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Hello, this is concerning Proposition 194.

I own a birddog and yes I am always concerned about traps after trapping season starts. However, this proposal is not the way to go. Whether to take my dog with when I go hunting is my choice. This is one of those proposals that will be impossible to enforce. Who is to determine if the dog is a hunting dog or a hiking companion? i.e. my husband hunts, I hike with him. The dogs belong to me, but they like to hunt. So are they hiking or hunting and why should hunting dogs be singled out? I haven't seen any statistics, but I would bet that more family pets have been caught in traps than hunting dogs. Hunting dogs are generally better trained than your average pet and the hunter is constantly keeping track of where they are. We have GPS units that track exactly where the dog is so we can find it and even if the dog had the misfortune to find a trap we can get there quickly to release the dog.

To make dogs safer, better regulations on trapping might be a better way to go. Signage alerting people there is a trap line. Traps required to be at least 50 yards off a trail, traps with the owners name so we know who the trap belongs to. Requirements on how often the line must be checked. If a dog is found in a trap, dead or alive with ID, required to notify the dogs owner rather than just dumping the dog off a bank. Maybe even some restrictions on where you can trap. While many trappers follow the trapper's code of ethics it is not a requirement for them. Maybe the code of ethics needs to be enforced. Limiting dogs is not the way to deal with poor trapping practices.
It came to my attention that there is a proposal, D, to prohibit the use of dogs in upland bird hunting after Oct. 31. I was shocked and discouraged to hear such a proposal. Hunting upland birds is a centuries old tradition in Western society. Those of us who own and train our hunting dogs spend countless hours and thousands of dollars to do it.

It's my understanding that this is a proposal put forth by those in the fur trade. Ostensibly it is to "protect" our dogs from traps. If they want to protect our dogs and the public, they would mark areas clearly that have traps nearby. It is wrong to have traps hidden and not inform people that there are traps about. I know the argument is that trappers are worried about theft. That is not a good enough reason to have traps hidden that even a person could step into, on Public Lands.

Those of us who go into wild places know there are hazards and accept them. I carry rope and a tool for opening a conibear trap. I accept the risks involved.

Taking away the rights of bird hunters to hunt with their dogs is as good as closing the season to us. Hunting grouse from a snowmachine with a .22 is fine for a villager doing subsistence hunting, but it is not the equivalent to sport hunting with a dog.

In this country, we are drowning ourselves in regulations. The quality of life keeps diminishing with greater levels of bureaucracy and control from above on all of the little people.
Regarding Proposal 194:5 AAC 92.080. Unlawful taking of game; exceptions. Prohibit the use of hunting dogs for taking upland game birds after October 31, for the Southcentral Region

Do not allow this regulation to take effect. The verbage associated with the proposal indicates a very biased opinion that demonstrates extreme ignorance of bird hunting and bird hunting dogs. This proposed regulation would not protect those dogs for the following reasons:

1) Most hunting dogs are trained to stay close to their owner (often in sight and within shooting range). Those that range further afield typically have tracking collars on which hunters can then use to relocate their dogs. If one such dog did get caught in a trap, their owner would likely be close by and able to remove the dog before it would suffer.

2) Most trappers attempt to trap in areas where there is not a great deal of human (and therefore, bird hunting) activity. Why trap in an area where the target animals will be subject to disturbance?

3) In my experience (and those of other bird hunters I have spoken with), dogs are very rarely caught in legal traps. My dog has been caught in snares twice while hunting, and both were set illegally (out of season) and without permission. Others have had similar experiences with illegal trapping and snares, in particular, being set in areas where people bird hunt regularly. Regulating bird hunters, who are in this case following the law, and not the illegal trapping, is completely backward. A well-maintained trapline is typically obvious to a bird hunter, and most would either avoid the area completely or restrict their dog’s behavior to limit the chances of being caught in a trap.

4) Regulating the use of dogs while bird hunting (during trapping seasons) would severely limit hunter opportunity for bird hunters. Most hunters will agree that a major part of bird hunting is working with a dog to search for and retrieve birds. Many hunters would not hunt if they were unable to use a dog. Personally, I see bird hunting as an excuse to take my dog and my gun for a walk - if I shoot a bird, then it is simply a bonus. I would not hunt if I could not also bring the dog.

This proposed regulation would be of little benefit to trappers. It would, arguably, limit the number of dogs in some habitats where trapping may take place; however, it would severely limit bird hunting activity. There are major holes in how such a regulation would be implemented:

1) What specifically qualifies as a hunting dog? Some breeds are specifically bred for bird hunting (retrievers, pointers, etc), but many people hunt with their pets, which could be mixes of multiple breeds. Without making a specific definition of a ‘hunting dog,’ how would the Wildlife Troopers be able to enforce such a rule?

2) Further, what about people who might want to take a gun along, just in case they saw something to shoot, while walking their pet? Does this qualify as ‘bird hunting’?

3) Attempting to enforce such a rule would place further stress on law enforcement personnel. Why enforce a law limiting the use of dogs (to prevent them from being caught in traps) when you could achieve the same goal by enforcing trapping regulations in areas where bird hunting and trapping may overlap?

In summary, the proposed regulation is a misguided attempt to regulate bird hunting activity. Most hunters will keep their dogs at a safe distance and under control such that they would not become caught in traps. If the spirit of the regulation was to prevent dogs from being caught in traps, that is commendable; however, as this is proposed, it simply limits hunter opportunity while being of minimal benefit to trappers. Enforcing such a law would be nearly impossible, as no definition of hunting dog was proposed, making any dog around a bird hunter potentially illegal, which is simply preposterous! Bird hunting with a dog is one of the most memorable experiences a hunter can have, and no regulation should limit this from taking place. Do not allow this proposal to take effect.
I would like to express my opposition to Proposal 194 banning the use of hunting dogs after October 31. I am an avid small game hunter who enjoys hunting over dogs and recently acquired a German Wirehaired Pointer that I am training into a bird dog. Neither myself, my dog or anybody else I know or their dogs have ever had troubles with traps or trappers. While not exceptionally popular, there are a large number of hunting dog owners in Alaska and the Southcentral Units. Adopting this proposition would be a great injustice to both the hunters and the dogs who love to hunt. Please do not adopt this proposition. Thank you.
Honorable members of Alaska's Board of Game

My correspondence is in response to proposal 194, a request for the Board to create regulation prohibiting the use of hunting dogs in the field beyond October 31st each year.

Such a proposal has no legal basis or precedence in disallowing a lawful and traditional activity that has been carried on for decades; I suspect since before statehood. Nothing about using dogs for hunting causes any risk to the public or their property, or any harm to the environment, or undue stress upon the wildlife resource. I find this proposal arbitrary and capricious.

To single out just one segment of the outdoor public because they partake in small game hunting with dogs is wrong and has no merit. Hunting with dogs is a part of American history dating back to colonial times, has a long history in Alaska, and is a most worthy outdoor activity for a growing number of Alaskans, especially with the lowering numbers of big game animals, the number of hunters pursuing them, and the growing expense to hunt them. Lucky young hunters start out their outdoor life by hunting upland game with a fine dog.

Outlawing dogs from hunting in the woods and on the tundra for those many months does not keep dogs out of the field and away from traps. What of all the dogs that go for hikes with their owners? What of skijoring? What of mushing? What of the training and use of search and rescue dogs? What of hunting snowshoe hare with a beagle? If Jack London were alive would he and "Buck" be required to stay out of the woods and off the tundra? This proposal only excludes the harmless activity of lawful hunters using bird dogs.

As a retired Alaska State Trooper with 32 years of law enforcement experience I can tell you that trying to enforce such a regulation would be nearly impossible and unfairly burden an already stressed small number of wildlife enforcement Troopers. Presenting such a case to a magistrate or a jury is totally lacking any appeal.

Bird dogs are born to hunt. Real dog men and women live to raise, train and hunt their dogs on upland game in Alaska, just like it is done all across the north American continent. Closing one area to hunting with bird dogs will shift heavy pressure to other areas while eliminating entirely the opportunity for some to hunt at all. Hunting dog owners are conservationists, hunter education instructors, outdoor mentors, and come from all walks of Alaska life. Many of these same people work tirelessly at creating and maintaining habitat that directly benefits not only upland game, but also a variety of other small game animals and countless number of woodland songbirds, and most notably moose.

What do trappers do for wildlife habitat?

No dog owner, regardless of whether their dog is a hunting dog or a family pet, ever wants to be anywhere near where traps are set. In my 42 years of life in Alaska one of my bird dogs has been caught once in a snare, and once in a leg hold trap, and both times those traps were set in and around very prominent public recreational areas. If I see a marked trapline, or even any sign of an active trapline, the last thing I want to do is put my dogs down to hunt. Another great fear for those of us who hunt with dogs are the traps and snares left unattended even after the trapping season has ended. Now there's something that should be a crime!

Trappers need to set their traps in more remote areas and clearly mark their traplines.

It has come to my attention that Proposal 194 was allegedly issued in retaliation to Proposal 180. Using the Board of Game in this manner is wrong.
I strongly and respectfully submit that Proposals 180 and 194 be dismissed from any further consideration.

I would be happy to offer testimony at your request. Thank you for the valuable work you do on behalf of Alaska's wildlife and those that enjoy using those natural resources.

Sincerely,

James M. McCann
P.O. Box 61038
Fairbanks, AK 99706
jimmccann@gci.net
907-590-7118
On the issue of limiting bird hunting with dogs after October 31. Instead of limiting activities in areas of trapping why not make it safe for everyone to be in areas around the highest population in the state? What is it going to take to make changes to the trapping areas, a child getting caught in a trap? This is not 1950 the population of people using the natural areas around Anchorage has shifted to people wanting to enjoy nature not exploit it for their own gain. We have hundreds of thousand of acres where trapping will not injure unintended victims so why do we, the majority, have to change our behavior to benefit the minority? If someone wants to trap make them change their behavior to participate in the activity, i.e. get further from civilization! We don't allow people to hunt near cities, so why do we still allow trapping near cities? The consequence is the same, an unintended victim.
I am against the amendment to prohibit the use of dogs while hunting after Oct 31st. While I understand this trapper's concern, we must also recognize that the use of dogs while hunting upland game birds is a time honored tradition. The use of dogs significantly prevents the loss of wounded or hidden birds. It also increases the success of the hunter in locating birds. I would be more inclined to support banning trappers using foot holds than I would banning "Mans best friend".
I support PROPOSAL 180 - 5 AAC 92.095 to restrict trapping in the Cooper Landing area. The purpose of this proposal is to ensure equitable access, during the trapping season, to trails and other areas where the presence of physically dangerous traps and snares endangers pets and small children and discourages other users from accessing these areas since traps may, at present, be legally set in and directly adjacent to these multi-use areas. The danger created by unethically set traps has prompted the need for this regulatory proposal. This proposal is aimed at minimizing or ending the risk of injury, mutilation and death to pet animals, notably dogs and puppies, and to small children. Clearly definable "Closed to Trapping" setbacks (to include exceptions for game management special concerns in specific areas that affect residents of Cooper Landing (and possibly small size non-lethal leg hold traps) has been determined in discussions with local trappers to be the best way to approach this matter.

Clearly definable, easily recognizable, coherent, reasonable and not excessive "Closed to Trapping" areas are needed. The objective is to make these regulations for the Cooper Landing area obvious enough to satisfy the stipulation of being "enforceable" areas. This simply means that a wildlife trooper would recognize that there are boundaries and trappers, pet owners and family groups would know with no uncertainty where all users can go and avoid run ins with set traps.

I also support a similar PROPOSAL 181 - 5 AAC 92.095 to restrict trapping in the Seward and Moose Pass areas for the same reasons as for the Cooper Landing area.
We are moving to establish regulations as guidelines for safer trapping practices in and around Cooper Landing. We intend to follow the BOG proposal process to accomplish this. We are willing to work with the Alaska Trapper's Association and Wildlife authorities to delineate "Public Use - Closed to Trapping" areas. We have proposed setbacks from roads, trails and other public multi-use areas in this proposal. We are looking to establish areas that are easily definable by boundaries, and therefore enforceable, but are not excessive while still being adequately large to be effective. We think we can do this, and if necessary, amend our proposal to agreeable boundaries. We recognize the changing demographics of our community, increased population and use of public lands, and feel regulation changes and clarification are necessary to avoid conflicts.
I oppose proposal #194.

I have two springer spaniels that I hunt with extensively whenever possible. This proposal would preclude myself and others with hunting dogs to hunt grouse and ptarmigan throughout the winter on the Kenai Peninsula. I do not think this proposal is right to eliminate hunting opportunity for bird hunters with dogs for almost 5 months (a large portion of our hunting season). This proposal does not speak to persons who wish to walk with their dogs in the woods or ski with their dogs. These animals are just as likely to be vulnerable to trapping, perhaps even more so. Our bird seasons seem long, but much of our opportunity is lost after September. Waterfowl leave. Spruce hens take to the trees and begin feeding on spruce needles. Sharptails winter in areas hard to reach by road. This makes bird hunting opportunities very limited during winter (ptarmigan, ruffed grouse, other grouse species in small niche habitat). Please don't take that opportunity away. It won't solve the trapping verses domestic dog problem that occurs in populated areas of Alaska where winter recreation of all kinds is becoming increasingly popular. Hunting with bird dogs is a very small portion of that larger issue of people taking their pets out in the woods when hiking, tree cutting, skiing, ski joring, dog sledding, winter camping, ice fishing, etc.

Mike Chihuly, Ninilchik
Dear Sir/Madam,

I'm opposed to Proposal 194 – 5 AAC 92.080 the prohibition of the use of hunting dogs for taking upland game birds after October 31, for Southcentral Region. Dog owners should be aware that trapping occurs in Alaska when furs are most valuable. Likewise, trappers should be aware that hunters may have dogs...

Both should have access and use of public lands.
Regarding the proposed moose hunt in Kincaid Park- totally opposed. If moose indeed do need to be culled from the park please let professionals do it and the meat be donated. Very unsafe to have hunters shooting in the park ans also seems like it will be expensive to regulate this activity.
Kincaid moose hunt I am for the hunt to occur, but oppose that it only be open to those that are 70% disabled or more. It should be open to anyone who would be considered eligible.
For the proposed cow hunt in Kincaide Park, I am opposed to it going forward with the disability portion as that is not equal access and actually put a less effective hunter in a position to humanely kill and harvest the animal. Because the disabled person would need help with removal, there is not a plan in place if the animal runs a long way off. I am concerned about the offal and waste attracting more bears. I am also opposed to the number of animals proposed to be taken. It seems like one person is wanting a private hunt.
I am opposed to proposal 194-5 AAC 92.080. My family and I hunt upland birds in south central Alaska with dogs and I’m offended that you would consider taking away half of the season. Upland bird hunting is all about the dogs, training, hunting and working with them as a team. This year I introduced my grandson to bird hunting (with dogs) and he loves it, I gave him the 20 gauge shotgun my father gave me. Also my wife, daughters, son inlaw and nepfew have been joining in the hunts, making it a great family experience. I am concerned about dogs getting caught in traps and do take precautions. If I know there is trapping in an certain area we will not hunt there just to avoid a problem. Trappers and hunters should be able to get along if we just communicate and pay attention to each other. It would be nice if all trappers posted areas where traps are set, that would take care of most problems. When we hunt dogs are always in sight and they are closely monitored so we would be aware when they pick up a scent and we are there to monitor the situation. I have studied the information available from ADFG on identifying types of traps and how to release dogs from traps, this information should be studied by everyone with a dog. I have not heard of any bird dogs getting caught in traps, it's mostly loose unsupervized animals. For the most part we are in control of our upland bird dogs. I would appreciate your concideration on behalf of the bird hunters in this area and DO NOT pass proposal 194. Thank you.
Request that you do not pass Proposal 194 – 5 AAC 92.080. Unlawful taking of game; exceptions. Prohibit the use of hunting dogs for taking upland game birds after October 31, for Southcentral Region as follows: Add a new line to 5 AAC 92.080 The following methods of taking game are prohibited: (X) Use of a hunting dog after October 31 for the taking of upland game birds in the Southcentral Region.

Passing this regulation would pose unfair restrictions to upland game hunters that hunt with dogs. They have every right to be in the field along with every one else. I urge you not to pass this proposal.

Regards.

Dennis Ackerman
As a trapper and hunter I strongly oppose proposal #194. All of us that walk our dogs, let our dogs outside of the home without being leashed, and when using them to pursue upland birds, know the dangers posed by traps, snares, etc., during and just after the trapping season. While I recognize some people make errors in judgement regarding where their dogs run, just as some trappers place their sets in poorly chosen locations, please give the rest of us the opportunity to continue using our dogs while the access to birds is outstanding. Thank you.
I would like to comment on:

PROPOSAL 194 -5 AAC 92.080. Unlawful taking of game; exceptions. Prohibit the use of hunting dogs for taking upland game birds after October 31, for the Southcentral Region as follows:

As an avid hunter, my versatile gun dog accompanies me constantly in the woods. I hunt small game throughout legal seasons and do NOT put my dog back in his kennel simply because October 31 has arrived. Thus, I do NOT support this proposal. I submit to you, there are more people with hunting dogs than trappers in this state.

Instead, consider changing trapping regulations to make traps safe for dogs. Traps could be placed in boxes, in trees, or another method which would still allow the sport without endangering other activities.
I support a hunt or other deterrent to the all too frequent moose encounters in Kincaid Park which raise public safety concerns. Any honest, frequent user of Kincaid has had a risky or at least an annoying encounter with moose, and probably more than once. The moose are habituated to humans. Various injuries have occurred and a death or serious injury is an ever present concern. A hunt is probably the most cost effective and efficient way to help solve the dual problem of thinning the herd and putting a fear of humans into the moose, as "wild" moose have. Please consider the proposal to open an October hunt in Kincaid Park.
I am writing for my family. We are opposed to Proposal 150 in the Southcentral Region. Hunting Moose within a major urban park is bad for the safety of the community which use it and bad for the city which promotes it as "a place to observe wildlife". The States own Fish and Game website promotes Kincaid Park as a place to view wildlife within its natural setting. I respect, all users of this park and applaud their motivation and desire to engage the outdoor active lifestyle, however I don't believe a Moose Hunt should be provided to help "cleanse" the area of a species which has been here much longer than us. Better signage, better communication to the public could help improve animal sightings in the park, but to establish hunts for moose, bear, eagles or any other animal in a Park being billed as a "natural environment" is a poor decision and not supported by the majority of it's users.
Moose hunt should only be allowed by professionals for the use of charity and not private individuals in Kincaid Park. This proposal was made by a person who would get a chance to get a public resource for private gain. If there is a cholines of the moose in Kincaid Park it should go to charity and any hunter would donate their services.
I support a moose hunt in Kincaid Park. I am a regular trail user and nearly everyone I know has had an aggressive encounter with a moose on those trails.
Comment in opposition to item 150 the Kincaid Park Moose hunt.

I am a moose hunter and very frequent (more than 3 times a week) user of the trails at Kincaid Park. I believe the proposed hunt is highly flawed and would create an extremely unsafe situation in the densely wooded trails of the park. The discharge of firearms in the most highly trafficked trails in Anchorage and the high likelihood of a wounded animal loose on the trails make this a BAD idea.
ATTN: Board of Fish and Game  
Alaska Department of Fish and Game  
Boards Support Section  
PO BOX 115526  
Juneau, AK 99811-5526 

December 30, 2014  

Dear Board Members:

I am writing in opposition of Proposal 150, the antlerless moose drawing permit hunt for physically disabled residents. I simply do not feel a hunt is warranted. Considering the number of Kincaid Park users, the incident ratio is extremely low. I believe it is our personal responsibility to learn how to recreate and live with the wildlife. I am an avid runner, hiker, cyclist and skier and use precaution all year round to ensure I do not startle the wildlife. As a pet owner, I also realize it is my responsibility to ensure my animals do not harass the wildlife and create a dangerous situation. I have come upon plenty of moose and bear and have remained unscathed.

With regard to the organized events and races, perhaps the organizers can take the time to walk the trail and create noises to scare the animals away prior to the race start. They could even have volunteers stationed at various locations with bull horns or some type of noisemaker to keep wildlife off the trails. I'm sure with a little creative brainstorming they could come up with viable solutions to the problem.

I would prefer my fellow Alaskans take responsibility upon themselves to learn how to stay safe instead of sacrificing the moose.

I sincerely appreciate your consideration of my opposition.

Respectfully,

Denise Abel  
1642 South River Dr.  
Eagle River, AK 99577  
907-726-7610
I am writing this letter in response to the recent suggestion of a moose hunt in Kincaid Park, Anchorage. As an Anchorage resident who hikes, skis and bikes in the park, I am very concerned about this idea. I am often in the park 5-7 days per week, accessing trails in all sections of the park. I bike up the multi use path and down the coastal trail, as well as, on the single track trails built in recent years. I hike in the park until the trails are ready for skiing, and I hike up on the bluff throughout the year. I have hiked with my dogs, as well as, friend’s dogs throughout the park.

Moose are one of the reasons people love to go to Kincaid. In all the years I have been using the park (15 yrs), I have never had a threatening experience with a moose! I have seen plenty of Moms and their young, watched bulls pursue cows, and even watched bulls sparring during rutting season.

Since the single track trails have been put in, I feel the moose have ventured out of sections of the park where they used to feed and take solace from people, dogs, bikes, etc. I don’t feel the moose are out of control and becoming too numerous. While out in the park, I keep an eye out for moose and bear and detour around if need be. One September, we had to detour off the bluff 5 times in a 2 hr hike! We expect a detour and are prepared for it- especially on the bluff in the fall! Unfortunately, I see too many people who don’t pay attention to what is going around them, have dogs that bark and lunge toward moose or bikers that go so fast they wouldn’t be able to react if a moose was in their path. High School races or other events in the park need to have a backup plan for rerouting when moose are lying by the trail or too close for groups to pass.

To have a hunt in the park without completely closing it down would clearly be unsafe. We have come upon a number of hikers who were lost on the trails, who had no idea how to get back to their cars. How would they know if they were in a danger area? Even if signs were posted, what if people had to detour off
through brush to avoid wildlife? I don’t see how you could guarantee that people
would not be in danger of getting hit, when they come in from the beach, Jodphur
parking area, the coastal trail, Little Campbell Lake, Raspberry parking lot, up by
the chalet and even from the neighboring homes along the roadway into the park.

Those of us that have spent years in this park love the wildlife- that’s what
sets it apart from parks in other cities! It’s a jewel in the heart of Anchorage!
Please don’t ruin what we have, by allowing this moose hunt!

Sincerely,

Theresa Bostwick
My comment is in regards to PROPOSAL 194 that would Prohibit the use of hunting dogs for taking upland game birds after October 31, for the Southcentral Region. I am strongly opposed to this proposal. This proposal would take away significant opportunity to upland bird hunt with dogs in Alaska. This would shorten the season that I could hunt with my dogs down to 82 days (Aug 10 - Sep 30) while trappers would have a 151 day season (Nov 1 - March 30 more that 2 months longer). Additionally some years Aug 10 is too early to start bird hunting because the chicks are still very small further reducing the number of days to hunt. There are many places that a person can hunt with dogs and there is no danger of the dog being caught in a trap in the South central area. Some of the best hunting for ptarmigan in this region does not happen until the ptarmigan are pushed into lower accessable areas by snows that do not come until after the beginning of November. Some land owners do not allow trapping but do allow upland bird hunting these areas would be closed to the use of dogs. Some trappers let trap lines rest for a year or 2 when fur is low. And there are significant areas that are not trapped by anyone. This proposal would close those areas to the use of dogs for upland bird hunting. I spend a significant amount of time training my dogs for upland bird hunting and I use them to ski-jour into areas to hunt ptarmigan. This proposal would significantly reduce my opportunity to do this. I should have at least equal opportuniy to pursue my passion of upland bird hunting as trappers do to pursue theirs. While this proposal could be a solution to reducing the number of hunting dogs caught in traps, I do not believe that it is the RIGHT solution.
I am commenting on proposed hunt 150 in Kincaid Park. I do not support this hunt. It is a hunt for a special interest group that is unnecessary and will cause more harm than good. Alaska is a big place - do we really need to hunt moose in a city park? The proposed reasons for the hunt are ridiculous. It appears that ADF&G has not qualified an increase in the moose population in this small area. In fact, there is anecdotal evidence to support the fact that the moose population has declined substantially since the 1990s. I hiked in Kincaid Park frequently during those years. Although I saw moose, I was always able to feel comfortable by adjusting my behaviour and allowing them to just do their thing. I believe that the problem lies with more humans, less space and lack of consideration by people using the park trails. Let's just use education, restrict fast-moving activities and give the remaining moose their freedom to use the park along with reasonably aware humans. I see no valid reason for a moose hunt! Put your efforts elsewhere for real hunters wanting a true fair chase hunt.
In reference to Proposal 202: Define calves in a manner that is workable for field identification and enforcement purposes; enforce the restriction on taking calves; in Unit 22, reduce the seasons for bull and cow caribou for resident hunters in a manner that will reduce annual take of Western Arctic and Teshekpuk herd animals (i.e. drastically change the current year-around open season); eliminate the non-resident season in Unit 22; establish a means to determine infractions of the rule in both local villages and with statewide hunters and transporters.
I am fully in support of BOG proposal 180 that is asking for set backs from the main roads and trails in Cooper Landing. Having lost one dog to unknown reasons, I feel that having a safety barrier around areas that are used frequently by dog owners and other multi-use users is not unreasonable. I don't object to trapping but feel that there should be reasonable boundaries that are enforceable in our community.

I do not support BOG proposal 194. There are many residents of Cooper Landing who raise and use hunting dogs. Many of them are concerned for their animals because of the lack of regulations and enforcement in and around our community.
I would like to comment about the Board of Game's Proposal 150 to establish a moose hunt in Kincaid Park. I visit Kincaid Park frequently during all seasons to run, ski, walk and look for birds. One of the great pleasures I enjoy about the park is that I often have the opportunity to see moose. This place is a gem in our big city. I am dismayed to think that the opportunity to see moose will be greatly diminished if this proposal passes. I realize that there have been occasions when people have been hurt by moose, but I suspect this is a very small percentage of the interactions that occur between moose and people. It is these very few incidents that get lots of press, while the countless times that people pass by moose with no problems are ignored. Why should all the moose be shot, only because of a few bad incidents? I am firmly against this idea. Our Big Wild Life Anchorage will become less so with this proposal!
Re: Proposal 150, the Kincaid moose hunt.

As a 64 year Alaskan resident I support the proposed hunt. Kincaid park is attracting ever more users, resulting in increasing conflicts with both moose and the bear population that regards the area as a buffet. The increasing threat has multiple branching consequences - injuries to park users are up and as problematic, park users are increasingly resorting to carrying firearms as well as using them. Culling moose in the park will reduce both the moose - human conflicts as well as the bear utilization given the reduced food opportunities. As a further benefit, reduction of transiting bears via the Campbell Creek and Chester Creek green belts will also be achieved.

Thank you for the consideration.

Jeff Schmitz
Proposal #150 - I am opposed to any moose hunt in Kincaid Park by able or disabled persons. A recent survey this past November by ADF&G and volunteer personnel indicates minimal numbers of moose in the park. To allow hunters with shotguns to roam the trails on ATVs or other such transport is ludicrous. Too many people recreate in the park to allow this type of activity. It is unsafe to tout the public in harms way in this manner. I have recreated in Kincaid for the last 15 years. I have come across moose while biking, walking and skiing. None of these encounters have resulted in an attack. One needs to be aware of their surroundings, take responsibility for their actions and avoid negative animal interaction by taking appropriate measures. I have seen people biking/skiing/walking wearing ear buds listening to music totally unaware of their surroundings. I have seen people trying to push moose off the trail to continue their ride/ski/walk instead of turning around or heading off trail to go around. Some people are not even aware of the physical indicators of an angry moose and disregard flattened ears. One of the advantages of living in Anchorage is the ability to view moose in their environment. I would be disappointed if the Board of Game were to allow this proposal to be approved.
Dear Board of Game,

I am writing in regards to the proposed moose hunt at Kinkaid Park. I support the hunt and this is why. For 30 years I have used Kinkaid Park to ski, bike, run, and hike, so I am familiar with the park and interacting with moose.

Humans must co-exist with moose but the situation at Kinkaid is beyond normal. Kinkaid is akin to a moose nursery because the population grows unchecked without any significant predators. Every cow has twins or triplets and thus every year the population continues to double or triple in a contained area.

To allay fears from the public that someone might get injured during a hunt, the solution is simple: close the park. Educate all hunters prior to the hunt. Another idea is to make Kinkaid moose meat an industry. I am not a moose hunter but enjoy moose meat. It could be a viable resource.

Thank you for your consideration of my letter.

Sincerely,

MaryBeth Printz
Proposed moose hunt in Kincaid Park: Ridiculous and unnecessary! Increased use of the park by humans means more moose encounters, but moose have as much right to be there as we do. I bike the Coastal Trail a lot in summer and have never had a problem with moose, other than having to wait a while for one or more to decide to move off the trail. It comes with the territory. Wildlife was one of the draws when I decided to move to Anchorage in 1981. There would be much more danger to humans if hunters were out there, shooting; and what if a moose is only wounded? No, it’s just a bad idea. Life comes with risks, and if you don’t want the possibility of a moose encounter, don’t go to Kincaid Park; stay safely in your home.
Regarding Proposal 194-5AAC 92.080

Having successfully and legally hunted upland birds and waterfowl with dogs in Southcentral actively for 20 years, I find it without basis to suggest that the taking of upland birds with the use of dogs after the 31 of October should be stopped. Furthermore such ban would deny many legitimate hunters from accessing game birds on public lands that are managed by the State. This proposal appears to be a thinly veiled attempt at denying a user group from accessing populations to benefit another.

Legitimate traplines that are ethically run pose little threat to bird dogs and if announced/marked would further reduce the risk of a dog being inadvertently trapped, as dog handler/hunters make the decision as to where to hunt with their dogs.
Proposal 150 Kincaid Park

I am all for the hunt in Kincaid Park as a born and raised Alaskan. I have 3 young children (6yr, 4yr, and a 2yr), we use the hiking trails and bike trails in this area and we have had multiple run ins with the moose in this area. There is plenty of wildlife in Anchorage but this area is an outdoor recreation area where I think the moose are a nuisance. I am raising my kids to enjoy the outdoors and this last summer I had my son riding his bike ahead of me while I walked with my younger 2 kids and I spotted a cow and calf off the side of the trail where my son was riding. The moose spooked him and he tipped his bike over and was stuck under it. If he were to get in between them the cow would have run him over. Luck being on my side they ran deeper into the woods. I am glad to hear of thinning out the moose in this area and I think the concept is a great idea as well it gives disabled Alaskans a way to provide meat for their families as I and many Alaskans are able to do. I think this topic is a win-win for people that use the park.
Re: Moose hunt in Kincaid Park, Anchorage

I am 63 years old and a 35-year resident of Anchorage. I spent a lot of time outdoors all my life hunting, fishing, camping, and hiking. I use Kincaid Park year-round since I began residency here in Anchorage. It is a wonderful gem for city residents to have easy access to. This is a haven for all kinds of wildlife, the most obvious one moose, as well as people. In all these years I have had my share of moose encounters, all which have fortunately been benign. I attribute most of my benign encounters to common sense and others just to good luck if there is such a thing. I have never talked to any person who has had a bad encounter with moose there either, as they also live by respect of this huge member of the deer family. The only bad encounters are ones that I read about that dealt with school related events taking place there. In these cases I think the problems could have been avoided such as having an organizing staff prospect the route for “problem” moose for potential reroutes or even delaying or postponing events. I am sure others have occurred that I am unaware of. These may have included users with off-leash dogs or simply not using sensible precautions such as keeping your distance, never getting between cow and calves, staying aware, or avoiding of the park during the rut, etc.

Since I started using the park 35 years ago many things have changed. People have moved from mostly slow, quiet sports such as classic cross-country skiing and walking to faster and more mechanized means such as skate-skiing, jogging, and mountain biking. These faster moving sports reduce the ability of users to look ahead for obstacles such as moose, etc. I don’t think the moose population of Kincaid has changed one way or the other over those years but the number of user hours has dramatically increased. Along with this increase in user time, one expects more people-moose encounters to occur. But one thing remains unchanged - observing common Moose Sense.

Based on the aforementioned, I think that a moose hunt is unwarranted for Kincaid Park. In the event a moose hunt is conducted, my opinion is that there should be a limited number of animals taken (less than 10 for example) and that the usual, and extended, safety precautions be taken. Each hunter should be accompanied by an Alaska Fish & Game staff, authorized and trained for the hunt, and dressed in bright clothing. Any hunters or their state “guides” that are simultaneously hunting while others are also hunting will have GPS devices transmitting their locations to a hunt coordinator for map display to avoid safe distance conflicts by radioing to the state staff. Due to the state budget situation, all hunters will reimburse the Department of Fish & Game for all staff time involved in the hunt or pay a special hunt fee to compensate for staff time.

Despite the contingencies cited immediately above, I still believe that a moose hunt in Kincaid is unwarranted and in lieu, more moose-wise education is needed for users that include the public and area schools.

Thank you for your time.
I oppose the Kincaid moose hunt proposal No. 150.

There is not an over population of moose in Kincaid Park and the safety of the public is not compromised. The argument of increased moose contact is mainly due to the new single track bike trails that are cutting through habitat that was once moose refuge away from main trails. Though caution needs to be taken, all should be able to use the trails without incident.

Several publicized moose-human conflicts were due to improper human behavior. I have seen several people exhibiting poor judgement and reckless behavior when encountering moose in Kincaid Park. For example, I watched as several mountain bikers passed a bull moose at close range with his eyes fixed on them and head lowered during the rutting season. I do believe if there is an animal exhibiting aggressive behavior unprompted by foolish human actions, fish and game should be called and officers will deal with the situation safely.

The Kincaid moose are a part of our Alaskan city culture. This is not Central Park in Manhattan. We have situations that are unique to Alaska and this is why we enjoy living and playing here. The moose do not deserve to be annihilated due to the over reactions of self-serving individuals.
Re: BOG proposal #194

Dear Sirs,

I am opposed to proposal #194, I am not anti-trapping. I have a trapping license. This proposal singles out a specific hunting/outdoor activity and prohibits it. If the goal is "dog safety", banning trapping in these same areas would be more effective.

I spend thousands of dollars and hundred of hours training my bird dogs. I would never intentionally endanger them by hunting on or near a trap line. A more reasonable suggestion may be to require trappers to post notices (as bear baiters are required to do), on trails near their trap lines.

Thank you,

Dan Brandvold
No Hunting In Kincaid. Never.
I want to add my voice to the large group of Anchorage residents who strongly oppose a moose hunt in Kincaid Park. The Park is not overrun with moose and seeing them is always a pleasure. In the great majority of cases which have been publicized regarding "dangerous" moose, the encounter could easily have been avoided by following Park rules (e.g. keep your dog on a leash) or by using common sense (post observers to use reasonable means to keep moose off trails during competitions). I have used the trails in the Park for over 35 years and I have never had a bad encounter with a moose. I also agree with the points made in the Commentary published by Bill Sherwonit in the Anchorage Daily Dispatch on January 8, 2015. Additionally, I note that I use the Park trails at least several times a week all year long and I always see other trail users when I am there. There is no way that a moose hunt could be safely conducted at the Park during any time of the year. Finally, I see many more moose in the Turnagain area where I live than I see at Kincaid. If the idea of a hunt is to remove "dangerous" moose, then the Board should set up a hunt throughout Anchorage and not limit the hunt only to Kincaid. Hopefully that will help you understand how ridiculous it is to schedule a hunt in one of Anchorage's most used parks.
A moose hunt in Kincaid park is wrong on so many levels I do not know where to begin, However, Bill Sherwonit's article in the ADN on 1/8/15 is a good summary of my thoughts on this issue, so I'll leave it at that. And to be very clear on this issue, THERE SHOULD BE NO MOOSE HUNT IN KINCAID PARK!!!!!!!!!!!!!!!!!!
I am contacting the Alaska Board of Game specifically to voice my **OPPOSITION** to Proposal 150-5ACC 85045 which would allow moose hunting in and around Kincaid Park in Anchorage.

This is an extremely poor idea, and the safety if the general public can't be 100% assured, regardless of what 'safeguards' may taken.

Additionally, in general, the vast majority of residents residing in Anchorage appreciate the fact that they can co-exist with wild animals indigenous to our area, and want to. This is one of the primary reasons why many of us choose to reside here.

The Anchorage Parks and Rec Department, and/or those responsible for managing Kincaid Park should review alternative options for park users to co-exist with moose in lieu of destruction of our very valuable, Alaskan wildlife as a result of a small group of individuals who believe that their 'right' to use Kincaid Park trumps the obvious; the logical and necessary protection of our urban wildlife.

Thank you in advance for this forum,

Sincerely, Jonathan Galin, Anchorage, AK.
As I live in Palmer I'm not a regular user of Kincaid park but when I head into Anchorage I'm always sure to grab either my Mtn. bike, ice skates or cross country skis. I have a hard time passing up the opportunity to enjoy the fantastic trail systems that Anchorage has to offer. I'm an avid outdoorsman and I love wildlife viewing however I'd like to lend my support to hunt proposal #150 first and foremost as a safety issue. Even as a limited user I have had several runs in with moose along the trail that were terrifying. I can't imagine what would have happened to me if a tree had been down on the trail or I crashed while being chased by a young bull or on multiple occasions a very angry cow with calves. On one instance I stayed on the trail for at least 1/2 hour to warn people who were approaching to not go down a trail where I had just been chased on my Mtn bike. Eventually I had to leave and I was quite concerned that some kids might come along and get stomped. I recently read some comments on ADN regarding this issue and one responder asked what I believe to be the essential question regarding this issue: is this a park for people or is it a park for wildlife? I don't believe it has to be one or the other, I do believe however that the balance has shifted to the point where people's safety and even lives are in jeopardy if the moose population is not managed and these types of encounters are reduced.
Regarding the proposed hunt in Kincaid to cull the moose, I am strongly against this action for several reasons.

1) Moose are one of the many attractions that this city has to offer. Whenever guests come from out of state, they always ask to see a moose. While I can usually find one around the house near UAA/Prov, Kincaid is an almost guaranteed find.

2) In my 20 years of being an Alaska resident, I have never endured a moose attack. I've passed them on the coastal trail, Chester Creek, Kincaid, Hilltop, etc. Having good situational awareness and the willingness to change direction if necessary is all that's required.

3) Having grown up in a shotgun only hunting area, I've seen just how far a slug can travel. Even though this hunt is designed for the disabled (and there are some pretty able disabled folks), and parts of the park will be closed, there is still an increased risk of an accidental shooting.

Thanks for taking this into consideration, and I sincerely hope that we won't see hunting in the park for a long time to come.
Re: Kincaid Park moose hunt proposal, (No. 150)

We are very much opposed to this proposed hunt. We frequently use Kincaid Park as a beautiful place to walk, ski, and to simply enjoy the natural world and all it has to offer, even if some risks are involved. (And with the number of people using the park vs. the number of negative moose encounters, the risk is extremely minimal). We have frequently seen moose there and have never had a negative experience involving them. For most people, seeing wildlife is a major part of the pleasure of the park experience. People just need to be aware, responsible, respectful, and enjoy sharing the space with Alaska's wildlife. So, please, we urge you to vote against this proposal. Thank you.
Proposals 132 and 192 are not needed actions. The current HIP data collection process has been determined by the USFWS and the ADFG to be sufficient for documenting hunter harvest of waterfowl in the US.

Proposal 194. My family dog is a hunting dog. So if I am walking my family dog on 11/1 and she gets stuck in a trap will I be breaking the law? Only if I have a firearm legal for upland bird harvest in an area with an open season? What if my neighbor’s husky gets caught in a trap? Is that OK? But what if her husky is half lab? She’s a vegan so she won’t be hunting. This proposed regulation is preposterous.

Proposal 181. Requiring traps to be set a far distance from a public use trail or road is a good idea.

Sheep proposals (too numerous to list out).

Statewide non resident allocation determined by drawing is a good idea.

Increase the non resident fee to similar fees from other sheep hunting states. The state should exploit the resource financially.

Increase the resident fee to $100 for sheep harvest ticket. I don't hunt sheep every year, but a free harvest ticket for a limited resource makes little sense.

Establishing a time duration for shooting after flying in sounds like a good idea, but in areas where walk in hunters and flown hunters can compete (TMA drainages on the north and east areas) the advantage is to the walk in hunters, but it all depends on timing or your arrival. If made a full 24 hours after arrival that may help with a perception of the issue. Hard to deal with the local TMA air service providers flying every day overhead checking on their customers. From my own experience that annoys sheep.
Dear Board of Game,

I would like to inform you of my opposition to an upcoming proposal where the use of bird dogs would be prohibited or limited for upland game hunting. I can’t understand why such a proposal would be necessary. It would unfairly and unnecessarily limit a large user group. Hunting upland game with dogs is not only enjoyable but safe and ethical too. I understand there might be certain risks, but I am capable of determining what is safe for the dogs I hunt with, minors I am hunting with, and myself. This proposal is plainly an unnecessary government intervention which would favor one user group over another. Hunting with dogs is a rewarding and fun outdoor experience which my family and friends enjoy. Please don’t allow this proposal to become regulation. Thank you!

Eric Lee
Hello:

Regarding proposed Kincaid moose hunt (No. 150) (unit 14C), as a local frequent Kincaid trail user, I think this is not a good idea, for safety reasons. Kincaid park has many casual entry points as well as official ones, & numerous park users in October.

Thanks for listening & all your hard work
Dear Members of the Board of Game

I'm writing today to oppose Proposal 194. I'm an Alaskan hunter, outdoor enthusiast, owner of a well trained versatile hunting dog and a conservation minded supporter of responsible game management. Although I see the substance of this proposal to be important, I believe the proposal itself is off the mark. The South Central Region vast area and if passed this proposal would negatively affect the outdoor recreation of a vast number upland game hunters and families. It is my opinion, restrictions and shorting the season for upland game hunting with dogs is as ridiculous as limiting trapping during the small game season.

As Alaskan's we share the great outdoors with multiple types of outdoor enthusiast during the hunting season. The answer to recreating together is through education, being aware of your surrounding and being prepared. Upland game hunters with dogs have the responsibility to be aware of trapping practices, as well as trappers share a responsibly to be aware of upland game and dog handling procedures. Educating dog owners on trapping practices, identifying trap line markings, and proper releasing methods trapped dogs is critical. This can be accomplished if various ways, such as hunting dog clubs, fish and game or through local media. It is also critical that trappers ensure they mark trap lines properly and do not place traps in areas close to populated areas which are used heavily by dog owners of all types. Ethical practices for both groups is paramount.

In closing, limiting recreation to certain individuals or groups because of fear, prejudice, or limited incidents is neither fair nor reasonable. Learning how to utilize and share the land we love is more reasonable and key to the overall freedom we live by under the constitution. Communication and education of trappers and dog owners is clearly the way forward to utilize and share the lands we love and cherish.

Sincerely

Scott J. Breitsprecher
As both a trapper and a dog owner that takes advantage of public lands in the seward area I am writing in opposition to proposal 181 - 5 AAC 92.095 submitted by Mark lutrell in reference to trapping regulations in unit 7 more specifically, the Seward area. I am in opposition of this because I believe that fur is a renewable resource that we, as Alaska residents, have a right to benefit from just as we do fish, game and firewood. Trapping done legally and ethically should bring no harm to people or pets. That said, it is written by the forest service that pets should be leashed and/or kept under control for the safety of EVERYONE, including the dogs. While this is not a true leash /law I think that people using public trail systems with or without dogs during the trapping season should be aware of what is going on and should make decisions accordingly as to how they are going to behave and allow their animals to behave.

Trappers following the law and trapping ethically have as much right to use these public lands as hikers and skiers.

The second main reason that I oppose these propositions is that forcing people to trap 250 feet from trails and roads will make the activity of trapping nearly impossible for MANY people who truly enjoy it, namely, the elderly and children. Especially in the Seward area of GMU 7 snow loads can be extremely heavy and this will make it much too difficult for older and younger trappers alike to get to sets that are 250 from the trails. Also, too from a trapper’s point of view you might realize that the animals use the trails just like we do and sometimes, I find, the trails actually concentrate the populations because like us, the animals are looking for the path of least resistance... i.e. the trail!

Now, because I do not want to just put down these ideas without offering any of my own and because I am equally upset by the unethical actions of some trappers that put a black mark on our group as a whole, I would like to propose this: put restrictions on the use of large conibears and visible bait sets. I think conibears 220 and larger should be set at least 250 ft from a road or trail, the only exception being in the flow of water, that is under the high water mark or below banks. Also, sets with visible bait that might lure in pets should, in my eyes, have the same restriction, at least 250 feet from a trail or road for the safety of people and pets. I think this would eliminate many of the conflicts that people are having.

Thank you,

Andrew Scrivo
Proposal 131: I oppose the reduction in bag limit for goldeneyes (Common and Barrows) because the west coast of Alaska does not seem to have any big population problem. The numbers are down a bit but duck numbers change from year to year. If the Department really sees a drastic drop in the big picture and feels it is a good move for the birds, not the author, then I will back the departments recommendations for a reduced bag limit.

Proposal 132. I oppose this proposal as I opposed it last year when it was voted down. This is an attempt at public oversight of the department and oversight of hunters, that is not necessary.

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

Chairman Ted Spraker:

My wife, Ann “Lulie” Williams and I are avid upland bird hunters. We are active members of the Arctic Bird Dog Association, the North American Versatile Hunting Dog Association, and past members of the Ruffed Grouse Society, numerous dog mushing clubs in Alaska, and past presidents of the Anchorage Skijor Club. We are commenting on board proposals #95 and #194, which are to be addressed at Board of Game meetings this winter. Please take our comments into consideration when deliberating on these two proposals.

PROPOSAL 95 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Reduce the bag limit for ptarmigan, shorten the season, and add a no-hunt corridor along the roads in Unit 13B as follows:

Unit 13B five ptarmigan per day, 10 in possession [10 per day, 20 in possession] August 20-March 31; except that from January 1-March 31 there will be a five mile (2.5 miles either side of the road) no-hunting corridor along both the Denali and Richardson Highways.

The reason for this proposal from the Paxson AC is to address inadequately protected ptarmigan populations in subunit 13B, especially along the roadside. Reportedly ptarmigan densities off the Denali and Richardson highways are healthy, while those along the road are not. The current August 10 opening date does not protect juvenile birds. The early closure (November 30) does not allow for late season hunting, which is more likely to target populations farther from the road system. The present bag limit (ten per day, 20 in possession) is too liberal if we couple it with extended season dates.

While we agree the ptarmigan populations along roadsides have been stressed and that changes are needed, we disagree with the entirety of the proposed solution. Ptarmigan hunting has improved in 13B since the winter closure after November 30. We can support a reduced
bag limit at 5 ptarmigan per day and 10 in possession and a later opening date of August 20 to protect young of the year, but we think the winter closure after November 30 in this area is still warranted. We hike with our pointing dogs, mostly in September, and we do not clean out the birds we encounter.

In short, we Support proposal #95 with modification. Reduce the bag limit to 5 ptarmigan per day and 10 in possession and change the opening date to August 20 as proposed, but retain the closure after November 30 in Unit 13B.

Proposal 194 – 5 AAC 92.080. Unlawful taking of game; exceptions. Prohibit the use of hunting dogs for taking upland game birds after October 31, for South-central Region as follows:

Add a new line to 5 AAC 92.080

The following methods of taking game are prohibited:

(X) Use of a hunting dog after October 31 for the taking of upland game birds in the South-central Region.

The reason for this proposal is to prevent hunting dogs being caught in lawful traps, (during trapping season) while they are being used for hunting upland game birds.

While we appreciate the intent of the proposer Al Barrette to eliminate hunting dogs from being caught in lawful traps, we whole-heartedly disagree with the proposed solution. This proposal, if passed, would discriminate against lawful upland bird hunters, but other dogs could be caught in traps, such as those running free with skiers, snowshoers, hikers, skijorers, mushers, and others. We think other solutions would be better. Many outdoor groups invite the Alaska Trappers Association to present programs on how to recognize trapping areas and how to release dogs from traps, including conibear traps. Furthermore, we think trappers should mark the beginning and end of trap lines or individual trap sets (not unlike required signs for black bear bait stations) to give other legal travelers in the area fair warning of what is ahead. We understand many trappers are reticent to do so because traps have been vandalized, but disturbing a legal trap is strictly illegal. We think official trap line markers, similar to the bear bait station signs, would be adequate, especially if lawful information is provided and heavy fines are posted for vandalism. Most people would chose to avoid a series of traps with free ranging hunting or running dogs if they know the sets are present. We have personally turned around several times with our hunting dogs where we have seen black bear bait station warning signs along trails. We would do the same for trap sets. We are not interested in disturbing a set, nor are we interested in putting our dogs at risk. We think
trappers should avoid setting traps immediately adjacent to popular public trails and roads. A reasonable distance should be established, especially in South-central Alaska where thousands of people and their dogs ply the backcountry year around. We are not against trapping, and we both gladly wear winter furs while mushing dogs or snowmobiling in winter.

We **Oppose Proposal 195** in its entirety. We think better solutions are available, such as education and trap line markers.

Sincerely

William "Bud" Rice

William "Bud" Rice

Ann "Lulie" Williams

Ann "Lulie" Williams
Dear Chairman Spraker:

Two additional proposals to come before the Board of Game (BOG) at the Southcentral Region March 13-17, 2015 meeting in Anchorage may affect or have the potential to affect wildlife harvest on three National Park System Preserve areas in Alaska (Bering Land Bridge, Noatak, and Gates of the Arctic).

Proposal 202 would change the caribou regulations for all game management units (GMU) associated with the Western Arctic caribou herd (WACH) and the Teshepuk caribou herd (TCH). The National Park Service (NPS) recognizes the conservation concerns raised by the significant decline in these herds and is supportive of the need to adjust harvest seasons and limits consistent with the rural priority outlined in ANILCA §804 and the Cooperative Management Plan. The NPS intends to provide detailed written comments before the end of the public comment on February 27, 2015 to allow additional time for discussions with area residents on other viable regulatory options.

Proposal 203 would close all Dall’s sheep hunting seasons in Unit 23 and Unit 26A west of the Etivluk River drainage. The NPS currently supports this proposal because of the conservation concerns associated with the significant population decline.

The NPS also supports the development of companion federal subsistence program proposals intended to address these conservation concerns as appropriate.

Sincerely,

Debora Cooper
Associate Regional Director, Resources
cc:
Sam Cotten, Acting Commissioner, ADF&G
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Bruce Dale, Acting Chief, Division of Wildlife, ADF&G
Pat Pourchot, Special Assistant to the Secretary for Alaska
Herbert Frost, Regional Director for NPS
Geoff Haskett, Regional Director, FWS
Chuck Ardizzone, Deputy Assistant Regional Director, FWS-Office of Subsistence Management
Frank Hays, Superintendent, Western Arctic National Parklands
Greg Dudgeon, Superintendent, Gates of the Arctic and Yukon-Charley
Jeanette Koelsch, Superintendent, Bering Land Bridge National Preserve
Mary McBurney, Subsistence Team Manager, NPS-Alaska Regional Office
Guy Adema, Natural Resources Team Manager, NPS-Alaska Regional Office
Bud Rice, Management Biologist, NPS-Alaska Regional Office
Andee Sears, Regional Law Enforcement Specialist, NPS-Alaska Regional Office
IN REPLY REFER TO
7.A.2 (AKRO-RNR)

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

Dear Chairman Spraker:

The National Park Service (NPS) made brief comments in a letter dated January 12, 2015 on proposals 202 and 203 submitted by the Alaska Department of Fish and Game (ADF&G) to come before the Board of Game (BOG) at the Southcentral Region meeting in Anchorage, March 13-17, 2015. These proposals may affect or have the potential to affect wildlife harvest on three National Park System Preserve areas in Alaska (Bering Land Bridge, Noatak, and Gates of the Arctic).

The NPS supports ADF&G proposal 202 with modifications as recommended in the February 4, 2015 letter from the Western Arctic Caribou Herd Working Group to the BOG. This proposal recommends changes to caribou hunting regulations for all game management units (GMU) associated with the Western Arctic caribou herd (WAH) and the Teshekpuk caribou herd (TCH). The NPS understands the conservation concerns raised by the significant decline in these herds, but we also recognize that natural cycles and processes have resulted in fluctuations in these caribou populations over the last several decades. The NPS is supportive of the need to adjust harvest seasons and limits where consistent with the Western Arctic Caribou Herd Cooperative Management Plan and the rural priority outlined in ANILCA §804. In short, these modifications would:

- Eliminate the harvest of calves by all hunters;
- Limit nonresident harvest to one bull, and eliminate nonresident harvest of cows or calves;
- Extend the resident cow harvest closure period in units 23 and 26A from May 16 – June 30 to April 1 – July 31.
- In Unit 22 retain the nonresident season for caribou harvest. The proposed season of August 1 – September 30 is impracticable because caribou are typically not in the area at that time and hunters may mistakenly take reindeer, which are present in the area;
- In Unit 23 change the nonresident hunting season to September 15 – October 10 to give the first caribou in the fall migration opportunities to cross major rivers in Unit 23 (e.g. Noatak River and Kobuk River) to set the migratory route, and to match the NPS start
date of September 15 for Commercial Use Authorizations for transporter a services.

The NPS supports the Working Group recommendations for five reasons:

1. NPS is a signatory to the Cooperative Management Plan;
2. The recommendations are consistent with actions identified in the plan for the estimated herd population;
3. The recommendations seem to reflect the majority public comments at various public meetings such as the Advisory Committee (AC) and federal subsistence Regional Advisory Council (RAC) meetings; and
4. The comments capture some of the regional variation, which needs to be accommodated.
5. These recommendations are consistent with NPS laws and policies, and are consistent with the 1982 NPS/ADF&G Master Memorandum of Understanding.

The NPS may offer additional comments at the BOG meeting pending additional recommendations from affected RACs and NPS Subsistence Resource Commissions yet to meet during this proposal cycle. The NPS looks forward to engaging in discussions about the WAH and TCH as the status of the herds change.

The NPS continues to support the Alaska Department of Fish and Game (ADFG) proposal 203 to close all Dall’s sheep hunting seasons in Unit 23 and Unit 26A west of the Etivluk River drainage. The NPS supports this proposal because of the conservation concerns associated with the significant population decline of Dall’s sheep in those areas.

The NPS continues to support the development of companion Federal subsistence program proposals intended to address these conservation concerns, as appropriate.

Sincerely,

[Signature]

Debora Cooper
Associate Regional Director, Resources
cc:
Sam Cotten, Commissioner, ADF&G
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Bruce Dale, Chief, Division of Wildlife, ADF&G
Pat Pourchot, Special Assistant to the Secretary for Alaska
Herbert Frost, Regional Director for NPS
Geoff Haskett, Regional Director, FWS
Chuck Ardizzone, Deputy Assistant Regional Director, FWS-Office of Subsistence Management
Frank Hays, Superintendent, Western Arctic National Parklands
Greg Dudgeon, Superintendent, Gates of the Arctic and Yukon-Charley
Jeanette Koelsch, Superintendent, Bering Land Bridge National Preserve
Mary McBurney, Subsistence Team Manager, NPS-Alaska Regional Office
Guy Adema, Natural Resources Team Manager, NPS-Alaska Regional Office
Bud Rice, Management Biologist, NPS-Alaska Regional Office
Andee Sears, Regional Law Enforcement Specialist, NPS-Alaska Regional Office
Alaska Department of Fish & Game  
Board of Game  
Board Support Section  
PO Box 115526  
Juneau, AK  99811-5526

December 30, 2014

Gentlemen:

I just read in the Anchorage Dispatch News (December 30, 2014) that you are considering a moose hunt in Kincaid Park.

I cannot believe such an option is even on the table. The article suggests that maybe 20 to 30 moose inhabit the park. How can you possibly even consider killing animals in a PARK? Furthermore, why would people even have guns in a park? Is it a park, or is it a war-zone? I thought parks were for people to enjoy the serenity of being away from business activities. A place to wind down and/or participate in physical activities—all trying to restore one’s soul. How can you relax, with shots being fired nearby? Am I being fired at? I like to walk on different trails—how do I know if there is a gunman poised around the next corner? Does he know it’s a person approaching, or is it a moose?

This is Anchorage. We are in Alaska. We do have wild animals. Please face reality.

During the summer months, I spoke to a couple on a fishing charter out of Homer. The couple complained that they had recently visited Germany, but the people didn’t speak English! Do you see any correlation? Get rid of the animals in the park so it’s safe for ME.

Oh, I guess we could just put bitumen over the entire Kincaid Park, so that might discourage animals. Just get rid of nature.

And, surprisingly enough, I don’t have any pets and I’m not a big animal lover—but I think fair is fair. I’d never do harm to an animal, and I definitely wouldn’t go around shooting them. There is something basically wrong with this picture.

I’m vehemently opposed to any sort of hunting on parklands.

Sincerely,

Denise A. Elder
Mr. Ted Spraker, Chairman  
Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 115526  
Juneau, Alaska 99811-5526

Attention: Board of Game Comments

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet March 13-17, 2015 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Southcentral Region. We have reviewed the 62 proposals the Board will be considering at this meeting.

The U.S. Fish and Wildlife Service, Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our comments are enclosed.

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

Sincerely,

Eugene R. Peltola Jr.,  
Assistant Regional Director  
Office of Subsistence Management

Enclosure
Chairman Spraker

cc: Tim Towarak, Chair, Federal Subsistence Board
Chuck Ardizzone, Deputy Assistant Regional Director, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Chris McKee, Wildlife Division Chief, Office of Subsistence Management
Kristy Tibbles, Executive Director, Boards Fish and Game, Board of Game, Alaska Department of Fish and Game
Bruce Dale, Acting Wildlife Division Director, Alaska Department of Fish and Game
Jennifer Yuhas, Federal Subsistence Liaison Team Leader, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record
RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Southcentral Alaska Region

March 13-17, 2015

Anchorage, Alaska

U.S. Fish and Wildlife Service Office of Subsistence Management (OSM)
PROPOSAL 140 – 5 AAC 85.045.(4) Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 6C.

Current Federal Regulation:

Unit 6C – Moose

Unit 6C—1 antlerless moose by Federal drawing permit only. Permits for the portion of the antlerless moose quota not harvested in the Sept. 1–Oct. 31 hunt may be available for redistribution for a Nov. 1–Dec 31 hunt.

Unit 6C—1 bull by Federal drawing permit only. Sept. 1 – Dec. 31

In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose may not receive a Federal permit. The annual harvest quota will be announced by the U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits. Federal public lands are closed to the harvest of moose except by Federally qualified users with a Federal permit for Unit 6C moose, Nov 1 – Dec. 31.

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January 14 through March 25, 2015.

Impact to Federal subsistence users/wildlife: Reauthorizing the antlerless moose season in Unit 6C will not impact Federally qualified subsistence users, as they can already harvest antlerless moose with a Federal drawing permit. Moose harvest is limited by annual quotas and reauthorizing the antlerless season will not impact the moose season.

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

Rationale for comment: While Federally qualified subsistence users already have an opportunity to harvest antlerless moose in Unit 6C, reauthorizing the State antlerless season will maintain management flexibility within the unit.

PROPOSAL 168 – 5 AAC 85.045.(13) Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in a portion of Unit 15C.
Current Federal Regulation:

Unit 15C – Moose

Unit 15C—1 cow by Federal registration permit only. Sept. 1 – Oct. 31

Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January 14 through March 25, 2015.

Impact to Federal subsistence users/wildlife: Reauthorizing the antlerless moose season in Unit 15C will not impact Federally qualified subsistence users, as they can already harvest antlerless moose with a Federal permit. Moose harvest is limited by annual quotas and reauthorizing the antlerless season will not impact the moose season.

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

Rationale for comment: While Federally qualified subsistence users already have an opportunity to harvest antlerless moose in Unit 15C, reauthorizing the State antlerless season will maintain management flexibility within the unit.

PROPOSAL 202 – 5 AAC 85.025 (a) (16) (17) (18) (19) (20) (21). Hunting seasons and bag limits for caribou and 5 AAC 92.085 (2) (D). Unlawful methods of taking big game; Change the caribou regulation for all game management units (GMU) associated with the Western Arctic Caribou Herd (WACH) and Teshekpuk Caribou Herd (TCH).

Current Federal Regulations:

Unit 21D – Caribou

Unit 21D, remainder – 5 caribou per day; however, cow caribou may not be taken May 16 – June 30

Unit 22 – Caribou

Unit 22B west of Golovin Bay and west of a line along the west bank of the Fish and Nikukluk Rivers and excluding the Libby River drainage – 5 caribou per day. Oct. 1 – Apr. 30.

May 1 – Sept. 30, a season may be opened by announcement by the Anchorage Field Office Manager of the BLM, in consultation with
Units 22A, 22B remainder, that portion of Unit 22D in the Kougaruk, Kuzitirin (excluding the Pilgrim River drainage), American, and Agiapuk River drainage, and Unit 22E, that portion east of and including the Sanaguich River drainage — 5 caribou per day; cow caribou may not be taken May 16-June 30.  

**Unit 23 – Caribou**

Caribou: 15 caribou per day; however, cow caribou may not be taken May 16-June 30.  

**Unit 24 – Caribou**

Unit 24 – that portion south of the south bank of the Kanuti River, upstream from and including that portion of the Kanuti-Kilotina River drainage, bounded by the southeast bank of the Kodosin-Nolitna Creek, then downstream along the east bank of the Kanuti-Kilotina River to its confluence with the Kanuti River – 1 caribou.  

Unit 24, remainder – 5 caribou per day; however, cow caribou may not be taken May 16-June 30.  

**Unit 26 – Caribou**

Unit 26A – 10 caribou per day; however, cow caribou may not be taken May 16-June 30.  

Unit 26B – 10 caribou per day; however, cow caribou may be taken only from Oct.1-Apr.30.  

**Is a similar issue being addressed by the Federal Subsistence Board?** Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January 14 through March 25, 2015.  

**Impact to Federal Subsistence users/wildlife:** There will be some reduction in harvest opportunity (i.e. the restriction on the harvest of calves and some unit specific resident season length reductions) for Federally qualified subsistence users, but these restrictions will be minimal and are appropriate for the conservation of the WACH and TCH. Reductions in harvest and shortening of season dates are a needed first step to promote recovery of the population.
Federal Position/Recommended Action: The OSM recommendation is to support this proposal for conservation purposes and to allow for the continuation of subsistence uses. The relevant Federal Subsistence Regional Advisory Councils (Councils) will be meeting in February and March of this year and will be submitting Federal proposals that are expected to mirror Proposal 202 with some region specific modifications. OSM would like to hear from the Councils prior to recommending more specific management actions.

Rationale: Due to the decline of the WACH and TCH as a result of increasing adult female mortality, poor calf survival, and low recruitment, more conservative management actions are needed now to reduce the caribou harvest in order to lessen the rate of population decline. These actions are consistent with the management levels identified for the WACH based on population size, trend and harvest rate in the revised Western Arctic Caribou Herd Cooperative Management Plan of 2011.

PROPOSAL 203: 5 AAC 85.055 (a) (9) and (10). Hunting seasons and bag limits for Dall sheep. Close all Dall sheep seasons in Unit 23 and Unit 26A west of the Etivluk River drainage (e.g., the Brooks Range west of Howard Pass). Retain hunt areas and hunt types (general season and subsistence hunts by harvest ticket hunts and/or permit) so similar hunt regimes may be restored when the population recovers.

Current Federal Regulations:

Unit 23— Sheep

Units 23 – south of Rabbit Creek, Kiyak Creek and the Noatak River, and west of the Cutler and Redstone Rivers (Baird Mountains).

No Federal open season

Units 23 north of Rabbit Creek, Kiyak Creek and the Noatak River, and west of the Aniuk River (DeLong Mountains)

No Federal open season

Unit 23 remainder (Schwatka Mountains)

No Federal open season

Unit 23 remainder (Schwatka Mountains)

No Federal open season

Unit 26— Sheep

Unit 26A – that portion west of Howard Pass and the Etivluk River (DeLong Mountains)

No Federal open season

* All hunts under Federal regulations have been closed for the 2014/2015 season under Temporary Special Action WSA14-03 as of August 19 2014.
Is a similar issue being addressed by the Federal Subsistence Board? Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January 14 through March 25, 2015.

Impact to Federal Subsistence users/wildlife: Closure of the sheep hunts under State regulations would limit Federally qualified users to hunting under only Federal regulations. However, Federal harvest was closed under Temporary Special Action WSA14-03 for the 2014/2015 season and is expected to remain closed for the foreseeable future through Federal management action. Closure of all State general and registration hunts will help aid in the recovery of sheep populations in the western Brooks Range that have experienced drastic declines in recent years.

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

Rationale: Since 2011, sheep populations have declined 50-80% in the area affected by this proposal. In addition to the decline in the overall population, low numbers of rams, and the apparent very low recruitment rate all suggest that any harvest could be detrimental to the population; could prolong or worsen the current decline; and hamper recovery.
Proposition 194: NO vote

Please consider voting NO to proposal 194.

Discriminates against bird dog hunters and not all dog owners.

We have just as much rights to access and season lengths as trappers.

I hunt frequently and while I have seen traps in the field I have not had any accidentally catches with my dogs.

We all have to rights to access and use lands for our enjoyment.

I belong to numerous dog related hunting clubs in the State of Alaska and Nationally. As a serious dog hunter and owner I feel there should be a better way to keep dogs out of harms way when considering traps. This proposal goes way over board and should not be adopted.

Thank You.
I support proposal 202 (18) (unit 23) as amended:

For Resident Hunters:

1. bag limit between March 15 and May 15 be three bulls and two cows

   (Right now the bag limit just states, "5 caribou/day").

   This will: a. limit the take of pregnant cows and therefore increase cow survival and calf-production

      b. keep the locals from being criminals

Subsistence hunters all across Unit 23 rely heavily on caribou, even in the spring as they're migrating back up north. We don't want to hinder the amount taken total, we just want to adjust the ratio.

I believe our RACs may amend NO COWS taken during this time; however, I believe that puts our Inupiaq People at risk of becoming criminals. They may travel miles for a hunt and only come across cows that day and we should allow them to at least take something home. Or they may accidently shoot a cow, thinking it's a young bull. We don't want them to become illegal that way either.

2. Bag limit between October 15-Jan. 15 be two bulls and three cows

   (right now, it's just 5 caribou/day, could be 5 bulls or 5 cows)

Our RACs up here may want NO BULLS to be taken during this time; however, I disagree with that.

This amendment will: a. decrease the take of stinky bulls, thus increasing the dangerously low bull/cow ratio.

   b. prevent our Inupiaq People from becoming criminals

Again, some folks near the wintering ground may want to shoot some young bulls that may not be rutting. We should keep that opportunity open for them and take away the chance of becoming a criminal for food security reasons.

Non-Resident Hunters

1. Closed Season

This will: a. increase the bull/cow ratio of the herd as non-residents take nearly 600 bulls/year

   b. allow for a more natural fall migration through the Delong and Brooks Ranges

   c. limit user conflicts between Resident and Non-Resident hunters in the upper Noatak River
The bull/cow ratio is so low and the amount of harvestable surplus is near its critical level right now that possibly by next spring's caribou census, we'll have to go into a more aggressive management style where we, by law, have to do predator control during the non-resident season. By closing the non-resident season now, we're just negating what we have to do next year anyway, we're just going to be ahead of the curve to see if we can begin increasing the bull/cow ratio before it drops even further.

Since non-residents take mostly bulls, this should hopefully save us around 550+ bulls to be available to breed shortly after the migration.
Proposal #210 – Oppose

Proposal 210 was inserted very late in the game with very little opportunity for public awareness of the proposal and will inject enormous uncertainty into every consumptive user’s plans and can potentially devastate commercial operators whose businesses depend on a reliable season to fulfill their contractual obligations.

Dear Board of Game Members,

I would like to apologize for the late date I’m submitting my written comments. It wasn’t until the two week deadline had passed that I was made aware that 210 was proposed and subsequently accepted as an agenda change request.

My name is Greg Jennen. I own and operate Alaska Glacier Mountain outfitters, LLC. My company has been operating in unit 6D for over a decade under a Chugach national Forest Priority use permit. From Valdez, we offer vessel based guided hunting trips in Prince William for brown and black bears in the spring and mountain goats in the fall.

Our black bear hunts are conducted after the close of brown bear season May 25 thru the end of black bear season June 10. Beginning in about 2008 we phased out our fall black bear hunts due to a severe lack of fish and subsequent lack of feeding bears on the streams of every bay of northwestern PWS. (This has persisted to this day) Later, the fall season was curtailed 10 days by F&G due to excess percent sow harvest during the fall season. It’s fairly self-evident in our experience that the lack of substantial spawning salmon runs in is a mitigating if not the prime factor involved in the bear population decline.

Beginning in 2007 we have kept a record of the date and location of every single bear sighted on every hunt we do. In 2009 there was an abrupt decline in the average number of bears sighted, not a steady downward trend moving forward beyond 2009. As an example, in 2007 we spotted 26 bears on our June bear hunt; a good representative average. Last year (2014) we spotted 32 bears on this same trip. However our success rate was 100% in 2007 and only 25% in 2014. The reason being that virtually all of the 32 bears we spotted were over 2,000 feet MSL in the alpine eating over-wintered berries due to a profound lack of snow beginning the day the bears woke from hibernation and moving forward until the seasons end. Certainly there is a downward trend in the PWS black bear population, but spring 2014 harvest statistics need to be taken with a grain of salt if not discarded outright due to the conditions.

Proposal 210 would be a huge change in the regs, coming into the public eye at a very late date with very little opportunity for the public to educate themselves on the issue and to make comment. I personally only became aware of it through chance due to the fact that a good friend from Cordova caught wind of it at the regional advisory meeting held in there at the end of January. I know of no one from Valdez or anywhere else in PWS that was made aware of the proposal before now. Any proposal of this magnitude should be afforded a good opportunity to be discussed by the public before it makes it way to the board. In past years large changes in 6D regs were preceded by notice to most interested parties residing throughout the unit. This has not been the case here.

A registration hunt is the least favorable remedy to the decline in the black bear population in PWS for every user with the exception of non-consumptive. For resident hunters planning a vacation it would mean days taken from work would likely be for naught once the season closes weeks early as it surely will. Reservations with transporters would have to be cancelled potentially losing hunters deposits. Baits will need to be removed early or not placed in the first place and gear purchases and boat rentals will have been wasted.

From a commercial use point of view it will be devastating. Most transporters and Registered Guides are booked years in advance. (Personally, we’re book through 2016) This will mean hunters will have flights booked, hotels reserved, licenses purchased and vacation days taken off only to have nowhere to go and nothing to do. For commercial operators this means any hunts booked will have to be refunded at the very last minute, once most of the expenditures for the trip have been paid and the operators can least afford it. Rescheduling the hunt to the following year will only conflict with the next year’s bookings and postpone the likelihood of another disaster piled onto the previous years.

The irony of the situation is that this is all well-trodden ground. Southeast Alaska has very similar circumstances and has experienced very similar problems. It would seem obvious that the well-considered, successful plan used in recent years in Southeast Alaska should be the path taken in PWS. Not a rushed decision slipped in under the radar that will inject an incredible amount of uncertainty into every consumptive user’s plans, be those users resident or non, commercial or recreational.

Regrettfully I’m unable to attend the meeting in person. Currently I’m on the trade show circuit marketing my business. Were I aware of the agenda change request earlier perhaps I could have made arrangements. Or at minimum submitted my written comments before the 2 week deadline. Unfortunately, I’ve learned after many calls to other concerned folks, that I’m not the only one in this regrettable situation. Hopefully the cooler heads will prevail and a good, long-term, reliable fix will be compromised on without the impulse to just do something.
Best Regards,

Greg Jennen
SUBJECT: Board of Game Proposal 202 – 5 AAC 85.025(a) (16)(17)(18)(19)(20)(21) Hunting seasons and bag limits for caribou, and 5 AAC 92.085(2)(D) Unlawful methods of taking big game; exceptions. Change the caribou regulation for all game management units (GMU) associated with the Western Arctic caribou herd (WAH) and Teshekpuk caribou herd (TCH).

To the Alaska Board of Game:

On behalf of the Western Arctic Caribou Herd Working Group, the group's Executive Committee is submitting comments regarding Board of Game Proposal 202, to change the caribou regulation for game management units (GMU) associated with the Western Arctic caribou herd (WAH). The Board of Game will consider this proposal at its March 2015 meeting.

The Working Group’s mission is to “work together to ensure the long term conservation of the Western Arctic Caribou Herd and the ecosystem on which it depends, and to maintain traditional and other uses for the benefit of all people now and in the future.” At our December 2014 meeting, the Working Group talked at length about the importance of conserving the WAH while it is in decline.

The Western Arctic Caribou Herd Cooperative Management Plan (updated 2011) defines the herd’s current population status as “declining conservative management level.” The Working Group supports eliminating calf harvest, reducing the months in which residents can harvest cows, eliminating cow harvest by nonresidents[1], and reducing the harvest of bulls by nonresidents. All of these measures are consistent with the Management Plan’s recommendations for the conservative management level.

The Working Group recommends the following amendments to Proposal 202:

Unit 22

- Do not change the season for nonresident caribou harvest. The proposed change to August 1 – September 30 is not sensible for Unit 22, as caribou are typically not in the area during the proposed season. Offering a two-month season when caribou are usually absent may mislead nonresident hunters to plan hunts at a time when they might encounter reindeer, which are not legal game. Keeping the existing nonresident season will be less confusing to nonresidents attempting to hunt caribou in Unit 22.
- The Working Group supports the proposal in Unit 22 to eliminate calf harvest, eliminate nonresident harvest of cows, and limit nonresident harvest to one bull.

Unit 23

- Extend the cow closure period that prohibits the resident take of cows to April 1 – July 31 (longer than the current closure dates of May 16 – June 30). This change will reduce harvest of pregnant and lactating cows, increasing calving rates and calf survival.
- Change the season date for nonresident hunting of caribou to September 15 – October 10. These dates will give the first caribou in the fall migration the chance to cross the major rivers in Unit 23 (e.g., Noatak River, Kobuk River) prior to the onset of intensive nonresident hunting activity. The amended start date also matches the September 15 date used in the National Park Service’s Commercial Use Authorizations for the start of guide and transporter operations.
- The Working Group supports the proposal in Unit 23 to eliminate calf harvest, eliminate nonresident harvest of cows, and limit nonresident harvest to one bull.

Southern portion of Unit 26(A)

- Prohibit the resident take of cows from April 1 – July 31. This change will reduce harvest of pregnant and lactating cows, increasing calving rates and calf survival.

Thank you for this opportunity to comment.
On behalf of the Western Arctic Caribou Herd Working Group,
Vern Cleveland, Sr., Chair

[1] The term “nonresident” refers to a hunter who is not a resident of Alaska.
I have reviewed Proposal 180 submitted by Ken Green to restrict trapping in the Cooper Landing area. I am quite familiar with all of the areas he has included in the proposal. These are areas heavily used by many recreational users. Traps placed close to areas frequently used by so many different users, including families with small children and pets, are a very dangerous hazard. Here in the Mat-Su Valley where I live we frequently have incidents with traps injuring and killing pets and putting our children in danger. I feel strongly that this proposal should be accepted so that the Kenai Peninsula area will be safe for everyone. His proposed regulations are very reasonable and in no way are detrimental to activities consistent with the code of ethics of the Alaska trapping community.
Hunt proposal 150 is a great idea. I agree with Ira Edwards. There are a dangerous amount of moose in Kinkaid Park. Allowing disabled hunters the chance to participate in an Alaskan meat hunt for moose accomplishes two worthwhile goals.

It is only a matter of time until a park user is injured at the park. Alaska is a huge state and we can afford to forgo a few moose in Kinkaid to ensure park user safety and fill a few freezers.
I wish to comment on Ira Edward’s proposal for a limited moose hunt in Kincaid Park for disabled persons (Proposal #150).

I support the proposal as a means to improve public safety in this heavily used municipal park. The Kincaid Master Plan calls for high density recreation which includes Nordic skiing, soccer, mountain biking, running, walking, snowshoeing, disc golf, and a myriad of other non-motorized uses. As the City of Anchorage continues to grow, we can expect to see more people seeking outdoor recreation that is close to home. Kincaid Park is a popular urban park that is an asset to our community for the psychosocial and health benefits that outdoor recreation provides.

According to some, including Rick Sinnott, moose numbers are declining within city limits. However, in recent years increased use has increased the number of human/moose encounters in the park. In his Sunday, February 1, 2015 article in the Alaska Dispatch News, Sinnott states that "As many as 700 moose consider the Anchorage Bowl home during some winters. It's far easier to see a moose in Anchorage than in Denali National Park and Preserve." Considering the number of moose in Anchorage and given its urban nature, it would seem that we have an unnatural moose density in a relatively small area.

Whether this is desirable is a matter of public opinion, for some would state that this is Alaska at its finest--wild and natural. It's what makes living here and not California so wonderful. Although I tend to agree with this, I believe that providing a moose sanctuary in the middle of an urban park, whose master plan calls for high density recreation, is anything but wild and natural.

At some point authorities must make the better judgment that public safety overrides marketing strategies to make Anchorage the "City of Moose," where the only practical means of controlling the moose population is with the hood of a car. I can claim to have done my part in this with a moose resting squarely on the hood of my Suburban. Four thousand dollars of damage later and a bit of whiplash, perhaps a few families ate well that winter but it wasn't without a cost.

Another case in point: Two summers ago I was ushering a group of Mighty Bikes (a youth mountain biking program) on a ski trail in Kincaid Park. There was a downed birch tree blocking the trail so the kids dismounted their bikes and proceeded in single file around the stump end of the deadfall. While the kids were walking their bikes a young bull approached us from the ski trail at a full run. From the pinned ears and forcefulness of his charge, I could tell that he was going to run right through my group. I stood between the kids and the moose and discharged a short blast of bear spray toward the animal. The moose grew angrier and charged us again. I discharged another blast, this time longer. Fortunately the moose thought the better of continuing the assault and he moved in another direction. I should add that we did not pass this moose on the trail, nor was there any sign that the moose was being chased by something else. We were traveling in an uphill direction so our speed was very low. We did not startle the animal as he approached us well after the kids had dismounted their bikes and were making their way around the deadfall. For whatever reason the young bull was in a bad mood and was set on stomping his way through my group.

There are high profile moose encounters in the media and countless others that are never reported. Increased recreational pressure in the park and an unnatural moose density are threatening public safety and it will worsen.

The reason why there are so many moose in Anchorage is that there are few predators, an abundance of food and no hunting pressure. Given a choice between improving public safety and a marketing campaign touting Anchorage as a City of Moose, I choose public safety. I encourage the Board of Game to authorize a moose reduction plan in Kincaid Park whether by professional Fish and Game staff or by physically disabled individuals.
I am opposed to moose hunting in Kincaid Park. I have enjoyed Kincaid Park and its moose for 30 years on foot, skis, and bike, winter and summer. People can get along with moose. We all need to be alert and respectful. I am a lot more afraid of hunting in Kincaid than I am afraid of moose.
Hello,

I am putting my thoughts and those of many others in writing so that they are heard by the Board of Game and all others attending in hopes that they will have some weight in the decisions made in regards to the Western Arctic Caribou Herd and the ability of residents of Unit 23, residents of Alaska, citizens of this country, and citizens of other countries being able to enjoy and utilize this resource.

There have been many articles written lately on the number of animals estimated in the herd and the concerns about the herd continuing to decline. I am not a biologist but I do know that herd sizes fluctuate naturally in their own cycle depending on natural factors. We cannot forget the herd was once down near 70,000 animals and grew to almost 500,000. Now the herd is at an estimated 235,000; this doesn’t seem that bad considering where it has been in the past. I believe that in order to have healthy heard you need a healthy number of calves and in order to have calves you need cows! Concerns seem to be focused on resident and nonresident hunters taking bulls, but this does not seem to be the way to increase calf numbers because one bull can breed many cows. I am a resident and can take up to five caribou per day. Who really who needs five caribou per day, even when you might be hunting for your extended family?

As an owner of an air taxi that operates state wide in Alaska, our company provides transportation for many people in the Kotzebue region, to include hunters and nonhunters as well as residents and nonresidents. Many nonresidents choose to donate their meat, whether it be caribou or moose, due to the cost of getting it back home and the risk of it spoiling. Every year my company alone has a list that is 2 pages long of names and phone numbers from people living in Unit 23 that ask for donated meat and we gladly provide it for them. Again, it is the nonresidents that take these animals. I often choose to stay late to accommodate the local people that need meat, even delivering meat to elders who are unable to make it to our hangar. Additionally, we also have given to the boys and girls club in the past, whether it is meat or left over food from hunters and campers.

I am concerned about ending the season in September because many people enjoy coming to the area in October when there is less pressure and in the last few years we have seen change in weather allowing for people to be out in the field until mid-October or later due to the lack of snow and mild temps. From my personal experience in the last few years I have not seen the caribou in NW Alaska start rut until mid-October which seems rather late compared to elsewhere in the state. If it is the rut that we are concerned about, I would be curious why we should not hunt during the rut, and what it might affect aside from possibly bad-tasting meat. I have taken caribou in late October and tasted meat from hunters who took caribou in October that was delicious.

Finally, let’s remember that years ago there were no caribou in this region at all; if people wanted caribou they had to travel towards Barrow. I do not believe that the taking of bull caribou are affecting the number of caribou available for harvest, rather it is the number of cows and calves being shot throughout the entire year or the fact that predator numbers have been on the rise in NW Alaska.

Thank you for this opportunity and in the end the state has done a fine job of managing our wildlife in this great state so I am confident the proper decisions will be made.
I support reducing the moose population in Kincaid Park.
Alaska Trappers Association
PO Box 82177
Fairbanks, AK 99708

February 6, 2015

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

Dear Chairman & Members of the Board:

On behalf of the nearly 900 members of the Alaska Trappers Association, we wish to share our opinions on several proposals which you will be considering during your March 2015 Region II meeting in Anchorage.

We SUPPORT proposals #144 - #147, which would modify hunting and trapping regulations on Kodiak Island. We respect the knowledge of ADF&G biologists and the judgment of Game Board members in matters such as this. We trust that both the biologists and the BOG members will make informed and reasonable decisions.

We take NO POSITION on proposal #177 which would realign starting and ending dates for beaver in Game Management Units 7 and 15:
- The proposal made no mention of the status of beaver populations in these areas. Information available to us provided conflicting views on this crucial aspect. We assume that beaver numbers are high, but could not confirm that.
- We were not convinced by the proposer’s comments regarding ease and safety of travel during his new season dates. He seemed to contradict himself.
- We assume that the existing season was adopted based on extensive input from trappers and biologists. We were not convinced by the current proposal that there is a compelling reason to change.
- Once again, we trust ADF&G and the Board to make an informed decision.

We are OPPOSED to proposals #178 and #179, which would impose a system of trap identification on trappers in GMUs 7 and 15. We respectfully disagree with the Homer Fish & Game Advisory Committee that these actions would solve any perceived problems. The Alaska Trappers Association has a long history of opposing requirements of this nature. There is no proof that trap identification solves any problems. In fact, some of our members have experienced harassment as a result of trap identification requirements in other states. We have no desire to bring faulty “solutions” for non-existent problems to Alaska.

We OPPOSE proposals #180 and 181, which would ban trapping in large areas around Cooper Landing, Moose Pass and Seward. In late spring of 2014, we offered to work with the primary proponent of these proposals in an effort to resolve perceived conflicts. He rejected that offer. We participated in a public meeting with the proponent in June 2014. Representatives of various organizations and agencies advised the proponent to consider our offer. We attempted to negotiate with him on several occasions, but our offers were rejected. Shortly after the start of trapping season, we took matters into our own hands and posted signs around the area advising trappers to avoid locations and practices which might lead to problems. We are unaware of any problems this season. In short, we have taken the initiative to resolve past conflicts and prevent new ones. We firmly believe that regulatory closures are unnecessary. We urge you to reject these proposals.

We appreciate the opportunity to participate in the regulatory process.

Sincerely,

Randall L. Zarnke, President
Kincaid moose hunt is ridiculous idea

I applaud Bill Sherwonit’s recent commentary in ADN. The idea of a moose hunt at Kincaid is ridiculous. If we are going to start a moose hunt we should also include owls. Over the years a number of skiers and hikers using the Kincaid trails have been injured by owls, so if we are going to kill off the moose we should probably kill off the owls as well. And let’s not stop there. In the past few years I have seen more and more black bears at Kincaid, including sows with cubs. They can be as dangerous as moose, especially in the spring. Perhaps they too need to be killed off. Then there’s the moose I see almost every day during the fall, winter and spring in my Turnagain neighborhood. If they are dangerous at Kincaid then they must be equally dangerous in my yard or the yard of my neighbors. Maybe we should kill them off as well.

The argument that moose pose an unacceptable hazard to Anchorage residents is ridiculous. Be cautious and leave the moose, owls and bears alone so that we can all enjoy seeing them. It isn’t only tourists who enjoy seeing the wildlife in Anchorage, but longtime residents do as well.

—John Miller
Anchorage

submitted by Patricia Dicraiker
I oppose a moose hunt in Kincaid park. I'm a regular user of the park and a member of one of the dog associations that uses the park throughout the summer and fall. Contrary to how we were depicted in an ADN article, we are not an "attack dog group" and we were never contacted by Mr. Edwards for our viewpoint on his proposal. Although we regularly see moose during our training sessions, we have never had a problem. Why? Because we respect them, are aware of them, and follow rules of general land stewardship. We need to learn to share space with them and setting up another moose hunt is not the answer.

Our training group (depending on weather) often trains into October on the weekends. A hunt could potentially displace us for no need.

In addition to dog training, I also use Kincaid for walking and biking. Again, I respect the moose, am aware of them, and try to keep my distance. As long as all users take the necessary precautions, we should be able to coexist.
As a longtime resident of Anchorage and one who regularly explores Kincaid Park (and other Anchorage parklands and greenbelts), I'm writing to express my strong opposition to Proposal 150, which would allow a moose hunt in Anchorage's Kincaid Park. I've already written about this in the newspaper and will use that commentary (below) as an extended explanation of my opposition:

**Kincaid Park Is No Place for a Moose Hunt**

While I applaud Rick Sinnott and the Alaska Dispatch News for alerting Anchorage residents to the new push for a moose hunt at Kincaid Park, both the reporting of this news and Ira Edwards' proposal to the Alaska Board of Game (BOG) raise serious concerns and demand further context and scrutiny.

First I'll address the story itself (“Moose hunt proposed in Kincaid Park,” Dec. 29). The placement of Sinnott's piece—complete with front-page banner headline—suggests it's important local news. I agree. But it is also a lopsided story, heavily slanted toward Edwards' perspective. Nearly all the "reporting" is based his viewpoints and beliefs. His claims are largely presented as fact, without apparent verification and almost no rebuttal. This is disappointing, given Sinnott's own wildlife expertise.

Because this is a news story, Sinnott no doubt felt obliged to keep his opinions out of the piece, but he could have found others who would rightly challenge Edwards' assumptions and conclusions. Though Sinnott includes Department of Fish and Game findings that provide alternative perspectives, they are buried deep in the story and not used to directly challenge Edwards' claims.

Sinnott takes Edwards' statement that he “canvassed most organizations that schedule events in the park” at face value, as well as his claim that their responses ranged “from favorable to neutral.” All of this is self-serving and should have been substantiated. The fact that "no organization has told [Edwards] it would oppose a moose hunt" means little, because we don't know all the groups he canvassed. I'm betting he didn't ask wildlife or conservation groups for their opinion.

Sinnott adds that a 2010 survey indicated 70 percent of local residents support an Anchorage moose hunt, including parks like Kincaid. But we don't know enough about that survey to determine whether residents who use and appreciate the parks support such hunts. I'd bet the percentage of park users approving a hunt would be substantially less than 70 percent.

All in all, the story gives an unbalanced and highly favorable spin to Edwards' push for a hunt. Here are some claims that I would challenge.

First, Edwards says “every time we have an event at Kincaid there’s a moose in the way.” That’s ridiculous. It’s the exception, not the rule, that moose require changes in an event or present a danger to participants; those circumstances tend to make it into the news precisely because they’re unusual.

Yes, there are certain times of year when moose should be taken into special consideration by event organizers (and others): in late spring and early summer, when cows with newborn calves are especially vigilant and protective; and the autumn rutting season, when bulls especially are likely to be stressed and easily agitated.

Given all the information that’s available about moose, local residents should know this and take extra precautions.

Though Sinnott refers to “troublemaker” moose, in fact human actions have largely contributed to the upswing of moose-human conflicts at Kincaid, whether in organized events or other, informal recreational activities. Two excellent examples are the "well publicized skirmishes" Sinnott recounts in his story. As I previously discussed in pieces published by Alaska Dispatch, (“The problem isn’t agitated moose, it’s people showing bad judgment,” Oct. 3, 2013 and “Explosion of new trails at Kincaid is a big part of conflicts between moose and people,” Oct. 28, 2013), people’s poor decisions led directly to the shooting deaths of the two moose.

We are supposedly the more intelligent species, yet we sometimes behave in remarkably foolish, ignorant, or stubborn ways.

To repeat: the problem at Kincaid Park isn’t trouble-making moose. The animals should not be hunted for public-safety reasons, Edwards’ chief rationale for starting a hunt there. And if a persistently dangerous moose is identified, authorities should remove it, not sport hunters.

Sinnott’s story also makes it clear that there’s been no upsurge in moose at Kincaid. In fact, based on F&G studies, it’s more likely moose numbers have dropped since the mid-1990s.
Nor is there any evidence that moose have become more aggressive. Based on my own experiences—I visit throughout the year—I’d wager Kincaid moose are as habituated to people as they’ve ever been, if not more. That’s not to say individual moose won’t sometimes become agitated and aggressive. A protective cow moose too closely or suddenly in early summer, an adrenalin-boosted bull moose in mating season that feels cornered—yes, they may attack a careless, unaware, or pushy person. But this is not new behavior, it’s normal.

Edwards’ blanket statement that cows are more dangerous than bulls—the reason he gives for proposing an antlerless moose hunt—is another dubious assertion.

Yes, cows are more dangerous for a period of time after they’ve given birth to calves. But bulls present a much greater danger in autumn, when Edwards proposes his hunt. My experience from late summer into winter is that cows, even those with calves, are remarkably tolerant of human (and even canine) passage, as long as a person or dog doesn’t try to get too close or harass them.

I would also argue Edwards’ point that bulls have “more intrinsic value” than cows. What’s his expertise, to make such a judgment? Again, his opinion masquerades as fact.

Though neither the number nor behavior of moose has changed substantially, what has shifted at Kincaid is the human element. As Sinnott wrote, “Nowadays the park crawls with people most of the year.” Actually, “crawls” isn’t the best word choice. Many of the people who recreate at Kincaid are moving fast: runners, soccer players, skiers, and especially cyclists. The explosion of single-track trails and those who use them are the single biggest change that’s contributed to Kincaid’s so-called moose “problem.” Those trails have greatly fragmented what remained of Kincaid’s already diminished woodlands. Thus it’s now harder for moose to avoid us humans and that in turn means more encounters. More conflicts.

Those who say we must have either a moose preserve or a moose hunt are creating a false choice. We can have both moose and human recreation. But people need to take more responsibility for their actions, they need to pay more attention to—and show tolerance for—our wildlife neighbors.

There’s another important point to consider: Edwards says October is the best time to stage a hunt because the park attracts fewer people. That may have once been true, but not necessarily anymore, not with the abundance of cyclists drawn to the single-track trails during fall’s “shoulder” season.

If allowed, an October hunt would displace a substantial number of people. Are the state and municipality really going to ban other recreational activities so that a few people can hunt moose despite no credible evidence that having such a hunt will eliminate moose-human conflicts? The only way to do that would be to kill all the moose. And who wants that?

In short, I can find no good reasons to break with long-standing policies and allow a hunt at Kincaid or any other municipal park. I hope the city holds firm on its prohibition of hunting and the discharge of firearms in local parks.

The presence of moose enlivens and enriches the visits of many locals drawn to Kincaid. Instead of killing them, why can’t we humans behave more responsibly and respectfully, so that both species face less danger from each other?

So, to reiterate: I request the BOG to oppose and deny this proposed Kincaid moose hunt.
Dear Sir or Madam:

As an avid recreational and commuting cyclist who frequents the Kincaid Park I strongly advise against the legalization and introduction of a hunt at the Kincaid Park. Compassion for or lack-there-of for handicap accessibility for hunting is in my opinion irrelevant.

I agree there have in fact been an increase in human-moose encounters; however, the fault is due to the overdevelopment of the trail systems which severely reduced the moose population's ability to avoid humans contact.

In viewing a Kincaid Park trail system maps of 2002 and 2008 one finds little significant increase in development, but since 2009 thru the present it appears as many as seventeen (17) single-track mountain bike trails have been added, increasing the number of trail intersections by forty-three (43)! Reference the “Singletrack Advocates Organization” own Kincaid Park 2014 Map:


The light blue lines largely represent the "legacy" trails as of 2008, prior to the proliferation of single-track trail development. All other colors represent new single track trails.

This over development in my opinion, though maybe well-intended, has proven reckless and play a significant role in the increased, sometimes dangerous human-moose encounters.

I suggest not only halting any new plans for further development, but also consideration for strategically abandoning/closing many of these new single-track mountain bike trails, giving the right-of-way and fair share of the natural habitat back to the moose population.

Thank you for your consideration on this important matter.

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

Re: March 2015 Board of Game Proposals

I am writing on behalf of the Chugach State Park Citizens' Advisory Board regarding new southcentral and regional regulatory proposals that will affect Chugach State Park.

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:

- To protect and supply a satisfactory water supply for the use of the people;
- To provide recreational opportunities for the people by providing areas for specified uses and constructing the necessary facilities in those areas;
- To protect areas of unique and exceptional scenic value;
- To provide areas for the public display of local wildlife; and
- 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 2015 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 February 9, 2015, meeting.

Proposal 148 – Support. This proposal would reauthorize all antlerless and either-sex moose hunts in GMU 14C except those in the Twentymile River drainage.

Most of the moose hunting opportunity in GMU 14C is in Chugach State Park. At least 18 (25%) of the 71 antlerless and either-sex permits offered in GMU 14C for the 2015-16 hunting season are in the park. In addition, many of the moose harvested in the remaining drawing permit hunts spend part of the year in the park. The only moose registration hunt in GMU 14C, which typically has 100-200 permittees, is in the park.
Most of the park is open for general season moose hunting for bulls with spike-fork and greater than 50-inch antlers or at least three brow tines on at least one side.

At its discretion the department has reduced the number of antlerless and either-sex permits issued in recent years because the population has been within the objective of 1,500-1,800 moose. However, when moose numbers begin to climb, antlerless and either-sex hunts will be needed to keep the population from exceeding its carrying capacity.

We support continuing to allow ADF&G to exercise its discretion in the management of antlerless moose in Chugach State Park and adjacent portions of GMU 14C.

**Proposal 151 – Oppose.** This proposal would change the “any sheep” bag limit to “any ram” for archery-only drawing hunts DS140, DS141, DS240, and DS241.

These hunts (85 permits in 2015) are located almost entirely in Chugach State Park.

On average, less than one ewe per year was harvested from these hunts in the past decade (2005-2014). Dall sheep populations in southcentral Alaska are limited more by adverse winter weather than by hunting. A small harvest of ewes is not likely to have any impact on sheep populations.

Contrary to what the proposal claimed, the Dall sheep population appears to be increasing in GMU 14C. From 2008 to 2014 the count increased from a low of 904 sheep to 1062 sheep, a 17% increase in six years. Although there is no biological need to harvest ewes in GMU 14C at this time, high populations in previous decades suggest that Dall sheep populations can exceed carrying capacity in the Chugach Mountains. Counts of 2,200-2,600 sheep in the late 1990s and early 2000s represented a population almost certainly exceeding the carrying capacity of its winter range. As Dall sheep numbers recover there may soon come a time when a limited ewe harvest may again be necessary to prevent overpopulation and damage to prime winter range.

An added benefit of the “any sheep” bag limit is that it allows a hunter to avoid a penalty for taking a ewe if one is shot by mistake while attempting to harvest a young ram.

**Proposal 152 – Oppose.** This proposal would allocate all but one of the Dall sheep permits in GMU 14C to residents. The single exception would be the Governor’s tag.

Most of these permits are in Chugach State Park. This is an allocation issue that is within the Board’s purview. However, we note that Chugach State Park has some of the largest rams in Alaska, and both resident and nonresident hunters value these animals highly.

Other than Dall sheep and several antlerless moose hunts, no other park regulations restrict the proportions of residents or nonresidents in Chugach State Park. Our board promotes the value of the park to attract outside visitors to the area. Continuing to allow nonresidents to hunt sheep in the park is consistent with this goal. We prefer the status quo.

**Proposal 153 – Oppose.** This proposal would limit the number of next-of-kin nonresident Dall sheep permits issued in GMU 14C.

Most of these permits are in Chugach State Park. The Board of Game has capped the number of nonresident Dall sheep permits in GMU 14C. Proposal 153 seeks to allocate more of those permits to hunting guides rather than allowing Alaskans to guide their next of kin on these hunts.
Clients of hunting guides tend to be much more successful than resident hunters or nonresident hunters accompanied by next-of-kin residents. If this proposal is adopted it will take hunting opportunity away from residents and their nonresident next-of-kin and would likely result in fewer permits being issued to accommodate the increased harvest from guided hunters.

Proposal 154 – Oppose. This proposal would increase the number of nonresident mountain goat drawing permits in GMU 14C by adding one nonresident permit for each of the following hunt areas: DG852 (East Eklutna), DG854 (Eagle River), and DG858 (Bird Creek).

Contrary to what is stated in the proposal, these three hunt areas are not “very inaccessible” to the average permit holder. They are popular among local resident goat hunters. Nonresidents may also apply for these hunts; however, they are in a minority. Very few permits (3-5) are issued each year for each of these hunts. Typically, one or two goats are harvested from each hunt area. Because nonresident goat hunters must be guided and guided hunters are more successful than residents without guides, adding a separate nonresident permit to each area would increase the harvest. This would necessitate reducing the number of resident permits significantly.

Other than Dall sheep and several antlerless moose hunts, no other regulations restrict the proportions of residents or nonresidents in Chugach State Park. We prefer the status quo.

Proposal 184 – Oppose. This proposal would open resident Dall sheep hunting seasons a week earlier (August 3) than nonresident seasons (August 10) throughout southcentral Alaska.

Chugach State Park supports a significant number of the Dall sheep hunts in southcentral Alaska. The park is heavily used by the public in early August. Opening the season a week earlier than in the past would significantly reduce sheep viewing opportunities for the majority of park users. Sheep hunting permits in Chugach State Park are distributed spatially and temporally to maximize the hunting experience. Thus, the reasons given for the earlier season (overcrowding, lack of opportunity, stressed rams) that might result in a diminished hunting experience are minimized or avoided in Chugach State Park. We see no good reason to adopt this proposal in Chugach State Park.

Proposal 185 – Oppose. This proposal would open resident Dall sheep hunting seasons a week earlier (August 3) than nonresident seasons (August 10) in GMUs 7, 14, and 15 and close both resident and nonresident sheep seasons on September 20.

Same rationale as Proposal 184. In addition, this proposal would eliminate many drawing sheep hunts in GMU 14C that open or close later than September 20. We see no good reason to adopt this proposal in Chugach State Park.

Proposal 186 – Oppose. This proposal would limit nonresident Dall sheep hunting in the southcentral region with shorter seasons, drawing permits, or other methods.

Chugach State Park supports a significant number of the Dall sheep hunting opportunities in the southcentral region. All sheep hunts in the park are by drawing permit only. Nonresident permits are already capped. Seasons for each hunt are short to allow two to three consecutive hunts with firearms and a follow-up hunt by archery only in most areas. We see no good reason to adopt this proposal in Chugach State Park.

Proposal 187 – Oppose. This proposal would allow a maximum of 10% of nonresident sheep hunt participation for the southcentral region.
Chugach State Park supports a significant number of the Dall sheep hunting opportunities in the southcentral region. All sheep hunts in the park are by drawing permit only. Nonresident permits are already capped at 13% for firearm hunts and 9% for archery-only hunts. This proposal would double the number of nonresident permits for bowhunters, which is probably not the sponsor’s intent. It would reduce the allocation of nonresident drawing permits in the park from 13% to 10%; however, this would have no practical effect on the number of nonresident permits if the current strategy is used to distribute the permits fairly among the various hunt areas and seasons.

If the current allocation strategy is used, even in those hunts where the most permits are issued, in the Southwest portion of GMU 14C (with three consecutive hunts where 7 resident and 1 nonresident permits are issued), allocating 10% of the permits would still be 1 nonresident permit for each hunt area/season.

There are no hunt areas/seasons in GMU 14C with 10 or more total permits where firearms are allowed. Therefore, if the Board adopts a strict 10% cap for nonresident sheep permits, the allocation strategy will need to be changed. If nonresidents are going to be allowed an opportunity to hunt in every hunt area and season, nonresident permits will need to be selected at random from the total number of permits issued in GMU 14C. There won’t be enough nonresident permits issued each year to distribute participants among every hunt area/season.

Other than Dall sheep and several antlerless moose hunts, no other regulations restrict the proportions of residents or nonresidents in Chugach State Park. We prefer the status quo.

Proposal 188 – Oppose. This proposal would allow a maximum of 10% of nonresident sheep hunt participation for GMUs 7, 14 and 15.

Same rationale as Proposal 187.

Proposal 189 – Oppose. This proposal would allow a maximum of 10% of nonresident sheep hunt participation in the southcentral region. Once drawn, residents and nonresidents cannot apply again for that specific drawing permit.

Same rationale as Proposal 187.

Proposal 190 – Oppose. This proposal would allow a maximum of 10% of nonresident sheep hunt participation in the southcentral region. It also proposes to limit the number of hunters transported by air charters, which is not in the Board’s authority.

Same rationale as Proposal 187.

Proposal 194 – Oppose. This proposal would prohibit the use of hunting dogs for taking upland game birds after October 31 in the southcentral region. The intent of the proposal is to avoid catching hunting dogs in lawful traps.

Chugach State Park provides some of the best opportunities for hunting upland game birds in GMU 14C. Bird dogs help retrieve lost and wounded birds. Retrievers are an important tool in ethical hunting.

Most of the dogs caught in legal traps in Chugach State Park are not hunting dogs. They are accompanying hikers, bikers, skiers or runners and are often caught near hiking trails. While we appreciate the concern expressed for hunting dogs in this proposal, we wonder if the next step will be a proposal to prohibit other off-leash dogs in Chugach State Park.
Currently, dogs are allowed to be off leash anywhere in the park except within ¼ mile of facilities and trailheads. We do not support the prohibition on the use of dogs for hunting upland game birds.

Proposal 196 – Oppose. This proposal would add five days to all resident hunting seasons and allocate 75% of the drawing permits to residents for the southcentral region.

Chugach State Park provides most of the Dall sheep hunting opportunities in GMU 14C. This proposal would increase the proportion of permits allocated to nonresidents from 13% in sheep hunts where rifles are allowed and 5% in archery-only sheep hunts to 25% nonresidents.

Chugach State Park provides nearly half of the moose hunting opportunity in GMU 14C, and more than half of all the Eklutna Valley registration hunt permittees are included in the total. All antlerless moose hunts outside of Joint Base Elmendorf-Richardson are currently for residents only. This proposal would allocate 25% of those permits to nonresidents.

Hunting opportunities are relatively scarce in Anchorage, compared to the large number of hunters living in the community, and most of the Dall sheep, mountain goat, moose, and brown bear hunts are drawing hunts. Allocating 25% of all drawing permits to nonresidents will significantly decrease local hunting opportunities. We prefer the status quo.

Thank you for the opportunity to respond to the regulatory proposals submitted for the spring 2015 Board of Game meeting. Please let me know if you have any questions regarding these comments and recommendations. I can be reached at 907-688-9078. Thank you for your consideration.

Sincerely,

Rick Sinnott
Chair

cc: Jessy Coltrane, ADF&G
Dear Shawn,

We received your letter dated February 2, 2015 regarding the possible changes to Federal Regulations on Alaska National Wildlife Refuges and Invitation for Continuing Government to Government Consultation.

Thank-you for reaching out to us for our comments. At our November 25, 2014 meeting we discussed these issues with you. As we spoke at the meeting we are deeply concerned to what the service is doing. Northway hunts on the refuge lands that were created in 1980. We have hunted on the lands long before it was a refuge. We count on the moose that we harvest on those lands for our basic survival. In recent years since the refuge was created, we have noticed the decline in the moose populations. We now hear wolves when we are hunting where we never heard wolves before. We see lots of wolf sign that we never seen before. We see many more bears and bear sign that we never seen before. We are seeing far less moose, which has been our food source for countless years. Bears and wolves are affecting our moose populations.

We have looked at the revised proposed regulations and at this time are still in opposition of all proposed changes. We have a good working relationship with the state managers. We do not want to lose the state tools in the toolbox to the FWS or the NPS. We have seen in the past when these two agencies work together to shut down state regulations. We are opposed to these procedures by both agencies. Currently GMU 12 we can harvest a grizzly over black bear bait. We know hunters who do this and we support this method of take. We, too, may be participating in more of this in the future due to the over abundance of bears.

We do NOT support this proposed regulation to close wolf and coyote seasons already open by the state. We support the taking of a wolf or coyote during the entire year. It is odd that the lower-48 classifies coyotes as vermin and allows the taking of coyotes year round even with planes and helicopters. Why are coyotes not considered vermin in Alaska? Coyotes were few and far between or non-existent decades ago. Many trappers & hunters never saw coyotes until recent years. They seemed to have moved in more recently. They should be considered vermin in Alaska, too.

As we look over your proposed changes, all we see is the government manipulating words to say what you want them to say. Your word “to clarify existing Federal Mandates for conserving...” is just a bunch of garble goop to justify the special interest groups that live outside Alaska.

Looking back to March 2011 on Unimak Island Caribou Herd EA, the Regional Director stated: “In addition, by selection of the No Action Alternative, the Service does not reject the
use of predator control as a valid wildlife management tool in support of subsistence when appropriate."

What has changed? These statements are conflicting. Is the USFWS officially rejecting the use of predator control as a valid wildlife management tool now for subsistence? Will the needs of people for food be superseded by anti-consumptive use philosophies that value wolves more than people?

This January 2015 notice repeatedly states that the proposed USFWS regulations will not affect subsistence use when conducted under federal subsistence regulations, but this is just words & simply not true. Government people in their government offices have no idea how these types of things affect us in the real world now and in the future. We have seen how it works in the past. Once something goes in the federal register, we never get it back. That is the reality. Another reality is that we hunt mostly under state regulations. Differing regulations like these will take a lawyer and land surveyor to understand. Common folk cannot be expected to sift through all these differing regulations and understand them.

This “natural diversity, biological integrity, and environmental health on refuges in Alaska in relation to predator harvest” statement is really hypocritical. This contrived proposed regulation changes would shift the concern of natural diversity, biological integrity, and environmental health to the detriment of our moose populations. It appears to us that the service is favoring predators over other species. We are in opposition of the addition of this language. We can argue what you are proposing is the manipulating wildlife for the benefit of the predators. This is the total reverse for what we advocate for wildlife populations. These types of regulations manipulate predators to keep ungulates at low levels. We oppose any changes in the closure procedures except we would approve of the addition that would require consultation with the state and affected Tribes and Native Corporations, as well as public comment.

We feel that public input from Alaskan residents is not given the same weight as outside special interests, as it appears the FWS is on a mission along with the NPS. We urge you to stop these senseless proposed changes and work closely with the state managers.

Sincerely,

Howard Sam and Nichol Rallo

Cc Lorraine and Lee Titus
Cc Eastern Interior Regional Advisory Council
Tok Fish & Game
Board of Game
Alaska Federation of Natives
ANSCA Corporations
National Wildlife Refuge System, Alaska Region
Barbara Cellarious- National Park Service
I ride my bike on the single track in Kincaid as well as on the Tony Knowles Coastal Trail year-round. I have also skied and walked on the Kincaid trails. I have never had a negative encounter with any moose or wildlife while recreating in these areas. Seeing moose along the way is part of the enjoyment of being in Kincaid Park as well as the City of Anchorage. Removing moose will take away from this experience and devalue the park. For the most part, the moose have become accustom to people. Obviously there are times when extra caution is to be heeded, spring calving and the fall rut. The number of negative moose/human interactions is probably pretty low considering the number of people using the park. I believe education is a better way to prevent or deal with human/moose interactions rather than permanently removing the moose. If we removed everything that posed a danger to our lives, the world would be a pretty bland and boring place. Please allow us to continue enjoying the moose in Kincaid Park, please do not allow the moose hunt.
I support proposal 180 in Cooper Landing, AK. There have been numerous and tragic incidents involving traps too close to neighborhoods and trails where dogs have been severely wounded. I believe in traps being tagged or somehow identified and that set backs be agreed upon and trapping areas far from trails, driveways, schools, parking lots, campgrounds and residential communities.
I support proposal 180
I support BOG Proposition 180 in regulating trapping setbacks and exclusions in the Cooper Landing areas and along the Resurrection Trail to Hope. We frequent Cooper Landing, Russian River Trail, Kenai Lake, and Tern Lake enjoying outdoor activities with our young grandchildren and our dog. We have heard first hand accounts of our friends and neighbors’ horrifying accounts of trapped and injured pets, and of pets killed by traps due to careless trap placement, poor or no trap warning markers, and outright lazy trapping methods employed by trappers in these areas. Our lodge hosts many people both Alaskans and out of state visitors who use the Resurrection Trail during the winter months, and most have dogs with them as they sled, ski, or snowshoe the trail. We feel that enforceable common sense setback regulations are appropriate and necessary to insure our safety and that of our guests. Kent Bowman
As a regular visitor to Kincaid park who has all too frequent encounters with the park's moose, it is my opinion that serious consideration should be given to support of the proposed moose hunt. While I enjoy being among the wildlife that Alaska has to offer, nowhere else in Alaska have I encountered moose that are so unnaturally habituated to humans. If incidents such as those that have been in the news over the last few years are any indication, it's only a matter of time before someone is seriously injured or killed. A balanced moose population, on par with more remote areas of the state, is certainly one step forward towards a safer park for all park users. Please join me in support of this proposal and thanks for your consideration on this matter.

Sincerely,

JDBatove
I do not support Al Barrette's proposal to prohibit the use of hunting dogs for the taking of upland game birds in order to avoid them getting caught in legal traps. This proposal favours trapping over hunting thereby giving the priority of use of public lands to one user group over another without a viable reason why this should be. When traps are set legally then dogs should be under control.

The real question this proposal opens up seems to be an issue of the legality of trap setting and boundaries. That would lead to the question of priority of use and to whether or not the issue of trap setting conflicting with dog hunting can be worked out with the Alaska Trapper's Association, Hunting interests and Wildlife authorities like it should be rather than simply prohibiting the use of hunting dogs. In this vein, it would be equally justifiable to pass a proposal prohibiting trapping where hunting dogs are being used.

The conflicts of trapping with other uses is a topic that has historically been very difficult to deal with, however, I disagree with banning one use to favour another - unless special areas are established to separate the uses.
I am against Al Barrette's proposal 194 to prohibit the use of hunting dogs for the taking of upland game birds in order to avoid them getting caught in legal traps. A proposal of this kind gives priority to trappers over hunters and in doing so gives priority of use of public lands to one user group over another without a viable reason why this should be. Dogs should be under voice control or on leash during trapping season and all traps should be set in legally approved areas.

My concern is that there needs to be clearly established areas where trapping is allowed as well as areas where trapping is prohibited. This would ease what seems to be increasing conflict between trappers and non-trappers in areas that are designated multi-use. As Southcentral becomes more urban and suburban, there are more user groups asking for areas to be set aside for non-trapping. This is not to say any group is pushing to eliminate trapping state-wide.

The conflicts of trapping with other uses is a topic that has historically been very difficult to deal with, however, I disagree with banning one use to favour another - unless special areas are established to separate the uses.

I fully support Proposal 180 for the Cooper Landing Area and also the proposal submitted by Moose Pass to set aside areas that are designated not for trapping.

Thank you for your consideration.
I am utterly opposed to the thought of hunting in Kincaid Park. The conditions proposed are absurd, it would be dangerous for all who enjoy the area, and park users need to learn to live with wildlife rather than killing everything. Common sense allows many people to co-exist in potentially dangerous situations. Schedule events when it's not rutting season, make yourself aware of new moose moms and their babies. It's like the bicycle event along Campbell Creek when the salmon were running. Where there is salmon, there are probably bears. Come on, people. Many of us are nature lovers and want it in its place for viewing. There are a variety of recreation activities—not just extreme sports.
I'm commenting on the proposed moose hunt in Kincaid Park. As a long-time and frequent user of the park, I can't think of a more ridiculous idea than opening up the park to a hunt. Besides the fact that this could be incredibly dangerous, there is no need to cull the numbers of moose in the park. People need to be more mindful of and look out for the wildlife while using the park. If people would use some common sense (keeping dogs on leashes, riding bikes at high rates of speed, etc.), there wouldn't be dangerous people/moose encounters. As an artist and photographer, one of the main reasons I visit Kincaid is to view the moose and other wildlife. Please keep the park wild and don't open it up for a moose hunt. Thank you.
Board of Game,

As a frequent visitor to Kincaid Park, I see no need for a moose hunt. My children participate in high school ski races in the winter. Occasionally a moose appears at an inconvenient location but the moose move on. This an acceptable aspect of living here in Alaska. When recent visitors from New York wanted to see a moose (an exotic sighting for them), I thought of Kincaid Park as likely location to view moose. Moose in the park are a good thing, not a problem.

Please table this proposal.

regards,

Gordon Jones, Anchorage
OPPOSE proposal

I agree with Bill Sherwonit's commentary dated January 8, 2015. My reasons for opposition:

1. There is not enough evidence from the 2010 survey to show which residents supported the hunt; I don't think due process was given to park users.

2. There is not enough evidence to support "problem moose" as rationale, and dangerous moose should be handled by the authorities. According to Bill Sinnott and the AK Dept of Fish & Game, there has not been a population increase of moose in the park.

3. Using youth groups as justification (because we don't want to hurt the kids!) is ridiculous. These young skiers and bikers are highly intelligent, and should already be educated and experienced in moose behavior. If not, they should not be on the trails until they receive training.

4. With the additional trails people should be more vigilant about wildlife as well as other humans, especially on the twisting, turning, fast-moving single track trails. Perhaps more warning signs on the more dangerous trails at the trailheads?

5. Most people who go to Kincaid enjoy the wildlife experience. I know I did. Kincaid was my saving grace for 6 years before and after work while stationed at Kulis ANGB. The running, biking, and skiing there are incredible. I could not tell you how many moose encounters I had (too many to count), but using the simple rules I used from reading the signs at the trailheads I never had a bad experience - that includes encountering a mama moose with her ears back and a rutting male who snorted at me. Staying alert and getting out of the danger zone quickly and calmly kept me out of trouble.

Thank you for the opportunity to present my comments.

Sincerely,

Renee Blake
Dear Board Members,

After review of the many proposals I would like to add my comments as a final summary for consideration and acceptance.

It is very clear that the Board must take drastic measures STATE WIDE to ensure a healthy and sustainable population of harvestable Dall Sheep for the citizens of and in the State of Alaska.

In order to do this the Board shall enact regulations STATE WIDE that will both; allow for the citizens of the State of Alaska to hunt prior to any opening for NON-Residence Big Game Trophy Hunters, and shorten the length of the season for NON-Resident Individual, who intrinsically harvest the higher percentage of legal sheep.

This is best fair practice move option before the ongoing collapse of the Sheep population becomes so bad that the season will be shut down all together for everyone as did happen in the Brooks. We have to look to the future and the future of our next generation of hunters.

This is also a preemptive move on the Boards part before legislation is passed to, “Allow Citizens/Resident Alaskan to Hunt 10 days prior to the opening of Non-Resident hunters for all Big Game.” This is allowable under the State Constitution and is not an infringement on management tools deferred only to the Alaska Department of Fish and Game.

The only logical and smart move for the Board Members to do is shorten the season for Non-Resident as proposed by a majority of submitted proposals:

Non-Resident Season Shortened Seven (7) days.

<table>
<thead>
<tr>
<th>Resident</th>
<th>Non-Resident</th>
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<td>Aug 10th – Sept. 20th</td>
<td>Aug 17th – Sept. 20th</td>
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Thank You,

John Kaiser

“Learn from the Passenger Pigeons that once numbered in the Billions. Don’t wait until it’s too late.”
We have owned a cabin in Cooper Landing since 1979. We spend a lot of time there in the spring, summer, and fall. Our 15 grandchildren visit us often when we stay at the cabin. The grandchildren love to run and play games in the woods behind our cabin. They have been warned to look out for traps, but they are not always careful. One of these years I fear they will be injured by a trap.

Therefore: I support Proposal #180 "Not on Our Doorstep"  Keith M. Brownsberger, MD
Hello, my name is Colin Lindsey. My comment is regarding the clean-list regulation, 5 AAC 92.029 - Permit for possessing live game. No official proposal has been sent in for the 2016 deliberations to amend this regulation, and so I cannot include a proposal number here. I hope that I can ask a pertinent question though. In the interest of brevity, the clean-list does not currently include any venomous reptiles.

If I understand correctly, to be considered for the clean-list a species must not be able to survive in Alaska in the wild, it must not be able to alter the genetics of an indigenous species, or interbreed, it must not be a significant danger to an indigenous species through predation or competition, it must not carry the risk of disease to indigenous species, and it must not pose any other foreseeable danger to any wildlife within the state of Alaska. I know that all non-venomous reptiles are on the clean-list. My question is why venomous reptiles were left off. I'm sure there are exceptions at universities for research and scientific endeavors, but regular people cannot keep a venomous reptile.

As far as I am aware, no reptile could survive in Alaska in the wild. Reptiles are ectothermic and the winters would kill them. There are no reptiles indigenous to Alaska for any reptile to interbreed with, except possibly a few Common Garter Snakes (Thamnophis sirtalis) which may wander in from Canada occasionally in the summers, and these are certainly too distant evolutionarily to interbreed with any venomous reptile. Without any indigenous reptiles, the possibility of disease and pathogens carrying over to an Alaskan wildlife species is remote to impossible. And because they would never survive in Alaska, a reptile, venomous or otherwise, would never be able to pose a danger of any sort to a native species.

I am not suggesting that we fill up the state with cobras. I am only wondering why they are absolutely off limits. Was the concern a danger to humans, rather than one of the regulation criteria? Again, I am not suggesting radical changes, but it is a fact that dog bites cause many times more problems in the US than poisonous reptiles, but Alaska is proudly one of the most dog-friendly states in the country. With moose walking down city streets, grizzlies on the fringes of most towns, and wildlife everywhere, most Alaskans tend to face dangerous animals as a fact of life. I think that the growing trend of reptile enthusiasts would appreciate being able to keep poisonous reptiles, just as the one-humped camel enthusiasts are allowed to see to their hobby without legal complications.

Perhaps before May 1st I will submit a proposal to the Board of Game for deliberation in 2016. I am a student, and the process looks rather intensive, but perhaps I will. Thank you for your time,

Colin Lindsey
As a resident of Michigan I have been fortunate to hunt in the mountains of Alaska three times now (twice in GMU 19C and once in GMU 15C). For some, it is a once in a lifetime opportunity. It has come to my attention that hunting for Dall sheep for nonresidents may switch to a draw only system. The reasons for this switch may be multiple, but my primary understanding is that Alaskan residents feel that nonresident hunters are lessening their chances of harvesting a Dall sheep. In the 30 days that I have spent hunting in your great State, I have never once encountered a resident hunter afield. While I support responsible, resource-based management of natural resources, and am all for keeping Dall sheep on the mountains, I do not support a nonresident draw only system for Dall sheep (Proposals #110-118). I think it is only fair that opportunities to pursue a Dall sheep in the mountains of Alaska be open to both resident and nonresident hunters alike.

Please contact me if you should have any questions or concerns.

Respectfully,

Bryan S. Judge
1629 Lookout Farm Drive
Ada, MI
49301
I oppose proposal 160. A moose hunt of any kind in Kincaid is not necessary for controlling moose and is a recipe for a public safety disaster.
There does not need to be a moose hunt in Kincaid Park. The problem is not the moose but the people using the park. Thomas Eley
February 11, 2015

Subject: Proposed Hunting in Kincaid Park, Southcentral Region Meeting, March 2015, Proposal 150, Anchorage Area, Unit 14C

Dear Mr. Spraker:

The Municipality of Anchorage opposes the proposal for hunting in Kincaid Park (Proposal 150, Anchorage Area, Unit 14C). The Municipality opposes hunting in municipal parks for reasons of safety for park users, and conservation of natural resources consistent with such public use.

Additionally, the Municipality would not authorize use of motorized vehicles to facilitate hunting in municipal parks. Motorized vehicles are generally incompatible with visitor safety, potentially damaging to trails or sensitive areas, and maintaining the condition and character of municipal parks.

In sum, neither hunting nor additional use of motorized vehicles in Anchorage's parks are consistent with the mission, goals, and objectives in management of the municipal park system.

The Alaska Department of Fish and Game maintains authority and responsibility to manage wildlife resources within the Municipality, and in particular, the Department's ability to respond as needed when circumstances dictate. The Municipality supports ADF&G staff, under their direction and control, in responding to reports of sick or injured animals, or animal behavior that seems threatening or otherwise unusual.

We appreciate the Board's consideration of the Municipality's concerns on behalf Anchorage's resident and visiting park users.

Sincerely,

[Signature]

John H. Rodda, Director
Parks and Recreation Department

cc: George J. Vakalis, Municipal Manager
    Holly Sproth-Torres, Park Superintendent
    Brad Cooke, Kincaid Recreation Supervisor
    Jessy Coltrane, Ph.D., Area Wildlife Biologist, ADF&G
    Gino DelFrates, Region 2 Management Coordinator, ADF&G
Tom Honer - I am an Alaskan.

Why should there always be proposals against trapping, when trappers haven't changed?

Most present-day trappers are from the 1970's, 80's, 90's generation. We definitely like to see and help the younger generation get involved in trapping in the outdoors. We need trails to walk on. I'm 60 years old and so are most of present-day trappers, my legs are getting worse, but I (we) still carry a lot of weight. It's hard and we work at it and try to cover as much ground as we can or have time to, we only trap around four months out of the year.

Nobody is being denied the use of any trail. Practically all trails and rural bush roads were made by loggers, miners, oil companies, hunters, trappers, and the state (for public use). And those certain groups are against all of those activities. Most of the people complaining never leave the trail and they think they have the only rights to it. They won't hike or ski unless someone paves them a trail, which I have done on snowshoes, most all of them are in a lot better shape than us. People will leave the trail only to follow our tracks to see what we are doing. Most of them know, a lot of them will destroy the set, if they find it. Some either steal the trap or pull it and then throw it to where you can't find it. And others take the animal. Even when people oppose issues in the world, doesn't mean the activities are wrong.
There virtually aren't any issues to warrant their proposals. It just comes down to that they are anti-trappers. They are against any type of hunting. Some people are against things just because they don't do them. Many people aren't even involved in any of the issues, but are talked into joining groups just to boost numbers to show huge opposition. People are more and more against practically everything our grandfathers did. All of our grandfathers and grandmothers built America, and a lot of people want to follow the tradition in their footsteps.

Some people are using dogs as a means to use against trappers. Very few dogs are in a voice-activated control when under any kind of a stressful situation, whether it be animals or humans. Even domesticated animals, considered tame, still have wild instincts. They are not in your control if unleashed. Dogs are pets, being a total responsibility of the accompanying person, to where they're not disturbing people and their belongings, and wildlife. That's why they have leash laws. If dogs are considered by some people as users, then they have to be regulated.
WE CAN ALL WALK ON AND USE THE TRAILS WITHOUT INTERFERING WITH EACH OTHER. I POSTED SIGNS ON TRAILS TO KEEP DOGS ON LEASH, ALL OF THEM WERE RIPPED OFF EVEN WHEN I CONTINUED TO REPLACE THEM. I'VE NOTICED NO DIFFERENCE OF PEOPLE OR DOGS TAMPERING WITH SETS NEAR THE TRAIL OR A WAYS OFF. I SPEND MORE TIME DISGUISEING MY SETS FROM PEOPLE THAN I DO FOR THE ANIMALS I'M TARGETING. LEASH LAWS ARE MADE FOR A REASON, OR THEY WOULDN'T HAVE THEM AT ALL. PETS ARE SUPPOSE TO BE YOUR FRIENDS. YOU SHOULDN'T LET THEM GET OUT OF YOUR SIGHT OR REACH. PEOPLE ARE THE REAL ISSUE, NOT DOGS. THERE ARE VERY FEW CASES OF DOGS GETTING IN TRAPS, AND PRACTICALLY NONE THAT ARE FATAL.

50 PEOPLE WILL COMPLAIN, AND YET YOU'LL JUST SEE A FEW ALL WINTER, AND HARDLY EVER THE SAME PEOPLE, FOR ONLY 2-4 MONTHS OUT OF THE YEAR, TRAPPERS ARE THE BIGGEST USERS. WHEN IT'S -20°, BLOWING SNOW, RAINING, OR SUNSHINE, TRAPPERS ARE OUT THERE. YOU'LL VIRTUALLY NEVER SEE ANYONE ELSE, UNLESS EVERYTHING IS JUST THEIR WAY.

Tom Honor
Soldotna, Alaska
Over 40 years a trapper

252-3612
Dear Alaska Board of Game,

I am writing you to support the following positions on proposed bills.

I SUPPORT proposal 170 for the following reasons:

- The 2013 and 2014 mortality rates for female bears are alarming, and clearly unsustainable. If the state’s liberal harvest quotas for sport hunters remain in effect, the area’s bear population will decline to a point where neither hunters nor non-consumptive users will be able to spot bears.

- The USF&WS proposal includes stricter harvest limits in the Kenai’s “back country”. These are the most easily viewed bears - those that live closest to areas easily accessible to visitors, photographers and wildlife watchers. Continued substantial population losses among these bears will be a loss for the area’s tourism industry.

- Any continued decline in the Kenai brown bear population is inconsistent with USF&WS’s legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography.

I SUPPORT proposals 180 & 181 for the following reasons:

- The Cooper Landing, Seward and Moose Pass areas are world-famous, year-round meccas for family-oriented outdoor recreation.

- Traps set adjacent to multi-use trails and facilities are dangerous to pets and small children. Such trapping is clearly incompatible with routes designed to be easily accessed by families with children and dogs.

- Such regulations clearly specifying no trapping areas would go a long way to eliminate what can be emotional and unpleasant conflicts between recreational users and trappers - a “win-win” for both groups.

I OPPOSE proposal 150 for the following reasons:

- A heavily-used park such as Kincaid is incompatible with a moose hunt, even if the hunt is very limited in scope. It is disingenuous to initiate a sport hunt in the name of public safety.

- The current estimated moose population in the park is not excessive. Most of the moose are habituated to sharing the park with a wide variety of recreational users. Many Anchorage residents - likely a majority - value Kincaid’s moose and accept their presence when they recreate in the park. Moose thriving in a city park add to Anchorage’s unique character and lifestyle.

- If a problem moose is identified and needs to be removed, trained wildlife biologists are best equipped to deal with it, not sport hunters randomly targeting all cow moose. Utilizing readily available professional wildlife personnel would be much easier, safer, and result in minimal
disruption to public use of the park.

Thank you for taking my comments into consideration.

best,

Laura Sneddon
Los Gatos, CA
408-221-9671
Please vote "Yes" on proposals to limit brown bear hunting and restrict trapping near recreation areas on the Kenai Peninsula, and to vote "No" on a plan to initiate a moose hunt in Anchorage's Kincaid Park

Proposal 170: SUPPORT
PROPOSALS 180, 181: SUPPORT
PROPOSAL 150: OPPOSE

Thank you,
Jed B. Zimmerman
Dear Board of Game

I am writing to ask you to vote yes on the proposals to limit brown bear hunting and restrict trapping near recreation areas on the Kenai Peninsula, and to vote "No" on a plan to initiate a moose hunt in Anchorage's Kincaid Park. I am strongly opposed to any and all trapping, snaring. Additionally please do not hunt and trap wolves!

Louise Kane
louise@kaneproductions.net
Dear Alaska Board of Game,

The last ten years have seen significant changes in the Dall Sheep population. The declining population and static demand has intensified competition dramatically in some areas. The road accessible in areas like GMU's like 20A, 24A, 25A, 26B has intensive resident users. Because it is cheaper fly from road access jumping off points the resident sheep hunters charter within one hour or less of a road.

The unlimited guide restrictions on the State, BLM and privet lands overlying these problem areas are where most sheep hunter conflicts are occurring. Un-restricted guides have no incentive to conserve any legal ram. Especially since the decline in available rams has caused an increase in hunt prices.
If they do not take the rams the other 9 guides with assistant guides who are hunting adjacent to them will.

Long established guides are being over run with new guides with aircraft support. The advent and common use of the Satellite phone also allows guides to have instant check in with assistant guides. Several guides have a plane ready for instant dispatch to pick up successful hunters, or to fly and re-spot rams that were missed by a client. The client and assistant guide are then re-dropped off for the next days hunt starting after 3 AM of the next day.

All other resident and non-resident guided hunters who are not using extreme technology to spot, communicate with aircraft support to pursue dall sheep, are at a distinct disadvantage and dissatisfaction. Continual disruption of sheep and other hunters with aircraft use, spotting and landing on the mountains has become intolerable for ethical hunting guides and hunters. There are residents with aircraft but they are a minority of the problem.

I feel strongly that the problem areas in GMU 24A, 25A, 26B, 20A, 19C and maybe others should be addressed at the March 13-17th meeting. The revision of the sheep management plans will take another 2-3 years to implement. Action taken now for the problem areas could have a sunset of 2-3 years, if the Board prefers regulatory alignment with a sheep management planning effort in the future. I feel resident hunters should pay a tag fee of 25-100.00 dollars. I feel the BOG should request the legislature to increase the non-resident tag fee to 1000.00 and implement a resident dall sheep tag fee. Hunter demand is such this will have little affect on hunter participation.

I am supportive of Proposal 207 option 1 restricting the use of aircraft to spot sheep during the sheep season, with an increase until 2 PM of the following day to take dall sheep.
It is currently against guide ethic regulation to spot game to pursue. This has little enforcement. If the BOG restricts the use of aircraft, there will surely be better enforcement and consistent restriction of all sheep hunters in the field.

**I am supportive of proposal 208 option 1** restricting non-residents to a calculated drawing hunt on State, BLM and privat lands. I feel the allocation of non-residents to be drawn should be no more than 25% of available rams, in GMU 24A, 25A, 26B and 20A. Resident allocation in these units should be the majority allocation.

**I support option 5 for resident hunters.** Resident hunters should not have to draw a permit. A system to rotate resident hunters through 3 distinct hunt periods would reduce resident competition through out the season. I listened to comments regarding using last name initials, and hunting partners during the sheep workshop.

If using hunter initials is unacceptable to the resident hunters, a drawing for placement into the three split seasons could be used to start the system. Once a resident hunter is drawn and placed in a hunt cycle that person would stay on that hunt rotation indefinitely. New resident hunters could either enter a placement drawing, or be required to enter the second and third hunt period to start their rotation.

Thank you for your considerations,

Jack Reakoff
Wiseman, Alaska
Maniilaq Association
P.O. Box 256
Kotzebue, Alaska 99752
(907) 442-3311

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

February 24, 2015

Attn: Board of Game

Comments re: Proposal 202 – 5 AAC 85.025(a) (16-21) Hunting seasons and bag limits for caribou, and 5 AAC 92.085 (2) (D) Unlawful methods of taking big game; exceptions;

Dear Board of Game Members:

On behalf of Maniilaq Association, please consider this as our formal written comment in response to your advertisement to the proposed changes in the existing hunting regulations, as outlined in Proposal 202.

We are in full support of the recommendations outlined by the Western Arctic Caribou Herd Working Group in their February 4, 2015 submission, which we have attached to this letter.

We appreciate your serious consideration of the comments submitted by the Working Group when drafting the final revised regulations, as the changes suggested are critical to the long-term sustainability of the Western Arctic Caribou Herd, and the people of our region (GMU 23).

Sincerely,

Tim Schuerch
President/CEO

Member Villages
Ivishappin, Nunatchiniq, Ipiitchiniq, Katchik, Kivalinaq, Laungwîq, Qikiqtagnik, Naitaaq, Nuvagic, Akuligaaq, Isinnaq, Tikigaq Ambler, Buckland, Deering, Kiana, Kivalina, Kobuk, Kotzebue, Noatak, Noorvik, Selawik, Shungnak, Pt. Hope
Proposal 150: Oppose
A moose hunt in Kinkaid Park is not needed and a greater danger to public safety than the moose now represent by their relatively small numbers, and the few incidents that have occurred. If a specific moose does in future prove dangerous to the public, the most appropriate action would be the have the moose dispatched by trailed wildlife agents.

Proposal 155: Oppose.

Proposal 167: Oppose. Hunting moose during their winter weakness is a bad solution to the problem of motor vehicle/moose collisions. Cutting back the roadside vegetation would be better. Driving more slowly in conditions of poor visibility (driver responsibility) is also advised.

Proposal 170: Support
This proposal may help stop the recent decline of Kenai Peninsula Brown Bears.

Proposal 171: Oppose
The US Dept of Fish & Wildlife’s proposal seems like the better solution.

Proposals 172, 173, 174. Oppose
For public safety all bait & carcasses should be removed from bear bait stations when the hunt is over. If it’s too inconvenient to the hunters, they can choose not to draw bears in with bait stations.

Proposal 178: Support
Permanently IDing traps will help trappers claim their gear if a dispute in the field occurs. It will allow better enforcement of existing regulations. It will also encourage more ethical trapping methods.

Proposal 179: Oppose
Why would trappers want to remain anonymous? Having a name and address, or a drivers’ license number permanently affixed to the trap would facilitate law enforcement.

Proposal 180: Support
Trapping on or near popular heavily used roads, lakefronts, campgrounds and trails is incompatible with other recreational uses. Traps and snares are dangerous weapons, and have caused numerous injuries and fatalities to beloved pets, and pose a clear danger to
people as well. Many communities in SC Alaska are now too crowded for close

Proposal 181: Support
For the same reasons as above (Proposal 180).

Proposal 191: Oppose
Just because felt-soled waders aren’t the only way invasive plants and animals are introduced to Alaska waterways and lakes doesn’t mean they should be allowed. Other means of limiting the spread of invasives need to be added to management tools as well.

Proposal 192: Support
Proposal 193: Support
This should help increase public safety.

Proposal 194: Oppose
Trappers already have the fewest number of regulations of any other hunter group. Now they want to limit bird hunters’ activities, so they can trap without the chance of catching valuable bird dogs? Maybe it’s the trappers who should be required to stay away while bird hunting is in season...this is the most absurd proposal I’ve ever read!

Proposal 195: Oppose
Removing contaminated soil is a reasonable requirement in these situations. Bait stations are questionable in that they introduce bears to human food, training bears (those that feed but don’t get shot) to potentially seek out other human foods in yards or dumps. Leaving residues at baiting stations continues to be a draw bears after the hunt, which could easily become a public safety issue.
To: Alaska Board of Game  
From: Paul Chanek, Chugiak, AK 99567  pchanek@ak.net  
Re: Comments for BOG meeting March 13, 2015

Please SUPPORT Proposal 170 by the US Fish and Wildlife Service (brown bear hunting limits) 
Brown bears are getting precipitously low in number on the Kenai, particularly females, if you are to believe the US F&W Service (and I do--their findings are based on scientific study not anecdotes). Bear hunting should be limited, as they propose, at this time. We all enjoy seeing brown bears on the Kenai, one of the few places you can see them so close to Anchorage. Wildlife viewing (especially of such an increasingly rare species as brown bear) is a major tourist attraction, which I'm sure businesses on the Kenai well appreciate. With bear numbers as low as they are, this is a sound proposal which makes sense.

Please SUPPORT Proposals 180 & 181 (trapping setback limits) 
These proposals are just common sense. They put into place limits that should have been there long ago (and which, I'm willing to bet, most Alaskans already assume ARE in place). Any traps should be set long and far away from public trails and roads, particularly in areas as highly used as those in the proposal. I personally walk dogs on trails--including those in the mentioned areas. It's absurd that traps can be set so closely that even leashed dogs (or even my own foot!) might be caught in one. What's the reasoning behind this? Hundreds (thousands?) of people use these trails constantly--adults, kids, many with their pets. How does that compare to usage by trappers? Clearly, trapping so closely is dangerous and unwelcome. It should always be kept to areas far enough away to prevent accidents. I don't think 250 feet off-trail is too much to ask of a serious, responsible trapper. A trap is the last thing I want to be thinking about when I'm out hiking on a public trail--and why should I have to? Again, this is just common sense.

Please REJECT Proposal 150 (moose hunt in Kincaid) 
Hunting moose in Kincaid Park is a ridiculous idea. You're asking for nothing but trouble in such a highly used public area, no matter what time of year a hunt would be held. Moose are not a problem in the park, clueless park users are. I have used Anchorage park areas for 30 years--hiking, biking, skiing--and have had no problems with moose, though I have, of course, had more than a few encounters. I have always followed one rule: moose always have the right of way. It's worked for me and everyone I know. If there are problem moose in Kincaid, they can be dealt with, as-needed, by officials, like any other problem. I personally enjoy seeing moose and do not want them eliminated from Kincaid. It's all part of the "big wild life"
we enjoy up here. These moose are also used to human contact—what kind of that be? Sounds more like hunters looking for easy pickings, rather than any kind of real safety issue, as it's being presented.

Thanks for considering my comments. I have lived in Alaska since 1984 and have always been an outdoor recreational user.

Paul Chanek  
21035 Country View Dr  
Chugiak, AK 99567  
907-688-4894  
pchanek@ak.net
Dear Alaska Board of Game Officers:

Below please find my comments pertaining to USF&WS Proposals 170; 180; 181; and 150.

I SUPPORT PROPOSAL 170: Population estimates for the brown bear population on the Kenai Peninsula are difficult to obtain because of dense forestry, and past estimates have indicated a decline—especially in females. Given the inevitable conflicts which may arise when wildlife habitat is encroached—however unintentional by recreational visitation—such conflicts are not resolved by mindless hunting by sports hunters, but should be investigated on a case-by-case basis by professional wildlife scientists and troopers. Wildlife management’s priority is always coexistence, not eradication. The brown bears of Kenai have a notorious low reproductive rate, and harvest limits should always err on the side of conservatism based, in large part, on the quantity of females who are killed due to human caused mortality (HCM). The USF&WS’s stated mission is to protect wildlife for “the benefit of the American people,” which includes not only sports hunters, but wildlife watchers, photographers, visitors and all other nonconsumptive users of this precious area. I will not visit this area again knowing that hunters are killing off an animal whose only crime is that it is alive and well. I will make every effort to my fellow tourists and others in the tourist industry to not visit an area that will become a killing ground. Alaska Board of Game: Please adhere to the USF&WS’s legal mandate to the American people, and practice your shooting and hunting skills in Iraq and Syria where it can be utilized most appropriately.

I SUPPORT PROPOSALS 180; 181: Trapping is cruel and inhumane—no matter what the target animal is. Any traps that are not set well beyond selected setback areas will injure or kill non-target animals—whether they are recreational visitors’ companion pets or other wildlife. Small children will also become endangered by these traps. Any tourists or recreational visitors to this area, upon seeing the unsightly and malevolent structure of a “trap,” will feel upset and nauseous, perhaps never to return again to this area. I know that I won’t. Most users of our nation’s wildlife areas today do not want to see bullets, blood, guts and animal suffering. Only education and respect for these majestic animals—so vital to their ecosystems—can avoid conflicts. Users of this area must be presented educational information that will enhance their experience by nurturing a healthy respect for brown bears, and their foraging for food is a fact that can be circumvented by our careful habits and clean-up rigor when in this area. “DO NOT ATTRACT TROUBLE” or something to that effect should be posted widely throughout this area.

I OPPOSE PROPOSAL 150: Disabled hunters should not seek to disable other living creatures. A
more therapeutic activity should be to increase the moose population, not decrease it. Moose numbers are dwindling in the lower 48 states; scientists suspect climate change as the reason. It is inviting disaster to think that the small populations in these areas can become locally extinct without affecting regional populations. People love watching moose—not killing them. They have become iconic fixtures, and their presence enriches us.

Thank you for allowing me to comment.

Yours truly,
Jeffrey Kramer
New York City
Members of the Alaska Board of Game

This email is being sent to voice our SUPPORT for Proposal 170

The biggest draw to Alaska is your wildlife and your natural resources. The main reason for us visiting is the wildlife. The decline of the breeding female population of brown bears on the Kenai Peninsula must be wisely managed. Fatality counts must not just figure in those killed by hunting, but all other methods as well.

Because these brown bears are an isolated population, have low reproductive potential and are difficult to monitor, bear management on the Kenai requires a very conservative approach. Documentation shows in 2014, 69 bears on the Kenai were documented as having died as a result of HCM. Of those bears, 19 (28 percent) were females and 6 were reproductive-age females. The previous year, 70 bears were documented as HCM. Of those, 34 (50 percent) were females and 24 were reproductive-age females. Telemetry data from radio-collared bears indicated almost 30 additional bears died of unknown causes in 2013, likely many of them females.

The documentation for the 2013 and 2014 mortality rates for female bears are alarming, and clearly unsustainable. If the state's liberal harvest quotas for sport hunters remain in effect, the area's bear population will decline to a point where neither hunters nor non-consumptive users will be able to spot bears. Seeing a bear in the wild was the highlight of our trip; likewise, it was the major disappointment of others who did not have the privilege of spotting one on their trips.

Notwithstanding recent years' excessive mortality rates, the population was already at a low density compared to other coastal brown bear populations. Continued decline will result in substantial long-term damage to the Peninsula's ecosystems. Once that ecosystem is fractured, it is nearly impossible to get that balance back. Do not take that chance.

The USF&WS proposal includes stricter harvest limits in the Kenai's "back country." These are the most easily viewed bears - those that live closest to areas easily accessible to visitors, photographers and wildlife watchers. Continued substantial population losses among these bears will be a loss for the area's tourism industry. This is your biggest draw. If we had not seen the wildlife we did, we would have not encouraged others to go. With our delightment in the wildlife viewing, we told all it would be a dream trip....to see the wildlife in its natural habitat....awesome! Do all you can to protect this experience for all.

The legal mandates in place are there to ensure non-hunters get the enjoyment of these magnificent animals also. Any continued decline in the Kenai brown bear population is inconsistent with USF&WS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography. Please, do all you can now to ensure the ability of your area to make those
memories for generations to come.

Thank you for your time.

Mr and Mrs Steven Aubry
Wisconsin Residents/Alaskan Visitors

Sent from my Samsung Galaxy Tab®|PRO
Members of the Alaska Board of Game

This email is being sent to voice our OPPOSITION for Proposal 150

We oppose for the following reasons.

A heavily-used park such as Kincaid is incompatible with a moose hunt, even if the hunt is very limited in scope. It is disingenuous to initiate a sport hunt in the name of public safety.

The current estimated moose population in the park is not excessive. Most of the moose are habituated to sharing the park with a wide variety of recreational users.

Increased public education focused on ways to avoid moose encounters, rather than killing most of the moose, is a much more appropriate means of preventing conflicts.

Many Anchorage residents - likely a majority - value Kincaid's moose and accept their presence when they recreate in the park. Moose thriving in a city park add to Anchorage's unique character and lifestyle.

If a problem moose is identified and needs to be removed, trained wildlife biologists are best equipped to deal with it, not sport hunters randomly targeting all cow moose. Utilizing readily available professional wildlife personnel would be much easier, safer, and result in minimal disruption to public use of the park.

Please take these points into consideration. Thank you for your time.

Mr. And Mrs. Steven Aubry
Wisconsin Residents/Alaska Visitors
Members of the Alaska Board of Game

This email is being sent to voice our SUPPORT for Proposals 180 and 181

PROPOSALS 180, 181: SUPPORT

We are writing to advise that we are in support of the above two proposals. Wildlife viewing is one of your most Important tourism draws. We could not imagine our trip to Alaska without the wildlife. There always seems to be a fine line to balance hunters/trappers rights with those of non-hunters/trappers. These proposals are a win-win situation for all.

Points to consider:

The Cooper Landing, Seward and Moose Pass areas are world-famous, year-round meccas for family-oriented outdoor recreation.

Traps set adjacent to multi-use trails and facilities are dangerous to pets and small children. Such trapping is clearly incompatible with routes designed to be easily accessed by families with children and dogs.

The proposed setback areas are limited in scope and clearly delineated. The regulation would be easily enforceable by wildlife troopers.

Such regulations clearly specifying no trapping areas would go a long way to eliminate what can be emotional and unpleasant conflicts between recreational users and trappers - a "win-win" for both groups.

It is inequitable that the activity of just one user group - trappers - deters people partaking in many other activities from safely enjoying multi-use public facilities and trails. Nothing in the proposals restrict trappers from simply placing traps beyond the setback.

Please take these points into consideration. Thank you for your time.

Mr. And Mrs. Steven Aubry
Wisconsin Residents/Alaska Visitors
PLEASE support Proposals 170 and 180, 181 to protect the Kenai brown bear population and restrict trapping on the Kenai Peninsula.

PLEASE oppose Proposal 150. Kincaid Park is a special place with the moose and should remain as it is!

Thank you.

Martha Wavrin
Dear Alaska Board of Game:

I'm writing you today to express my opinion on some of your upcoming proposals. I have been to your beautiful state four times and am planning my next visit for 2016. I hope that you consider my opinions because - if not - I will not spend tourism dollars in your state.

I have been to Kincaid Park and have seen the moose. The park is beautiful and it was a wonderful time for me. Allowing any hunter, even a disabled hunter, to hunt in a well-traveled, busy park with moose who have been habituated to humans is a very bad concept. It makes no sense and it will limit travel dollars to Anchorage and this park. It will also endanger others - regardless of the precautions. If you allow this hunt to continue, it will not only endanger people, it will kill gentle animals, we have conditioned to not fear humans. Consequently, I, and other like minded visitors and constituents, will come to protest this inhumane proposal. You cannot allow this!

In addition, I also visit the great state of Alaska to observe and cohabitate with your brown bears in the Katmai National Park and Kenai Peninsula. I don't understand why, each year, you want to loosen restrictions and open up more hunting. I understand that hunting associations may lobby you but you need to consider that many of us come to Alaska to enjoy your wildlife, not hunt and kill it. Please pass proposal 170, 180 and 181. Again, as a tourist, I spend my money to enjoy the moose, brown bears, and a variety of other wildlife. My understanding is allowing a continued decline in the Kenai brown bear population is inconsistent with USF&WS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography.

Please consider my opinion and act accordingly. I appreciate your consideration.

Sincerely,
Johnell Olsson
Vail, Colorado
303-618-2148
From: Margaret McGinnis
To: DFG, BOG Comments (DFG sponsored)
Subject: Proposals 170, 180, 181, 150
Date: Wednesday, February 25, 2015 5:11:36 PM

I am writing to support Proposals 170, 180 and 181

- The brown bears are an isolated population, have low reproductive potential and are difficult to monitor (population studies in heavily forested regions are extremely difficult and expensive), brown bear management on the Kenai requires a very conservative approach.

- The 2013 and 2014 mortality rates for female bears are alarming, and clearly unsustainable. If the state's liberal harvest quotas for sport hunters remain in effect, the area's bear population will decline to a point where neither hunters nor non-consumptive users will be able to spot bears.

- Notwithstanding recent years' excessive mortality rates, the population was already at a low density compared to other costal brown bear populations. Continued decline will result in substantial long-term damage to the Peninsula's ecosystems.

- The USF&WS proposal includes stricter harvest limits in the Kenai's "back country". These are the most easily viewed bears - those that live closest to areas easily accessible to visitors, photographers and wildlife watchers. Continued substantial population losses among these bears will be a loss for the area's tourism industry.

- Any continued decline in the Kenai brown bear population is inconsistent with USF&WS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography.

Proposals 180 and 181

- The Cooper Landing, Seward and Moose Pass areas are world-famous, year-round meccas for family-oriented outdoor recreation.

- Traps set adjacent to multi-use trails and facilities are dangerous to pets and small children. Such trapping is clearly incompatible with routes designed to be easily accessed by families with children and dogs.
The proposed setback areas are limited in scope and clearly delineated. The regulation would be easily enforceable by wildlife troopers.

- Such regulations clearly specifying no trapping areas would go a long way to eliminate what can be emotional and unpleasant conflicts between recreational users and trappers - a "win-win" for both groups.

- It is inequitable that the activity of just one user group - trappers - deters people partaking in many other activities from safely enjoying multi-use public facilities and trails. Nothing in the proposals restrict trappers from simply placing traps beyond the setback.

*I am opposed to Proposal 150*

- A heavily-used park such as Kincaid is incompatible with a moose hunt, even if the hunt is very limited in scope. It is disingenuous to initiate a sport hunt in the name of public safety.

- The current estimated moose population in the park is not excessive. Most of the moose are habituated to sharing the park with a wide variety of recreational users.

- Increased public education focused on ways to avoid moose encounters, rather than killing most of the moose, is a much more appropriate means of preventing conflicts.

- Many Anchorage residents - likely a majority - value Kincaid's moose and accept their presence when they recreate in the park. Moose thriving in a city park add to Anchorage's unique character and lifestyle.

- If a problem moose is identified and needs to be removed, trained wildlife biologists are best equipped to deal with it, not sport hunters randomly targeting all cow moose. Utilizing readily available professional wildlife personnel would be much easier, safer, and result in minimal disruption to public use of the park.
Dear Sir or Madam:

I am a Kenai Borough resident living in the Soldotna area, and I support proposals 170, 180, & 181. I oppose proposal 150.

Regarding 170:

I support proposal 170 to restrict brown bear hunting on the Kenai Peninsula.

The data available is clear that the 2012-2013 season loss of brown bear sows has and will reduce the brown bear population adversely for years to come. Our brown bear population already was at a low density compared to other Alaskan coastal brown bear populations prior to this loss brought about by the decision to extend the season that year by the Alaska Department of Fish & Game. This population is already adversely affected by ecosystem disruption from the burgeoning population density of the Homo sapiens population on the peninsula, road kills, and killings during human-bear encounters. Using U.S. census data from 2011, it seems that 15% of the Alaska resident population is determining the management policies over the wishes of the remaining 85% of us. We live here also, pay our taxes as well, and expect that our voice is heard over the hunting minority. We expect that Alaska policy makers will do their jobs and respect the law including the US Fish & Wildlife’s legal mandate “to ensure opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography”. It makes considerable more sense to use my tax dollars to enforce existing policies and develop additional bear-human safety policies and education rather than driving the extinction of yet another remarkable species for the wishes of a small minority. Clearly our ecosystem and others are changing and “traditional” notions of living in Alaska are not consistent with all the data we now have regarding the health of a myriad of wild animal populations. Additionally, “traditional” notions have no role in rational management strategies to ensure the current and future health of these populations. We do not actually live in a Jack London novel or on a reality TV show about Alaskan life, written by a screen writer from California. It’s time to wake up and face current realities and preserve what we have left.

Where is the democracy of allowing a minority view to prevail?

Regarding 180 & 181:

I support proposals 180 & 181 to restrict trapping beyond a 250 foot setback adjacent to public roads, multi-use trails, and recreation facilities near Cooper Landing, Moose Pass, and Seward.

My family lives in a rural area on the Kenai Peninsula. We frequently hike, cycle, ski, berry-pick, and cut firewood with our family dog on and near our local trail systems including the affected areas.

Again, an even more significant minority of Alaskan residents, less than 0.5% are determining policy for those of us who hike, bike, ski, photograph, and marvel at the remarkable animals that attempt to survive in Alaska and have existed here for millions of years, long before human evolution even began. We constantly worry that our pets will become caught or killed in traps. We have already had one dog maimed in a snare, suffering with lifelong pain and disability. Clearly a 250 foot set-back for a trap is a small price to pay for this fringe minority of Alaskans to continue what in my opinion is a very cruel and un“sportsmanlike” method of cruelly killing an animal plus it risks the safety of children and family pets.

Where is the democracy of allowing a minority view to prevail?

Regarding proposal 150:

I oppose proposal 150 to allow moose hunting in Kincaid Park by disabled people or anyone.

My family uses the Anchorage trail systems including Kincaid Park frequently and year round. We hike, cycle, ski, photograph wildlife (moose particularly) and bring our dog with us. We bring tourists/family visitors to Kincaid Park for cycling, hiking, and animal viewing. I also am an Emergency Physician, and I find it remarkable that this proposal to discharge rifles within a city park has been able to gain any traction at all! The risk of a gun shot wound while enjoying a public trail system never crossed my mind as a possibility in Anchorage unless it was due to an
assault. Disguising proposal 150 as concern for disabled people, allowing them to hunt is unconscionable. Occasional moose human incident is a far smaller risk than allowing the use of firearms in a populated area even if it is claimed that access will be restricted during the hunt. The number of Anchorage moose is actually declining, so it is less of a problem for this habituated population. Educating trail users regarding avoidance of altercations with moose is considerably more sensible in order to reduce human or moose injuries. Proposal 150 would restrict the use of these trail systems by a majority of Alaskans and tourists during the proposed hunt. Those of us who live and recreate in Alaska are well aware of the risks and accept the fact that this is not DisneyLand, and that we always are at some risk when we enjoy the Alaskan environment. That’s why we live here isn’t it?

Sincerely,

Craig Doser
I am a Kenai Borough resident living in the Moose Pass area, and I support proposals 170, 180, & 181. I oppose proposal 150.

Regarding 170:
I support proposal 170.

The data available is clear that the 2012-2013 season loss of brown bear sows has and will reduce the brown bear population adversely for years to come. Our brown bear population already was at a low density compared to other Alaskan coastal brown bear populations prior to this loss brought about by the decision to extend the season that year by the Alaska Department of Fish & Game. This population is already adversely affected by ecosystem disruption from the burgeoning population density of the Homo sapiens population on the peninsula, road kills, and killings during human-bear encounters. Using U.S. census data from 2011, it seems that 15% of the Alaska resident population is determining the management policies over the wishes of the remaining 85% of us. We live here also, pay our taxes as well, and expect that our voice is heard over the hunting minority. We expect that Alaska policy makers will do their jobs and respect the law including the US Fish & Wildlife’s legal mandate “to ensure opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography”. It makes considerable more sense to use my tax dollars to enforce existing policies and develop additional bear-human safety policies and education rather than driving the extinction of yet another remarkable species for the wishes of a small minority. Clearly our ecosystem and others are changing and “traditional” notions of living in Alaska are not consistent with all the data we now have regarding the health of a myriad of wild animal populations. Additionally, “traditional” notions have no role in rational management strategies to ensure the current and future health of these populations. We do not actually live in a Jack London novel or on a reality TV show about Alaskan life, written by a screen writer from California. It’s time to wake up and face current realities and preserve what we have left.

Where is the democracy of allowing a minority view to prevail?

Regarding 180 & 181:
I support proposals 180 & 181 to restrict trapping beyond a 250 foot setback adjacent to public roads, multi-use trails, and recreation facilities near Cooper Landing, Moose Pass, and Seward.

My family lives in a rural area in the Moose Pass Area. We frequently hike, cycle, ski, berry-pick, and cut firewood with our family dog on and near our local trail systems.
Again, an even more significant minority of Alaskan residents, less than 0.5% are determining policy for those of us who hike, bike, ski, photograph, and marvel at the remarkable animals that attempt to survive in Alaska and have existed here for millions of years, long before human evolution even began. We constantly worry that our pets will become caught or killed in traps. We have already had one dog maimed in a snare, suffering with lifelong pain and disability. Clearly a 250 foot set-back for a trap is a small price to pay for this fringe minority of Alaskans to continue what in my opinion is a very cruel and un"sportsmanlike" method of cruelly killing an animal plus it risks the safety of children and family pets.
Where is the democracy of allowing a minority view to prevail?

Regarding proposal 150:
I oppose proposal 150 to allow moose hunting in Kincaid Park by disabled people or anyone.

My family uses the Anchorage trail systems including Kincaid Park frequently and year round. We hike, cycle, ski, photograph wildlife (moose particularly) and bring our dog with us. We bring tourists/family visitors to Kincaid Park for cycling, hiking, and animal viewing. I also am an Emergency Physician, and I find it remarkable that this proposal to discharge rifles within a city park has been able to gain any traction at all! The risk of a gun shot wound while enjoying a public trail system never crossed my mind as a possibility in Anchorage unless it was due to an assault. Disguising proposal 150 as concern for disabled people, allowing them to hunt is unconscionable. The occasional moose human incident is a far smaller risk than allowing the use of firearms in a populated area even if it is claimed that access will be restricted during the hunt. The number of Anchorage moose is actually declining, so it is less of a problem for this habituated population. Educating trail users regarding avoidance of altercations with moose is considerably more sensible in order to reduce human or moose injuries. Proposal 150 would restrict the use of these trail systems by a majority of Alaskans and tourists during the proposed hunt. Those of us who live and recreate in Alaska are well aware of the risks and accept the fact that this is not DisneyLand, and that we always are at some risk when we enjoy the Alaskan environment. That’s why we live here isn’t it?

Sincerely,

Roger Martinez, M.D.
P.O. Box 222
Moose Pass, AK 99631
Dear Alaska Board of Game:

I'm writing you today to express my opinion on some of your upcoming proposals. I have been to your beautiful state four times and am planning my next visit for 2016. I hope that you consider my opinions because - if not - I will not spend tourism dollars in your state.

I have been to Kincaid Park and have seen the moose. The park is beautiful and it was a wonderful time for me. Allowing any hunter, even a disabled hunter, to hunt in a well-traveled, busy park with moose who have been habituated to humans is a very bad concept. It makes no sense and it will limit travel dollars to Anchorage and this park, it will also endanger others - regardless of the precautions. If you allow this hunt to continue it will endanger people and it will kill gentle animals, I will come onsite and protest. You cannot allow this.

I come to Alaska to see your brown bears and I don't understand why, each year, you want to loosen restrictions and open up more hunting. I understand that hunting associations may lobby you but you need to consider that many of us come to Alaska to enjoy your wildlife, not hunt and kill it. Please pass proposal 170, 180 and 181.

Again, as a tourist, I spend my money to enjoy the brown bears. My understanding is allowing a continued decline in the Kenai brown bear population is inconsistent with USFWS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography.

Please consider my opinion and act accordingly. I appreciate your consideration.

Sincerely,

Judy Kimminau
1118 Fillmore St.
Denver, CO 80206
720-204-2044
Members of the Board of Game:

I adamantly support Proposals 180 and 181 establishing designated setbacks for trapping activity in specific areas. The population of the State of Alaska is becoming more and more diverse, and the Board of Game needs to acknowledge that users of trails, overlooks, roads, etc. should not be "forced" to become an unintended participant in one user's activity - that of the trappers. Most of us who choose to hike, ski, bike, run, ride horses, geo-cache, etc., etc. DO NOT want to become either viewers, or sadly, victims of the activity of trappers. This one user group - trappers - is affecting a multitude of other user groups. Hikers do not force other users to hike; bikers do not force other users to bike; on it goes. However, unethical trappers who have no force of law to prohibit their unethical behavior DO force other user groups to either "witness" their activities within eyesight of popular trails and/or suffer the consequences of their family pets becoming the unintended victims of these landmines or death traps. I reside in the Mat Su Borough, and we are experiencing the same conflicts. We have reports of trappers placing their traps within residential neighborhoods, on private property without the owners' permission, along trails in popular parks that were originally established as skiing and running trails, and the most alarming of all...school property. The consequences have been both dire and expensive for the owners who have had pets (aka family members) killed or maimed.

An avalanche of public awareness and criticism is building. You have an opportunity to make a change that will be looked upon by future generations of Alaskans as the right move at the right time. Please make the correct and ethical decision - the decision that in fact supports the ADFG guidelines: "avoid high-use recreational areas; avoid situations where you might catch a domestic dog or cat, such as near homes or trails frequently used by hikers, skijorers, ..."

Lynn Mitchell, CPA, Founder of Alaska Safe Trails
I SUPPORT Proposal 170

Submitted by managers at the U.S. Fish & Wildlife Service Kenai National Wildlife Refuge this proposal seeks to address the steep decline in the female brown bear population on the Kenai Peninsula by restricting hunting seasons and lowering harvest limits. New harvest limits would be based not just on the number of bears killed by hunters but on total Human Caused Mortality (HCM) which includes both hunting and bears killed in defense of life and property.

- Because these brown bears are an isolated population, have low reproductive potential and are difficult to monitor (population studies in heavily forested regions are extremely difficult and expensive), brown bear management on the Kenai requires a very conservative approach.

- The 2013 and 2014 mortality rates for female bears are alarming, and clearly unsustainable. If the state's liberal harvest quotas for sport hunters remain in effect, the area's bear population will decline to a point where neither hunters nor non-consumptive users will be able to spot bears.

- Notwithstanding recent years' excessive mortality rates, the population was already at a low density compared to other coastal brown bear populations. Continued decline will result in substantial long-term damage to the Peninsula's ecosystems.

- The USF&WS proposal includes stricter harvest limits in the Kenai's "back country". These are the most easily viewed bears - those that live closest to areas easily accessible to visitors, photographers and wildlife watchers. Continued substantial population losses among these bears will be a loss for the area's tourism industry.

- Any continued decline in the Kenai brown bear population is inconsistent with USF&WS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography.
I SUPPORT Proposals 180 and 181

Together these proposals would restrict trapping within a 250-foot setback adjacent to specifically designated public roads, multi-use trails and recreation facilities near the communities of Cooper Landing, Seward and Moose Pass on the Kenai Peninsula. (Proposal 180 designates the specific closure areas for Cooper Landing, and Proposal 181 designates the areas for Seward and Moose Pass.)

- The Cooper Landing, Seward and Moose Pass areas are world-famous, year-round meccas for family-oriented outdoor recreation.
- Traps set adjacent to multi-use trails and facilities are dangerous to pets and small children. Such trapping is clearly incompatible with routes designed to be easily accessed by families with children and dogs.
- The proposed setback areas are limited in scope and clearly delineated. The regulation would be easily enforceable by wildlife troopers.
- Such regulations clearly specifying no trapping areas would go a long way to eliminate what can be emotional and unpleasant conflicts between recreational users and trappers - a "win-win" for both groups.
- It is inequitable that the activity of just one user group - trappers - deters people partaking in many other activities from safely enjoying multi-use public facilities and trails. Nothing in the proposals restrict trappers from simply placing traps beyond the setback.

I OPPOSE PROPOSAL 150

This proposal would establish a drawing permit hunt for up to 10 antler-less moose (cows) in Kincaid Park, a large and very heavily used park within the Municipality of Anchorage.

- A heavily-used park such as Kincaid is incompatible with a moose hunt, even if the hunt is very limited in scope. It is disingenuous to initiate a sport hunt in the name of public safety.
- The current estimated moose population in the park is not excessive. Most of the moose are habituated to sharing the park with a wide variety of recreational users.
- Increased public education focused on ways to avoid moose encounters, rather than killing most of the moose, is a much more appropriate means of preventing conflicts.
- Many Anchorage residents - likely a majority - value Kincaid's moose and accept their presence when they recreate in the park. Moose thriving in a city park add to Anchorage's unique character and lifestyle.
- If a problem moose is identified and needs to be removed, trained wildlife biologists are
best equipped to deal with it, not sport hunters randomly targeting all cow moose. Utilizing readily available professional wildlife personnel would be much easier, result in minimal disruption to public use of the park
Dear Board of Game members,

I live in the Moose Pass area, and I support proposals 170, 180, & 181. I oppose proposal 150.

I support proposal 170 to restrict brown bear hunting on the Kenai Peninsula.

It’s apparent that the 2012-2013 season loss of female brown bears has already significantly reduced the brown bear population when that population was already low compared to other Alaskan coastal brown bear populations. And it appears the low count was caused by the Alaska Department of Fish & Game’s extending the hunting season prior to that. The numbers of bears and other wildlife species are already severely affected by the loss of their habitat due to the growing human population on the Kenai Peninsula.

What seems especially unfair is, according to U.S. Census data, a small percentage of Alaskans are deciding management policies of wildlife - regardless of the wishes of the majority of us. Hunters and trappers are a MINORITY of the population here in Alaska; the majority of us would prefer to see the animals ALIVE in wild places. Where is OUR voice in this, and why are WE not represented???

Aside from the pleasures that many Alaskans receive from viewing and photographing wild animals in their natural habitats, thousands of tourists make the pilgrimage to Alaska every year for precisely the same reason.

I support proposals 180 & 181 to restrict trapping beyond a 250 foot setback adjacent to public roads, multi-use trails, and recreation facilities near Cooper Landing, Moose Pass, and Seward.

I live in the Moose Pass area and frequently hike, cycle, snowshoe, ski, berry-pick, and cut firewood near the trail systems here as well as Seward and Cooper Landing - and I always have my dog along.

And once again, an even MORE significant minority of Alaskan residents, less than 0.5%, are determining policy for the rest of us. When only a very SMALL number of Alaskans wish to trap and kill the animals, the greater MAJORITY of us would prefer to see and photograph them alive and well in their wild homes. Aside from that, I am constantly concerned that my dog will end up in a trap. This has happened to not only another dog of mine in the past, but to a neighbor’s dog as well. Trapping in the first place is a CRUEL and BARBARIC way to secure an animal and should be outlawed simply because of THAT! How can we, as a civilized society continue to practice such torture of an animal!??

I oppose proposal 150 to allow moose hunting in Kincaid Park by disabled people or anyone.

My family and I frequently use the Kincaid Park and other Anchorage trails. We hike, cycle, and ski the trails, and we photograph the wildlife. We have played on the Kincaid Park trails dozens and dozens of times during our 25-year Alaska residency, and have never had a problem with a wild animal encounter. Moose numbers are declining in the Anchorage area as on the rest of the Kenai Peninsula, and it seems utterly unnecessary to contribute to this decline under the guise of protecting the public from a supposed danger from their presence.
In fact, in order to completely eliminate any “danger” of moose, we would have to eliminate them altogether, wouldn’t we!? Why can’t we instead launch an effective campaign to educate people about how to behave in the presence of wildlife. Also, by putting the issue of hunting on a pedestal, that is closing the park for a month so that a handful of people can attempt to kill a moose, does not represent a democratic system, as the great majority of Alaskans have no interest in hunting!

Joanie Martinez
Box 222
Moose Pass, Alaska
Proposal 170 – Hunting season and bag limits for brown bear

I support proposal 170

The brown bear population on the Kenai National Wildlife Refuge has sharply declined over the last several years due to overhunting. Brown bears have a very low reproductive rate and killing females at a rate of 28% to 50% per year of the harvest is unsustainable.

To stop this decline measures need to be taken: shortening the hunting season and lowering the harvest levels are the only way to go.

Hunter education is sorely needed too. The high harvest 28%-50% of females tells you the story.

Jos Bakker
PO Box 211403
Auke Bay, Alaska 99821
February 27, 2015

Alaska Board of Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526
dfg.bog.comments@alaska.gov

Re: Southcentral Region Board of Game Proposals 170 and 171 (Kenai brown bear)

On behalf of the Center for Biological Diversity and our more than 825,000 members and online activists in Alaska and the rest of the United States, we thank you for the opportunity to comment on the Board of Game’s proposed regulation changes for Southcentral Alaska. These comments focus on Proposals 170 and 171, dealing with management of Kenai brown bear hunting.

The Center urges the Board to adopt the Fish and Wildlife Service’s proposal, Proposal 170. Given the high mortality rate of Kenai brown bears in 2013 and 2014, the Service’s proposal likely does not go far enough in limiting brown bear harvest. It is, however, the most sensible proposal before the Board, and we therefore encourage you to adopt it.

The Kenai Peninsula’s population of some 500 to 600 brown bears faces an uncertain future. The Kenai National Wildlife Refuge’s emergency fall hunt closure in 2013 and subsequent closure from September 2014 through May 2015 highlighted the precarious situation in which the State of Alaska’s predator control policies have placed this unique population of brown bears. At least 70 Kenai Peninsula brown bears were killed in 2013. In the spring 2014 state-sanctioned hunt at least 51 Kenai brown bears were killed.

These high harvest levels are unsustainable. A recent study shows that if human-caused mortality of adult female bears on federal lands continues at the rates recorded in 2013, Kenai brown bears face a 33 percent probability of extinction on federal lands in the next 25 years (Morton 2013). And continued human-caused mortality at 2013 levels through the year 2015 will lower the Kenai Peninsula brown bear population to less than 500 bears, at which point the population loses evolutionary viability (Traill et al. 2010, Flather et al. 2011, Morton 2013). As the Fish and Wildlife Service stated in its proposal, “modeling indicates that this high loss of adult females [in 2013 and 2014], in combination with high overall mortality, will continue to impact the population in coming years” (FWS, Proposal 170). Recent harvest levels are unsustainable and must be stemmed immediately. The Fish and Wildlife Service proposal, Proposal 170, is a
significant improvement over the current regulatory framework and is superior to the Alaska Department of Fish and Game’s (ADF&G) proposal, Proposal 171.

Kenai Brown Bears: Population Trends, Genetic Isolation and Extinction Risk

Kenai Peninsula brown bears are vulnerable to population decline and eventual extinction because of their small population, physical isolation from other bears, and genetic distinctness. Because of the bears’ unique characteristics and vulnerabilities, the only way to ensure that Kenai brown bears do not become threatened with extinction is to drastically curb human-caused mortalities.

A. Evidence of Genetic Isolation

The Kenai Peninsula brown bear population is exceptionally susceptible to rapid decline due to almost complete isolation from mainland brown bear populations through a combination of geographic and anthropogenic factors (Robinson et al. 2007). Since the end of the last ice age, the 24,300-km² Kenai Peninsula has been separated from the Alaska mainland by a 16-km-wide isthmus of ice, rock, and mountains, effectively restricting bear emigration or immigration to very low numbers. More modern impediments to movement through this narrow strip of land include two communities, two airstrips, 13 km of roads, two campgrounds, railroad tracks, a 30-km-long lake, and several glaciers (Farley 2005). Combined, these factors create a functional barrier to brown bear movement and connectivity between the Kenai Peninsula and the Alaska mainland.

Studies to date support the genetic isolation of the Kenai Peninsula brown bear population. Microsatellite and mitochondrial DNA analysis show that the Kenai Peninsula brown bears are less genetically diverse than mainland Alaska brown bears, and that the Kenai Peninsula brown bears do not breed with bears from the Alaska mainland (Jackson et al. 2008, Talbot and Farley 2009). This isolation places the Kenai Peninsula brown bears at risk of extinction, not only due to genetic factors including genetic drift and inbreeding, but also because a loss of genetic diversity reduces a population’s ability to evolve and adapt to climate change (Visser 2008).

B. Population Viability of the Kenai Peninsula Brown Bear

Recent analysis shows that the current hunting regulations threaten the long-term viability of the Kenai Peninsula brown bear. Populations prone to extinction are generally characterized by large body size, large home ranges, low densities, low recruitment rates, and limited dispersal—all attributes of the Kenai Peninsula brown bear population (Woodroffe 2001, Morton et al. 2013). For such populations, human-caused habitat degradation and fragmentation and restricted immigration or emigration exacerbate the risks of demographic stochasticity, disease, and inbreeding and genetic drift (Laikre et al. 1996, Frankham 1998, O’Grady et al. 2006, Boitani and Powell 2012). Extinction risks for Kenai Peninsula brown bear are amplified by high levels of human-caused mortality, including legal hunting, defense-of-life-and-property (DLP), illegal killings, and road kill (Suring et al. 1998, Suring and Del Frate 2002, Morton 2013, Morton et al. 2013).
Population viability analysis (PVA) is the most common tool used to determine the probability that a population will go extinct within a certain amount of time\(^1\) (Boitani and Powell 2012). A PVA is an especially useful tool to determine a sustainable yearly mortality quota for a population such as the Kenai Peninsula brown bear, where anthropogenic factors play a large role in the number of bears killed each year, the animals are difficult to accurately census, and where the population faces additional stressors due to reduced genetic variability (Chesser et al. 1993).

Based on input and output parameters developed by Farley (2013), Morton (2013) calculated the population trend of Kenai Peninsula brown bears using a reproducible, scientifically-based PVA. The scientists inputted empirical data from the 2010 population census and from long-term studies on the bears to determine the future population trajectory of Kenai Peninsula brown bears under the current regulatory framework and various levels of human-caused mortality of adult female bears.

The model showed that if human-caused mortality of adult female bears on federal lands continues at the rates recorded in 2013 in which 12 percent (24) of adult females were killed, half (12) of which were on federal lands, this raises the probability of extinction on federal lands over 25 years to 33 percent (Morton 2013). Further, continued human-caused mortality at 2013 levels through the year 2015 will lower the Kenai Peninsula brown bear population to less than 500 bears, at which point the population loses evolutionary viability (Traill et al. 2010, Flather et al. 2011, Morton 2013).

Human-caused disturbance and range-contraction is a significant factor leading to the extinction of a population, and these factors are rapidly increasing on the Kenai Peninsula, increasing the relative risks of low population size (Channell and Lomolino 2000, Boitani and Powell 2012). Human activity and development may especially affect the most important group for population viability of the Kenai Peninsula brown bear—females with young. For example, females with cubs modify their movements based on perceived risk, assuming subdominant status and frequenting less productive salmon streams when risks increase (Suring et al. 2006).

Taken together, these factors—including small population size, genetic isolation and proximity to humans—make careful management and protection of Kenai Peninsula brown bears essential to preserving them. If current mortality trends continue, Kenai brown bears will qualify for listing under the Endangered Species Act. The state has the opportunity to reverse the downward trend, but it must act quickly.

\(^1\) The PVA process is widely accepted as the most scientifically valid means by which to establish a long-term conservation plan for a species. The International Union for Conservation of Nature (IUCN) recommends quantitative analyses using PVAs for Red List conservation status assessments when adequate data is available. The Fish and Wildlife Service routinely uses PVAs to determine extinction risk of a species.
Conclusion: Adopt Proposal 170 and Reject Proposal 171

Proposal 170 would delineate “front country” and back country” areas for hunting and set separate caps on female mortality in the two areas. Although we are concerned that the Service’s proposed female mortality cap of 12 is not protective enough, it is preferable to the ADF&G proposed cap of 17. We support the Service’s proposed shortened season dates for the back country.

The Kenai Peninsula brown bear is an iconic figure on the landscapes of Southcentral Alaska and a huge draw for tourists and residents alike. But recent high mortality rates for Kenai brown bears are not sustainable and have already forced the Refuge to close its lands to brown bear hunting on two separate occasions. Should the trend continue, the Kenai brown bear will be on a path to Endangered Species Act listing. It is in the Board’s best interests to adopt more protective regulations now to prevent further imperiling the Kenai brown bear.

Thank you for the opportunity to comment.

Sincerely,

[Signature]

Rebecca Noblin
Alaska Director
Sources


Subject: Proposals 170, 180, 181, 150

I SUPPORT Proposal 170

Submitted by managers at the U.S. Fish & Wildlife Service Kenai National Wildlife Refuge this proposal seeks to address the steep decline in the female brown bear population on the Kenai Peninsula by restricting hunting seasons and lowering harvest limits. New harvest limits would be based not just on the number of bears killed by hunters but on total Human Caused Mortality (HCM) which includes both hunting and bears killed in defense of life and property.

Because these brown bears are an isolated population, have low reproductive potential and are difficult to monitor (population studies in heavily forested regions are extremely difficult and expensive), brown bear management on the Kenai requires a very conservative approach. The 2013 and 2014 mortality rates for female bears are alarming, and clearly unsustainable. If the state's liberal harvest quotas for sport hunters remain in effect, the area's bear population will decline to a point where neither hunters nor non-consumptive users will be able to spot bears. Notwithstanding recent years' excessive mortality rates, the population was already at a low density compared to other costal brown bear populations. Continued decline will result in substantial long-term damage to the Peninsula's ecosystems. The USF&WS proposal includes stricter harvest limits in the Kenai's "back country". These are the most easily viewed bears - those that live closest to areas easily accessible to visitors, photographers and wildlife watchers. Continued substantial population losses among these bears will be a loss for the
area's tourism industry Any continued decline in the Kenai brown bear population is inconsistent with USF&WS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities such as viewing and photography.

I SUPPORT Proposals 180 and 181

Together these proposals would restrict trapping within a 250-foot setback adjacent to specifically designated public roads, multi-use trails and recreation facilities near the communities of Cooper Landing, Seward and Moose Pass on the Kenai Peninsula. (Proposal 180 designates the specific closure areas for Cooper Landing, and Proposal 181 designates the areas for Seward and Moose Pass.)

- The Cooper Landing, Seward and Moose Pass areas are world-famous, year-round meccas for family-oriented outdoor recreation.
- Traps set adjacent to multi-use trails and facilities are dangerous to pets and small children. Such trapping is clearly incompatible with routes designed to be easily accessed by families with children and dogs.
- The proposed setback areas are limited in scope and clearly delineated. The regulation would be easily enforceable by wildlife troopers.
- Such regulations clearly specifying no trapping areas would go a long way to eliminate what can be emotional and unpleasant conflicts between recreational users and trappers - a "win-win" for both groups.
- It is inequitable that the activity of just one user group - trappers - deters people partaking in many other activities from safely enjoying multi-use public facilities and trails. Nothing in the proposals restrict trappers from simply placing traps beyond the setback.

I OPPOSE PROPOSAL 150

This proposal would establish a drawing permit hunt for up to 10 antler-less moose (cows) in Kincaid Park, a large and very heavily used park within the Municipality of Anchorage.

A heavily-used park such as Kincaid is incompatible with a moose hunt, even if the hunt is very limited in scope. It is disingenuous to initiate a sport hunt in the name of public safety. The current estimated moose population in the park is not excessive. Most of the moose are habituated to sharing the park with a wide variety of recreational users. Increased public education focused on ways to avoid moose encounters, rather than killing most of the moose, is a much more appropriate
means of preventing conflicts. Many Anchorage residents likely a majority - value Kincaid's moose and accept their presence when they recreate in the park. Moose thriving in a city park add to Anchorage's unique character and lifestyle. If a problem moose is identified and needs to be removed, trained wildlife biologists are best equipped to deal with it, not sport hunters randomly targeting all cow moose. Utilizing readily available professional wildlife personnel would be much easier, safer, and result in minimal disruption to public use of the park.
As the author, I would like to withdraw proposal 194; Prohibit the use of hunting c-upland game birds after October 31, in Southcentral Region Units. I have since been in discussion with hunters who use working dogs, and I believe that this issue can be addressed outside of the Board of Game process.

Al Barrette
Subject: FAR opposes BOG Proposal 150-5 AAC 85.045, Anchorage Area, Unit 14C

2015 February 25

Dear Mr. Spraker and Alaska Department of Fish and Game, Boards Support Section:

Friends of the Anchorage Coastal Wildlife Refuge (FAR) opposes the opening of Kincaid Park to a moose hunt. FAR supports Municipality of Anchorage Department of Parks and Recreation Director, John Rodda, in his letter, dated February 11, 2011, for all the reasons the City opposes this proposed hunt.

Recent human/moose conflicts signal an urgent need for greatly improved public education about appropriate human and pet behavior in Kincaid Park, and elsewhere, around wildlife. Furthermore, FAR supports ADF&G in their suggestion to seasonally close parts of Kincaid Park, to uses that will harass or disturb moose during important parts of their life cycles, such as calving and, perhaps, the rut. FAR recommends that ADF&G and MOA cooperate to help prevent said conflicts.

FAR recognizes the growing need to preserve the remaining habitats not taken by miles of trails and sports fields so that wildlife and slower moving user groups are also able to continue to use and enjoy Kincaid Park, as the master plan for this facility intended. Kincaid Park serves the City well as a place where tourists and residents appreciate unique opportunities to view and photograph scenic vistas and wildlife, watch wildlife, sketch, paint, walk, and gather data for scientific studies. The Park is a unique access to this spectacular wooded area and the Anchorage coast cherished by all. We strongly agree that, as the MOA suggests, ADF&G professionals should address, if circumstances dictate, sick, injured, or behavioral issues of a given animal. Professionals are usually able to take care of issues without closing the Park.

FAR has seen rumors that ATVs would be proposed to broach the Anchorage Coastal Wildlife Refuge for the purpose of helping hunters remove the carcass post hunt. This would be unacceptable as it would damage the fragile saltmarsh habitat (Class A Wetlands) below Kincaid Park.

Again, FAR opposes BOG Proposal 150-5 AAC 85.045.

Thank you for your time and consideration.

Sincerely,

Barbara Švarný Carlson
President and Executive Director

cc: George J. Vakalis, Municipal Manager  
    John H. Rodda, Director, MOA Parks and Recreation  
    Holly Spoth-Torres, Park Superintendent  
    Brad Cooke, Kincaid Recreation Supervisor  
    Jessy Coltrane, Ph. D., Area Wildlife Biologist, ADF&G  
    Gino DelFrate, Region 2 Management Coordinator, ADF&G
Please vote "Yes" on proposals to limit brown bear hunting and restrict trapping near recreation areas on the Kenai Peninsula, and to vote "No" on a plan to initiate a moose hunt in Anchorage's Kincaid Park.

We need to protect the animals with common sense.

Dena
From
Robert Archibald & Roberta Highland
Po Box 2460
Homer, AK 99603

To
Ted Spraker, Chair, Alaska Board of Game
ADFG Boards Support
P.O. Box 115526
Juneau, AK 99811

Subject
PROPOSAL 183 - 5 AAC 92.530. Management Areas.
Create a Management Area for Kachemak Bay in Game Management Unit (GMU) 15C:

Dear Board of Game,
We strongly support Proposal 183 in its entirety.
We also want to go on record as agreeing with the letter of support written by the
Kachemak Bay State Parks Advisory Board; thus we will not reiterate their excellent
comments.

Please support Proposal 183.

Sincerely,

Robert Archibald & Roberta Highland
Dear Ted Spraker,

The Kachemak Bay Conservation Society (KBCS) strongly supports Proposal 183, shown in the text box above. We believe the justifications outlined under the proposal provide a clear rationale for the need and value of establishing the Kachemak Bay Management Area.

KBCS would like to emphasize the following reasons that this proposal should be adopted:

1. Adoption of proposal 183 will provide a more comprehensive and coordinated approach to wildlife and habitat conservation within Kachemak Bay State Park (KBSP) and the Kachemak Bay Critical Habitat Area (KBCHA).

2. Adoption of proposal 183 will enable management of wildlife populations and habitats in the new area to be more specifically tailored towards addressing concerns and priorities outlined in the ADF&G action plan Our Wealth Maintained: A Strategy for Conserving Alaska's Diverse Wildlife and Fish Resources (ADF&G 2006, revised 2015).

KBCS wholeheartedly supports the wise and forward-looking efforts being made by the Kachemak Bay State Park Citizens' Advisory Board to promote establishment of the Kachemak Bay Management Area.

Sincerely,
Roberta Highland
President,
Kachemak Bay Conservation Society
Comments to the Alaska Board of Game
Southcentral Meeting
March 13-17, 2015

Sheep Issues

Alaska Backcountry Hunters & Anglers has twice now submitted proposals to this Board to limit nonresident sheep hunters in Region III because of the known problems in some subunits where unlimited nonresident sheep hunters and the unlimited guides they are required to hire are causing overharvests of sheep, conflicts and crowding afield, and levels of harvests that can lead, and have led, to restrictive drawing hunts for both nonresidents and residents.

It should be noted that this Board requested that we not submit a proposal to only “fix” problem areas or “hotspots,” because the Board was unwilling to just fix certain subunits due to that exacerbating and spreading the problems elsewhere. This is why our proposals have addressed all of Region III.

The issues and problems surrounding sheep hunting are not something that is unknown. Both the guide industry and this Board have stated repeatedly in public and to the legislature that we have a big problem with a system that places no limits on the number of big game guides nonresidents are required to hire, along with unlimited nonresident sheep hunting opportunities in many areas of the state.

Yet this Board has continued to not address these concerns, either voting down or deferring the numerous sheep proposals that have come before this body.

In February of 2014 at the Interior Region III Board of Game meeting the public was told that the Board had requested that ADFG commission a scientific sheep survey to better understand what was going on afield, and what the issues and concerns were and if those concerns that have led to the numerous sheep proposals before this board were valid.
The Board at that time deferred all the sheep proposals before them to the 2015 Region IV meeting in Wasilla, using the rationale that the results of the sheep survey would help them make a more informed decision.

The results of the sheep survey only highlighted the many problems so many have been complaining to this Board about over the last several cycles. Yet the Board still refused to address the proposals before them, and instead generated their own proposals that are ostensibly going to be acted on (or deferred) at this Region II meeting in March 2015.

During all this time, the Department has not really been able to present data that accurately reflects the reality of what is going on in individual subunits. A case in point is the Department’s presentation to the Board last month at the Wasilla meeting (RC 74) regarding all the sheep proposals before it. Nowhere in that presentation did the Department break down the statistics for individual subunits in Region III. Instead they presented graphs going back 30 years that showed yearly levels of nonresident and resident sheep hunter numbers and harvests region-wide.

Here below is the Department data we expected them to show the Board, taken from the Department’s A&Rs on our proposal #111 (Region IV 2015) that has been withdrawn.

<table>
<thead>
<tr>
<th>Unit/Area</th>
<th>Average annual hunter numbers</th>
<th>Percent resident hunters</th>
<th>Average annual harvest</th>
<th>Percent harvested by residents</th>
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<tbody>
<tr>
<td>All Region III</td>
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<td>70%</td>
<td>503</td>
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<td>29%</td>
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<tr>
<td>Unit 12</td>
<td>288</td>
<td>76%</td>
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Many times members of this Board and the public have said on the record that 8 in 10 of all sheep hunters in Alaska were residents, alluding they made
up the vast majority of sheep hunters and that it wasn’t nonresident sheep hunters (or guides) that were a problem.

But if we look at the reality, according to the Department, averaging over the last nine years across Region III, nonresident sheep hunters make up 30% of all hunters and take 50% of the harvest.

Keep in mind that nonresidents make up 30% of all Region III sheep hunters even though we have restrictive drawing hunts in areas like TMA and DCUA that limit nonresidents to only 10% of permits.

Further breaking it down, in subunit 19C nonresident sheep hunters make up 53% of all hunters and take 71% of the total harvest.

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**In subunit 19C nonresident sheep hunters make up 53% of hunters and take 71% of the total harvest.**

In subunit 20A, a known problem area, nonresident sheep hunters make up 36% of all hunters and take 62% of the total harvest.
So why does neither the Department nor the Board ever really get this kind of factual information out there during meetings? And if the sheep survey conducted by Dr. Todd Brinkman essentially proved that the concerns so many had were real, why did this Board continue to kick the proverbial can down the road and again do nothing?

At the Region IV meeting in Wasilla last month, this Board held an informal sheep town hall meeting that drew 168 members of the public. The one single thing everyone agreed on is that there are far less sheep out there today than there have been.

Yet neither the Department nor the Board will say we have any real sheep conservation concerns.

Again, we want to include Chairman Ted Spraker’s testimony to the Alaska legislature in 2013 (pasted in after our comments), testifying in support of the proposed Guide Concession Program to limit big game guides in Alaska on state and BLM lands. This was the Board’s solution to the “nonresident component” problem. Putting all nonresidents on draw-only hunts was not the desired solution for the Board or the guide industry, and we understand why that is, but with the failure of the Guide Concession Program, for

Table 111-1. General season hunter statistics during fall 2004-2013 Region III Dall sheep hunts:

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In subunit 20A nonresident sheep hunters make up 36% of hunters and take 62% of the total harvest.
Chairman Spraker and this Board to continue to do nothing to solve these known problems is—and we mean this with all due respect—simply wrong.

It’s wrong for the sheep resource, it’s wrong for residents, and it’s equally wrong for nonresident sheep hunters as well as the guides they are required to hire.

In the end, while any nonresident over-the-counter sheep tag will always be coveted, our nonresident hunting brethren are becoming more and more aware of the problems in some areas of the state like 20A, and they will look for Canadian sheep hunts or sheep hunts conducted on federal lands in Alaska where guides (and their clients) are limited. None of these problems if they continue are good for the state’s reputation, guide businesses on state and BLM lands, resident sheep hunters, and most especially the Dall sheep resource.

And what’s equally wrong in our opinion is the Board generating a proposal that includes limiting resident sheep hunters, when there has not been a single proposal to do that coming from the public over the last few cycles.

The bottom line is this: AK BHA has always respectfully communicated with other orgs, this Board, and the Department, on these sheep issues. We firmly believe we have sheep resource concerns in some areas. We also firmly believe that by waiting too long to address the nonresident/guide component, that both resident and nonresident sheep hunters will be put on restrictive draw-only hunts. We have offered compromises others haven’t. We have tried to work with all parties to first and foremost protect our sheep populations and secondly to ensure our membership and all resident sheep hunters continued to have sheep hunting opportunities.

We are frustrated. We sincerely believe this is not how the best system of wildlife management in the country, that allows for such widespread involvement and engagement of the public, is supposed to work.

**Conclusion on Sheep Issues**

AK BHA supports a formal state-sanctioned sheep Working Group to address sheep issues and make (nonbonding) recommendations to the Board of Game at the 2016 Statewide meeting in Fairbanks.
We also support continued efforts on a workable Guide Concession Program the legislature can go along with, to solve the (known) nonresident and guide component problems.

Should neither of these two things come about, we will be submitting a similar proposal to address these issues at the next available opportunity.

**Proposal 207 – Support as amended**

Alaska Backcountry Hunters & Anglers supports option #2 in the Board-generated proposal #207 to extend the current timeframe between when a sheep hunter can land via aircraft and help to take, or take a sheep. We support changing the regulation from 3am the next day to 2pm the next day after flying when a hunter can help to take, or take a Dall sheep.

**Proposal 208 – Oppose in entirety**

Thank you for the opportunity to comment. Chairman Spraker’s comments to the legislature are below.

Sincerely,
Mark Richards
Chairman – Alaska Backcountry Hunters & Anglers

Complete Testimony of BOG Chairman Ted Spraker
House Resources Committee Hearing
HB 158 – DNR Guide Concession Program
March 11, 2013
(transcribed by Mark Richards)

“Mr. Chairman I am here today representing the Board of Game to discuss and share some of the challenges – and you’ve heard a lot of them already today - that the Board of Game will face if some sort of guide concession program to regulate the numbers of guides and the moving around of guides throughout the state is not implemented.

But I do want to make it very clear that I’m not here today to discuss the finer points of this project. You know, we look at the conservation and so forth, we’re not looking at the budgets or the areas or how these programs are laid out, we’re just looking at the resource.
And we have two major concerns; in fact we have written three letters of support to DNR since I’ve been on the board supporting some sort of limit to the number of guides and their ability to move around the state. And the reason we have supported it with three different letters, there’s two reasons, one is conservation of the resource and the 2nd concern the Board of Game has – and we’ve addressed this quite a bit – is crowding. And we feel that under the current system where there is no limit to the number of guides that can operate on state and BLM-managed lands, this has resulted in some fairly heavy generally localized overharvest of game and certainly crowding.

And I want to give you just a little bit of experience from the Board of Game. Every meeting that I’ve attended since I’ve been on the board – and I started in January of ’03 – there’s been proposals requesting some sort of reduction in harvests by nonresidents. And it first pretty much started, and in the last couple terms that I’ve been involved in it, it’s been surrounding sheep harvests. Primarily competition and overharvest and so forth of legal rams for sheep hunting. But now we have proposals and it’s spread to all big game, we’ve got proposals ahead of us now that deal with some sort of reduction in nonresident take for all big game, so that has changed.

And the requests come in basically two forms. First, proponents of these or offerers of these proposals would like to first eliminate all nonresident hunters; that’s a common statement, or at least stagger the opening season dates. We commonly see that in proposals to give the residents a five day or seven day head start before any nonresident hunter is allowed to hunt. The second kind of level of proposals that we get are to only allow nonresident hunting by limited drawing permits. And usually there’s an allocation assessed with these proposals, and it’s usually around 10%.

And I went through the recent supplement for drawing hunts and I looked at all the hunts and just struck them down to 10%, and that’s quite and exercise but I would encourage you if you’re interested in this to look at it. That’s huge. That would really make a difference. You’ve heard a lot about the financial benefits of nonresidents, you know the Board doesn’t really look at all the financial parts of it, we look at the conservation. But we understand those things. And this 10%, if that was approved by the Board, would be absolutely huge as far as money coming into our state that go to the Department of Fish & Game for managing our game.

The second thing that we are really faced with is this crowding issue, and I want to give you just a couple of quick examples. We’ve talked a lot about the Palmer to Glenallen area, 13D/14A, this is south of the Glenn Highway. And as I said we had 36 to 38 guides that were operating in this area. What the Board did, because we had several proposals to address this, we convened kind of a town hall meeting. And the room was full. We had guides, we had a lot of resident hunters there that were interested in sheep hunting. We had a very good discussion. And what was interesting to be because I realize how guides have such difficulty with their financial plan and stability when you go on permits. Knowing that, what really interested me is, all but one guide – and there were probably 8 or 10 guides in the room that operated in this area – all but one guide said, we’ve had
enough, competition is so fierce in this area we can’t offer a quality hunt, there’s very limited chance for success for our clients, and we just can’t compete at this level anymore. We would rather have permits, and then the quality goes up, the size of the ram goes up, we have more sheep to look at, the conservation part’s addressed, and mainly the crowding issue is addressed. We’ve seen examples of that.

Another area the Board of Game is looking at, and I’m sure this is going to come up fairly soon, we’ve got a meeting in Fairbanks 2014 in the spring, and this is south of Fairbanks, 20A, there’s currently about 15 guides registered for this area. And from what I hear from other guides – I’m not a guide – but what I hear from other guides around the state is that the area can probably support about a third of that number and have some really quality hunting, so that’s another area we’re going to have to deal with, And here’s something else that I’m really concerned about. Is that, there’s a difference in having guides competing with guides, that’s one issue, but the way I look at it as a BOG member, and a real state’s rights sort of guy, is that this really puts a lot of competition on residents. Because guides are well equipped, they have large camps, wall tents, a string of horses, aircraft, they’re set up, I mean this is their business. For your average hunter that goes in there for a long weekend or a week or whatever, those guys, those residents have a tough time dealing and getting game in places where you have a lot of guide competition.

Another area, and Deputy Commissioner Fleener referred to this one as well, is 19C, it’s over west of the Denali National Park, and in this area it’s primarily competition between guides. And we’ve heard this from several guides. One guide that I know personally that works in this area said that the competition is building. I think part of that may be because of what the Board did down in 14A and 13D, I think we probably pushed some of these guides over into that area. And again, when you have an area that’s fully utilized, and when you’re sheep hunting the areas of access and landings strips and so forth, regardless of how good of a super cub driver you might be, they’re limited, there’s a finite number of places you can access these sheep areas, And if the guides are operating all of those, and they’re usually there the full season, again it really impacts the number of residents that hunt in that area.

My last example on that series is we have our next BOG meeting, starts Friday in Kenai, and before us we have 53 proposals. We have 9 proposals addressing some sort of competition, overcrowding, overharvest or whatever, and this competition between residents and nonresidents. And that ratio is not uncommon in the last four or five years I’ve been on the Board. So there’s a lot of concern.

Mr. Chairman, in summary, just a few points.

The Big Game Commercial Services Board licenses about 15 to 20 – some years even more than that – new registered guides each year. And in the Board’s opinion, we just don’t have enough state land to accommodate that level of growth without additional hunting restrictions. And here’s the concern of the Board again.
These new guides probably will not be able to compete successfully with established guides in the area. But I’ll tell you who these young guides, and very ambitious guides can compete with, are residents of the state. And again, as we add more new guides, and we don’t have some sort of limit on the number of guides or how large an area they can operate in, I think it spills down to the residents and really impacts the residents and their ability to take game.

Another concern we have of course is if this plan or some sort of plan is not implemented, the board will be obligated to address what we usually call hotspot hunts. Representative Wilson brought up this point about, why don’t you just fix some of these areas – what the Board has run into is that what the board has run into is that if we fix an area over here, what we do is we push the problem over there. And we’re pretty handy at doing that under this system because we recognize hotspot issues. We’ve done this kind of a piecemeal sort of operation and I think the BOG has pushed some of these problems to other areas, whereas if we had some sort of global approach I think it would be a lot better. Better for nonresident hunters through guides and certainly better for residents.

Mr. Chairman, my last point, or just concluding statement is, I think that by adopting some sort of system to regulate the guiding numbers, and would address this conservation and crowding, we’re going to greatly benefit not only the future and stability of the guiding industry – I think that is paramount here – but I think it’s really going to make a difference in the hunters that are residents of the state, and benefit the residents. I see a lot of – and I’ve looked at this fairly carefully – I see a lot of benefits from this sort of regulation to resident hunters in the state, especially when it comes to places that are really popular for moose hunting and popular for sheep hunting.

Mr. Chairman, with that I’ll conclude and I’ll do my best to answer any questions.”
Dear Members of the Alaska Board of Game,

I'm writing to support proposals 170, 180 and 181 and voice my opposition to proposal 150.

Proposals 170:

I have followed this issue for over a year and have written two letters to the manager of the Kenai National Wildlife Refuge in December 2013 and Aug 2014 supporting the emergency and temporary closures on the Kenai Peninsula due to the significant decline in adult female brown bears. Those closures were examples of responsible wildlife management and Proposal 170 continues in that same vein.

It is my understanding that the U.S. Fish & Wildlife Service has proposed restricting hunting seasons and lowering harvest limits in an effort to address the inordinate declines in the female brown bear population. I support this proposal as well as the educational and enforcement efforts, particularly as they pertain to improperly stored food and trash. Addressing food and trash issues is critical in preventing nuisance bear encounters and is our responsibility in coexisting with this beautiful animal.

Hunting limits were not imposed in 2013 thus the need for the emergency and temporary closures. I support the U.S. Fish & Wildlife Service's conservative approach in preserving female population numbers. The data clearly supports using the Human Caused Mortality index as a reasonable way to ensure the sustainability of this magnificent resource, to do otherwise is irresponsible. The conservative approach outlined in this proposal is further warranted given the isolated area these bears habitat in, their low birth rates and the difficulty of obtaining population counts in such a heavily forested area.

The sport hunting quota can not remain in effect given the current data showing declines of over 69 bears a year. Responsible game management requires that visitors, bear watchers and photographers have opportunities to view these magnificent creatures in the back country. Declines in populations can become precipitous if not managed with care. Further declines in the bear population in this area will result in the loss of a treasured resource for the wildlife watcher as well as the hunter.

I personally know of out of state tourists who spend significant dollars visiting the Kenai Peninsula to watch these bears and visit the surrounding area who would not spend these dollars if this resource is not managed correctly. I would also like to visit this area and will closely watch how the Board addresses this proposal.

Proposals 180 and 181:

I support the trapping 250 foot setback for roads, trails and recreational facilities near the communities of Cooper Landing, Seward and Moose Pass Areas.

Recreationalists that include families, children, dogs and others on foot should not have to concern themselves with dangerous traps at recreational access points to public lands. The 250 set back is a limited and reasonable approach to a potentially dangerous situation. One user group (trappers) can not trump the utilization of public lands.

Nothing prevents trappers from setting traps beyond the 250 limit. I find it hard to understand why there would be any resistance to this reasonable and enforceable limitation.
Proposal 150:

I do not support a sport hunt in Kincaid Park. It is particularly distressing to me that this proposal has veiled itself as a sporting opportunity for the disabled and a mechanism to address human-moose encounters which have garnered some recent publicity.

This is a heavily utilized park within the city limits of Anchorage and is not appropriate for a sport hunt. Requiring closure of the park and the monitoring of all the access points is all we need to know in determining the inappropriateness of this location for a sport hunt. Requiring a waiver to the municipal ordinance that prohibits firearm discharge (a waiver Anchorage officials do not support) also points to the inadvisability of this proposal.

The few isolated incidents of human moose interaction is not resolved by a sport hunt. Most residents of Anchorage enjoy and are respect the close proximity of moose in this area. If it in fact is, or becomes a problem the best solution is to allow the trained wildlife biologists to deal with the problem through public education and other resources at their disposal.

Thank You for allowing me to provide my input and I hope your decisions will be guided by the reasonableness, sound data and science behind the support and opposition to the above proposals.

Sincerely,

Jim Broderick  
james6534@earthlink.net
The Alaskan Bowhunters Association

Proposals for Early Archery Sheep Seasons

Registration permit season August 1-9 for archery only
Full curl, double broomed or 8 year old Rams only
All sheep areas statewide, which allow harvest ticket
IBEP certified bowhunters only
No scope sighted centerfire firearms allowed in the field

- Would reduce crowding at the Aug 10 opener
- Could be easily implemented this year
- Participation and success rates could be closely monitored
- Would increase sheep hunting opportunity
- Would provide guides with additional hunt to sell
- Would increase business for air taxis and Transporters
- Would have minimal impact on the sheep population
- Would not discriminate against nonresidents
- Could be considered experimental for 2-3 years pending the results
- Biologically not harmful to sheep population as shown by some Canadian sheep hunts starting mid July
- Brinkman survey showed high support
- Bowhunting only is a limitation of methods. It is not a special interest group
- Would be interesting to see how many rifle hunters would take up archery gear to hunt the early season

Dedicated To Fostering And Perpetuating Fair Chase Hunting With The Bow & Arrow
Proposal 169 – Support: This proposal is for an early archery season for Dall sheep and falls under the general discussion of sheep hunting statewide. Allowing an archery season for sheep starting on August 1st and requiring full curl, double broomed, or eight years old would provide extra opportunity for hunters to be in the field hunting sheep under less crowded conditions. This would improve the quality of the experience for both the hunters choosing to use archery gear who would not be competing with firearms hunters as well as sheep hunters choosing to use firearms because there would be less crowding in the field. Business wise it would be good for guides, transporters and air taxis by providing an extra hunt for which to provide their services. Because archery hunters make less noise they would not disturb the sheep populations as much as simply providing an extra week of firearms hunting. Biologically it should not be a problem because Dall sheep seasons open in parts of Canada as early as July 15th without affecting the sheep populations. This hunt could easily be implemented this next regulatory year as a registration hunt. That would allow close monitoring of the effectiveness of the hunt in terms of both participation and harvest success. If 20 years of experience with the Unit 14C archery hunts is to be believed there will only be a less than 2% harvest rate for archery hunters seeking mature full curl rams.

We would like to emphasize that with modern archery gear, nearly anyone can learn to hunt with conventional archery equipment. So bowhunters are NOT a special interest group. Providing an archery only hunt is a limitation of methods and means. Archery hunts are NOT hunts provided for a special interest group.

We would also like to point out that according to the Brinkman survey (Table 12 pg 20), more archery only hunts had the highest approval of any of the alternative hunts suggested on the survey when all resident hunters were pooled.
Proposal 164 – Support: this proposal is to request an archery season for moose extending seven days after the regular season. This would include elimination of the early August archery moose hunts. So we are not requesting more hunting days. We are requesting the same number of days but at a time when there is less foliage, the bulls are moving more and are out of velvet and when meat care is more practical because of cooler weather.

As a corollary to this proposal we would partially support the proposal #163 to eliminate the early archery season for moose but would not support that entire proposal to eliminate all early or late special weapons seasons. We also do not support proposal #165 to create yet another early archery moose season.

Proposals 172, 173 & 174 – Support: We believe the requirement to salvage Brown/Grizzly bear meat if the bear is taken over bait is inappropriate and was placed there by individuals who are opposed to baiting bear. In no other hunt statewide (except for subsistence hunts) is it required to salvage meat from Brown/Grizzly bear. This regulation stands as an obstruction to hunters harvesting Brown/Grizzly bears. The Board of Game has made it clear that they would like a higher harvest of those bear. So by keeping this regulation they are going against their own policies of harvesting more bear.

Proposal 195 – Support: The requirement to remove all “contaminated soil” from a bait station was not initiated by the Board of Game but was added as a discretionary condition by members of ADF&G who were basically opposed to bear baiting. It is virtually impossible to do. There is no good definition of what constitutes contaminated soil and no direction on what should be done with it. There has been no demonstrated need for this regulation. It is basically meant to harass and act as an impediment to bear baiting. It places hunters at risk of prosecution in spite of their best efforts to comply with the law.
Kachemak Bay State Parks Citizens Advisory Board  
P.O. Box 3248  
Homer, Alaska 99603  
907-235-7024  
February 20, 2015

Ted Spraker, Chair, Alaska Board of Game  
ADFG Boards Support  
P.O. Box 115526  
Juneau, AK 99811

**PROPOSAL 183 - 5 AAC 92.530. Management Areas.**  
Create a Management Area for Kachemak Bay in Game Management Unit (GMU) 15C:

Proposal 183 provides a more comprehensive wildlife/habitat conservation approach to prevent depletions while developing and conserving wildlife resources within Kachemak Bay State Park (KBSP). We ask the BOG to consider using a framework similar to the ADFG Wildlife Action Plan to coordinate activities and reinforce communication between ADFG, ADNR, the educational/research organizations, and concerned constituencies to ensure greater public participation and support for the regulatory process.

KBSP is not only an invaluable, popular Special Purpose Site created to preserve and protect its unique and exceptional scenic nature, including fauna, but it also overlaps a portion of Kachemak Bay Critical Habitat Area (KBCHA) set up to “protect and preserve habitat areas especially crucial to perpetuation of fish and wildlife”.

Other relevant designations in KBSP, include a National Estuarine Research Reserve (KBNERR), NOAA Habitat Focus Area, a National Water Trail, and a Western Hemisphere Shorebird Reserve Network, site of International Importance.

The ADFG Kachemak Bay Critical Habitat Management Plan documented the historic concerns with some populations of fish and wildlife within Kachemak Bay. For example, many fished species such as herring; King, Tanner, Dungeness Crabs; Spot, Side stripe, Coon stripe Shrimp; Sea Cucumbers; Steamers, razors, and Sea urchins, were reduced to precarious thresholds leading to depletion and closure.

Populations of abundant sea duck species prominent in this CHA Plan are now depleted and are listed as species of greatest conservation need in the Departments Wildlife Action Plan. The high level of human use of Kachemak Bay combined with the vulnerable wildlife resources of the Bay, warrants creating a discrete management area.

The rugged Gulf of Alaska Coastal Mountain Ecological region contrasts sharply from the rolling Cook Inlet Basin Ecological region of the remainder of 15C. The different species assemblages and densities need a more judicious and systematic review under a more objective KB Management Area.

Harvest continues on some depleted species at the same levels as when populations were abundant and strong and biological conditions were more favorable. Shifted baselines or what is known as generational amnesia, may be the culprit. Knowledge extinction occurs because a younger generation of managers and the public are not aware of past biological conditions so recent “baseline” surveys actually depict depleted populations, when compared to local knowledge of species, size, and abundance.
We urge the BOG to create a Kachemak Bay Management Area that will utilize local knowledge, research, and education under a plan modeled on the ADFG Wildlife Action Plan, a blueprint for a Comprehensive Wildlife Conservation Strategy. The objective is to evaluate harvest and rehabilitate depleted species as required under the CHA Management Plan and “keep common species common.”

This Action Plan Strategy is designed to help Alaska prevent further Threatened and Endangered listings thereby reducing the potential for federal oversight. Depleted species run contrary to our ADPOR, ADNR and ADFG statutory and regulatory obligations as well as mission statements, guiding principles, and goals.

As a vehicle to open dialog with the BOG, the ADNR and ADFG and relevant to the creation of this proposed Kachemak Bay Management Area, both KBSP and KBCHA Management Plans mutually agree through a Cooperative Agreement that includes:

1. "Nothing alters the obligation of DPOR and resource management divisions (Wildlife Conservation) to work with each other on issues regarding management of fish and wildlife populations and harvest," and

2. "A free exchange of research and information between agencies is encouraged and is necessary to attain the management goals of the state."

With dwindling state revenues and the need to streamline agency efforts, this proposed KB Management Area creates an efficient, coordinated, transparent approach to clarify, corroborate, and validate wildlife management actions.

And finally, to provide for public safety, maximize efficiencies between agencies, and effectively reduce confusion to the public, this KB Management Area can enable existing KBSP regulations specific to KBSP boundaries. Current ADNR regulations restrict or manage certain hunting and firearm discharge practices. Inclusion in ADFG Game Regs, summary publications, and website brings clarity.

These specific DPOR regulations include:
1. All commercial (guided) hunting, fishing viewing or transportation activities are required to have a DPOR permit.
2. Discharge of a firearm is prohibited within 1/2 mile of any developed facility, campground, trailhead, building or other developed areas.
3. Target shooting and firearms sitting is prohibited.

Thank you for considering a more effectual, cost effective Management Area to safeguard the Park’s Habitat and wildlife species. We are eager to begin serious dialog among involved agencies, the Boards and NGO’s to better conserve and manage wildlife populations and habitats for a wide range of public uses and benefits.

With Sincere Regards,

David Taylor, Chair
KBSP Citizen Advisory Board
CC:
Governor Bill Walker
Governors Transitional Wildlife Committee Chair
Sam Cotten, Commissioner ADFG
Representative Paul Seaton
Senator Gary Stevens
Senator Peter Micciche
Tony DeGange Wildlife Habitat Director
Wildlife Diversity Program
Bruce Dale - Wildlife Conservation Director
Kristy Tibbles, Executive Director, Alaska Board of Game
Ben Ellis, Director, Division of Parks and Outdoor Recreation
Claire LeClaire, Director, Division of Parks and Outdoor Recreation
Jack Blackwell, Division of Parks and Outdoor Recreation
Roger McCampbell, Division of Parks and Outdoor Recreation
Jason Whooley, Division of Parks and Outdoor Recreation
Joe Meehan, Habitat Division
Ginny Litchfield Habitat Permitting
Center for Alaskan Coastal Studies
Western Hemisphere Shorebird Reserve Network
National Maritime Wildlife Refuge
Kachemak Bay Environmental Education Association
Nature Rocks Homer
Homer Chamber of Commerce
Homer City Manager
Mike Navarre Kenai Peninsula Borough Manager
Kachemak Bay National Estuarine Reserve
Kachemak Bay Birders
Kenai National Wildlife Refuge
Alaska Maritime Wildlife Refuge
Center For Alaskan Coastal Studies
Homer High School
Homer Junior High School
Sailwood Lodge – Sadie Cove
Kayak’Atak
Makos Water Taxi
Kodiak Treks
Kachemak Bay Excursions
Homer Book Store
Coal Point Trading Company
Lands End Resort
Inspiration Ridge Wildlife Reserve
Alaska Tree Tops Lodge
Cook Inlet Keeper
Hallo Bay Wilderness
Emerald Air Service
Bald Mountain Air Service
Northwind Air Service
Homer Howl
Friends of Kachemak Bay State Park
National Water Trail Committee
K-Bay CHA Board
Pratt Museum
K-Bay National Estuarine Reserve
K-Bay Conservation Society
China Poot Wilderness Lodge
Sadie Cove Wilderness Lodge
Tutka Bay Wilderness Lodge
Still Point Retreat—Halibut Cove

1. Kachemak Bay State Park (KBSP)
   - legislatively acquired in 1970
   - Authority: Art VIII, Sec. 7 Special Purpose Sites Alaska State Constitution.
   - Purpose: “to protect and preserve these lands and waters for their unique and exceptional scenic nature, the park is established and shall be managed as a scenic park” (AS 41.21.131)
   - Obligations: to protect and preserve the natural; geological, faunal, floral and cultural resources for scenic and wilderness values for long term multiple use and enjoyment such as camping, picnicking, sightseeing, nature study, hiking, and related activities. (AS 41.21.990)

2. Kachemak Bay Critical Habitat Area (KBCHA)
   - Legislatively created in 1974
   - Authority: AS 16.20.500 – 16.20.690
   - Purpose: to protect and preserve habitat areas especially crucial to perpetuation of fish and wildlife
   - to restrict all other uses not compatible with this purpose.
   - Obligations: to manage the area to maintain and enhance fish and wildlife populations and their habitat
   - “Priority should be given to rehabilitate depleted species.”
   - To provide consistent long range guidance to ADFG and other agencies involved in managing the Critical Habitat Areas

3. Legislative and Constitutional obligation:
   AS 41.21.131 (Kachemak Bay State Park)
   - AS 41.21.140 (Kachemak Bay State Wilderness Park)
   - AS 41.21.990 “In order to protect and preserve these relatively spacious areas of outstanding natural significance, where major values are in their natural geological, faunal, and floral characteristics…”
   - AS 41.20.020. (Duties of Department of Natural Resources)
   - Art. VIII, Section 7. (Special Purpose Sites) Alaska State Constitution
The legislature may provide for the acquisition of sites, objects, and are historic, cultural, recreational, or scientific value. It may reserve them to provide for their administration and preservation for the use, enjoyment, and welfare of the people.

- **Sec. 38.05.295. (Parks and Recreation Areas) Alaska Statutes**
  The commissioner shall establish a policy and prescribe rules and regulations by which parks and recreation areas, including public scenic overlooks and cultural sites, shall be developed and managed in a manner that will best serve the interests of the people of the state. The commissioner may classify public lands as parks, scenic overlooks, cultural sites and recreation areas as long as the general intent of this chapter is maintained.

- **Sec. 41.20.040. (Division within Department of Natural Resources) Alaska Statutes**
  The commissioner of natural resources may establish within the Department of Natural Resources a separate division to perform the functions relative to parks and recreational facilities specified in sections 10-40 of this chapter and related or additional functions as are otherwise assigned to the department by law.

- **Sec. 41.20.010. (Declaration of purpose) Alaska Statutes**
  It is the purpose of this chapter to foster the growth and development of a system of parks and recreational facilities and opportunities in the state, for the general health, welfare, education, and enjoyment of its citizens and for the attraction of visitors to the state.

**Cooperative Agreement between ADNR and ADFG:**

- "the obligation of DPOR and the ADFG resource management divisions (Wildlife Conservation) to work with each other on issues regarding management of wildlife populations and harvest."
- A free exchange of research and information between agencies is encouraged and is necessary to attain the management goals of the state.

**Mission Statement of Division of ADFG:** To protect, maintain, and improve the fish, game, and aquatic plant resources of the state, and manage their use and development in the best interest of the economy and the well-being of the people of the state, consistent with the sustained yield principle.

**ADFG Guiding Principles:** Seeking excellence in carrying out its responsibilities under state and federal law, the department will:

1. Provide for the greatest long-term opportunities for people to use and enjoy Alaska’s fish, wildlife, and habitat resources.
2. Improve public accessibility to, and encourage active involvement by the public in, the department’s decision-making processes.
3. Build a working environment based on mutual trust and respect between the department and the public, and among department staff.
4. Maintain the highest standards of scientific integrity and provide the most accurate and current information possible.
5. Foster professionalism in department staff, promote innovative and creative resource management, and provide ongoing training and education for career development.
Goals:

- Optimize economic benefits from fish and wildlife resources.
- Optimize public participation in fish and wildlife pursuits.
- Increase public knowledge and confidence that wild populations of fish and wildlife are responsibly managed

Mission Statement of Division of Parks and Outdoor Recreation:

The Division of Parks and Outdoor Recreation provides outdoor recreation opportunities and conserves and interprets natural, cultural, and historic resources for the use, enjoyment, and welfare of the people.

Excerpts from KBSP Park Management Plan:

- “Preserve the parks natural and cultural resources and scenic and wilderness values for long term multiple use and enjoyment.”
- “To efficiently and effectively provide for multiple use outdoor recreation needs of park visitors with consideration to public preferences resource values and legislative intent.”
- “To assist in the development of regional and statewide tourism.

Excerpts from Kachemak Bay Critical Habitat Area Management Plan.

- To protect and preserve habitat areas especially crucial to the perpetuation of fish and wildlife...” AS 16.21.500
- “to give priority to depleted wildlife populations, while creating sustainable multiple use opportunities.”
- Minimize harmful disturbance to wildlife, especially marine mammals, and nesting, rearing, staging and wintering waterfowl, shorebirds, and seabirds
- Maintain, protect, and if appropriate, enhance the quality and quantity of nesting, rearing, feeding, staging and wintering habitat for resident and migrant waterfowl, shorebirds, and seabirds
- Maintain or improve opportunities for hunting, fishing, recreating, viewing, photography, education, and study of fish and wildlife.
- Provide information about the critical habitat areas to the public

Excerpts from ADFG Wildlife Action Plan focusing on “the list of species on the Comprehensive Wildlife Conservation Strategy (CWCS):

- “to conserve the diversity of Alaska’s wildlife resources, focusing on those species with the greatest Conservation need.”
- “to coordinate and integrate new conservation actions and strategies with Alaska’s existing wildlife management and research programs.”
- “to raise awareness of their conservation needs and promote opportunities for effective collaboration...to meet those needs."
• "to promote and facilitate meaningful participation by commun-
sharing information about the species and the ecosystems they use.
• "To look for every opportunity to unite in conservation efforts”

A Kachemak Bay Management Area can promote:
1. **The ADFG Wildlife Action Plan** as a conservation strategy.
2. **Prevention** of further depletions.
3. **Meaningful participation** between our KBSP Board, KBCHA Board, and the Homer F&G Advisory Committee.
4. **Synchronized Efficient and consistent research** between agencies, NGO’s and the public
5. **Coordination and cooperation** between ADNR and ADFG multiple and mutual obligations to preserve and protect fish and wildlife populations.
6. **Develop an information/education program of Park and CHA.**
7. **Inform public about fish and wildlife values.**
8. **Communication** between land use habitat issues and the Board of Game process.
9. **Synchronized** research from adjoining neighbor organizations.
10. **Rehabilitation** of depleted species
11. **Acknowledge habitat ecological region designations**
12. **Opens communication** between ADNR and the BOG.
14. **Fostering public understanding** of and support for maintaining and improving the diversity, health and wealth of Alaska’s wildlife fish and habitat resources.
15. **Formally units wildlife law enforcement activities rangers with officers.**
16. **Streamline and synchronize** agency forces.
17. **Develop wildlife habitat maps** to insert into Management Plans.
18. **Develop protocols** between agencies to better coordinate wildlife actions.
19. **Integrate educational** organizations.
20. **Integrate tourism** related businesses.
21. **Integrate research** organizations.
22. **Develops a process, already in place, that provides broad opportunity for public involvement**
23. **Promote consistency** between Management Plans to raise stature of wildlife into the outdoor recreation arena
24. **Integrate local knowledge** into species and habitat data/information systems
25. **Develop and implement uniform/ complementary habitat classification systems**
26. **Integrate** all agency and NGO GIS mapping overlays
27. **Opens communication,**
28. **Align and synchronize** multiple jurisdictional agency mandates.
29. **Expanding opportunities** to all constituencies
30. **Enhance our States economy** and bring tax revenue into State coffers.
31. **Create Consistency** to more effectively insure abundant wildlife populations
I support proposal 180 submitted by Ken Green. This is a reasoned approach to avoiding conflicts between trappers and other users of the trails, campgrounds, and various facilities. I am a licensed trapper and have a home in Cooper Landing.
Girdwood Trails Committee members support in total Proposal 180 that prohibits trapping within 250 feet of any road that leads to public or private property in the Cooper Landing area. The Committee also supports Proposal 180’s restrictions on trapping within 250 feet of multi-use trails and campgrounds and other special area closures in the defined area.

Like Cooper Landing, Girdwood and the Portage areas have seen increased recreational trapping that, though mostly legal, has resulted in dog injuries and worrisome user issues on the trails. Our members sympathize with Cooper Landing citizens and support their efforts to retain trapping but to limit it so that children, adults, and dogs are not harmed and so that disputes do not escalate. Girdwood Trails members find Proposal 180 to be reasonable, enforceable, and beneficial to Cooper Landing citizens and its winter visitors.
Dear Members of the Board;

On Wednesday evening I attended a presentation, in Valdez, as presented by Fish and Game from the Cordova office. It was a worthwhile presentation with a lot of information. My biggest concern at the conclusion of the meeting was the decrease in the black bear harvest numbers in unit 6D (Prince William Sound).

I have been baiting bears in the Valdez Arm for about 12 years now. I have noticed since about 2006, a decrease in the number of sows with cubs at my stands. Actually, I have seen none since 2006. This year was probably the worst year I have had for the sighting of any bears, visually or on camera.

Our weather here has been unusual for the past four years. This year, 80" of snow, 2014 - 225", 2013 - 420" and 2012 - 525". In 2013 we had a lot of snow cover and a heavy rain that caused many avalanches and flooding over here. In 2014, "green up" started almost one month early.

In the past couple of years we have also seen a decrease in ocean sport fishermen. Many people travel for long weekends, to fish and bear hunt. This number has also been decreasing as can be seen by the increase of available boat slips within the harbor.

While the biologist had many statistics, NO ONE knows how many bears are currently in unit 6D. Were the heavy winters a factor, maybe. Was the early spring and green up a factor, maybe. Did people mis-schedule their hunt timing, maybe.

The fact is, no one, has any answers to why we saw a decrease in the black bear harvest. For that reason, I support, turning Unit 6D into a registration hunt until Fish and Game can obtain sufficient data as to the true population of black bears.

The biologist also said that an Emergency Order may also be necessary shutting down all bear hunting. It is the only option available to her to stop the decrease. Again, I would hate to see this as there is no data, supporting any conclusion as to why we had a decrease in the bear harvest.

Sincerely,

David Armstrong
I SUPPORT Board Game Proposal 180 - Cooper Landing Area. Because trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot "safety zone" along roads and trails is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and where traps may be placed.
I SUPPORT Board Game Proposal 180 - Cooper Landing Area. Because trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot “safety zone” along roads and trails is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and where traps may be placed.
Recently I saw the prince william sound black bear highlight on KTUU news. They mentioned the Board of Game was considered doing something about the harvest numbers of black bears in prince william sound. As someone who has hunted for spring black bear in the western, northern, and eastern sound, I can assure you the population of bears has dropped significantly since I began hunting in the sound. Before 2010, you could hunt for 5 days and see upwards of 20 bears including a few nice trophies. Now in that same period of time, you see about 5 bears, all of which are quite small. I rarely see bears over 6 feet now. When talking to other hunters they say the same things; no big bears and fewer bears. I also looked at the published harvest data and was surprised to see how high of a percentage consisted of females. I agree that something needs to be done with the amount of hunters now coming through the Whittier tunnel. Preservation of resources for continued use is always the right choice.
I SUPPORT Board Game Proposal 180 - Cooper Landing Area. I do not own a dog nor do I trap or hunt. Trails are used by multiple users. Placing traps on trails, is in my opinion, a form of "cheating." It is a documented fact that Game use trails for easier travel, rather than doing their own bushwacking. They take the path of least resistance. A 250 foot "safety zone" along roads and trails allows safe passage to all and in my opinion is a far more sporting thing to do. The safety of people and pets is tantamount.
As a resident of Cooper Landing, AK, I am writing in support of Proposal 180 currently before the Board of Game (BOG). Why common sense regulation such as this must be put forward as a community proposal and not generated as rules and regulations by the BOG itself I do not understand. If the BOG does not have adequate process and rules to regulate an enterprise such as trapping, then it should not be issuing permits for trapping. Without proper regulation such as Proposal 180, the State of Alaska has wrongly selected one user group over another.

Whether a user wants to hunt with a dog, take his child off trail to teach her about the habitat that surrounds her, or just wants to encounter and admire wildlife in a healthy, balanced ecosystem, this should be as valid a use as trapping and therefore should have protections that allow the user to safely engage in that activity. Since trapping is a commercial enterprise the burden should be on trappers to avoid negatively impacting other users in the area. After all, access is a state residents’ right, but commercial use of a public resource is a privilege. We do not leave it to commercial fisherman to self regulate. I do not understand why the BOG would think it appropriate for the trappers to self regulate. Why is it that respect for other users is a part of the Alaska Trappers Association’s listed ethics and recommended by the State of Alaska Fish and Game Department, but it is not required? That is patently inadequate and must be amended, if not by Proposal 180, then by statewide regulation instead. Nothing else will do.

I recently read Walter’s Story by Barbara Atwater about her native family member from the Iliamna Lake region. Even when villages were few and far between, trappers traveled far afield to work their trap lines. They didn’t trap near the village!
I support Board Proposal Board 180 - Cooper Landing Area because trails need to be made safe for both humans and their domestic pets and 250 foot safety zone is very reasonable.

Thank you!
I have property in Cooper Landing. My family and family dogs like to spend time roaming the woods around our property. Recently signs have gone up in our neighborhood indicating conflict with some trapper. I do not want traps set anywhere near homes, schools, businesses, trails, in our community. There is certainly enough open space in Alaska that trappers do not need to set traps near communities in any part of Alaska. I support the Proposal 180 from Cooper Landing to the Board of Game and any changes that need to be made to trapping laws to protect innocent people or their pets from traps.

in Cooper Landing
My name is Theo Lexmond. I am a resident of Cooper Landing and am writing in support of Proposal 180: “A proposal for trapping restrictions in Cooper Landing as enumerated by roads, multi-use trails and campgrounds, and specific special area closures.” It is the purpose of this proposal to address several key questions about the conflict that exists between trappers and non-trappers in our community.

Why is it permissible that a trapper driving through Cooper Landing can take any pullout off of the Sterling Highway, such as the ones that parallel Quartz Creek, can lay down a line of traps just feet from the edge of that pullout, and moments, hours or days later, any motorist passing through, who uses that same pullout to stop and admire the views, and let his or her pet out to tinkle, can have their pet caught in a trap?

Why is it that any trapper can lay traps just a foot from the edge of one of the beautiful trails that lead from the heart of Cooper Landing, up into the mountains or along the rivers, thereby making it incredibly dangerous for any young family that wants to go out and use that same trail to let their toddlers and pets play in the snow and enjoy the day?

Why is it that we must live with this situation year after year, when both the Alaska Trapper’s Association, in its Code of Ethics, and the Alaska Department of Fish and Game, in its rulebook for trappers, identifies such behavior as unethical? We live with it because, although it may be unethical, it is not illegal. You, the Alaska Board of Game, permit this situation to persist. We are fed up with it. We are not unreasonable people. We are not anti-trapping. I own a cabinet full of fur supplied by trappers that I use for tying flies. We want reasonable protections for all of the other people who use multi-use areas of our community like roads and trails. We want regulations that match the ethical standards of the Alaska Trappers Association and the recommendations of the Alaska Department of Fish and Game, so that unethical trappers can be punished for persistently endangering their fellow citizens by their unethical choices to trap in places where pets and small children can be caught.

It is ridiculous that one user group that practices an activity that is dangerous to the pets or small children of other user groups has their dangerous activity protected, while the rights of others to use that same public land go unprotected under the law. I recognize that the Board of Game believes they have no responsibility to deal with “social issues.” But when your management of how game is taken creates a “social issue,” you become responsible whether you care to admit it or not.

Please adopt our request for regulatory relief. Please adopt Proposal 180. Trapping and other outdoor activities can coexist. But they can only coexist if the rights of all user groups are respected and protected.
I SUPPORT Board Game Proposal 180 - Cooper Landing Area. Because trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot "safety zone" along roads and trails is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and were traps may be placed.
Proposal 202 regarding Western Arctic and Teshekpuk Caribou

ADF&G has a statutory responsibility under AS 16.20.690 to annually provide the legislature with a list of critical habitat areas. To protect these herds for the long run, ADF&G needs to complete its due diligence and identify critical calving, feeding, overwintering, or migratory areas for these herds; they should submit this list for legislative approval as soon as possible.
I am a year round resident of Cooper Landing. I own/operate a small fishing guide business on the Kenai River. I am an avid outdoorsman who utilizes the access to public lands and waters on the Kenai peninsula for recreation. I do not support the exclusion of any user groups on public lands in my community. I do not support Proposal 180.
I saw the KTUU piece on possible emergency order for PWS Black Bear. Having hunted the Western, Northern and Southern Sound extensively for more than a decade (every spring and many falls). I can tell you that the number and size of black bear is precipitously lower. We have noticed this change for several years. We have also seen a dramatic increase in hunting pressure with more people and more people getting farther out into the the more remote places in the Sound. We no longer expect to see several bears over 6 foot in the course of a week-long hunt like we used to, making it no surpirse that more novice hunters are killing so many sows. In fact we often go the whole trip without seeing a single large "trophy" size boar. We often see Troopers when out in the Sound and ask them if they are seeing large boars and are told the same thing - no or very rarely. Just so we are clear, we don't just drive around in the boat drinking coffee and glassing beaches, we silently kayak all the nooks and crannies. The problem is not data collection artifact, it is real.

I hate to see the hunt limited, but it is clearly in trouble and the population requires some protection so we can hunt it for years to come with an Alaska level quality population.
I SUPPORT Board Game Proposal 180 - Cooper Landing Area.

Because trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot "safety zone" along roads and trails is neccessary and reasonable to protect adults, children and pets using our trails and roads. This proposal does not prohibite one use over the other but instead allows everyone to to facilitate these places knowing where it is free of traps and were traps may be placed.
Why is there any question that hunting for these caribou herds should be shut down? With herds half of what they were 13 years ago they need time to re establish their herds. It reminds me of 40 years ago when King Crab had to be shut down...a few years later it was reinstated, and today the size of them is that of juniors...I have yet to see full grown crabs. Indicates that once again this species is being over fished.

Alaska has renewable resources. Don't let them become extinct. If disease is increasing due to the climate warming, then why would you all not immediately close hunting down instead of putting additional stress on the herds?
Good Day Board of Game.

I would like to ask that you explore the idea of addressing an issue of a long term resident of Alaska who has just moved to another state for work. I have lived in Alaska for many years and have been a bear hunter (along with fishing and Moose) for years. The regulations state that since I have been required to establish my residence in another state, I lose the ability to not need a guide to hunt Brown Bears. A guide would be needed and I understand the reasoning for someone who has never hunted here before, but it seems to me that if you have been a long time resident and have hunted them before (and can prove it by expired hunting licenses still in possession), why should I have to use a guide to be with me when I have hunted them as a resident before? I would gather that the Guides would like to have my money, but GMA 13 are chock full of Brownies. I have a 2014, 2013, 2012 etc. still in my possession and was also an employee of ADF&G. The last thing I want to do is be illegal, but I think two years grace period (pay the non-resident tag), but remove the requirement for a guide for Brown Bear would be reasonable. Proof must be provide (Muni Tax Bills, Length of Employment verification from Human Resources, Expired Resident Licenses, Copy of your Drivers Licenses, Etc.)

Best regards,

William Clay

Chugach Alaska Corporation

Huntsville, AL
To whom it may concern:

My name is Jason Bickling and I am a resident of Seward. This letter is in reference to Proposal 181 - 5 AAC 91.095: proposed by Mark Luttrell on unlawful methods of taking fur bearers. I am adamantly against this proposal for a number of reasons.

Mr. Luttrell’s proposals for these areas are: 1. unjustified and unwarranted in their need and 2. are far too restrictive and create barriers for certain user groups.

The recent issues that have been discussed about dog and human safety are from an incident(s) that occurred in Cooper Landing. The issue needs to be addressed at that area – not blanketing all areas in reaction to incidence(s) there. Mr. Luttrell is very vocal in our community about his anti-trapping and anti-hunting stances. I believe this proposal has more to do with his personal viewpoints than anything.

My family is an outdoors family. My wife is an avid runner and hiker and she takes our dog on Lost Lake trail and many other trails as well on a nearly daily basis. Year round, we hike regularly with our two kids and our dog. I ride my mountain bike and fat bike with my dog - I log over 600 miles a year on my bikes (year round) the Iditarod sections between Nash road and Primrose. I make the traverse from Nash Road to Bear Lake a couple times a week usually on my fat bike and there is no foot traffic whatsoever on 80 percent of the trail. We have never had an incident with our dog and don't know anyone who has on these sections that we spend so much time on.

I have an 8 year old son and a 5 year old daughter and we trap as a family. It is a good way for us to get out and enjoy the woods a couple times a week throughout the long winters. We spend significant time on the Iditarod trail between Nash Road and Bear Lake because it is just out of our backyard. We have trapped successfully and safely back in that section for a few years now without having any kind of domestic bi-catch in our traps nor people harmed. We make sure that all of our traps are off trail where they will not be seen or found by a hiker or their dog. Given the proposed regulation, having to set each trap 250 feet off of this trail would make trapping prohibitive for my young kids. The terrain along our section of the trail is very scrubby /brushy with significant devils club. It is hard enough to get our sets off the trail enough to where they aren't see / difficult to be found (for human or animal), which we do as practice anyway. Making it a minimum 250 feet, taking an extra 500 off trail feet for every trap (there and back), would make it prohibitive for my young kids to fully participate in this outdoor recreation until they are much older, especially in years of heavy snow. I'm also sure that this minimum distance would also have an effect on elder or handicapped trappers in the area. Again, I believe this is unwarranted as even in this low snow year, there is very little traffic from humans or dogs (much less families) once you get about half mile off of Nash Road. There are only a few months out of the year that we are allowed to trap – the proposed regulation would more or less take away my kids’ access to this outdoor sport that they enjoy for just a short time each year.

By running a trap line off of a recreational trail, it does not prevent equitable access to non-hunters or non-trappers. I freely take my family on a majority of the mentioned trails (many on which trap lines exist) without fear of my dog or my kids getting caught in a trap or snare. To say that when trappers or hunters use a trail it prevents access to others is completely untrue.

I also don't understand why Mr. Luttrell is proposing #3 leg hold traps only. Connibears (110s, 120s, 155s, etc) for marten, weasel, mink, etc. are also traps that have no chance of getting a dog or child into them, especially as they are usually mounted a ways up on a tree or pole. This proposal would also inhibit us from using underwater otter or beaver sets using 220s or 330s in waters nearer than 250 from the trail. These trapping set-ups are also ones that are non-threats to dogs or humans.

I would please ask the Board of Game to vote NO on this proposition. The need for it has not been demonstrated AND Mr. Luttrell’s blanket proposition takes away equitable use for many who have different outdoor interests than himself. Thanks for your time and consideration.
ATTN: Board of Game Comments January 7, 2015

Alaska Department of Fish and Game

Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Regarding Proposal 194 – 5 AAC 92.080.

I am a devout Alaskan bird hunter, a versatile hunting dog owner, an outdoor enthusiast, a conservation-minded supporter of responsible game management, and a concerned citizen who object’s to this possible new regulation. I take exception to Mr. Barrette singling out upland bird hunters specifically as this in my mind is a blatant form of discrimination.

While I do not currently trap, I did while growing up in the Appalachian mountains of Pennsylvania. I believe there’s a shared responsibility by both users in this situation to avoid inadvertent catches of domestic animals. Just last week a close friend [non-bird hunter] of mine had his dog trapped at a very public access point just off a local trailhead. Clearly this was an inappropriate spot to trap. When I did trap, I always set my traps with consideration for domesticated animals and through my 10 years or so, never caught something I wasn’t specifically targeting. Successful trappers have a keen sense of the land and should be able to recognize and avoid potential problem areas such as the one mentioned above.

Prohibiting the use of hunting dogs for taking upland game birds after October 31 in the Southcentral Region would significantly reduce days afield as the season opens August 10th or in some areas after Labor Day. Anyone who hunts birds would tell you the beginning [first few weeks] of the season is poor at best as broods are still grouped and difficult to hunt. Protective hens act very differently during this time, commonly running with their younger birds in tow sometimes for great distances to elude dogs. This said, the core [most productive] part of the season would be limited to approximately 6 weeks total.

I love my dogs and the last thing I want to have is one injured or killed in a trap. This proposal severely degrades both dog handler and dog’s quality of life by severely restricting day afield. We spend many hours and many dollars throughout the year preparing/training our dogs for a season that typically shuts itself down way too early due to deep snows.

While I want to believe Mr. Barrette had good intentions with this proposal, he’s off the mark when it comes to what resembles lower 48 politics. There’s plenty of territory here for both user groups here in Alaska. As populations continue to grow, my fear is, life as we know it in the Last Frontier is taking on the very image of the reason [to escape competition of limited resources] I moved back here when I retired from the military nearly 4 years ago.

Please consider my request to not approve this proposal.

Respectfully,

Guy L. Sachette

Guy Sachette

Eagle River, Alaska
I SUPPORT Board Game Proposal 180 for our Cooper Landing Area. Because these trails are multi-use, efforts must be made for the safety of all of those using trails and roads. A 250 foot “safety zone” along roads and trails throughout Cooper Landing is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and were traps may be placed.

Thank you.
I SUPPORT Board Game Proposal 180 - Cooper Landing Area. Because the trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot "safety zone" along roads and trails is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and where traps may be placed.
Dear Board,

I have watched over the last 40 years as a small group of people in Alaska were responsible for ruining our crab, then destroying our shrimp, then the halibut became mushy and the salmon decreased in numbers so badly that I have not seen the runs fill our rivers in many many years. We were over run by rabbits that destroyed our land but our predators were destroyed and even seeing a wolf or a coyote is almost a miracle.

Perhaps we need to cut back the horrid attempts of your "board" messing with our wildlife and in doing so will be giving it a break. Thereby, letting the wildlife recoup, and replenish, and even out the system, that pardon the expression, "God made for us". Heaven knows your board is not made up of gods and have not been very adept at keeping Alaska the great place it once was.

Back off, stop wasting our resources, our dollars, our fuel, our totems, our food and our love of Alaska.

Sincerely,

Linda Feiler
I SUPPORT Board Game Proposal 180 - Cooper Landing Area. Because the trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot "safety zone" along roads and trails is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and where traps may be placed.
I strongly support at least this minimum setback from trails. I also want larger no trapping zones so I can subsistence bird hunt. Hard to hunt a bird dog on a leash.

someday a kid is going to get seriously injured in the larger traps as they get set and left and snow covers them up.

Truly don't understand why a few people can ruin the hiking and wildlife viewing for the rest of us. Why force the proponents of this measure to keep spending hours on this measure when any rationale person can see it will eventually happen and when it does it will be far more restrictive than this very modest proposal.
This is the best thing I've heard in years. Please make trappers responsible.

creating a 250 foot safety zone prohibiting trapping around trails and public roads in Cooper Landing (trappers would be able to lay traps beyond the 250 foot area, currently they can set traps on trails).
This proposal (Board Game Proposal 180) is for Cooper Landing but hopefully if a 250 Safety Zone could be established in Cooper Landing a precedent could be set for other neighborhoods to protect pets and children.
To Whom, It Might Concern,

I am writing in reference to proposals 207 and 208. I have hunted sheep in Alaska for the last 9 years and also own and use a private airplane for my hunting purposes. I have been in Alaska for the last 16 years and spent 8 years in the guiding industry. I also hunt other states and put in for non-residents tags draws across the western states year after year.

I am opposed to Proposal 207 to further regulate the use of aircraft for sheep hunting. #1 would be impossible to enforce and #2 & #3 will not address the problem of harassing game during hunting season. Stricter fines/enforcement of game harassment is a better solution to "picking your 40"sheep with an airplane".

Proposal 208

I am against the restriction of resident hunters without first restricting non-residents. In other states that have limited resources to hunt that I apply for, I am lucky if the state gives 15% of the harvest to nonresidents most of them are 10%. In Alaska we allow around 40% of the harvest to non-residents and in some of the most crowded areas it’s greater than 50% of the take to non-residents.

Though not covered in these two proposals, I fully support resident sheep hunters paying higher fees for tags to make up for the limiting of non-residents.

The BOG should take a serious look at making all non-residents draw and removing the guide requirement for dall sheep, brown bear and goat. This regulation, along with the governors tags make this a rich mans sport which is unconstitutional.

Thank you,

Dan Jirak
February 27, 2015

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

Subject: Support Proposal 202 as Amended

Dear Members of the Board of Game:

The Northwest Arctic Borough submits these comments on Proposal 202 regarding limitations of the hunting seasons and limits for caribou. Caribou provide a critical subsistence resource for the people of the Borough, and as a result of the precipitous decline in the Western Arctic Caribou Herd, Borough residents have had difficulties obtaining sufficient numbers of caribou to feed their families in recent years. This situation is compounded by the fact that our region has one of the highest costs of living and one of the highest unemployment rates in Alaska.

On behalf of the Borough, I wish to support the position on Proposal 202 approved by the Kotzebue Sound Fish and Game Advisory Committee at its January 6, 2015 meeting. In summary, implementation of that position would close the non-resident season completely and close the bull caribou opening from October 15 – January 15. It would also increase the closure of the cow season from April 15 through June 30.

These measures are necessary to respond to significant declines in the Western Arctic Caribou Herd. During the ten-year period between 2003 and 2013, the year when the herd was last counted, there has been a 50% decline in the population. Between 2011 and 2013 alone, there was a 27% decline in the herd.

Thank you for this opportunity to comment on Proposal 202. Please contact me if you have any questions about this letter.

Sincerely,

Reggie Joule
Mayor
Please support proposals 180 and 181.

Trapping should be restricted in these areas, that are used by recreational users such as myself.

Thank you.
I strongly support Proposal 170. It is apparent that the population of bears is declining and in trouble. I encourage you to take action to protect this population of bears, for tourists such as myself, who do not hunt the bears.

Thank you.
Oppose Proposal 150.

Please do not establish the proposed permit hunt for anterless moose in the Kincaid Park, which is heavily used by recreational users and tourists such as myself.

Thank you.
I am against proposal 180. I think this issue needs more discussion and time to work out kinks before a decision is made. My main concern as a trapper is what would be defined as a trail? There are many trials in this area.
The Boone and Crockett Club was responsible for establishing the first piece of game law legislation protecting the wildlife of the newly formed Territory of Alaska in 1902. By the early 1960s the Club noted the increased use of aircraft in hunting and promoted the concept that using a plane to spot, land, and then shoot big game was not fair chase and helped to establish laws restricting such aircraft use. The Boone and Crockett Club does not support any type aerial scouting to locate big game species for hunting purposes and would support PROPOSAL 207 - 5 AAC 92.085 if this were also to become law.
Proposal 202 presents an arbitrary approach to game management that imposes undue burden on Alaskan enterprise, jeopardizes the long-term revenue stream for game management and does not present a method that is reasonably calculated to enhance caribou survival statistics.

According to the ADF&G statistics presented only 5% of the 14,000 harvested animals from the Western Arctic herd comes from hunters who are not resident to the area. That totals 700 caribou. Statistics on non-resident hunters for the Teshekpuk herd are not presented but local community hunting pressure is represented as accounting for a harvest of approximately 2400. Assuming a similar ratio (although such ratio is highly unlikely given the more difficult access to the Teshekpuk herd) the impact of non-resident hunters is negligible accounting for a total of 120 caribou. However, the impact of the proposed rule change is many times higher in terms of available harvest and will create more problems than it solves. As a rule, Proposal 202 seeks to impose the bulk of the restriction on non-residents but at numbers so low as to make virtually no contribution to the long-term game management plans for the areas herd. Assuming that in fact the reduction in available harvest correlates directly to a decrease in the actual harvest, reducing the bag limit from 5 to 2 would result in a total reduction in harvest of 480 animals. At a 5 to 1 reduction that is only an additional 240 caribou out of more than 14,000 harvested. Proportionally, the reduction in non-resident bag limit does little to actually adjust the harvest but it does discourage non-resident fees.

The inordinate imposition of these restrictions to non-residents will in fact produce a limiting effect on the taking of other game such as wolves and bears. A review of the statistics of non-resident tag purchases demonstrates a high number of wolf and grizzly tags accompany the purchase of caribou tags by non-residents. Traveling to Alaska and paying the license and tag fees to the state is a high expense and the numbers of non-resident hunters have fallen in comparison to resident hunters according to ADF&G statistics published on their website. Non-resident revenue is valuable because it helps directly underwrite the expense of performing the very surveys that led to the publishing of Proposal 202. Limiting the opportunities at such a disproportionate level will limit the attractiveness to non-residents of using the resources in Alaska - perhaps to the long term detriment of game management revenue. As stated in the supporting documentation to Proposal 202 one of the primary factors believed to be at play in the reduction of the caribou herd is natural predation. Accordingly, creating a game management policy and rule that would create a likely decrease in the hunting pressure on predators makes little sense. In fact, a more sound policy would couple a reduction in predator tag fees for non-residents. Combined with a more reasonable reduction in annual bag limits on caribou this would produce a decrease in overall hunting pressure on caribou with an increase in hunting pressure on predators.

A more reasonable proposal would seek to place less restriction on non-resident quotas coupled with an incentive to pressure predators as appropriate in the various GMU’s. A bag limit of 2 caribou per season would result in a 60 % reduction in the total limit for non-residents and would be more reasonable.

Thanks Terry Overly JR  R-935
Proposal 207 will not solve issues with declining sheep populations. It will only single out a group of resident Alaska hunters that are seriously dedicated to sheep hunting and conservation. Proposal 207 will create a variety of issues including, law enforcement, crowding, air traffic congestion before season, hunter conflicts, personal opportunities, and unequable advantages to guides. My last statement from the mat-su meeting expands on a few of those issues. (RC 067).

A couple of questions to ask yourself.....

- If somebody invested the time and money to learn how to shoot at 800 yards, would it be fair to take that advantage away?
- If somebody spent their life training themselves to be in better physical condition to access sheep habitat, would it be fair to restrict them?
- If somebody invested in better hunting gear in order to gain an advantage with, sustainability, glassing, shooting, hiking, packing, stamina, accessibility. Would it be fair to take that advantage away?
- If somebody invested in a top of the line ATV to help with accessibility would it be right to take that advantage away?

The point is, not everybody has the same advantage for hunting. It is up to the individual what advantages they make for themselves. Most hunters that don't have aircraft do not know how much effort it takes to hunt with an aircraft to actually make it an advantage. In most cases there is no conflict with hunters using aircraft and hunters not using aircraft. This is because hunters with aircraft will access areas that would be impossible by foot. This to me, helps with any congestion problems because it spreads hunters out. If the board feels the need to restrict hunters, let's start with non residents first.

I believe that sheep hunters can work together on this. Predation is a large part of the problem and I think having a predator control program would make a significant difference. One issue is that many working residents do not have the time to dedicate to a predator control program. (Unit 16 predator control was a huge success for moose!!!) I think if we raised the cost of sheep tags as well as implement a trophy fee to non residents we could use that funding to pay for predator control. Coyotes and wolves are doing more damage to sheep population than conservative hunters ever will. I would be happy to pay people that do have time to take predators during the winter months in sheep habitat. A bounty may be a great way to entice people into taking predators. Lots of ideas to expand on this subject and I think it could ultimately lead to sustainable sheep hunting.

Successful or not every year I enjoy sheep hunting. Part of the experience is the flying. Taking away a part of the sheep hunting experience that a lot of us have worked so hard for would discourage support with many other issues at hand. Thank you for your consideration.
I oppose proposal 207, all changes for the use of aircraft for sheep hunting. I would suggest you focus more on conservation for Dall Sheep rather than regulation of aircraft stated in proposal 207. From a conservation stand point, if you managed Dall Sheep harvest like the other areas already done in the state through a permit drawing system for that area. It would allow Dall Sheep populations to be managed properly. Ultimately Dall Sheep management is essential to sustain a good population for all residents, non residents, guides, transporters, and air taxi services. The state could also award concessions to qualified registered guides like the federal managed areas already do. This allows everyone to be on the same playing field looking out for the best interest of the Dall Sheep populations in the state, rather than penalize the people using aircraft. Proposal 207 would encure more cost for the state of Alaska through enforcement when we could use those cost for conservation such as additional survey work, draw permitting, guide use concessions, ect. These principals/regulations are in effect in other areas of the state already why not model a management plan after them.

Regards,

Darrin Anderson

Palmer Alaska
Board Members,

First thank you for your service to the state of Alaska. I would like to comment on proposal 202 concerning the Western Arctic Caribou and particularly the herd hunt changes. I have watched this decline for several years with concern and agree they need help. I feel the main culprit is climate change and ice. I believe the best way to help is to reduce cow and calf harvest. You need to do more in this area. I am not a guide but an out of area resident hunter but in all fairness I believe with your changes the season starts too late for non-residents. After mid-september in the Coleville river area the weather is too unreliable and the few guides I know in that area try to get out. I propose an earlier start to the nonresident season. I also believe the harvest for non-residents should be 2 Bulls. Most of the non-resident hunts there are "Hunts of a lifetime" and being able to take 2 bulls will not reduce numbers. Very few of these non-residents will take more than one bull but many will buy a grizzly and wolf tag and would help with predation issue. Only reduction of cow and calf harvest offers a slim chance of help with this natural decline. The non-resident changes are only to placate local hunters and will hurt the commission by cutting off needed revenue during a time of falling budgets. I would also hope that enforcement and local peer pressure in the villages will reduce waste of their valuable food source as has occasional been seen in the past.

Thank you for your consideration,

Robert Holbrook
I support proposal 180 to limit the areas where trapping is allowed in the Cooper Landing area. I live in Cooper Landing year round, and hike, pick berries, hunt mushrooms, and fish the streams and lakes in the area. I believe I have the right to pursue all these activities without fear of harm from a trap someone has set and left unmarked. The Cooper Landing area is no longer a wilderness area and its recreational user groups have grown in both numbers and diversity. It is no longer an appropriate area for the trapping of game.
I support proposal 180. Let's get trapping off the Kenai Peninsula all together. Trappers are an extreme minority who are receiving a disproportionate amount of the resource (land) compared to the recreational users (bikers, hikers, skiers etc...)
I just read the proposal to limit aircraft for sheep hunting purposes. Really? Why not limit people to archery only or sling shots, or only rock throwing? Maybe make it limited to access by pogo stick only? I am an avid sheep hunter and pilot and believe this is a stupid response that doesn't address the real issues of limited sheep numbers, not to mention the hugely impossible task of trying to enforce it. When is Alaska's fish and game boards going to wake up to the fact that our fish and game are not unlimited resources. Every other state in the nation has realized this years ago and have taken the necessary step to limit hunting pressure by going to state wide draws. I realize that this is wildly unpopular, especially among the guides who populate these boards, and will limit my ability to hunt as well. States that have done so have now reaped the reward of vastly increased size and quality of their herds. There is no need to reinvent the wheel here. Pick any one of the western states as a model. I think it about time that this board grow a pair and make some real decision that will affect the long term quantity and quality of our herds, make some bandaid attempt that only affect a few. One other question? Is this the lowest hanging fruit that can address the issue? Really? Airplanes? I write this with zero confidence that this board listens to any outside voices, and am confident that this decision is already made, and this letter does little except give a forum for people to vent. Get out of your bubble, the answers to these problems has already been solved many times over and it wasn't by limiting airplanes.
I strongly appose the Board of Game proposal 207 and 208 and have testified to this at the last game board meeting.
To the members of the Board of Game

Proposals 180 and 181. Support. Road trapping and trapping on recreational hiking trails, ski trails, etc. needs to be stopped. Conflicts between user groups should be avoided; and the interests of hikers, skiers, and non consumptive users should be respected.

Proposal 150. Oppose. I ski, run, and bike in Kincaid Park on average at least once a week, all year long. I like seeing moose, but understand that you need to keep your distance, both for the sake of the moose, and also for safety reasons. One of my children attended Junior Nordic at Kincaid when he was 9 and 10 years old, and one of my other children skied at Kincaid for two years as a teenager with the West High ski team. For these reasons, I recognize the safety issue. But the way to deal with safety is NOT to authorize a hunt for recreational purposes, whether the hunters be deserving citizens, or otherwise. Instead, the safety issue should be dealt with by the Department's wildlife biologists, who should use deterrence tools such as rubber bullets and similar techniques; even the occasional killing of a moose that is identified as harassing hikers, skiers, etc.

I note for the record that there are both black and brown bears at Kincaid. I have seen both at Kincaid Park within the last six months. My point being that there is inherent danger in having wildlife in Anchorage, and in Kincaid Park. I strongly favor having wildlife in our city and in our park. Please, you have the entire state [with very small exceptions] in which to hunt. Don't take away one of the very last places in Alaska where people like me can enjoy our wildlife.

Very truly yours, Kneeland Taylor
This is to state my opposition to Proposal 150, the Kincaid Park special interest moose hunt. There is no public safety issue that would be addressed by a hunt in Kincaid. To the contrary, public safety would be negatively impacted by any such hunt itself. The Municipality of Anchorage recognizes the hazards and negative impacts this would generate and they have opposed any such hunt. Discharge of firearms within Municipal parks is specifically prohibited. Use of ATVs in the Anchorage Coastal Wildlife Refuge would damage important wildlife habitat. Closing the park to all other users for several weeks at any time of year is both absurd and unfair. It would also be costly for ADF&G and the Municipality to try to implement. And the moose population in the park could not sustain this hunt. It would be better utilized for viewing by the majority of residents and visitors who are not hunters. Reject Proposal 150.

I would also like to support the Emergency Petition to re-establish a buffer zone around portions of Denali National Park and Preserve in which the killing of wolves by hunting or trapping would be prohibited. In eight years the wolf population of Denali declined by 65% to just 50 wolves in 2014. Besides their utility in a healthy ecosystem, wolves in the Denali region are worth much more to the State through tourist and resident visitation to the area than they are to the very few trappers who are responsible for the majority of the reported wolf kill there. Re-institute the buffer zone and protect this important wildlife resource.

I am quite sure no one on the Board of Game will read these comments, let alone consider them, but they will a part of the public record regardless.
I support a 200 feet setback for trapping on all trails, roads, and public beaches in the Cooper Landing and Moose Pass area. Trapping near public areas can lead to pets getting caught in traps and many of the trails and roads are heavily used.
I support Proposal 180 and setbacks of 200' from the described areas.
I am commenting to support Board of Game Proposal 180 - Cooper Landing Area. This is a proposal to prohibit trapping within 250 feet of any road that leads to public or private property in the Cooper Landing area. I am in support of all restrictions proposed in proposal 180 including restrictions on trapping within 250 feet of multi-use trails and campgrounds and other special area closures in the defined area. I support this proposal because it contains means by which trapping related deaths and injuries can be mitigated, and conflicts regarding trapping in multi-use area can be controlled. We need to be cognizant of the need to make multi-use areas safe and attractive to residents and visitors.
PROPOSAL 207 - 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Modify sheep hunting opportunities statewide.

Potential changes to use of aircraft for sheep hunting:

1. From August 10 to September 20 aircraft may only be used to place hunters and camps, maintain existing camps, and salvage meat and trophies while used for the purpose of Dall sheep hunting. Using an aircraft for the purpose of spotting sheep or locating Dall sheep during the open hunting season is prohibited.
2. It is against the law to hunt or help someone else take a Dall sheep until 2 PM the day following the day you have flown.
3. It is against the law to hunt or help someone else take a Dall sheep within 5 miles of the site where you were flown-in, until 24 (48) hours after you have flown.

Support #1 of proposal 207.

It has been a long standing fact that spotting sheep from the air with the purpose to pursue is not "Fair Chase". Boone & Crockett has defined Fair Chase for many years and even to enter an animal into the B&C record book you have to sign an affidavit that you did not spot the animal from the air. Please see below.

For the purpose of entry into the Boone and Crockett Club’s® records, North American big game harvested by the use of the following methods or under the following conditions are ineligible: I. Spotting or herding game from the air, followed by landing in its vicinity for the purpose of pursuit and shooting;

The accepted practice of spotting sheep from the air (Trophy Judging) among Alaska hunting guides and resident hunters has become accepted and even recommended as "Fair Chase" within Alaska. I believe this practice is wrong and is not "Fair Chase". The Alaska BOG would be doing the sheep of Alaska a great disservice to continue to allow this practice to happen. Not only does it increase harvest of mature rams it also puts undue stress on the sheep. The way hunters and guides are using their aircraft is not "Fair Chase" and to not put a stop to it now, would only encourage the practice going forward. The advancement of technology and the number of people that now have access to super cub aircraft has been one of the impacts on our sheep population.

Proposal 153 Limit the number of next of kin nonresident sheep tags in Unit 14C.

Next of Kin have taken over the non-resident sheep draw. I have tried multiple times to get the exact data from ADFG regarding the % of NOK drawing tags in 14C but can not get anyone to get me the information. I do know that in 2014 of the 12 non-resident sheep tags 5 went to NOK. In the TOK over the last 5 years 50% of the non resident tags have went to NOK and there would even be a greater % of non resident tags going to NOK if they did not cap it at 50%. The Brinkman survey is just that a survey, 50% of the tags non-res sheep tags going to NOK is fact. I believe in 2012 ADFG did not check the % of tags in the TOK that were issued to NOK (4 of 6 non-res tags went to NOK) and they had to issue another TOK non-res tag to meet their own requirement.

The number on NOK that are applying for the limited non-res tags is growing at an incredible rate. But the number of Guided non-res applicants is dropping as they see the reduction of tags, and the chances of drawing getting out of sight with the number on NOK applicants. As the population continues to grow within the state it is only a matter of time before NOK are taking all the non-res tags thus making sheep guide businesses in draw areas no longer viable.

Along with that there is an abuse of the NOK hunts taking place. Each year we have a NOK hunter that has drawn a Drawing Sheep tag that is looking to hire a packer. They do not want to pay for a guide, they just want someone to come along and help them carry all the stuff that goes along with a backpack sheep hunt. When I explain they cannot hire just a packer, and they need a licensed guide then they just say they will just do the hunt themselves. I then explain that the NOK they applied with has to accompany them on their hunt and they say something like “There is no way my Grandma from Fairbanks is going on a backpack sheep hunt with me”. This is happening all the time, and if not randomly checked by the troopers they go hunting illegally. The NOK non-res drawing needs to be a separate DS # and needs to have additional measures taken to make sure the resident they are putting down on the application is a verified NOK and will be accompanying them on their hunt.
Increase the number of nonresident goat drawing permits on Unit 14C.

Underutilized resource. The Goat population is very good within 14C. Harvest is very low due to the hunt. There is a reason for a guide! A goat is a big animal that lives in very tough terrain. With 14C being a no airplane landing area it makes these goat hunts very physical and the need for a guide is very obvious. That is why I propose to increase the number of Guided Non-resident goat hunts within 14C. Guides not only help with the sexing and trophy judging, but also bring the horsepower that is needed to get these animals out of the remote areas they live in. There are no losers with the increase of a few guided goat tags, only winners.
I support this proposal submitted by USFWS. Human caused mortality of brown bears on the Kenai Peninsula is at a level these slow recruiting animals cannot sustain. The liberalization of brown bear hunting regulations in 2012 that included a 9-month open season and one bear every regulatory year beginning in 2012 has taken a toll on the brown bear population.

Proposals 173, 174: Oppose
Removal of the meat salvage requirement for brown bears killed over bait would be legalizing wanton waste. Brown bears were considered a trophy animal not that long ago. Now hunters just want to kill them and leave the meat behind to rot.

Proposals 180, 181: Support
I support these proposals. In areas of high use, it makes good sense to require a 250 setback for setting traps and snares. It is past time there be regulation like this, rather than the trapper associations saying they encourage trappers to steer clear of areas where there likely will be conflict only to get hit with really bad press when someone’s pet is caught in a trap or snare.
February 26, 2015

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the March meeting in Anchorage. The Alaska Professional Hunters Association Inc. (APHA) is opposed to attempts to change non-resident allocation formulas established in Board Policy (2007-173-BOG). APHA members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are in line with the principles of sustained yield and result in a maximum benefit to ALL users. The APHA maintains its support of the Board’s current allocative policies and believes that the well-defined, species specific, resident preferences are in the best interests of all Alaskans.

Second Degree of Kindred:

Alaska’s Professional Hunters have recently (past 10 years) struggled with developing a clear position on allocation of tags to non-residents hunting with Alaskan relatives within the 2nd degree of kindred. AS 16.05.407 clearly delineates who can accompany non-resident hunters pursuing Dall Sheep, Brown/Grizzly Bear and Mountain Goats. What is not clear and therefore the within the purview of the Board of Game (BOG), is how those tags should be allocated. Should non-resident relatives be considered residents or non-residents, or should they be set aside in their own category? Without clear statutory direction, the BOG has implemented a variety of allocation strategies in a pragmatic effort to address allocation concerns across a vast State with different needs and scenarios. At this point, the APHA does not see the need for statutory allocation direction or a statewide BOG policy on 2nd degree of kindred provisions. However, the BOG should always seek to derive the maximum benefit from our game resources while making preferences between beneficial users. Where game populations are subject to more demand for harvest than supply; we ask that the BOG recognize that guided non-residents have a much higher associated benefit to the State than unguided non-residents.

Guide Industry Facts (McDowell 2014):

- 89% of licensed Guides are Alaska Residents (Registered / Master Guides)
- $78 Million of Total Economic Activity
- $51 Million in New Dollars to the State Economy
- $13 Million in wages in Rural Alaska
Regardless of whether or not a big game animal is a guide required species or not, professional guide services provide added value and benefit to Alaska’s economy, especially in rural Alaska. Guided hunters are also more likely to transfer possession of their meat to their guides, who in turn share that meat with local communities and other Alaskans. Much of this activity is for animals that are not guide required thus no 2nd degree of kindred provision. Guided hunts provide Alaskan jobs and support rural infrastructure all the while keeping much of the valuable meat in Alaska.

Second degree of kindred hunts, on the other hand, provide little added value to the economy and a high likelihood of harvested meat leaving the State. What 2nd degree of kindred hunts do provide for is family hunting connections and heritage. The value of the hunting tradition and this heritage is something that all hunters recognize. As a group of hunters, the APHA recognizes this value. This balance of resource valuation allows us to support limiting the number on 2nd degree of kindred hunters for brown bear in unit 4 while supporting family hunts for black bears in region I.

**Individual Proposal Comments**

Below you will find our comments on individual proposals under your consideration for Region II. Leading up to the drafting of these comments the APHA held a tele-conference and invited all of its members to participate in the drafting of these comments. This tele-conference was well attended with good representation from guides who conduct hunts in Region II. You will find that there are some proposals that we don’t have comments listed for. These were proposals that we felt did not directly impact guides or that are outside of the group’s purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations. While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. Because the APHA takes a statewide perspective when approaching Board proposals, we urge
you to consider regional expertise from our members even when their position is different from that of the APH.

Given the opportunity, Alaska’s hunting guides will continue to bring a wealth of wildlife and hunting experience to the table.

Proposal #207- Oppose

This is a non-allocative and non-conservation based issue, and can be very divisive. We would encourage the board to stay focused on working on the more important issues of crowding, allocation and conservation through a sheep-working group.

Proposal #208- Discussion- Recommendation

We would like to thank the Board for putting this proposal out for discussion. At this time the APHA is unable to develop a strong consensus on the variety of options that are proposed here. However, as a result of discussion prompted by this proposal, we have been able to develop strong consensus in some areas:

Conservation:

APHA members, broadly, think we have real conservation concerns with sheep in Alaska. This is a point of strong consensus.

Resident Draw/Crowding:

The APHA is ABSOLUTELY OPPOSED to any form of resident draw to address crowding, no matter how short.

Drawing hunts should always be considered a last option and they should be used to manage harvest, not crowding. There are many, many options that can be used to address crowding some examples, for discussion purposes follow:

- Rotating season dates on a harvest tag basis
- Dividing effort up in a fair, yet predictable manner to spread effort out (alphabet, random “number,” residents can pick their season dates, etc.)
- Rotating the first ten day hunt period based on a “once every 2(3)(4), year” basis

To be clear, the APHA is not endorsing any of the above options. The APHA supports a SHEEP WORKING GROUP to work through these kinds of options and asks that the board recognize that this is the best format to get stakeholder “buy in” on restrictions that will ultimately affect ALL users.

State Land/Federal Land:

APHA members agree that the conflicts over allocation differ depending on whether we are talking about state or federal land. Proposal 208 recognizes that difference.

Sheep Working Group:

The APHA maintains absolute positive support for a Sheep Working Group. This is the only type of format where we can work together to not only manage the resource and hunters but set goals and desired outcomes for the actions of the board, both now and in the future. Sheep and sheep hunting are worth our effort.

Recommendation:

Use proposal #208 as the “vehicle” for a statewide proposal created by a sheep working group. This will allow for FULL A/C input before next year’s statewide meeting in March.

Proposal #141- Support

We support this proposal as written, based on the stated conservation concerns brought forward by the Copper River/Prince William Sound A/C. We would also support other viable Mt. goat management alternatives (i.e. point system, public education on sex identification) to address conservation concerns expressed in this proposal. We do not support managing under drawing system as an alternative to the proposal. The APHA supports solving conservation concerns, without going to drawing hunt management.
Proposal #142- Oppose

We oppose this proposal because non-resident harvest in Unit 8 is a minor component of deer mortality. Non-resident harvest accounts for approximately 10% of the unit-wide harvest, with 85% of that harvest being buck harvest (Kodiak A/C minutes). A low percentage (>15%) of non-resident hunters harvest more than 2 deer.

Deer declines on Kodiak Island are caused by weather, not human harvest. This proposal does not address a real conservation concern and should not be passed.

Proposal #143- Strongly Oppose

We oppose Prop. 143 because our membership has strong feelings about “fair chase” hunting and resource stewardship and conservation. Experience has taught us that bears, in particular, are easy to wound and lose when shots are taken at long range or in other questionable situations. As guides, hunters and conservationists we have both a legal, and moral obligation to ensure that wound loss in minimized. The consequence to the hunter of an animal wounded but not recovered greatly encourages ethical hunting practices, benefits the resource, and improves the overall hunting experience. If Prop. 143 is passed, more hunters will tend to take questionable shots, and more animals will be wounded and lost.

We urge you to carefully read the letter from C.U.B.S. on this issue. Kodiak Island is home to the largest sub-species of coastal brown bears in the world. Kodiak’s bear management plan is widely regarded as one of Alaska’s premiere programs. One important aspect of this plan is the respect we show for the animals by discouraging wound-loss. We urge you to fail this proposal and maintain the public’s trust in hunter’s respect for Kodiak Island’s bears.

Proposal #151- Support

We support this proposal, as written, for the stated conservation concerns. Alaska does not have any “spare” ewes in its sheep population currently. We urge you to pass this proposal because our membership has similar conservation concerns as those expressed by the Anchorage A/C.

Proposal #152- Oppose

Overview:

Proposal #152 simply seeks to exclude non-resident hunters, who are already held to a low percentage of overall hunter effort, in all of 14C, except for one governor’s tag. We strongly oppose proposal #152 because it is not conservation based but purely allocative in nature.

Governor’s Tag:

Presently there is one “governor’s tag” issued for the Chugach Range (units 14C, 14A and 13D). This tag generally sells for very substantial sums of money, most of which returns to ADF&G for conservation purposes. Non-resident hunters, by law, must be accompanied by a licensed guide. Alaska’s governor tags are especially attractive because of the highly qualified guide services offered in Alaska. Resident hunters benefit from this relationship because they do not pay for sheep tags.

Guides:

Alaska’s guides are statutorily limited to holding a maximum of 3 guide areas at any one time. Proposal #152 would not create an exception to this restriction. The likely result of the passage of Proposal #152 is that the highly qualified guides who currently accompany the Governor’s Tag “winners” would not hold this guide area on their license anymore, due to a loss of all other non-resident opportunity.

Summary:

Removing non-resident allocation in 14C is not historically justified and completely unwarranted. Passage of this proposal will result in destabilizing the “Governor’s Tag” program. ALL CONSERVATION DOLLARS TO THE DEPARTMENT MATTER AT THIS POINT. The Governor’s tag program, on an animal by animal basis, provides an excellent return to the Department in the form of dollars for conservation. Proposal #152 will result in devaluing this opportunity, to the point where passage of this proposal could cost the Department, literally, hundreds of thousands of dollars over time. Meanwhile, local guides (most of the guides who provide services in 14C live locally to the area) will be put out of business in one fell swoop. The APHA strongly opposes this proposal.
Proposal #153- Support-Amend

Overview:
Capping the number of 2nd degree of kindred tags where the number of tags is very limited and where the resource is wholly allocated is warranted because guided hunts more effectively maximize the benefit of the resource for Alaskans. Sheep tags in 14C are precious, limited and fully allocated; therefore proposal #153 should pass.

Resident or Non-resident Allocation:
Proposal #153 seeks to award a total of 2 tags already allotted to non-residents to relatives of Alaska Residents. We ask you to consider three options in how you pass this proposal:

• Option one:
Amend and pass: Take the 2 proposed tags (1 rifle, 1 archery) from the tags allotted to resident take. This is our most preferred option and we think is most consistent with the legislative intent of the 2nd degree of kindred provision. This option maximizes Alaskan families’ ability to hunt with their relatives. This also allows for flexibility later on if residents want to argue the value of accompanying their relatives and give them more leeway in the total number of tags that can be issued to their relatives.

• Option two:
Amend and pass: Consider 2nd degree of kindred half resident and half non-resident for purposes of allocation. Take the 2 proposed tags alternatively out of the tags allotted for residents and non-residents on alternate years. This is our second most preferred alternative because it more effectively captures the maximum benefit of the resource than considering relatives non-residents but still reduces the number of guided non-residents.

• Option three:
Pass as written: Take the 2 proposed tags from those allotted to non-resident hunters.

Status Quo:
If proposal #153 fails, there will be a continued trend of more and more non-resident relatives receiving sheep tags in 14C. From 2004-2013, over ¼ of the total tags available to non-residents were awarded to non-resident relatives. In the most recent 2-3 year period, this number was even higher. In Tok, fully 50% of non-resident tags are currently being awarded to non-resident relatives. There is no doubt that 2nd degree of kindred hunters should be considered in allocation schemes but they should be capped in their number, whether their tags are taken from the resident or non-resident pool. If non-resident relative hunters are not capped for the limited opportunity that the 14C draw offers, they will eventually end up with most of the non-resident tags that are offered thus the maximum value of the resource will not be realized.

Proposal #154- Support

We fully support proposal #154 with the following recommendations:

1. Recognize that this caps the total number of “guided non-resident” tags available, currently 100% of the available goat tags in DG852, 854 and 858 could go to “guided non-resident” hunters.

2. Allow for 2 “guided non-resident” tags for each of the new proposed drawing hunt opportunities described in proposal #154

3. Make the bag limit: 1 male in new proposed hunts

4. Require a guide-client contract to apply for the “guided non-resident” hunts

We believe the mountain goat resource is very underutilized in these hunt areas, with many of the animals dying of old age rather than being harvested. The department has stated that the harvest goal is 6% of the population. With the very low success rate of these hunts the department could double or triple the permits in these areas. Presently DG 852 has 5 permits; DG 854 has 3 permits; and DG 858 has 5 permits.

Proposal #158, 159, 160 - Support

We support these proposals to add non-resident opportunity in 15C based on the numbers presented in proposal #158. If there is harvestable surplus and the population is within management objectives, non-resident opportunity should be provided for.
Proposal #169- Oppose

We oppose reallocation of the limited sheep resource in Alaska without a stated conservation goal.

Proposal #170- Oppose

We oppose proposal #170 because managing Brown bear by a population density estimate from 2010 without consideration of habitat carrying capacity or area wide population estimates is poor management. For instance, how do we know that the estimated bear densities in 2010 were healthy? Restrictions or management plans should be based on solid population and carrying capacity data not one-time high ratios of female harvest.

Proposal #171- Support

We support the Brown bear harvest objectives outlined in proposal #171 while making the same recommendation as in our comments on proposal #170: Restrictions or management plans should be based on solid population and carrying capacity data, not one-time high ratios of female harvest.

Proposals #184-190- Oppose

We oppose all proposals that seek to limit or restrict non-resident allocation without stated conservation concerns.
I SUPPORT Board Game Proposal 180 - Cooper Landing Area. Because trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot "safety zone" along roads and trails is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and where traps may be placed.
I do not own an airplane but I enjoy hunting with friends who own airplanes. I am opposed to the current proposal to limit and restrict the use of aircraft for Dall Sheep hunting. The proposal to delay the time in which a hunter may pursue Sheep after landing, will dramatically affect the ability of folks to enjoy a limited time hunt (long weekend) - this should be an inherent right as a resident to be able to plan for OR take advantage of bad weather, to spend a weekend or short-duration hunt! This proposal would completely eliminate this opportunity. The proposed restriction to mandate a minimum distance from the landing strip, before pursuing Sheep is absolutely ridiculous! I’ve seen Sheep move long distances, in short periods of time during hunting season and it’s a very real possibility to land late in the day and camp the proposed 5 miles from the Sheep, only to wake up and find them right outside your tent! This scenario and opportunity is not made possible, nor is an advantage created, exclusively because of the use of aircraft to access the hunting area! The current same-day airborne restrictions need
This proposed change is largely unenforcable, and fairly subjective. You cannot tell whether an aircraft is spotting sheep or recon-ing an Iz or ? unless you are in the aircraft. You only think you know. Is this what our already overwhelmed Brown-shirts are expected to do now? My biggest problem with this proposal is that it is a way for people to feel better, not fix an actual problem. We don't need MORE UNNECESSARY regulation from govt, we need a thought out - solution to a problem. Does this somehow fix (PERCEIVED) overcrowding? Does this put more sheep on the mountain?

Creating regulations that aren't the right fix for the problem doesn't help anyone. This is clearly the case here. I strongly oppose this proposal.

It's a solution looking for a problem.
Prop 177  Support w/amendment. Limit of 5 beaver Oct 20 - November 10; retain April 30 closure.

I have concerns with nontarget catches prior to the November 10 general opener. Most April beaver are much more prime than October beaver.

Prop 178/79  Oppose.

I have concerns with set tampering/disturbance on the part of law enforcement and the potential for mischief as stolen, tagged gear could then be reset illegally.

Prop 180  Oppose

Cooper Landing is a roadside federal subsistence community. The 1990 census recorded 249 while the 2010 census recorded 289.

(1) Proposal 180 seeks trapping closures based on both perceived Public Safety concerns and actual interactions involving traps and loose running dogs. I am consistently unable to find news reports referencing trap-related injuries to non trappers anywhere in the entire US or Canada.

(2) Kenai National Wildlife implemented a 1 to 2 mile wide by approximately 30 mile long corridor closed to almost all trapping beginning 7 miles from the main business district in Cooper Landing. Additionally, starting 10 miles from town, the Skilak Loop area is totally closed to all trapping along 19 miles of road and a total of 44,000 acres. These restrictions have been in place since at least the mid 80's.

(3) Snowmachine closures implemented by Chugach National Forest in the mid 2000's locked most trappers out of vast, previously accessible trapping grounds. Due to the federal subsistence preference, local residents of Cooper Landing retain privileged motorized access to these otherwise inaccessible areas.

(4) Prop 180 eliminates existing landowner options for dealing with nuisance wildlife. Landowner permission to trap is already required by existing law.

(5) Proposed setbacks are ineffective and one-sided in the absence of complimentary leash laws.

(6) Trapping activity in the vicinity increases in response to rising fur prices and open lynx seasons. Recent years have seen both open lynx seasons and rising fur prices. Both situations are now reversed and have resulted in predictable decreased trapping effort.

(7) Any trapping restrictions (setbacks) implemented on federal lands under Prop 180 are likely to not apply to local residents due federal subsistence preference.

In response to Prop 180 I have personally spent much time and effort on the behalf of myself and the Alaska Trappers Association (ATA) to include:


Jan. 2013 Granted interview to local reporter including information regarding existing areas closed to trapping near Cooper Landing as noted above.

Jan. 2013 Helped host a Shared Trails Seminar in Cooper Landing on behalf of ATA which include how to recognize the presence of a trapline and hands on instruction as regards the operation of a variety of trapping gear.

Spring 2014 Helped solicit Community input regarding possible locations to consider for mutual voluntary solution.

June 2014 Attended and participated in local meeting between area residents and various agency representatives.

Oct 2014 and Feb 2015 Personally met with author of Prop 180 in order to discuss specific areas to include under the mutual voluntary approach. Neither meeting was successful.

December/January 2014-15 Personally posted cautionary signs aimed at trappers in various locations near Cooper Landing.

Feb/March 2015 Initiated communications with Cooper Landing Planning and Advisory Committee seeking to continue to address user conflict issues in the event Prop 180 fails.
I SUPPORT Board Game Proposal 180 - Cooper Landing Area to provide a 250 foot no trapping "safety zone" along roads, trails and campgrounds as is necessary and reasonable to protect the multi-users of these trails and facilities. Quite frankly, the proposal is in alignment with ethical trapping practices, and the proposed rules simply allow for enforcement of unethical trapping practices that currently has no enforcement capabilities.
I SUPPORT Board Game Proposal 180 - Cooper Landing Area. A 250 foot “safety zone” along roads and trails seems a minimal distance to protect people and pets. By clearly identifying a safe place for trappers and a safe place for people and pets, both groups will benefit and areas can be enjoyed rather than having locals afraid to share these beautiful places with their families and pets and having responsible trappers receiving unfair abuse because of the misguided actions of an inconsiderate few. Having pets, toddlers, and traps all in the same place can only increase tensions between these groups. Providing trappers and young hikers and pet owners with guidelines and distinct usage areas is brilliant in its simplicity. Thank you for considering such a common sense and reasonable proposal.
Good afternoon, my name is Mike Kistler. I'm the father of 4 kids, age 8 thru 16, we are a hunting family, and we are opposed to prop 207 for several reasons but mainly because it is hard enough to take kids out of school for any period of time without them paying the price academically, but to change the rules of flying and sheep hunting is to punish kids that can take the time for a two day hunt and turn it into a 48 hour waiting period then hunt, many kids will lose that weekend in the field with their parents because they just can't afford to miss 2 additional days of school.

Thank you, Mike Kistler
The natural resources belong to all Alaskans, therefore I am asking the BOG to vote against this infamous proposal (150) concerning the Kincaid moose hunt. It is unacceptable that the BOG wants to authorize the killing of moose by using them as scapegoats in saying that they care about public safety. These public servers (BOG) should be working on behalf of Alaska and for the best interest of the state and not only working for a select group of people who have nothing else on their mind than kill, kill, and kill. I have been attending Advisories and BOG meetings and have been targeted and silenced by the Advisories and the BOG because these public servers do not share my ideas in preserving the natural resources for future generations. I am asking the BOG, how many people have been killed by moose as opposed to humans? People are suppose to be more intelligent and take precautions when they go to parks. When people moved to Alaska they should know that there is wildlife here, after all the wildlife was put here and Indigenous people have been sharing this beautiful land for thousand of years and both have survived. By the way in order to have balance, we need diversity in the Advisories and in the Board of Game from subsistence and tourism individuals but so far there is only one kind of people in the Advisories and in the Board of Game, sports hunters, and there is no representation for subsistence and tourism. Living moose and other wildlife are very highly valued in the tourism industry drawing a source of revenue for the entire community and the state. Once again, I strongly oppose this infamous proposal (150) about the Kincaid moose hunt.
Dear Mr. Chairman and Board Of Game Members,

Concerning Proposal 207, I feel that these restrictions of aircraft use have nothing to do with the management of the resource. There will be no fewer sheep harvested because of these changes. The residents will be hindered the most as not all have 10 days to two weeks for a hunt, especially our youth. As it sits with the proposal to not allow sheep scouting during the season, the airplane owners and airtaxis will all want to go opening day so that they will know where the sheep are. There also has to be taken into consideration the current split seasons. The enforcement of this type of regulation would be a nightmare. What is the difference between scouting for sheep or caribou? This is a people management tool, not a game management method.

Concerning Proposal 208, I am for the limited draw for non residents for the entire season. According to Article 8 of the Alaska State Constitution, the resources of Alaska are to be managed for the benefit of its residents and for a maximum sustained yield. We need to limit non-residents as they are taking 40% of our already depleted sheep population. A 20% harvest for non residents would be more acceptable. Even at that rate, the opportunity is way more lenient than most States that have sheep hunts. If fees are an issue, the Department could increase a non resident tag to $1,500 and a resident tag to $200 and no one would bat an eye. Concerning resident hunters under Proposal 208, there should be no limits to the amount of time they have in the field. Once again this is managing and restricting resident hunters and has nothing to do with putting more sheep on the mountain.

Overall, the current management program of sheep at the Department of Fish and Game needs to be revisited and reworked. Time is of the essence and until we have all the information, such as true sheep numbers, intelligent management decisions will be difficult.

Thank You for your time and consideration.

Ethan Williams
907-232-8382
ethanw@mtaonline.net
I'm writing to ask that you do not allow a moose hunt at Kincaid Park. It is a horrible idea. Kincaid park needs its moose to keep its value, moose numbers are low, why make them lower? People in Denali National Park learn how to camp around bears, people in Anchorage and learn how to get around a moose in Anchorage. Moose make Anchorage special, killing them is taking away what makes us special. Hunting in a popular park is a major safety concern for people. It is a bad idea just like the Predator Control Program, please vote against it.
To whom it may concern,

Currently the state of Alaska is experiencing a shortage of dall sheep. Majority of game management units within this state have seen drastically reduced sheep populations, with the exception of a few small areas. This population decline has led to a reduction in the amount of full curl rams available for harvest. In addition to this, Alaska has the highest non-resident harvest rate for wild sheep nationwide. The statewide harvest of dall sheep (average for last five years) is currently 45%. Additionally, most federal lands in Alaska regulate the harvest of sheep by guided non-resident hunters while state lands currently offer unlimited non-resident harvest opportunities for dall sheep. As a result of this the harvest rates for non-residents are actually much higher than 45% within Alaska state lands. For example, in unit 19C the non-resident take comprises 75% of the entire dall sheep harvest. This has resulted in Alaska residents avoiding hunting on state lands to seek areas (federal lands) where guided non-resident sheep hunters are limited and harvest levels are more aligned with nationwide levels. This has resulted in the majority of Alaska residents becoming dissatisfied with current management and hunting of dall sheep in Alaska. As a result of this, it is time for the board to impose restrictions upon non-resident dall sheep harvest in Alaska.

Alaska residents are guaranteed by the state constitution for preference when it comes to the allocation of this state’s fish and game resources. To let non-resident harvest rates approach 45% statewide, with a drastically higher percentages on state lands is completely unacceptable. The vast majority of Alaska residents have shown they desire non-resident sheep harvest levels be reduced. This has been expressed both in resident testimony at board of game meetings and additionally within the recently completed statewide sheep hunter survey. It goes completely against the Alaska state constitution and the expressed majority opinion of Alaska residents for the board to consider reducing resident dall sheep hunting opportunity while non-resident dall sheep harvest rates remain at current levels.

It is my opinion that the board of game should not implement any restrictions upon Alaska resident dall sheep hunting opportunity or aircraft use for dall sheep hunting. Without first reducing the non-resident harvest of dall sheep to 10% of the total take. By imposing a maximum non-resident harvest rate of 25% for dall sheep statewide, the board would eliminate current crowding problems (which occur directly from high non-resident harvest rates). Additionally, I believe the state should impose a mandatory limit of two clients (maximum) in the field at a time for all master and registered guides while hunting sheep. This would spread the non-resident harvest out over a greater period of time and thereby eliminate some of the current crowding problems associated with sheep hunting.

By reducing the non-resident harvest and restricting guides to two clients in the field, the board would uphold that which is mandated in the Alaska constitution (resident resource preference) and support the wishes of Alaska residents. Additionally, these measures would also protect Alaskan’s declining dall sheep population. The majority of states nationwide limit non-resident sheep harvest to around 10%. To ask that Alaska finally manage it’s sheep in a manner consistent with how other states manage their game populations is a fair and balanced approach to addressing the current problems associated with dall sheep and dall sheep hunting in Alaska.

Sincerely,

Luke Graham
I oppose proposal #207 and hope it is not passed. I am a life long AK resident born and raised here in the Wasilla area and have hunted sheep since I was 8 years old (now 32). Although I have seen many changes in sheep hunting and population dynamics over those years, I do not see current airplane restrictions to be a problem area. Yes there are individuals that abuse the same-day-airborn rules and harrass sheep with their airplanes, but no further laws or restrictions will change this. Enforcement of current laws are the only way to combat these violations. The people that break the laws will continue to do so, and the only people this proposal will affect are those honest hunters that are doing things ethically now. My other concern is as a father of two small children that will soon be sheep hunting. Placing time limits and distance limits on airplane use will make it very difficult to take any children or young adults hunting on the weekends without missing school. They are the future of hunting and wildlife management. We are killing our traditions and lifestyle if we are unable to get the next generation involved because time simply does not allow for landing at a strip, hiking in somewhere and hunting, and then packing a ram out.

I urge the board to fail this proposal based on sound rationale instead of listening to emotional testimony from a few individuals that are hoping to limit airplane usage for their own sheep hunting advantage.
I would like to comment on proposal #208. I am a lifelong AK resident born and raised in the Wasilla area and have hunted sheep almost every season for the last 25 years. Sheep hunting is my passion and the main reason I returned to AK after dental school. Although I still dream about opening day of the season all year, I have noticed some major negative changes in sheep hunting over the last few years. The last 5-10 years I have had more negative interactions with guides and fellow resident hunters than ever before. I believe this is due to more hunting pressure in the harvest ticket areas because more areas have gone to drawing and fewer tags given out. I also believe the number and quality of rams has decreased in the OTC harvest ticket areas. Simply put, we have fewer areas to hunt sheep and fewer quality rams to hunt. This has caused many guide operations to become VERY territorial and harrass resident hunters to make it less likely to have competition. This concentrates the resident hunters even further as we try to stay away from bad hunting experiences. I have been confronted by guiding operations on the ground to the point that you worry whether or not your tent or airplane will be there when you get back. Others in my hunting group have witnessed guide airplanes herding sheep towards their non-resident hunters on the ground. This is NOT the way sheep hunting is supposed to be.

I agree that changes need to be made and I commend the board for taking a long look at these options. I am very much in favor of limiting the number of non-resident hunters and next-of-kin hunters. We as residents pay the higher living costs and suffer through long dark winters for the privilege to hunt in this great state. Let's keep it in favor of the residents. I understand there is much political pressure about this issue and money becomes a factor. I am very much willing to increase cost per resident sheep tag to help offset the loss of state revenue. I just do not feel limiting residents or making specific time periods for hunting does anything except help the guide industry. And many of these guides that those changes would help are not even state residents. I don't see how that helps the state in any way.

Thank you for your effort to improve sheep hunting in AK.
I fully support proposal 170 that may help brown bear numbers increase on the Kenai Peninsula. I completely trust the science driven expertise of the USFWS.
I fully support proposals 180 and 181 that help create safer trails for recreational users in Cooper Landing and the eastern Kenai Peninsula.

These similar proposals seek to create legally enforceable, easily identified areas that are small but free of traps. They do not attempt to restrict trapping in general. They represent a sane and well-reasoned improvement to existing conditions.

If these proposals do not pass, user conflict will grow.

The Seward Advisory Committee might have supported proposal 181 if they had realized that dogs are not required to be on leashes on KPB, State Parks, State DNR and USFS land except at developed public facilities (USFS and Parks only) like trailheads and cabins. Dogs can legally run free on trails.
I was disappointed that the board of game chose not to take any action regarding the dall sheep proposals. Clearly, the state of Alaska is out of step with the rest of the country and Canada when it comes to regulating the harvest of wild sheep. Our state constitution mandates that Alaska’s natural resources are to be managed for the maximum benefit of Alaska residents, this does not seem to be happening with our sheep harvest. As I understand it, there is currently no limit to the number of sheep which are subject to harvest by non residents, this needs to be modified as it is not congruent with our state constitutional mandate.
I SUPPORT Board Game Proposal 180 - Cooper Landing Area. Because trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot "safety zone" along roads and trails is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and where traps may be placed.
Restricting aircraft use in sheep hunting is totally unrealistic and unfair. Many people that love to hunt sheep, and go after only old, trophy sheep, don't have 20, 30, 40 or even 50-year old legs, and an airplane that they've flown for many years for the main purpose of hunting sheep is their only way to pursue their passion. Plus, this law would be extremely difficult to enforce, and would also open many opportunities for hunters and guides to make false reports of people violating the law!
#208-SHEEP HUNTING. The proposal to limit resident sheep hunters to time-slots is totally unrealistic. There is no way a non-resident should have unlimited hunting opportunities while limiting residents to hunt periods based on their last name (or whatever). People that live in this state should have first priority on ALL of the resources of this state.
I oppose proposal 150 which seeks to establish an antlerless moose hunt in Kincaid Park. I have been a user of the park since 1980 and have never had any negative encounters with moose, not even cows with calves. I ski, hike, bird watch, walk my leashed dogs, and ride my bike there. I like seeing moose in the park and use common sense when I am on the trails, giving moose a wide berth or changing my route if necessary. Kincaid Park would have to be closed for the 2-3 duration of a hunt for public safety; many different users of the park would be displaced for the benefit of 10 hunters. Kincaid Park is a public park, not a private hunting reserve.
Dear ABG,

Regarding Proposal 150: I urge you to vote "No" on the moose hunt in Kincaid Park in Anchorage.

Regarding Proposal 170: I urge you to vote "Yes" for putting strict limitations on brown bear hunting.

Regarding Proposals 180 & 181: I urge you to vote "Yes" for trapping restrictions of brown bears in Kenai Peninsula.

As a former hunter myself, I wish to submit brief comments pertaining to both hunting and trapping of brown bears: According to stats, brown bear numbers have dropped significantly, especially females needed for reproducing & maintaining a healthy, diverse population. Human interaction is the major reason for their decline, so killing bears is not the answer for ecological or ethical reasons!! To the contrary. Educating the public with widespread publicity campaigns (social media platforms, public forums, school programs, media coverage) about preventing bear-human conflict is key to keeping people & bears alive. The eco-tourist industry, healthy brown bear population, and your work ethic/reputation all factor into making the right decision on behalf of all the players. Furthermore, trapping is indiscriminant and is a barbaric method of killing any animal.

As for hunting moose in the park, I oppose it because I believe people must learn to live with/tolerate their local wildlife. If people are occasionally inconvenienced by wild animals when they step into what is considered the only home they have, then so be it. Eco-tourists such as myself would very much enjoy seeing moose and other native wildlife while visiting Kincaid Park. Selling hunting licenses to people who want to bragging rights about large game they kill is hardly my idea of proper or scientifically sound wildlife management.

Thank you for your consideration and please do what is right by the wildlife in your state. If you don't, no one else will.

Sincerely,

Lesa Miller
I SUPPORT Board Game Proposal 180 - Cooper Landing Area. Because trails are multi-use, efforts must be made for the safety of those using trails and roads. A 250 foot “safety zone” along roads and trails is necessary and reasonable to protect people and pets. This proposal does not prohibit one use over the other but instead allows everyone to safely access these places knowing where it is free of traps and where traps may be placed.
Alaska Board of Game,

I would like the board to consider and vote yes in favor of proposals that encourage the “hunting” of sheep rather than the “killing” of sheep. I would also encourage the board to give residents preference when there is more demand than the resource can support (i.e. all draw hunts and some of the more heavily hunted sheep areas such as unit 20).

Sheep are not a subsistence/meat pursuit but rather a trophy species for almost all of the people that pursue them. Unfortunately, this has led to a culture of people wanting to kill rams to put on pictures on Facebook and trophies on their walls. Although some want the experience of sheep hunting and killing a ram is the cherry on top, unfortunately, they are a small minority. I think there are some good proposals put forth by the board that will get us back to “hunting” sheep rather than just “killing” them.

**Proposal 207-I support options #1 and #3:** I feel that aircraft use is out of hand and should only be used for transporting hunters, not finding game for them. Using aircraft to spot sheep gives a person a huge advantage and at a time when most indications point to a resource in decline, we should not allow an activity that allows someone to be much more successful, not to mention is considered unsporstmanlike by many people.

The arguments I hear against this is that it is not enforceable; I need to circle to check on landing spots, etc. However, I think it can be enforced to some degree. Yes people are going to violate it and not get caught, but if we took away every law/regulation we couldn’t enforce easily and catch folks in the act all the time we would have next to no laws on the books. A regulation is needed so that when someone is caught they have to pay the consequences. Most hunters I know have a camera with a video option that can be used to record illegal activity and turn over to the troopers. Also, most pilots use a GPS and their tracks can be looked at to see if they were circling sheep or realistic landing spots. From my understanding this isn’t much different than some of the same day airborne investigations.

Use of aircraft also allows people to access better areas and allows them a much better chance at spotting any sheep in the area, even as they fly in. We need to give sheep a chance to disperse and move around so that they can’t be spotted the day before, sat on overnight, and then killed at 03:00 the next day. Part of sheep hunting is hiking around hoping to find a legal/large ram, not knowing where one is then going straight to where he was last seen trying to find a predetermined target.

Sheep aren’t a cryptic species and if you know the general area they were, unless they moved a long distance, it is hard for them to hide from spotting scopes and binoculars if you know where to start looking. I would like that a person has to be on the ground at least one full day (00:01-23:59) before they can harvest an animal. This would give the sheep more time to move around. I hear arguments that guys can’t do weekend hunts with this, but I think if people want to kill a sheep they need to make having an actual hunt more of a priority than killing sheep and trying to get out of the field in one or two days. There are many places across the state they can go to where they can start hunting sheep the moment they leave their vehicle; it just may not be as easy. If they want to use a plane and really want to hunt for a ram they may have to work harder and dedicate more time to harvesting that animal. We shouldn’t cater to folks and make things easier because they have tight schedules and want to kill sheep instead of spending time on the ground hunting them. Let’s remember that it’s called sheep hunting, not sheep shooting.

**Proposal 208-I support options #2 for Non-Residents and option #4 for Residents, oppose option #5 for Residents:** There is a lot of evidence pointing to crowding and/or quality of hunt issue and we need to figure out how to spread hunters out over the course of a season. I believe these options do a very good job of that. It also makes resident hunters chose what type of hunt/experience they want, and still allows everyone (residents and non-residents) the option to hunt sheep every year if they want. I hear people mention weather and/or they may be moose or caribou hunting late August into September, but this is Alaska and people hunt across this whole state well into September every year and will have to make decisions on what they want to hunt. These options give us the both of best worlds-
chances at a less crowded hunt, but still a guarantee that we can still hunt sheep if we want. I think Non-resident should have a similar system with a cap (10%) on the early season draws/registrations.

Proposal 153 and 154-OPPOSE!! I adamantly oppose these two proposals as they serve as nothing but to promote the guide industry. These are all highly sought after tags by residents for lots of reasons, and to designate them for guided hunters only (or Non-Residents in general) is asinine. These resources have much more demand than they can support (hence why they are on a drawing permit) and when a resource is limited I believe that residents should be given priority. If there needs to be more hunter participation, increase the tags to give everyone a better chance at getting one and harvesting those animals. Otherwise we create situations like Kodiak where guided non-residents have much better odds at getting a tag than residents which is just plain wrong in my opinion.

If Non-Residents must be allocated tags, I can’t imagine putting a guide requirement on them. I would much rather see a non-resident father, daughter, son, etc. of a resident get those tags and have an opportunity at a hunt they probably couldn’t afford otherwise and experience it with an Alaskan relative. Securing clients for guides is not the Board’s responsibility, as there are millions of acres of harvest ticket/registration areas across Alaska that is at the guide’s disposal. It should be up to the guide to provide a hunting experience that people want to sign up for, not be forced into using one. If someone draws a tag and wants to use a guide I have no problem with it, but taking away opportunity because they don’t want to/can’t afford a guide is ridiculous.

I thank the Board for taking the time to consider my comments. As you make decisions about these and other proposals, please remember that there is a big difference between hunting and killing. Also keep in mind that opportunities and a resident’s access to a state resource should take priority over dollars and non-resident opportunity.

Sincerely,

JOHN CAMPBELL
To Board of Game,

I am writing you today to express why I hope you do NOT pass proposition 207 and 208, mainly because they both will make the citizens of the state of Alaska suffer! Please do not pass them.

First a little of why I'm qualified to speak on the issue......

I'm Alaska resident since 1976. I have hunted moose, deer, caribou and sheep almost all the years I have lived here.

I own a super cub and fly a minimum of 45-50 hours every fall looking for good spots to hunt. With my girls in middle school and high school, most of our trips are long weekend trips only. If the "48 hour rule as stated in prop 208 passes, I will not be able to take these trips with my girls. The current allotted wait time is very ample! I use the plane as a tool to spot game, yes but I do it in a responsible way like all of my flying friends. We do not push or harass game. Many times I have seen a camp in the valley floor below and leave the area, knowing someone else is already there.

The following are just a few reasons I do not support props. 207 and 208:

207- unfairly targets the hard working people who live and work here, ALASKANS.

   It would limit the time I could spend with family hunting long weekends! "48 hours"

   It is not fair to target a small user group, plane owners, and make them and them only suffer.

208- limits the time residents can spend in the field pursuing sheep! That is just wrong!

   We all know weather in Ak changes things. If I have to choose a time period to hunt in it may not work out weather wise. Or if I don't find a big ram the first hunt I'm done for the year.

   I do not shoot a ram every year, I look for big, old sheep. I have harvested 5 dall sheep. I have gone on at least one sheep hunt a year for as long as I can remember, sometimes three or four trips a year!

I believe that both of these propositions put restrictions only on Alaskan residents and specifically residents with planes. That is wrong. The State Constitution states the resources of Alaska are to be managed for the citizens of the State FIRST! Please do the right thing and table propositions 207 and 208 until next year. Set up working groups to tackle the issue and hammer out common sense restrictions. The biggest problems are, predator contro for sheep predators (coyote), non resident guides in the field for sheep, (I have heard about 75% of the guides in the field, guiding sheep hunters, are non residents!), the number of guides period for sheep especially is totally out of control. The skew tan river drainage alone has at least 5 or 6 guide camps, it has decimated what was already a low sheep number area! Finally, we need to consider limiting the number of sheep hunters each guide can take out every year! Some guides literally take as many sheep as they can out of an area then move on to the next.

Please make the right decision for Alaskan residents!

Mark Stiller
My name is Joe Ray Skrha and I am a 35 year resident of the State of Alaska residing mile 3 Kenai River. I am writing you to stop killing brown bear. Because these brown bears are an isolated population, have low reproductive potential and are difficult to monitor (population studies in heavily forested regions are extremely difficult and expensive), brown bear management on the Kenai requires a very conservative approach.

The 2013 and 2014 mortality rates for female bears are alarming, and clearly unsustainable. If the state's liberal harvest quotas for sport hunters remain in effect, the area's bear population will decline to a point where neither hunters nor non-consumptive users will be able to spot bears. Notwithstanding recent years' excessive mortality rates, the population was already at a low density compared to other coastal brown bear populations. Continued decline will result in substantial long-term damage to the Peninsula's ecosystems.

The USF&WS proposal includes stricter harvest limits in the Kenai's "back country". These are the most easily viewed bears - those that live closest to areas easily accessible to visitors, photographers and wildlife watchers. Continued substantial population losses among these bears will be a loss for the area's tourism industry. Any continued decline in the Kenai brown bear population is inconsistent with USF&WS's legal mandates, which include ensuring opportunities for non-consumptive users who value and enjoy wildlife for activities.

Sincerely,

Joe Ray Skrha, Attorney at Law
Regarding the WAH Caribou herd. Regulations for GMU23 & GMU 26A West.

Season: August 1 through October 7 (close during rut) and Nov.1-Dec.31 Bull Caribou only.

Bag limit: Residents: 2 Bull Caribou/year

   Non Residents: 2 Bull Caribou/year

Work to set Federal Subsistence Season: August 1 through October 7 (close during rut) and Nov.1-Dec.31 Bull Caribou only.

Work to reduce Federal Subsistence bag limits from 5 Caribou/day to 5 Bull Caribou/year

Work to reduce Federal Subsistence bag limits for residents of GMU 23 & GMU 26A West from 15 Caribou per day to 5 Bull Caribou/year.
the proposal to limit use of aircraft to scout sheep will only hurt the resident hunters. With so many guides in the mountains and many of them placing multiple camps no matter if they are using them or not it sometimes takes a great effort and amount of flying before a resident hunter can even find an unoccupied area to hunt let alone one with a legal ram in it. This regulation targets resident hunters only as the guides will be able to continue to scout for sheep while moving clients and gear with airplanes between already established camps. The better proposal to help return the sheep population to what it was would be to limit the # of non-resident hunters a guide can take during a season and limit the # of camps he can place in any one use area.
Proposal # 207 is grossly unfair to many resident sheep hunters. It sounds more like a case of "have nots" trying to penalize "haves" in regard to aircraft. It would be more productive to concentrate on issues that would increase sheep populations such as predator control.
Thank you for this opportunity to comment on Ira Edward's proposal for a limited moose hunt in Kincaid Park for disabled persons (proposition #150).

I support Proposition #150. I feel the numbers of moose in Kincaid Park present a serious risk to park users. As an Anchorage resident for over 30 years I have been witness to a huge expansion of recreational use of Kincaid Park. The addition of soccer fields, biathlon range, disk golf course and singletrack trails have brought thousands of people to the park who never used to recreate there. I think this is a wonderful thing. Kincaid is a thriving park. People love to go there, both summer and winter.

The Municipality of Anchorage takes pride in Kincaid Park and what has been accomplished there. I applaud their efforts and those of the many non-profit agencies who have partnered with them to develop Kincaid fully. But, I feel we have reached a breaking point. Where there used to be small groups of people and a few moose, now there are lots of people and way too many moose. We have reached critical mass and something needs to be done before someone gets killed. Many have been injured. I am one of them. I was trampled by a moose while riding my bike in Kincaid Park two summers ago. I am lucky to have escaped without serious injuries.

We need to prioritize public use of the park over allowing for the proliferation of the moose population there. I spoke to numerous people in public office, fish and game authorities and municipal employees after I was trampled by the moose. Jesse Coltrane told me two years ago that she would not oppose a moose hunt in Kincaid. Chris Birch told me to imagine Anchorage was New York City, and Kincaid was Central Park. He asked me to imagine the conflict of humans vs moose! I feel we have reached a population density that will no longer allow for safe use of the park.

Please be proactive and work towards a solution of limiting the numbers of moose at Kincaid Park. I hope it will not take someone getting killed there for authorities to take serious action on this issue. Thank you for your time and consideration.
Thank you Board of Game members for considering my comments on these proposals. I know it has been a very busy year for the board members and staff and I appreciate all of the time and effort you put into this.

Proposal 151: Support
Changing these hunts to any ram is necessary with a decline of 50% of our sheep population in the past 15 years. Every ewe is important.

Proposal 152: Oppose
There is a very limited number of non-resident permits in this area and the current managing strategy is working very well and should stay in place.

Proposal 153: Support
There has been a growing number of non-resident next of kin hunters applying for these hunts and putting a cap on the number they can draw is necessary to sustain a viable guiding opportunity in the future. If the board adopts this proposal please take the rifle permit out of DS230, DS231, DS232, DS236, DS237 or DS238 and take the archery permit from DS 240. If you do this it will maintain a guiding opportunity in every hunt area in the park every year. Thank you.

Proposal 154: Support
Creating these Mt. goat hunts will bring money into the state and generate a guiding opportunity that doesn't really exist now because there is so many resident applicants. I believe there should be 2 permits issued for each hunt. These Mt. goat populations are very under harvested and I think the Dept. of Fish and Game could issue 2 or 3 times the permits in these areas without going over their harvest goal of 6% of the population.

Proposal 208: Oppose
I think the board is working in the right direction with this proposal but should make every effort to find a solution to the crowding problem with going to draw permits.