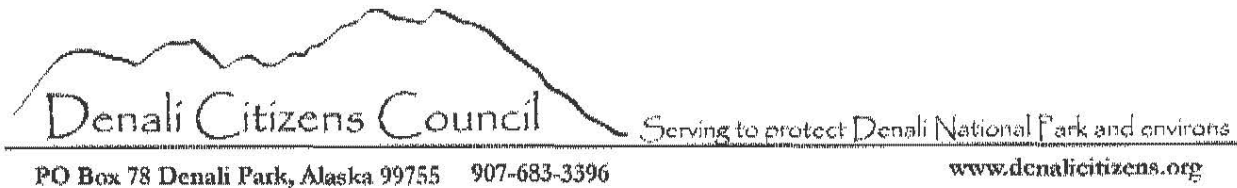
Sincerely,



Ray Gary

**I am against proposals 213, 227, 228, 229, 230, 231, 232**





Alaska Department of Fish and Game  
Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811  
FAX: 907-465-6094

Feb. 17, 2012

RE: Proposals for Spring Board of Game Meeting, Fairbanks, Alaska, March 2- 11, 2012

Members of the Alaska Board of Game;

Thank you for the opportunity to comment on proposals from the 2011/2012 Proposal book for the Interior Region (Region III) Game Management Units, to be considered at your Spring 2012 meeting in Fairbanks.

These comments represent the board and members of the Denali Citizens Council a small, grassroots public education and advocacy organization, founded in 1974 in Cantwell and headquartered at Denali Park, whose interests include both Denali National Park and the park's gateway communities. We've been involved for several years in encouraging collaborative planning for the Wolf Townships, west of Healy and surrounded on three sides by the national park. Our comments on each proposal before you are listed below.

**Oppose Proposal 213 (authored by the Fairbanks Advisory Committee)**

Many of our members live and recreate in the Yanert River Valley, an east-west trending upland area in the Alaska Range emptying into the Nenana River as it passes Denali National Park. The Yanert River is a fast-moving, glacial river that also receives fresh water from streams both north and south. Ground cover is composed mainly of moist, brushy uplands and occasional stands of spruce. There is a pinch point a few miles up the Valley where travelers use the braided Yanert River in winter. Access from the Parks Highway at the Valley's western edge is limited to one 17(b) easement across Ahtna lands. A small airstrip near the head of the Valley provides bush plane access.

The Yanert Valley is currently one of the few remaining areas declared non-motorized for hunting and hunting support. Its relative isolation, nestled in the Alaska Range and surrounded on three sides by mountains, promotes its easy identification as a discreet Controlled Use Area. It is popular for horseback hunting and with individuals who enjoy a quiet backcountry experience. It is logical to continue this special designation for at least two reasons – Alaska hunters want it and it is easily demarcated geographically.

**DCC Board**

Nancy Bale  
Anne Beaulaurier  
Jean Balay  
Cass Ray

Hannah Ragland  
Nan Eagleson  
Jared Zimmerman  
Charlie Loeb

Julia Potter, Community Organizer



We think that the Fairbanks AC, which authored this proposal, did not understand the hunting culture of the Yanert Valley, nor did that AC understand the particular access constraints that apply there. There is a buffer of Ahtna-owned land between the Parks Highway and state lands open to hunting in the Yanert Valley. These Ahtna lands are crossed by a single, narrow 17(b) easement. There is no dedicated parking off the highway for hunting vehicles, and no state lands where one could be designated. Even with horse hunting, vehicles are seen strung along the shoulder of the Parks Highway during hunting season, as there is no off-road place for them to park. Because access from the Parks Highway is largely through private lands, conflicts with several home owners are simply inevitable. Increasing this conflict by adding the late season motorized hunt is not in the best interests of the state or hunters.

The Yanert Valley is within Unit 20A, however it is its own little ecosystem. The excesses of moose identified for other parts of 20A have not been noted here, and hunting for antlerless moose is not considered necessary by locals, nor is it popular. The late season motorized hunt proposed by this proposal would be entirely for antlerless moose, whose overabundance in this area has not been proved. The department must also consider the general unpopularity of antlerless hunts in 20A, evidenced by a recent vote by the Middle Nenana Fish and Game Advisory Committee. The Department has already reduced harvest quotas in 20A. A late season hunt in the Yanert Valley – is it even desirable at all?

Motorized problems – A late season hunt was originally pitched as a snowmachine hunt, however if Fish and Game institutes a motorized hunt after September 30<sup>th</sup>, it will be an ATV hunt, since snow cover is unreliable in this area until mid to late November on some years. Damage to existing trails and the creation of new, rutted trails in this vulnerable valley are inevitable. Similarly, the braided area of the Yanert is classically unstable for travel in the early season and is always subject to overflow, the bane of dog mushers and skiers, and a real danger for snowmachine travelers.

You are aware that the Middle Nenana Fish and Game Advisory Committee has voted against this proposal. This very fact indicates that a variety of reasons exist NOT to pass this proposal, reasons that have already been explored and examined by the AC. We urge you to leave the Yanert Valley CUA as it is. A variety of hunters, recreationists and local citizens will be relieved if you do.

#### **Oppose Proposals 227-232 (authored by the Fairbanks AC or members of that AC)**

Unit 20C is a large, diverse area extending north from Denali National Park to the Tanana River and including just about every habitat type that exists in Alaska. Western portions of the area are roadless backcountry where locals have long hunted and trapped for subsistence, areas closer to the road include private property with a variety of trails. Much of the area is wet, with abundant permafrost and several rivers. The area contains Lake Minchumina, the Wolf Townships, the Nowitna National Wildlife Refuge, parts of Denali National Park, and acres of spruce, taiga and bog. If there ever was a diverse area from both a habitat and a management standpoint, this is it.

This area will not lend itself to management with a one-size-fits-all intensive management strategy - there are simply too many different habitats, animal populations and human cultures within this one area. The department has been devoting its census work elsewhere and does not have data to cover the overall health of this area's resources. There is simply little or no evidence, other than anecdotal, of a problem



with too many predators, nor is there an overall knowledge of whether the habitat can support more moose. The Middle Nenana Fish and Game AC voted these proposals down, indicating their skepticism about whether they are warranted. These proposals are simply too big and are not justified by data. Please do not approve the intensive management plans detailed in Proposals 227 and 229. In addition, control of wolf predation is not indicated by data in 20C, and is not appreciated or desired by locals. Please vote down Proposal 228.

The three proposals advocating liberalization of regulations to allow taking of black and grizzly bears are simply unproved and premature at this point. In addition, the Board of Game, if using them at all, should target these types of activities to areas where an overabundance of bears can be proved to be harmful. Such proposals should have sidebars and their language should be tight and specific. Proposal 230 is simply too broad and unspecific and includes baiting of brown bears without data to show they are overabundant. Proposals 231 and 232 are similarly non-specific and unproved. To state, in the language of Proposal 232, "Moose hunters will benefit by the board creating an ecosystem capable of providing sustained yield of moose," shows a tremendous amount of hubris. We do not support the "creation of ecosystems" by the Board of Game. In our view, the Board may be called upon to solve discreet problems, but not to apply single-minded management in Game Management Unit 20C.

#### Wolf Townships remain controversial

In 2010 I appeared before you at the March Board of Game meeting and advocated for a no hunting/trapping zone for wolves in the Wolf Townships. I carried with me a petition signed by hundreds of Alaskans supporting some form of protection for wolves that venture out of Denali Park to the northeast into the Wolf Townships (after caribou, who go there also), and are easy prey for hunters and trappers there. Although the Board of Game has removed all wolf hunting/trapping limits in the Wolf Townships north of Denali, there is still a significant group of Alaskans who support the institution of such controls. Although we do not have a proposal for you at this time, we as a group and individually want you to know that we would be happy to work collaboratively toward real solutions for wildlife management in the Wolf Townships. We know that some of our members may not get exactly what they would like in a collaborative process, but we support such a process.

#### Support Proposal 233 (authored by Jim Stratton)

We support Proposal 233. It would make no wildlife management changes itself, but it does support the collaborative development of a Controlled Use Area Plan for those very Wolf Townships that have become so controversial over the years. This is why I urge that you approve Proposal 233.

We appreciate your work on behalf of all Alaskans,

Sincerely,

  
Nancy Bale  
DCC Board of Directors  
907-277-3825