

Submitted By
Liz Matos
Submitted On
3/4/2016 9:24:41 AM
Affiliation

Dear Alaska Government Members,

You have a special and dear task...to PROTECT the environment and all the animals in it. This especially includes wolves.

Wolves are an integral part of our world, especially Alaska. The lower 48 have made so many mistakes regarding wildlife and your amazing state is so because of animals like the wolf. Please protect and foster the growth of these majestic creatures. They deserve to be here and it is inhumane to do anything but protect them.

Thank you for your attention.

Sincere Regards,

Liz Matos



Submitted By
Raytha Poland
Submitted On
3/3/2016 1:46:46 PM
Affiliation

The hunting season needs to be canceled, not just shortened. I just don't understand how a state known for its incredible beauty can be filled with people who promote SUV as an ugly picture of residents. Wolves are vital. Period. Hunting should only be allowed to feed a family and not because someone considers an animal, or any part of an animal, a trophy. Alaska was always on my bucket list to visit. I will never set foot in Alaska until those who can change the horrendous atrocities inflicted upon the animals who reside there to a positive. No murdering animals and calling it control. Not ever!

Submitted By
Marjorie Lulay
Submitted On
3/1/2016 3:28:29 PM
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The idea that any organization thinks they can arbitrarily decide a species of wildlife needs to be "managed" by killing them is sadly mistaken! Your board needs to stop any and all plans of killing wolves and bears immediately and start to realize that nature has a better "management" plan that has worked for centuries before man decided they knew better! All you're trying to do is exploit the lives of wolves and bears to increase the coffers from hunters interested in killing moose or caribou! Stop encouraging idiots to come to Alaska for "trophies" of animals that have the right to live as nature intended without the interference of humans!

Submitted By
Claude Bondy
Submitted On
1/26/2016 5:19:32 PM
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Hello,

I'm probably too late or in the wrong year but I wanted to submit an issue to maybe be looked at. Here in Unit 13 they do the aerial wolf predator control. I trap in a good part of Unit 13 during the season, with most of my efforts between November 10th and the last day of February. Many others do as well. I am a supporter of wolf control, but I would like to make sure that the sportsman on the ground have a first chance at these wolves. A couple of winters ago, I had 3 different packs working my trapline. I was excited because ADF&G keeps the numbers so low here, you rarely see a track. I was making sets, and next thing you know, the planes showed up and killed or ran off all of them in just a week. All along my trapline all I seen was blood spots and ski tracks from planes.

I would like to propose that they at least hold off the aerial predator control until March 1st and let the sportsman on the ground have a chance first.

Thanks,

Claude Bondy

Submitted By
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Submitted On
2/10/2016 2:46:37 PM
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I object to alaska safe trails (a non profit corporation licensed in Alaska) using deceptive advertising to influence the makeup of the fish and game board. See Alaska dispatch paper dated 10 Feb 16 showing a young child caught in a trap. In fact the incident happened in North Carolina and not Alaska. Someone else can determine if they are in compliance with corporation law in Alaska.

I want the board to be comprised with people that understand the fish and game issues and not by people who are concerned with incidental catching of loose dogs not on leash. (Alaska has the highest incidents of dog bites in the USA). Alaska also has a leash law for dogs.

Submitted By
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Submitted On
12/16/2015 2:05:02 PM
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To Board of Game.

I am an avid bow hunter and would like to make a few suggestions to enhance our sport.

#1. When obtaining a moose harvest ticket a hunter would be required to specify rifle or bow. #2 Adopt extended hunting seasons for bow hunters in all or at least some game management units. The challenge of bow hunting would thus be rewarded with longer seasons, and greater chances of success. Currently the trend in Fairbanks area is for a hunter to get a harvest ticket, hunt rifle in whatever unit they choose, then if they aren't successful they converge on Fbks Management Area to bow hunt and have a longer season. This results in less proficient archers because they haven't been practicing, and a greater density of hunters in a smaller area. Many other states have strictly bow hunting regulations to benefit the hunters that enjoy the challenges of fair chase and humane/ ethical kills. If the board feels that these regulation changes would result in over harvesting maybe the Drawing Permit quotas could be adjusted accordingly.

Thank you for your consideration of these suggestions and any others that would enhance bow hunting in this wonderful state.

Submitted By
Colt Foster
Submitted On
2/22/2016 3:54:58 PM
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I would like to urge the board to dismiss any proposal which limits the use of airplanes, specifically those proposals involving "spotting of wildlife" from the air. Prop 207 from last year banning spotting of sheep from the airplane had several negative affects on my hunting season. The most notable change was the increased hunting pressure in units 16 and 19 during the first 2 weeks of sheep season. I have hunted sheep in the area for 26 years and have never seen as many hunters, camps, and airplanes flying leading up to August 10th as I did in 2015. This was an observation many of the old time sheep hunters echoed as well. I left the hunting area on August 11th after realizing another hunter was after the same group of rams from a different direction. When I attempted other hunting trips later in the season I found tents (both inhabited and empty decoy tents) on almost every airstrip. Because of the new law I did not feel comfortable looking for other out of the way places to land as it would be easy to be confused for spotting for sheep rather than airstrips. If the goal of prop 207 and similar props was to increase hunter satisfaction and hunt quality, then it failed miserably. These types of proposals will only concentrate hunters into smaller areas and smaller time frames. Both resident and guided non-resident hunters will fight over the prime areas leading up to the day "spotting" becomes closed, whether that is for sheep, moose, caribou, etc. This increases confrontations and lowers the quality of the hunting experience for everyone involved. Laws like these hurt the resident airplane owners and school age children the most as they usually only have long weekends to hunt due to work/school commitments. But it also hurts the guiding industry and non-resident hunters that are looking for a quality hunt and solitude of Alaska. Why would a non-resident choose Alaska over Canada if this is the new normal? And why would residents continue to support lawmakers that don't see how politics are negatively affecting hunting in Alaska? The answer to both questions is that they will not. So again I urge the board to dismiss any future proposals limiting spotting of wildlife from airplanes. I would also request revision or dismissal of prop 207 from last year. There are already adequate laws in place to discourage and report harrassment of wildlife via airplane. And I truly believe that individual hunters have the right and ability to make good ethical decisions. Further laws like this do nothing but cause more competition and divide our hunting community.

Sincerely,

Colt Foster

Submitted By
Daniel Lilja
Submitted On
3/4/2016 7:50:45 AM
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hunter

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Dear BOG,

Thank-you for being open to other views regarding Proposition 207 that made it illegal for a sheep hunter to pursue Dall sheep if they may have seen sheep from the air while travelling to a hunting camp. As a sheep hunter I am opposed to this regulation. It puts an unfair burden on sheep hunters accessing their area by airplane. The way the rule is written it makes it nearly impossible for an ethical hunter to continue a hunt after flying.

Thanks for your consideration,

Daniel Lilja

Submitted By
David Hartley
Submitted On
3/1/2016 4:01:58 PM
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Member

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The Alaska Department of Fish and Game spends millions to kill wolves and bears trying to boost moose and caribou for hunters. Department reports reveal outlandish expenditures. For example: during 2012-15, a total of \$621,900 was spent to kill 49 wolves (\$12,692/wolf) in the upper Koyukuk area; on the North Slope, a total of \$349,900 was recently spent to kill seven brown bears at \$49,986/bear. Stop wasted taxpayers money and resources by needlessly killing wildlife in the name of a few people who are unfairly favored as being a majority. . .which is a horrible dishonesty and injustice to us who are gaist such practices and expenditures.

David Hartley

Wilderness guide and backcountry planner.

Submitted By
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Submitted On
2/28/2016 8:21:08 AM
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Alaska State Board of Game

To Whom it May Concern:

As a 55 year resident of Alaska, I have seen the full scope of Alaska State management of its fish and game resources. I have been directly and indirectly involved in the various battles waged for sensible and sensitive stewardship of these resources. Two especially important improvements were when the wolf bounty was finally sent packing and later when same-day airborne hunting of wolves and bear was prohibited. In short, there was a period with more sensible stewardship practices that better respected the principles of **sound science, conservation, sustainability of wild animal populations, biodiversity, healthy ecosystems, fair chase, and traditional hunting ethics.**

In 1994, however, things began to reverse direction. When the legislature passed the Intensive Management Act, at first, the law seemed to work fairly well because the Board of Game represented a somewhat wider part of the Alaskan public. Things really changed, though, and events started turning toward the dark side when the BoG in 2003 became much less democratic in its composition and, consequently, in its decisions relating to predator control.

Since then, in almost every management unit, they have gradually lengthened wolf and bear hunting and trapping seasons, increased "bag" limits, and opened seasons when pups were helpless and adult pelts were in poor condition for use as clothing. A wolf bounty was even proposed, and more than 100 pilots were permitted to hunt wolves from the air. Even worse, wolf pups were allowed to be gassed in their dens, bears could be snared or trapped and their body parts sold, and same-day airborne hunting was allowed again! All of this has happened recently in an Alaska where less than 20 percent of our population even hunts, much less traps! The consequences for the social fabric of wolf packs has been devastating, and for a state near bankruptcy where wildlife viewing, especially of wolves, brings in twice as much revenue as hunting and trapping, this practice is simply irrational. For me (once a hunter but never a trapper), it is an inch short of insanity, and it must change!

I am not a spring chicken and understand only too well what I believe are irrational politics in our State. I also understand, as a State biologist once told me, that biology is driven by politics here. How sad, but true.

But, although progress moves slowly and in fits and starts, it ultimately does happen, and one of these days, hopefully sooner than later, the elected politicians in this State will realize that and begin to change the process again in a direction that better reflects the values stated in my first paragraph. Part of this process, of course, is what the majority of Americans still understand as democratic inclusivity and representation. It is high time the Governor's office, the Legislature, and the appointees of these branches of government, such as the Board of Game, return to what once, not long ago, was more sensible and sustainable stewardship of ALL of our wild animal resources, not just those that benefit humans alone.

Thanks.

Frank Keim
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cc: Governor's Office and Senators and Representatives of the Alaska Legislature

Senator Murkowski, U.S. Senate

Submitted By
mark cooley
Submitted On
12/8/2015 10:50:42 AM
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guide

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I own the Talstar Lodge on the Talachulitna River and am an assistant guide for Triple C Outfitters. It would be a great help if the law on baiting were changed on the Skwentna and Talachultina rivers to be 1 mile from any seasonally occupied dwelling unless it is across the river from that dwelling. It is that way on the Yentna up to the Skwentna then it changes to just 1 mile period. There are many places that could have a bait but there is an old cabin across the river that you never see anyone at but we don't dare put in a bait as it is within the 1 mile radius. Please consider this as it would be easier on the hunters and as this is a predator control area it would help get rid of some more bears to help get the Moose population stabilized. Thank You Mark Cooley



Submitted By

Megan wu

Submitted On

3/1/2016 12:10:35 PM

Affiliation

Wild animals are the treasure to all human beings, should let the ecosystem to take the main role of controlling their population without man kind's intervene.

Submitted By
Peter Stavrianoudakis
Submitted On
2/22/2016 11:51:24 AM
Affiliation

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First let me applaud the fact that you allow peregrine trapping. Secondly that you have opened it to non-residents and thirdly that's you are considering increasing the limit on non-resident permits

I have been a falconer in California beginning in the early 80s. I have witnessed the decline and the incredible increase in peregrine populations. One of the greatest contributor stop that's wild population has been Santa Cruz breeding project For decades we have been breeding and releasing peregrines and our own state refuses to acknowledge the healthy wild population we helped to foster. Many birds released here migrate north and south but we are at a loss to bring new blood in from the wild for breeding projects let alone to have the opportunity to fly a bird trapped on passage. Please increase the number to allow those souls the chance to journey to your great state to fly a passage peregrine

Submitted By
Richelle Plummer
Submitted On
3/4/2016 3:57:04 PM
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Local Business Owner and Hunter

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As a business owner, food producer and hunter, I oppose any proposition that restricts the production of food and raising of livestock. There is no scientific basis in the State of Alaska to warrant such proposals.

Any future proposals should be designed in cooperation with community members most affected, anything less would be cowardly.



Submitted By
Robert
Submitted On
3/2/2016 6:50:45 AM
Affiliation

I used to have so much respect for Alaskans. When did it become more important to cater to a handful of rich hunters that to preserve your great state as wilderness where all creatures co-exist and mother earth does the culling of the weakest, not a 5000 dollar high powered rifle. I guess the oil companies and big interests finally got to you. Sad.

To: Alaska Board of Game

For your consideration:

5 AAC 92.050. Required permit hunt conditions and procedures. Establish a preference system each year for drawing hunts as follows: Establish a ranking system for each individual for each year applying for the Alaskan drawing permit hunts instead of a point system.

What is the issue you would like the board to address and why? There seems to be years that some hunters receive more than one permit in a hunting year while many hunters don't receive any. I propose that instead of ranking the hunting choices for each species have a ranking of all of the hunter's choices. After drawing a permit that hunter will be unable to draw another hunt unless it is an undersubscribed hunt for that year. This would allow for possibly adding hunt choices per species and bring in more revenue. It would allow more people to draw permits and give more people a chance at hunting with a permit. It would also allow the hunts to have a higher possibility of being used if it is the only one that the hunter would be receiving that year. When more than one is obtained it sometimes becomes a factor of which one can I do and the other hunt(s) are not done. This is unfortunate when there are other hunters out there not getting a permit at all that would be able to do the hunts. The ranking would not have to be by species although the applicant would determine preferences. For example the applicant could have 1) DI403-Delta Bison, 2) DS102-Tok Sheep, 3) DG347-Seward Peninsula Goat, 4) DB201-Kodiak Brown Bear, ect. The drawing would then proceed in the same manner as currently until the applicant's name is drawn or the permits have been filled. As stated above once drawn the applicant is withdrawn from being able to draw another permit unless it is undersubscribed. This distributes the permits out to more people for more to enjoy. This process keeps from having a point system to keep track of and allows more people to enjoy a permit each year.

Thanks for your time and consideration,

Sincerely,

Roy Sayman

Submitted By
Warren Crawford
Submitted On
3/4/2016 6:16:33 PM
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Please use only biological data to establish regulations. Do not use emotional moments to decide on these issues. Think about the whole group of Alaskans and Visitors before regs are completed.

Submitted By
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Submitted On
3/2/2016 9:32:37 AM
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I live in the Panguingue Creek subdivision. I am blessed to be surrounded by Park lands. Having wildlife as neighbors is just one of the vital assets to my home here. Bears, caribou, wolves, lynx, fox and of course the lovely moose travel through here, while some even take up residency. Bear baiting to me is unsportsmanlike, they are certainly hungry in the springtime. I would like to see a trapping/bear baiting ban in the wolf townships. To think that our wolf populations have diminished so greatly due to harvesting just across the park border is disturbing to me. Wolves are travellers, let's give them a chance to travel and bring their populations in the park and surrounding areas back up. For the love of this land.

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Proposal #17

I support proposal #17 as stated but would like to offer an alternative. I would prefer the regulation that takes effect July 1, 2016 requiring all archery hunters have an approved certification for all hunting in Alaska be REPEALED.

The Board was not provided accurate information on the availability of archery certification in other States. ADF&G stated that IBEP, or equivalent certification is available in all 50 States. While IBEP claims they offer it nationwide, they are only offering practical testing field days in 33 states at this time. Some of these states only have one field day in the entire State per year. I know of at least one pair of hunters, from Utah, that has been forced to book a field day while on vacation in Arizona. In addition, some States mandate that you are a resident of that state to participate in a practical testing day. There are a few other programs out there but most of them overlap the States already covered by IBEP.

Archery hunters that are forced to use archery methods by archery only season are VERY different than archery hunters that CHOOSE to use archery gear in general seasons. The former are dedicated hunters that are generally very competent; the later are often (not always) hunters that get into archery by necessity to be allowed to hunt a longer season or for more desirable animals, many of whom are inexperienced and practice very little. There are zero statistics to support additional wounding by archery hunters in general seasons. In fact, I have found general season archery hunters to wound animals less frequently than rifle hunters. I have hosted approximately 100 archery hunters in the last ten years with only two of these hunters wounding and losing animals, these hunter wounded several due to anxiety while in the presence of bears. Both where archers with decades of experience, tournament shooters, and both certified... No amount of certification will eliminate these scenarios. In contrast, I have hosted or hunted with many more rifle hunters. This year alone we had six of our hunters, or about 20% wound animals. Luckily, all but one where recovered after either a guide follow up or a very long tracking job, the one bear that got away was shot in the back foot at 12 yards by an active duty sniper team leader with a bad case of bear fever. With the advent of extreme long range shooting, wounding loss in rifle hunting is increasing dramatically while archery hunters, equipment, and competency are advancing quickly.

Proposal #18

I support the proposal and would advise the board to add "air-bows" to this proposal. Air Bows are a new concept that are essentially an air rifle that shoots a traditional arrow. They are very deadly and are probably appropriate for use in general season hunts as they are more powerful than a traditional bow and have an effective range of at least 100 yards.. They are certainly not appropriate for archery only hunting areas.

Proposals #21-26

I would like to see the language in 92.085 amended to read or have added to: **"From August 8 - September 20, using an aircraft to make multiple, consecutive passes over a sheep or group of sheep is prohibited"**

I believe this language more accurately prohibits the activity that actually affect hunters in the field. This language is infinitely more enforceable than the current language. It will allow a pilot to make a single pass whether it is intentional or unintentional. It also allows for multiple passes

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in a case where a pilot is looking for a landing area, etc. A hunter on the ground with a video camera would provide an easy case to AWT if someone is participating in this activity.

The issue of spotting animals from the air to judge legality or trophy quality is purely an ethical issue as long as the animals are not harassed or other hunters adversely effected. Although this activity does not strictly adhere to my personal ethics, neither does it overtly affect my hunting experience. Many hunters believe this activity IS ethical and I don't want to see them demonized for an activity that has no effect on conservation, or the experience of other hunters. I find this issue very analogous to bear baiting, an activity I participate in regularly. I find bear baiting perfectly ethical, and completely necessary, in some locations, to take bears consistently. Some hunters and many non-hunters find baiting unethical. The same arguments are also try for the spotting of game from the air.

Proposals #27-28

I support the concept of both of these proposals. The average age of sheep harvested is at an all time low. Any proposal to increase the average age of rams taken is **very** desirable. Average Age of Harvest has been dropping for over 20 years and is now at all time lows for both resident and non-resident hunters. Proposal 27 may not be that helpful because many of the very young rams taken are full curl, but may mitigate this some by making rams taken strictly on age criteria older. I would prefer the proposals be amended to the following age-based system:

Years hunter must take off before hunting next	Age of Sheep Taken
0	10
1	9
2	8
4	7
6	6
8	5
10	4 and younger

Proposal #29

I am **ADAMANTLY OPPOSED** to proposal 29. The Board addressed this issue just last year and unanimously voted against it. While discussing this proposal I asked the simple question - Why? We have very good dictionary definitions of broken, everyone knows what they mean. In addition I asked how large of a problem it was. The answer, statistically, was that it was not a problem at all. Less than 1% of all sheep sealed where sheep that where only legal by broken on both sides (that is less than 8 years old and not full curl). Of these, no one could come up with a single incident where one was really questionable. As a matter of fact, in a room full of sheep hunters, biologists and Board members, there was only three of us that have ever seen a ram less than 8 years old and broken on both sides.

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I analyzed the data for the take of 8400 sheep since 1988 that had “brooming data”. 0.6% of these sheep were broken on both sides and under 8 years old. We are talking about 1 in about 200 rams taken. Then ask how many are marginal? You will be looking at 1 in a couple thousand sheep taken.

Judging legality of a ram is already very difficult and quite subjective, especially in the field. **PLEASE** do not make it more difficult by adding a definition that will also be difficult to see and judge in the field. All sheep hunters know a broken horn when they see one through a spotting scope at a couple hundred yards. No one will be able to judge if most or all of the lamb tip is missing, or if the tip is more than a set diameter. Those of us that have looked at thousands of sheep still argue about how long a lamb tip can be. Don't complicate field judging more.

Proposal #30

I support Proposal #30 and would be willing to have the time period to be even longer if residents also had a one year wait in between sheep kills.

Proposal #32

I oppose this proposal. I believe drawing hunts should be reserved strictly for areas of extreme crowding or conservation concerns. Statistically, drawings hurt Resident hunters the most. In almost all cases, not only are the number of resident hunters decreased, success rates also go down due to the fact that people that know the areas and are serious hunters are replaced by people that do not know the areas and in many cases would have never hunted the area without drawing the tag.

The author's assertion that there is no other state that are not all on permit is not only not true, but if it was, is not a fair comparison. Alaska has half the sheep in the Nation and fewer people than almost any other state. Western Canadian Provinces are much more analogous and all have many open areas even though both Alberta and BC have many times the population of AK.

Proposal #33

I helped draft this proposal with my wife and some friends. I continue to support this proposal to reduce early season crowding as long as there is another action to offset the increase in take that it would cause. This is a simple fix that would reduce crowding and provide separation of resident and non-resident hunters. This should appease resident hunters that think they are not able to compete with guides. We can't solve the problem of lack of hard work and motivation, or the selfish desire to eliminate others even though there would likely be zero benefit to their own hunting; but maybe we can improve perceptions.

As written, this proposal would, without a doubt, increase the costs to guides taking sheep hunters. In the years residents hunted first, up to 50% of the ram harvest would be taken before guides can even start with non resident hunters (according to fact that residents take the majority of sheep and even more residents will choose this time period). In the years non-residents start first, guides will have a week period that they will either need to pull all their stuff and guides from the field or leave them out there and pay them.

This proposal could also pass without the swapping of seasons, just give Residents the first period, nonresidents the last. All Resident head-start proposal offered to this date result in four unworkable problems:

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- #1 Increased crowding due to more Residents choosing the early time period.
- #2 Increased conflicts due to residents and air taxis filling up strips/areas traditionally used by guides before they get there, leaving them no option but to step on toes when they arrive
- #3 The disproportionate consequences that would be suffered by the Brooks Range due to the shorter season limited by weather.
- #4 Increased take due to increased resident participation and resident guides personal hunts.

This Proposal, even if adopted without the swap (residents always start first), will reduce or eliminate #1-3

There may need to be an additional measure to maintain #4 - overall take. I suggest the system I recommended to amend proposals 27&28 with (age based system).

Proposal #34

I also helped draft this proposal with my wife and friends. I oppose it at this time, as written. This proposal may be more complicated than it needs to be but we were trying to provide solutions to the perceived problems in sheep hunting while providing opportunities for as many segments of the hunting public as possible. It attempts to allow for a longer season and separation of hunters WITHOUT increasing the take of rams. This issue statement in the proposal accurately states the intent. This proposal was written with the intent that it could be tweaked but the public or to provide options if the sheep working group didn't take place or failed to provide recommendations.

Proposal #35

I oppose this proposal. It will simply eliminate the chance for hunting partners with the wrong last names to hunt together. Many people only hunt once every several years and only one of them would be able to take a sheep.

Proposal #36-39

I am opposed to these proposal for the same reason they have been rejected for the last several Board cycles. If the Board would like to go the direction of a Resident head-start, please see my comments for Proposal 33. These will simply increase sheep take too much. They may also actually increase the number of sheep that go to Guides and their clients. Guides will probably still take the same number of hunters, in addition, hundreds of them will go on personal sheep hunts. Most guides do not hunt sheep for themselves due to simple time conflicts. This will allow a time for them to hunt if they are residents which about 90% are. So, guides will take a sheep for themselves AND the same number of sheep for their clients.

Proposal #41-45

I oppose these proposals. Most state that all other states have a 10% cap. This is simply not true. The only other state that has an open sheep hunt has no cap on that hunt at all. In drawing hunts, Wyoming has a 25% cap, NM 16%. All other species in the nation without drawings are not capped by non-resident allocation. Canadian Provinces are much more of an apples to apples scenario. All of these that have a cap are in the range of 25% and are only in drawing areas. Across the board caps seldom work well in vast areas. A viable, more flexile alternative is this concept:

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85.055. Hunting seasons and bag limits for Dalls sheep. Nonresident Guided hunters will be managed based on a Sheep Hunting Age Tracking Strategy

Guided Nonresident sheep hunting will be managed by Guide Use Area (GUA) and Federal Concession, on a drawing basis, if needed, to reach Age Goals set out in this regulation.

Age goals (based on a 3 year rolling average of Guided Nonresident Harvest) for Areas within GMU 7-15 are 8.6 years; GMU 23-26 are 9.4 years; and GMU 16-22 are 9.0 years.

A drawing will be instituted when a GUA or Concession drops below the Age Goal; For Every tenth (0.1) of a year the GUA/Concession drops below the goal, an additional

This idea allows for a real conservation based approach to managing guided hunters.

Proposal #46

I support this proposal in theory. I understand that sheep may be disturbed by multiple stalks by bowhunters before the rifle hunters get a chance but this will limit some crowding without increasing take. Archery hunters are famously unsuccessful at taking calls sheep. This may also reduce take of non-residents and minimize guide crowding in some areas. As a guide, I would try to book a couple archery hunters for this hunt. This would make for fewer hunters the rest of the season. In all sheep areas in Federal land, we are limited as to the number of hunters we can take. If I take two in the archery season, that is two less I could take in the general season and they would likely not be very successful.

I would not agree with the elimination of having a rifle with a scope in the field because there are often also grizzly and caribou seasons open.

Proposal #47

I support this proposal. I really like this concept. An early youth hunt would minimize crowding later and provide for a great family opportunity WITHOUT adding to overall harvest.

Proposal #48

Of the options in this proposal, I prefer the Status Quo. See above for my preferred alternatives. Please remember that the Brooks Range has a season that is essentially only Aug 10-31. After this time, it is simply too risky to hunt sheep on a regular basis.

Proposal #50

I support this proposal and have drafted similar in the past. With the advances in DNA technology, it is very easy and inexpensive to determine the sex of an animal. I have personally witnessed several cases where evidence where removed inadvertently. One of these cases was with a bullet! Others where where young or inexperienced hunters simply couldn't figure out how best to leave it on the meat. Still others where simply inadvertent knife strokes. I also know of a person who mistakenly removed it, secured it in a plastic bag, zip tied it to a quarter and still got a ticket. With the current "No Warning" culture at AWT, removing this requirement is simply the best option. I am fanatical about meat care and have always hated the risk of urine on the meat you run with this disgusting practice.

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Proposal #52

I oppose this proposal unless AWT can make a provision to use otherwise unlawful means to recover game on a case by case basis. I have used the example of a wounded duck being chased in a boat. It is completely reasonable to do this but technically unlawful. Another example would be looking for a wounded animal with an airplane that was shot in the rain. In both of these cases the ethical thing to do is to use the means available to you to kill the animal as quickly as possible. Doing what is right is not always easy or popular and, at times hard to enforce.

Proposal #54

I drafted this proposal and ask the board **DEFER** this proposal to next years' meeting. This proposal seems to be popular with those that I have discussed it with but it needs to be fleshed out further. The intent if this proposal is NOT to increase take as stated in the Department comments. The new limits may need to be tightened a little to accomplish this. The intent of this proposal are three fold: #1 and most importantly, is to allow for people to make a simple mistake without becoming criminals. AWT's current "no warning" policy is the primary driver of this proposal. If AWT had a policy of issuing a warning of a marginally sub-legal animal, to first time offenders with clean records, this proposal would not exist. People are human and mistakes happen no matter how careful you are. Just ask the AWT Lieutenant that shot a bull moose in a cow hunt last year. #2 This would allow an administrative penalty that would allow AWT time and money to be spent where it is really needed - catching poachers and protecting people. Their budget is a disaster and I am really worried about decreasing services. We have already witnessed some of these consequences. #3 It would cause people in areas where animals are tightly restricted to be more careful when selecting animal sex (bears, goats, etc.).

Alternative - BOG instruct the AWT to issue an official warning, to first time offenders of a size limit violation, that their animal falls with 5-10% of legal (pick a number) or has other unusual characteristics (bay points on moose; points off the burr, near the hair line on spike/fork; odd angle sheep horns, etc)

Proposal #55

I oppose this Proposal especially with the declines of brown bears seen in the last few years on the Alaska Peninsula and other areas.

Proposal #56

I oppose this proposal. This is another solution looking for a problem. We have wanton waste laws that prevent the waste of game meat that is legally required to be salvaged. I suspect it would be very difficult to come up with a real world example of where this has happened. Almost all black bear hunters bring out the animal whole, or at least in one pack load and there are very few cases where a brown bear is required to be salvaged (over bait) where there is not a vehicle within a reasonable distance where meat can be loaded at the same time. Please look for way to make hunters' lives easier with fewer ticketing offenses. DO NOT make regulations like this that have ZERO effect on conservation what-so-ever.

Proposal#58

I oppose this proposal. This is a knee jerk to an isolated case where tens of gallons of chocolate were used in a State 4000 miles away. That volume of chocolate is not even readily

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available in Alaska. Most pastries, commonly used for bear bait have small amounts of chocolate that are not harmful to bears. I would not be opposed to a regulation that said you could not use more than a gallon of chocolate at a time, or something similar.

Proposal #59

I support this proposal but prefer proposal #62 to eliminate the permit condition talking about contaminated soil. It is absolutely impossible to remove ALL contamination. Even if you do not use liquid, every time it rains, particles leach into the soil. Dears drag around small pieces, etc.

Proposal #62

I strongly support this proposal. This causes more stress for bear baiters than any other regulation because we know it is absolutely impossible to remove all contaminated soil without construction equipment. AWT has said , on the record at the BOG, that this would only be enforced in egregious cases, then proceeded to describe those cases. Many of them are common practice in bear baiting. The BOG needs to rule one way or the other rather than having this discretionary condition included by a bureaucracy.

Proposal #63

This is a common sense proposal and I support it but i would not support requiring GPS coordinates.

Proposal #65

Although I have found many great ways to eat grizzly bears since this regulations was passed, I support it's repeal. I have heard from many credible people that these bears are truly bad to eat in some areas. Maybe an alternative would be to eliminate it in coastal areas, or areas likely to have high consumption of salmon? We will continue to salvage brown bear meat but it is very hard work to take the meat and process it correctly. Many hunters do not have the culinary ability to make it edible.

Proposal #67

I support this proposal. Trespass is rampant along highway corridors and it is not reasonable to expect an animal to fall in the right-of-way and not encroach on private property.

Proposal # 68

I support this proposal as long as you may still use FLIR to locate wounded game, much like the light regulation. If economical, this would be a great tool to recover game that has been lost.

Proposal # 69

I Oppose this proposal. Dogs have been a fabric of Alaskan life for over a century and are part of the hunting culture.

Proposal #71

I support this proposal but it may be wise to add a caveat "except when searching for wounded game". This may clarify the issue discussed above for the need of all reasonable means to dispatch a wounded animal.

Proposal #72-74

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I support these proposals and would suggest an even larger caliber of .25 but not more. .243 and under are capable of killing any animal on earth but the risk of wounding loss is very great, especially among younger hunters that commonly use these calibers.

Proposal #83

I wrote this proposal and I strongly support it. It is completely unnecessary to have both a locking tag and a harvest ticket. Maybe an alternative would be to get rid of the tags altogether and have non-residents pay for their harvest ticket. This is common in other jurisdictions.

Proposal #90

I support this Proposal. Adf&g may not have the authority to permit sheep and goat owners but the Board does have the authority to remove these animals from the clean list. This disease is real and would be absolutely devastating if entered our wild sheep populations.

Proposals #96-98

I support these proposals in concept. I believe a bonus point system where half of the pool is kept completely random to continue opportunity for new/young people is the best alternative.

Another, less onerous alternative would be to allow hunters to put all their choices in the same hunt. This would allow people to concentrate effort in the hunts they really want.

Also consider letting people put in for up to 10 drawings for each species. This is a simple way to increase funding to a cash strapped budget.

Proposal #99

I support this proposal. There has been years of hard work by the Board, and by the guide industry that is at risk without this proposal or something similar.

Proposal #101, #107

I strongly oppose these proposals. Either of these proposals would devastate hundreds of Alaska Small businesses. Across the board regulations such as this would harm the Alaska economy and eliminate many guide businesses. Alaska Guides are 100% small businesses, 90% Alaskan owned, and bring in more new dollars to the State per amount of resource taken than any other Renewable Resource Industry in Alaska.

Proposal #134

I support this proposal but also ask the board to authorize a limited drawing hunt for Nonresidents with an initial opportunity of up to 50 tags.

ADF&G states in the proposal "Additionally the reported caribou harvest is well below what we consider sustainable for this herd while allowing herd growth." This is due to the remote location of the herd in it's current range. It is simply impossible to harvest the number of caribou that would be considered near the sustainability number with the caribou spending most of their time far from villages. Obviously the ANS was set artificially high during a time when the herd was at all time highs and should be readdressed to also include times before the explosion of the herd and after the crash.

Proposal # 138

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I oppose proposal 138 as written because it does not request a conservation based system and a one-size fits all proposal across vast areas is simply not wise. Areas with very difficult access can sustain much higher nonresident effort simply because residents don't show up to hunt. Other, more accessible areas should see more resident effort. I would like to suggest an alternative:

85.055. Hunting seasons and bag limits for Dalls sheep. Nonresident Guided hunters will be managed based on a Sheep Hunting Age Tracking Strategy

Guided Nonresident sheep hunting will be managed by Guide Use Area (GUA) and Federal Concession, on a drawing basis, if needed, to reach Age Goals set out in this regulation.

Age goals (based on a 3 year rolling average of Guided Nonresident Harvest) for Areas within GMU 7-15 are 8.6 years; GMU 23-26 are 9.4 years; and GMU 16-22 are 9.0 years.

A drawing will be instituted when a GUA or Concession drops below the Age Goal; For Every tenth (0.1) of a year the GUA/Concession drops below the goal, an additional 10% of the baseline number of tags will be eliminated. If an Area later reaches the Age Goal, the drawing will be suspended.



Ahtna, Incorporated



February 22, 2016

ATTN: Alaska Board of Game Comments
Alaska Department of Fish & Game
P.O. Box 115526
Juneau, Alaska 99811-5526

To Whomever It May Concern:

Enclosed are Ahtna Tene Nene' C&T Committee's comments on wildlife proposals for the 2016 Alaska Board of Game Statewide meeting.

Sincerely,



Roy S. Ewan
Chair

DEFINITIONS

Proposal 1 – 5 AAC 92.990(a)(47). By Alaska Outdoor Council. Definitions. Remove hovercraft and aircraft and airboats from the definition of motorized land vehicles as follows:

Comments:

We oppose Proposal 1 to remove hovercraft and aircraft from the definition of motorized land vehicles. Doing so would allow use of hovercraft and airboats on controlled use areas, which prohibits motorized land vehicles.

Regulations regarding use of hovercrafts and airboats while hunting should be dis-allowed or more restrictive. Airboats and hovercrafts are noisy, and disrupts hunters in the field while hunting for wild game. Wild game will leave an area, if they are disturbed by noisy man made machines. Quality of hunting expedition will be disheartening due to noisy, bothersome, loud hovercrafts and airboats.

Proposal 2 – 5 AAC 92.990(a)(5)(A). By Alaska Outdoor Council. Definitions. Modify the definition of ATV as follows:

Comments:

We oppose Proposal 2, which would eliminate “with vehicles with 4 or more wheels”. Doing so would dis-allow hunting with a truck or car. Ahtna People rely heavily on use of vehicles to hunt with. A definition of ATVs should be written into regulation. Definition of ATVs should be operated on land and water and dry weight should be 1500 lbs. Dry weight for Argos are 1500 lbs. Argos can be driven on land and water.

Proposal 3 – 5 AAC 92.990. By Fairbanks Fish and Game Advisory Committee. Definitions. Establish a definition for general hunt as follows:

Comments:

We oppose Proposal 3 to define General Hunt. General Hunt does not need to be defined, it is understood to mean that it is not a subsistence hunt or general hunt if the species does not have a positive C&T finding. Nonresident hunt is also defined.

It appears that proponents of Proposal 3 is trying to define subsistence hunt for the purpose of Amounts Necessary for Subsistence (ANS). ANS has tools in place to determine ANS for all species. The process for determination of ANS is reliable, accurate method and does not need to be revised.

Proposal 5 – 5 AAC 92.990(a)(6). Definitions. By Yaquillrit Kelutisi Council. Amend the definition of bag limit as follows:

Comments:

We support Proposal 5 to amend definition for game birds to include all the meat from the breast, back thighs, legs, wings, gizzard and heart. This definition would follow federal regulations in the spring/summer hunt for migratory birds.

Alaska Native People consider it wanton waste leave parts of migratory birds in the field or thrown away. It is considered taboo or ingii to throw away edible meat and part of migratory birds.

Proposal 6 – 5 AAC 92.990(a)(6). Definitions. By Wrangell Fish and Game Advisory Committee. Amend the definition of bag limit as follows:

Comments:

We oppose Proposal 6 to add to the definition of spike-fork antlers. Adding a third tine to the definition for spike-fork antlers will have hunters take an illegal spike-fork moose. Adding another tine to the definition of spike-fork will also confuse the public as what a spike-fork moose antler is.

Crossbow & Archery (Proposal 8-18)

Miscellaneous Topics

Proposal 19 – 5 AAC 92.XXXX. Board generated proposals. By Fairbanks Fish and Game Advisory Committee. Establish a regulation for board-generated proposals as follows:

Comments:

We support Proposal 19 to have regulations in place, whenever a board generated proposal is submitted by the Alaska Board of Game. Due to cutbacks to the Alaska Board of Game's budget, proposals submitted to the Board may not be thoroughly reviewed or the Board may not have the time to make informed decisions on proposals brought before the Board.

Board generated proposals should be submitted by 3 members of the Alaska Board of Game. Sixty-five days to allow the public to respond to a Board generated proposal is an adequate number of days to respond to a board generated proposal.

If an issue is urgent, then the Board should be allowed to submit a proposal. Board generated proposals should be based on one particular subject matter that is basically similar in its intent and meaning. For example, if 51% of the total proposals that were previously submitted to the Alaska Board of Game were in favor of an earlier moose hunt, then the Board should be allowed to write a proposal in favor of an earlier moose hunt.

Board generated proposals should only be written when an urgent matter is brought before the board. Urgent means that 51% of the public members present at a specific Alaska Board of Game meeting has stated what their concerns are on a particular subject matter; and the total proposals (51 percent of total proposals submitted) were similar in nature to one subject matter.

Sheep Hunting (Proposals 21-49)

Use of Game, Possession, & Transportation

Proposal 50 – 5 AAC 92.150. By John Frost. Evidence of sex and identity. Remove the requirement for evidence of sex for hunts with bag limits of only one sex as follows:

Comments:

We oppose Proposal 50 to remove for evidence of sex for hunts with only one sex. Unethical hunters may take large game species illegally. Enforcement will not have proof what sex a large game is without evidence of sex requirement in regulations.



DNA tests are expensive and take months to conduct. ADFG's budget is declining, it would cost to conduct such tests.

Proposal 51 – 5 AAC 92.010. By Alaska Hunters Association. Harvest tickets, and reports; and 92.130. Restriction to bag limit. Modify bag limits for nonresidents accompanied by a resident relative as follows:

Comments:

We oppose Proposal 51 to change 5 AAC 92.130 and 5 ACC 92.010 to add nonresidents hunting with resident relatives to harvest wild game and to have bag limits count towards both of them. Resident relatives can take their relatives with them to hunt, without letting them shoot wild game or using permits, harvest tickets, etc. Non-residents also have the option of hunting with guides, they should hunt with guides, and share meat with relatives.

Proposal 52 – 5 AAC 92.220(i). By Alaska Wildlife Troopers. Salvage of game meat, furs and hides. Clarify the requirements regarding retrieval and salvage of wounded game as follows:

Comments:

We support Proposal 52 to clarify what reasonable means. Everyone who hunts and wounds a wild game should attempt to look for the wounded animal. Wild wounded game should not be left in the field to suffer.

Proposal 54 – 5 AAC 92.130. By Aaron Bloomquist. Restrictions to bag limit. Establish an additional statewide bag limit for big game species as follows:

Comments:

We oppose Proposal 54 to allow an additional take of large game. Alaska Board of Game has an established Unit specific hunt for wild game with hunting seasons. Another hunting season does not need to be created. This propose of this proposal is allow an with more hunters in the field to harvest additional moose, Caribou, Mountain Goats, and Dall Sheep with longer hunting seasons. Non-Residents will benefit from this proposal.

Bear Baiting

Proposal 59 – 5 AAC 92.044. Fairbanks Fish & Game Advisory Committee. Permit for hunting bear with the use of bait or scent lures. Clarify and restrict the use of liquids at bait stations as follows:

Comments:

We oppose Proposal 59 to amend 5 AAC 92.044(8) to clarify and restrict the use of liquids at bait stations. Liquids would attract bears, leave the ground saturated with oil, long after bait station is removed. It could cause a safety problem for other hunters who come across an old bait station. Oil and greasy spots soaked into the soil will attract bears and other animals.

Proposal 61 – 5 AAC 92.044(8). By Fairbanks Fish and Game Committee. Permit for hunting bear with the use of bait or scent lures. Allow the use of game as bait as follows:



Comments:

We support Proposal 61 with an amendment to exclude beavers from furbearers list. Using other furbearers as bait would attract bears to bait station, and utilized carcass of other furbearers.

Proposal 62 – 5 AAC 92.044. By Alaskan Bowhunters Association. Permit for hunting bear with the use of bait or scent lures. Remove the requirement to remove all contaminated soil from bear bait stations as follows:

Comments:

We oppose Proposal 62 to remove the requirement to remove all contaminated soil at bait stations. Contaminated soils will attract wild game, be a safety issue, and isn't good for the environment or wild game. Wild game may be poisoned by contaminated soil.

Proposal 63 – 5 AAC 92.044(8). By Alaska Department of Fish and Game. Permit for hunting bear with the use of bait or scent lures. Amend bear baiting regulations to require specific locations to be given at the time of registration and to update the nonmenclature of the signs required as follows:

Comments:

We support Proposal 63 to change wording of sign to bear bait station and to give specific location of baiting station on a form to the department. Public needs to know the location of a bait station to keep a safe distance from the bait station.

Proposal 65 – 5 AAC 92.220. By the Alaskan Bowhunters Association. Salvage of game, meat, furs, and hide.

Comments:

We oppose Proposal 65 to remove the requirement to salvage brown bear meat at bait stations. Bait stations may not be within 1 mile of a house..... or permanent dwelling or 1/4 mile of a publicly maintained road. Use of bait or scent lures will attract other bears to the bait station, this will create a safety issue, if brown bear meat is not salvaged.

Unlawful Methods of Taking Game

Proposal 66 – 5 AAC 92. 080(16). By Jake Sprankle. Unlawful methods of taking game; exceptions.

Comments:

We oppose Proposal 66 to remove 5 AAC 92.080(16). Allowing the use of felt shoes will spread seed of invasive weeds more easily. Invasive seeds may spread through other ways, however, to allow felt shoes will definitely spread seeds of invasive plants.

Proposal 67 – 5 AAC 92.080(1). By Ahtna Tene Nene' Customary & Traditional Use Committee. Unlawful methods of taking game; exceptions. It is unlawful to hunt or trap within State Federal Aid right-of-ways without written documentation granting permission from private land owner[s].

Comments:

We support Proposal 67 to make it unlawful to hunt or trap within State Federal Aid right-of-ways without written documentation granting permission from private land owner[s].



The issue of hunting or trapping in Rights-of-ways has to be settled by the Alaska Board of Game. It is unclear to hunters, if they can hunt or trap within a right-of-way on private lands in Alaska. In the *Highway Rights-of-Way in Alaska:2013*, it states, "There are many other "scope of use" issues that are less clear such as camping, fishing and other incidental uses that have yet to be settled in Alaska". Board members can settle this question through modifying 5 AAC 92.080(1) to dis-allow hunting or trapping within State Federal Aid Right-of-Ways.

Trespassing on private lands in the Copper River Region and Cantwell community area is a problem. Hunters intrude on private lands, when they hunt in right-of-ways on private lands.

Modifying 5 AAC 92.080(1) to stop hunters from hunting or trappers from trapping on private lands will show respect to private land owners, provide safety to the public and private land owners, and keep hunters from illegal trespass onto private lands.

Proposal 68 – 5 AAC 92. 080(7). By Alaska State Troopers. Unlawful methods of taking game; exceptions.

Comments:

We support Proposal 68 to prohibit the use of any forward looking infrared device (FLIR). Forward looking infrared device enables hunters to easily harvest a moose with this device. Hunters can spot a moose by infrared and enhance imagery technology. Fair chase while hunting for wild game will be done away with this equipment. Moose population may be depleted by hunters utilizing FLIR to hunt with.

Proposal 69 – 5 AAC 92.080. By Guy Fulton. Unlawful methods of taking game; exceptions.

Comments:

We oppose Proposal 69 to dis-allow hunting with dogs. Hunters may want to take out dogs when they camp out to hunt or hunt for water fowl, black or brown bear, they will not be able to take dogs out, if this proposal is approved by the Alaska Board of Game.

Proposal 70 – 5 AAC 92. 085. By Fred Harbison. Unlawful methods of taking game; exceptions.

Comments:

We oppose Proposal 70 to restrict use aircraft for hunting big game species. Regulations are in place that address land and shoot. Hunters have to wait the next day after 3:00 a.m. to hunt for big game. Under 5 AAC 92.085(8), it states that "a person who has been airborne may not take or assist in taking big game animal until after 3:00 a.m. following the day in which the flying occurred...

It would be difficult for enforcement to enforce this proposed restriction on aircraft use. Enforcement will not know if pilots are trying to locate a safe place to land an airplane. Pilots have to circle around to determine whether it is safe to land. Pilots would be cited for looking for a large game, if they saw a large game while in flight, attempting to land an airplane.

Proposal 71 – 5 AAC 92. 085. By Alaska Wildlife Troopers. Unlawful methods of taking game; exceptions.



Comments:

We support Proposal 71 to clarify same day airborne prohibitions to dis-allow a person [to be] assisted by a person who has been airborne in taking a big game animal until after 3:00 a.m. following the day in which the flying occurred.

It would be difficult for enforcement to prove that a pilot shared information on spotting a big game animal and passing that information on to another person who was on the ground, and to affirm if that person were to hunt for that big game specie. Enforcement could not prove that a pilot shared information to a hunter on the ground and that hunter on the ground attempts to hunt for that large game specie.

It will be costly to the Department and the State of Alaska to defend this in court. The Department does not have the funds to enforce this regulation or to defend it in court.

Proposal 72 – 5 AAC 92. 085. By Tom Crace. Unlawful methods of taking big game; exceptions.

Comments:

We oppose Proposal 72 to use .243 caliber or larger for hunting moose or caribou. Caliber restrictions placed upon hunters is not necessary. Hunters will be cited for not having a minimum of .243 caliber or larger rifle with them while hunting for large fame in the field.

Most hunters know that to harvest large game animals a large caliber rifle is needed to hunt with. No one wants to hunt with a 22 rifle or smaller, doing so would only wound wild game.

Proposal 73 – 5 AAC 92. 085. By Tom Crace. Unlawful methods of taking big game; exceptions.

Comments:

See comments under Proposal 72.

Proposal 78 – 5 AAC 92.095. By Alaska Trappers Association. Unlawful methods of taking big game; exceptions.

Comments:

We oppose Proposal 78 to remove statewide regulations on all requirements to remove ID tags on traps and snares. Each region in the State of Alaska is different, member of the Board should consider trapping proposals and regulatory actions in each region in the State of Alaska. Some areas in the State are populated areas that have public maintained roads. Trappers may set traps or snares near these roads, trails, etc. Existing trapping regulations should be kept in place for these regions in the State of Alaska.

Proposal 79 – 5 AAC 92.095(a). By Michelle Anderson and Patricia O’Brien.

Comments:

We oppose Proposal 79 to require traps to be checked every 24 hours, and documented as to when trap or snare was last checked due to severe weather. This proposed regulatory action is unnecessary and would be burdensome to trappers. Written documentation will be destroyed by weather conditions - snow and wind or rain, trappers will be cited because of this. Enforcement will have to check traps and cite trappers. Enforcement do not have the resources to check every trap line in the State of Alaska.

Licenses, Tags, Harvest Tickets & Reports

Proposal 82 – 5 AAC 92.012. Licenses and tags. By Bobby Graham.

Comments:

We oppose Proposal 82 to remove regulatory requirement to immediately affix locking tag to an animal prior to leaving kill site. Hunters may abuse regulations that require locking tags, such as hunts for Bull Moose. They may not claim moose, they shot and killed, if locking tag requirement is removed from regulations.

Proposal 83 – 5 AAC 92.010. Licenses and tags. By Aaron Bloomquist.

Comments:

We oppose Proposal 83 to eliminate the use of harvest tickets in any hunt requiring a metal locking tag. ADFG Department will not get data information on animals harvested by nonresidents and nonresident aliens. Harvest tickets would still be required by residents.

Off Road Vehicles (ORV) Policy (Proposal 87)

Miscellaneous Permits (Proposal 88-94)

Hunting Permits Proposals 95-108)

Proposal 103 – 5 AAC 92.071. By Alaska Outdoor Council. Tier I subsistence permits.

Comments:

We oppose Proposal 103 to have a reporting system in place. This proposal appears to want to determine ANS and harvests. Alaska Board of Game determines who qualifies for Tier I subsistence permits, not Subsistence Division.

ADFG has a reporting process in place for Copper Basin Community Subsistence Hunt for Moose & Caribou, Tier I and Tier II hunts and other subsistence hunts, it isn't necessary to revise the current reporting system.

ADFG doesn't have funds to create and administer another reporting system. Creating and administering another reporting system isn't going to improve the reporting system.

At the Tier I level, all residents in the State of Alaska can hunt in a subsistence hunt. ADFG determines the number of Tier I permits to be distributed after population counts are done. Analysis and data information is gathered through Tier I permits returned to ADFG office. A process is in place to determine who participates in subsistence hunts, and pre-determined number of Tier I permits to be distributed for subsistence hunts.

Proposal 104 – 5 AAC 92. 010. By Fairbanks Fish and Game Advisory Committee.**Comments:**

See comments under Proposal 103.

Proposal 105 – 5 AAC 92.070(a). Tier II Subsistence hunting permit point system. By Rod Arno.**Comments:**

We oppose Proposal 105 to do away with eliminating 5 AAC 92.070(a)(1)-(3) and replacing it with number of days (180 per year) spent harvesting noncommercial harvesting and preserving wild fish and game within Alaska.

Eliminating (1) would take out possibility of scoring 50 points for the number of years an applicants has hunted or eaten from the population, and (2) possibility of getting 10 points for the number of years an applicant has hunted or eaten from the game population and possibility of 25 points for the amount of time during the year the applicant spends harvesting wild game or fish within the hunt area boundary. One criteria, number of days hunted in Alaska would replace (1)-(3). Families that hunted together, from generation to generation, in the hunt boundary area harvesting using fish and game resources throughout the whole year would be taken out of the equation. Criteria that replaces (1)-(3), would include the whole State to prove uses of fish & game resource, not the local hunting area, where the applicant would hunt, and it would only include one criteria-number of days per year of harvesting these resources. Criteria for subsistence uses of the resources would be removed from regulation 5 AAC 92.070(a). Tier II Subsistence hunting permit point system.

Proposal 106 – 5 AAC 92.062. Priority for subsistence hunting; Tier II permits. By Alaska Department of Fish and Game.**Comments:**

We support Proposal 106 to change in hunt type from Tier I to Tier II and vice versa during the regulatory regulations cycle. Changes from Tier I to Tier II or vice versa should only be done during the regulatory cycle so hunters will be able to plan for and hunt during the regulatory year. It will also give the Department better management and time to administer subsistence hunts.

AC Jurisdiction for Antlerless Moose Seasons (Proposals 109-110)**Proposal 110 – 5 AAC 98.005. By Mat Valley Fish and Game Advisory Committee. Areas of jurisdiction for antlerless moose seasons.****Comments:**

We oppose Proposal 110 to add Units 13 to the Matanuska Valley Advisory Committee's jurisdiction for authorizing antlerless moose hunts. Matanuska Valley Advisory Committee's jurisdiction is outside of Unit 13, this advisory committee doesn't need to be included in the decision making process to authorize antlerless moose hunts. Local advisory committees in the Copper Basin areas would not have, nor ask for, jurisdiction to reauthorize antlerless moose hunts outside of Unit 13.

Game Management Units (Proposals 111-112)

Antlerless Moose and Tag Fee Reauthorizations (Proposals 113-131)

Proposal 119 – 5 AAC 85.045(a)(11). By Alaska Department of Fish & Game. Hunting seasons and bag limits for moose.

Comments:

We oppose Proposal 119 to re- authorize the antlerless moose season in Unit 13. If there are too many cow moose in Unit 13A, cow moose will find nutritional sources elsewhere. Cow moose have the capacity to move to other areas to feed themselves, based upon traditional Ahtna knowledge. Cow moose have sustained themselves and will continue to do so without intervention from the department.

Killing cow moose that may have a calf is not the practice of the Ahtna People. Cow moose may have a calf with it and accidentally shooting it will leave the calf an orphan.

In the 1970s, there was an open season on cow moose, moose population crashed to a very low number. Too many cow moose were killed, which depleted the moose population. This may happen again, if too many cow moose are killed by residents and non-residents.

Cow moose may be impregnated with twin calves, may be killed, 3 moose would be potentially killed.

Proposal 123 – 5 AAC 85.045(a)(11). By Alaska Department of Fish & Game. Hunting seasons and bag limits for moose.

Comments:

We oppose Proposal 123 to re- Authorize the antlerless moose season in Unit 20A for the same reasons stated in Proposal 119.

Proposal 129 – 5 AAC 92.015. By Alaska Department of Fish & Game. Brown bear tag fee exemption.

Comments:

We support Proposal 129 to reauthorize the brown bear tag fee exemption. More hunters will apply to hunt brown bear in Unit 11 and Unit 13, if exemption is reauthorized. Brown bears are thought to be healthy in Unit 11 and Unit 13, harvesting more will not impact the species population.

Proposal 130 – 5 AAC 92.015(A)(4). By Alaska Department of Fish & Game. Brown bear tag fee exemption.

Comments:

We support Proposal 130 to reauthorize grizzly brown bear tag fee exemption in Unit 12. Brown bears are not a conservation concern in Unit 12. This will encourage more hunters to hunt for grizzlies and harvest them.

Regional and Multiple Units (Proposals 132-137)

Proposal 137 – 5 AAC 92.108. By Alaska Department of Fish and Game. Identified big game prey populations and objections.

Comments:

We support Proposal 137 to modify the Intensive Management population and harvest objectives for moose in Unit 20A. Reducing population objectives and the harvest objectives will help to support to meet moose harvest objectives and keep moose population in line with carrying capacity of the habitat.

Proposal 142 - 5 AAC 92. 121. By Alaska Dept. of Fish & Game.

Comments:

We support Proposal 142 to renew and modify the Unit 13 predation control plans so that the successful predator control activities will occur. This program is necessary to reduce the effect of predators and to enhance moose, caribou and other wildlife populations.

IM Program in Unit 13 keeps predator population in balance to allow for more consumptive uses of moose. The IM program is very important to the Ahtna people who rely on subsistence uses of moose, caribou and other game populations.

Moose populations estimates in Unit 13A, 13B, 13C, and 13E was 5,496. Hunters in Unit 13 benefit from the Intensive Management Plan in Unit 13. Moose populations has increased. In 2015,, ratio of calves per 100 female moose was 25/100, Yearling Males were 6/100 and Males were 31/100. Total moose harvested in Unit 13 was 988.

Copper River/Ahtna Inter-Tribal Resources Conservation District is conducting a moose browse project on former corporation lands in Tazlina, Kluti-Kaah and Gulkana villages. A total of 1500 acres in Unit 13A, Unit 13D and Unit 13C have been treated to enhance moose habitat. We are also working on the fire management plan for the Copper Basin to effectively increase moose and caribou habitat on a landscape scale. The IM program is a very important part of the overall management structure for Unit 13.

Proposal 141 - 5 AAC 85.056 . By Denali National Park and Preserve.

Comments:

We oppose Proposal 141 to change the season for hunting wolves in GMU 20C on lands in the Stampede corridor (Wolf townships) adjacent to Denali National Park from August 10-May 31 to August 10-April 15. Black bear baiting is already allowed in this area, wolves will go to a black bear bait station too. The Department states in an ACR that they do not have a conservation concern for this wolf population. If the prey population is low, then predator population will be low, too. National Park Service allows national diversity to occur on National Park Lands, they do not allow predator control programs. National diversity management practices is killing off wild game.

February 22, 2016

Submitted By
Thor Stacey
Submitted On
3/4/2016 11:59:00 PM
Affiliation
Alaska Professional Hunters Association

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Address
1283 Mendenhall Peninsula Rd.
Juneau , Alaska 99801

March 4th, 2016

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.

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 APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or regional basis. Given the opportunity, Alaska's hunting guides will continue to bring a wealth of wildlife and hunting knowledge and experience to table.

Proposal 21- AMMEND

APHA has spent a lot of time in the last year debating and discussing the restrictions on using aircraft to spot sheep during the hunting season. Many members supported a blanket repeal of the ban others have vocally supported the restriction. In an effort to lower conflict and divisions within the group a compromise to amend and improve Prop. 207 was developed. This language is not perfect or 100% supported by any APHA member because it represents hundreds of hours of discussion and real compromise to get to a consensus on the issue of spotting sheep. It is important to note that APHA has many members who own and fly airplanes and many members who do not. Strong feelings exist on both side of the issue but genuine good will is more the rule than the exception. Some pilots support the restrictions, most do not. Some of non-pilots oppose the restrictions, most support them. The issue is polarizing and divisive, however APHA members by and large are committed to working with eachother and the general public. We have always recognized that we don't own the resource or the mountains.

APHA respectfully requests you careful consideration of the following language to amend and improve last years Prop. 207:

“From August 10th to September 20th, you must avoid using an aircraft in any manner to spot Dall Sheep for the purpose of taking a specific sheep. Making multiple, consecutive approaches in any mechanical powered equipment, near any individual or group of sheep is also prohibited during this time so as to avoid altering the experience of other hunters. All aircraft used for hunting sheep must have 12” numbers.”

Sheep Proposals

Sheep Working Group:

APHA is thankful to the Department the Board and the other Stakeholders who, in good faith, supported the concept of a “Sheep Working Group” (SWG). To say this has become a challenging process is an understatement. To assert that the SWG is a waste of money or time is more a reflection on the individual or group making the assertion than on the resource in question or the value of gathering knowledgeable persons from across the state in one room to work on sheep conservation. Any consensus driven process relies on gathering a group of individuals with a willingness to compromise who have good will towards each other with some basic social skills and open minds that consider others interests as well as one’s own selfish goals. APHA entered into this group with the intention of considering any request and any idea. Unfortunately a super small minority of the SWG stated their goals to see the group fail. This conflict does nothing at all to help conserve or mange sheep. APHA maintains its position that conservation measures are appropriate at this time where re-allocation, or fighting over who gets to kill the last ram, is absolutely at odds with bright future. APHA suggests that if money is to be spent on future SWG meetings the board reconvene the steering committee to select the future participants rather than allow stakeholder groups to “self-select” their representative.

Proposals 27-47&49 – OPPOSE

APHA requests that proposals 27-49 all be voted down. These proposals fall into four broad categories: proposals that attempt to address crowding, resident head start, reallocation/non-resident draw, and incomplete conservation concepts.

Resident Head Start:

Prop. 38 is a good example of a “resident head start” proposal. APHA strongly opposes these concepts because they have few positive upsides with many negative effects. Most important is that none of the proposals seek to save sheep or increase the value of the resources, instead their stated goal is “resident preference.”

Effects of Resident Head start:

1. Resident preference or advantage
2. Increased crowding
3. Diminished quality experience during early season
4. Guides will utilized “transporter endorsement” on their license to
5. Alaska guided hunts will be worth less money, especially on federal lands
6. Perception that hunters need to rush to be in the field first will be reinforce
7. Increased conflicts between guides and transporters
8. Displacement of many quality guides on Federal Lands

Reallocation Proposals/ Non-Resident Draw:

Proposal 41 is a good example. These proposals have no conservation basis at all and simply seek to reallocate the resource.

Incomplete Conservation Concepts:

Proposal 27 is a good example of a true conservation attempt but this proposals and others are not developed to the point of being ready to be passed and applied at this time.

Crowding:

Proposal 35 is an excellent attempt to address crowding in the field but like other good ideas this concept has not been developed enough or accepted by the public as a whole.

Suggested Course of Action**Conservation:**

During the sheep working group discussions it has become apparent that there are real reasons to be concerned about sheep in Alaska. Since 1994 the average age of non-resident sheep has declined from 9.27 years old to 8.52 year old. The past four years have all broken records for new low state harvests of dall sheep. Resident success has stagnated at 22-24% statewide while non-resident success dropped from the 70-77% to 57% in 2015. Less sheep were harvested in 2015 than ever before while average age and success rates continue to plummet. There is real need to develop a new conservation based approach to sheep management in Alaska.

Suggested Course of Action:

APHA suggests that the BOG vote down every sheep proposal except Proposal 136 and to amend Prop. 48 as follows:

Amend Proposal 48 to:

“ 85.055. Hunting season and bag limits for dalls sheep. Nonresident guided hunters will be managed based on the Sheep Hunting Age Tracking Strategy

Guided Nonresident sheep hunting will be managed by Guide Use Area (GUA) and Federal Concession, on a drawing basis, if need, to reach Age Goals set out in this regulation.

Age goals (based on a 3 year rolling average of guided nonresident harvest) for area within GMU 7-15 are 8.6 year: GMU 23-26 are 9.4 years: and GMU 16-22 are 9.0 years.



A drawing will be instituted when a GUA or Concession drops below the Age Goal; For every tenth (.1) of a year the GUA/C drops below the goal, 10% of the baseline number of tags will be withheld. If an area later reaches the Age Goal, the drawing will be suspended for open participation.

Conclusion:

Alaskans deserve a path forward that benefits the resource. Move the amended proposal 48 and Proposal 136 forward to a special meeting. Allow full comment and outreach on the Age Tracking Strategy vs. Prop. 136's Re-allocation strategy. Pass the concept that best protects the resource and allows for prosperity and during times of plenty and restrictions in times of low abundance.

Prop. 136 is a strait re-allocation proposal that affects only State and BLM land. The Age Tracking Strategy has strong conservation goals built in and treats all land statuses equally. Request full analysis by the AC's, public, Department and base your decision on the results. If neither are acceptable, use the work to build on the eventual decision.

*****Alaska's guides and APHA members are not in support of the Age Tracking Strategy at this time. They will have a position by the time the board meets in March. The idea is too new, too innovative to have full consideration yet. APHA board voted to put the idea on the table however*****

Proposal 51- SUPPORT

*"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 opportunities should be allocated. Should non-resident relatives be considered residents or non-residents? Perhaps they 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 but it is time that a statewide BOG regulation or policy be adopted on 2nd degree of kindred allocation. We believe, 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 higher associated benefit to the State than unguided non-residents.**"*

Proposal 51 uses the same codified language that applies to "youth hunts" in Alaska.

This addresses many concerns and abuses with non-resident 2DK use and allocation. If the board passes the proposal as written it would still be legal for a resident to bring multiple non-resident relatives out in to the field on a hunt for brown bears, goats or sheep. However the actual harvest would not be allowed to exceed the bag limit allowed to the resident relative. So families will be still be able to hunt together but there will be limitation placed on total take allowed, based on the resident bag-limit and if there is a non-resident season allowed at that time. Currently it is legal for a resident to take all of his/her non-resident 2DK relatives on a hunting trip for sheep, brown bears or goats with all of the hunters being able to harvest animals with only one resident in the field at that time. We are firm that this issue needs to be addressed by the Board of Game at this time and this proposal is the best statewide option.

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**
- \$12 Million in spending on Goods and Services in **Rural Alaska**
- \$1.95 Million in Direct Revenue (ADF&G) in Non-Resident License & Tag sales
- Contributed to the \$14.9 million in Pitman-Robertson funds in 2012
- Guided Hunting Provided 2,210 jobs

APHA wishes to be clear that we are not suggesting 2DK opportunities are not important to maintain or that these opportunities do not benefit the public. APHA is stating, however, that guided non-residents provide the MAXIMUM benefit for the use of the public's resource.

Respectfully, we ask the BOG to carefully give this proposal consideration. Alaska's population has grown exponentially in the last two decades. Most residents were born in other states and we have a large transient military population who quickly qualify as residents. The number of potential 2DK hunters has grown by leaps and bounds. Most of Alaska's guides are residents who rely on non-resident allocation for their livelihoods. More and more hunts are fully allocated, sheep are declining with serious restrictions on non-resident opportunity looming in the near future. 2DK needs to be addressed and it should be addressed on a statewide basis. Proposal 51 is our preferred solution because the link between who benefits from the use of a public resource in a 2DK scenario most closely resembles the youth hunt scenario. APHA asks that the BOG apply the bag limits used in regulating youth hunts to 2DK opportunities.

Other Options Considered:

Adopt a new board policy to read:

In any permit hunt for a guide required species under AS 16.05.407(a) with set nonresident and resident allocation levels, resident allocation will include nonresident hunters accompanied by a resident relative under AS 16.05.407(a)(2).

Proposal 53- OPPOSE

APHA opposes proposal 53 based on conservation concerns and hunter ethics concerns.

Some units in the state incorporate "wound loss" in their total *human caused bear mortality numbers*. There is little doubt that a certain percentage of bears, or other animals for that matter, who are struck by an arrow or bullet and that are not recovered, succumb to their wounds. Since hunting "would loss" is human caused mortality and managing human harvest is only factor 100% in control of the State, Proposal 53 removes a tried and true "tool" from the management "tool box." Sound management is, by definition, wildlife conservation. Proposal 53 therefore threatens conservation and wildlife management in areas that account for wound/loss in their bear management



plans.

Hunter ethics cannot be imposed or created through regulation. However, certain unethical behaviors can be discouraged and their impacts mitigated by sound regulation. Alaska is a large and geographically diverse state with many challenging habitats, climates and social perspectives. Upsetting careful, unit specific, compromises based on sound ethics and/or recognition of unique environmental conditions is unwise at this time. It is certainly unethical to repeatedly wound animals with no regard to whether or not the animal will perish or not. It is also clearly within the regulatory authority of the BOG to restrict or forbid unethical hunters from repeatedly wounding animals. These regulations are not an effort to make hunters ethical; instead they impose sanctions on those willing to repeatedly maim a publicly owned resource a practice clearly counter to ethical hunting values and deplorable to the large non-hunting public.

Proposal 54- SUPPORT

APHA is in conceptual support of Proposal 54 and urges the BOG to explore the least punitive direction possible to get hunters to comply where horn/antler restrictions are used as conservation tools.

The proponent of Proposal 54 clearly outlines the problem, the solution and desired result. We urge careful consideration of this proposal and that the board seek ways to address the problems addressed.

Hunting is a wonderful way of life. As our regulations are constantly adding layers of complexity we urge consideration of the ramifications to hunters in the field when they make an honest mistake.

Proposal 55- OPPOSE:

We oppose Prop. 55 based conservation concerns expressed by the Department.

While we agree that it is easier to understand and enforce a regulation that is applied statewide. We also agree that there potential to abuse or false report under the current system by claiming a bear was killed in a "one every year unit" instead of a "one every four year unit. However, these concerns do not rise to the level of supporting the proposal as written. Alaska is a huge state with large regional differences in wildlife habitat and abundance. Proposal 55 undercuts historic conservation measures that proved largely effective in managing bear populations for "sustained yield."

Proposal 57- OPPOSE:

We are strongly opposed to this proposal as written.

Prop. 57, if passed, will have the effect of creating a short-lived economic opportunity at the expense of long-term sustained yield management goals. From a global perspective, Brown bears are a valuable and important big game animal deserving of careful protections. These careful protections extend to international restrictions on the sale of bears and their parts, such as the prohibition on the trade of gallbladders. Prop. 57 therefore has implications extending far beyond the Nushagak AC's area of concern or even their sphere of influence. The potential downsides to this proposal far outweigh any short-term economic benefits to local residents.

Proposal 57 has the potential for terrible and far-reaching unintended consequences. There is are defined reasons that call for confiscated elephant ivory to be burned rather than sold to recover enforcement costs. Once animal parts are legal to be sold in one unit, state or country, it is nearly impossible to track or monitor illegal sales of animal parts of the same species illegally harvested in another area. CITES and other international treaties were carefully drafted to address these types of concerns. Prop. 57 is the proverbial "Pandora's box";

Proposal 62- SUPPORT

APHA supports Proposal 62 due to stated concerns over zealous enforcement. We see the addition of the “contaminated soil” language as modifying the baiting permit stipulations beyond the intent of the BOG. Therefore, the BOG should clarify its intent and give clear direction to remove these onerous conditions.

Proposal 63- SUPPORT

We support this proposal based on its stated merits.

Proposal 65- SUPPORT/AMMEND

AMMEND: APHA supports amending this proposal to require salvage of Brown/Grizzly Bear meat at bait stations to align with current black bear salvage requirements (spring).

Proposal 67- SUPPORT

Proposal 67 clarifies and affirms private landowner rights. Relationships between the hunting community and Native Corporations and other private landowners is an important issue that we take seriously. Proposal 67 clarifies what seems to be a gray area and benefits the general public, enforcement and landowners. Hopefully this will reduce conflicts in the field and give clear direction to public safety.

Proposal 68- SUPPORT

APHA strongly supports Proposal 68 based on its stated merits.

Proposal 69- OPPOSE

Proposal 69 is absolutely impossible to enforce and would make it illegal to be accompanied by a dog on ANY hunt. This would ban the use of dogs for everything from waterfowl hunting to a kid taking his or her best friend out for bear protection. The proposal has zero merit. The stated concern of “disease transmission” has nothing to do what so ever with hunting specific activities. If the proponent of this idea wanted to accomplish his stated goal he would have to ban dogs in all of Alaska.

Proposal 70- OPPOSE

Proposal 70 seeks to expand the ban on spotting sheep to all species. APHA opposes Proposal 70 due to the lack of stated conservation goals the unknown effects of the ban on spotting sheep.

The passage of “proposal 207” has prompted a guiding industry wide discussion about the use of airplanes when hunting. Many good ideas and issues have come to light since 207 passage. One thing is clear: restricting airplanes is a divisive and difficult issue if the restriction is focused solely on aircraft. Proposal 207 will most likely have some unintended consequences. Now is not the time to expand

on this restriction when the real effects of Proposal 207 are still unclear.

Please fail Proposal 70 based on a lack of conservation goals or a stated desired outcome that would measure the success or failure of the proposal.

Proposal 71- SUPPORT

We strongly support Prop. 71 and recognize it as an effort to close a “loophole” in the *same day airborne* law. Prop. 71 is clearly within the intent and spirit of the ban on hunting the same day airborne, it does not take the law into new territory. Please pass Prop. 71.

Proposal 82- SUPPORT

We support Prop. 82 based on its stated merits.

Proposal 90- SUPPORT

APHA strongly support measures to protect dall sheep from catastrophic disease transmission. APHA defers to the information provided by Wild Sheep Foundation (WSF), the State and other groups for scientific justifications.

Alaska’s hunting guides largely rely on dall sheep for their livelihoods. In fact many, many more hunting guides and many more people are employed by the pursuit of wild sheep in Alaska than will ever be supported by domestic livestock. This has nothing to do with wild land grazing potential and everything to do with natural populations of bears and wolves. It is impossible to imagine a scenario where wolves or bears would be shot, trapped or poisoned off to accommodate domestic animals in Alaska. In fact, when extirpating bears off of Kodiak Island was attempted, it was shown that bears were far more valuable than cows. The effort to exterminate bears on Kodiak failed but only after hundreds of bears were gunned down and left to rot.

Wildlife is valuable, it is publicly owned and it is precious. Hobby herders who harbor potential disease vectors in the form of pet goats and sheep who are willing to pose a risk to hundreds of millions of dollars worth of wild sheep should cautiously approach this discussion.

FACT: Wild sheep populations across the western US were decimated by disease transmission from domestic stock to wild populations.

FACT: Successfully raising large numbers of sheep or domestic goats requires a predator free environment.

Point of equity: In the lower 48 states ranchers and herders have successfully protected their livelihoods because they make their living as ranchers. Wildlife in these states is secondary to domestic animals, politically, economically and socially. In Alaska the opposite is true. Many, many Alaskans, hunting guides and others, make their livings from wild animals not domestic animals. Since livelihoods are threatened by domestic animals in Alaska and Alaska is not conducive to the ranching and herding industries, the same arguments take primacy here but the results are the exact opposite. Domestic animals are secondary to wild animals in Alaska because our economy benefits from the later not the former.

Proposal 98- OPPOSE

APHA opposes proposal 98 due to its complexity to implement and the ambiguous nature of the “issue” it proposes solve.

Proposal 99- SUPPORT

APHA respectfully submits Proposal 99 as the last link in the necessary to chain to fix the Departments objections to having its staff verifying or certifying the existence of an agreement between private parties. Proposal 99 merely requires that a code (UVC) given by Dept. Commerce be provided to apply for certain drawing hunts. ADFG simply accepts the code, nothing more.

Proposal 99 legally addresses the issues raised by the department. Proposal 99 is also the result of a tremendous amount of collaboration between ADFG and DCCED. APHA is appreciative of the support ADFG has provided to this effort as well as their strong stated personal support for this proposal. APHA is especially appreciative of ADFG diligence to make sure certain guide required drawing hunts have predictable participation. This is especially important from a conservation perspective as many area biologists have stated on numerous occasions.

Prop. 99 improves on the old guide client system by making the new UVC system applicable statewide.

Given the strong support from ADFG and DCCED we now ask that the BOG pass Prop. 99 as written to ensure a more stable and equitable drawing hunt scenario well into the future. We feel strongly that maximizing the benefit of the resource is one of the BOG guiding priorities; Prop 99 clearly does this.

APHA would like to thank ADFG, once again, for its strong support and assistance in developing this proposal and for its help developing a system that works STATEWIDE.

APHA strongly supports passage of this proposal AS WRITTEN.

Failure to pass Prop. 99 will devalue every non-resident drawing hunt in the State.

Proposal 101- OPPOSE

APHA strongly opposes Prop. 101 due to its complete disregard for conservation. Prop. 101 simply seeks to reallocate harvest but fails to account for known differences in guided non-resident take vs. non guided resident take. One example is the low rate of sow harvest by guided non-residents vs. resident hunters. The proponent of Prop. 101 simply seeks to reallocate harvest without consideration given to real world effects if increased sow harvest. Sow harvest is only one example of a conservation concern.

Prop. 101 also fails to offer up new information or analysis on other hunt parameters he takes issue with. For instance: what would the drawing odds be in a coveted part of Kodiak Island if the opportunities were doubled? A cursory look says, still not very good at all! Lets say we increase certain hunt drawing odds by a few percentage points. Is that a good justification for massive reductions guided hunt opportunity? Additionally, we will likely end up dropping the overall number of tags available and sow harvest increases and harvest reductions become necessary. This will likely have the result of bringing us right back to square one as far as numbers of resident opportunity.

Proposal 101 does not take a holistic approach to hunter opportunity, resource value, social-economics or resource conservation.

Proposal 102- OPPOSE

APHA opposes this proposal based on the Kodiak Bear Management Plan. The Kodiak Bear Management Plan clearly stipulates that 2KD hunters come from the resident pool of hunts. The Kodiak Bear Management Plan is one of the most successful strategies of its kind in the world and is the result of a real collaboration between stakeholders. Upsetting the plan by “cherry picking” one issue is in appropriate at this time.

Proposal 107- OPPOSE

We strongly oppose all proposals that simply seek to reallocate a resource to one group or another without a stated conservation goal or conservation concern. The argument that Alaska should allocate hunting opportunity like other States (none of which have a Board of Game or subsistence use) is logically flawed on many levels. Because prop. 107 does not even pretend allude to well established allocation criteria's such as; sustained yield or maximum resource value it should fail.

Proposal 108- OPPOSE

APHA opposes Prop. 108 because it seeks a blanket repeal on a few areas that the Board of Game chose to provide historic guided non-resident allocations when a draw became necessary to solve conservation challenges.

Historically the BOG has been challenged to limit take by a drawing hunt system while providing for small amount of guided non-resident use. These challenges are magnified where the species in question is not a “guide required species.” The fact is that guided-non-resident hunters have a higher associated economic and social benefit than non-guided-non-residents. Many guides are rural residents who employ locals from small communities who then return to share meat with their families and communities. Since the BOG is charged with developing allocations schemes that provide for priority uses (residents) while attempting to maximize the overall value and return on the limited resource in question. Naturally there will be situations where it makes sense to allocate some of the resource to guided-non-resident hunters instead of non-guided-nonresident hunters. **APHA opposes Prop. 108 because guided-non-resident use needs to be predictable to be valuable and because the benefits of guided clients are too far reaching and significant across Alaska to be whipped out simply because a drawing hunt was the best option to solve a conservation concern.**

Proposal 135- SUPPORT

APHA supports Prop. 135 unless local guides in the area express true conservation concerns with the proposed increase in opportunity.

Alaska Trappers Association
PO Box 82177
Fairbanks, AK 99708

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

February 4, 2016



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 2016 Statewide meeting in Fairbanks.

We OPPOSE proposal #67 which would prohibit hunting and trapping within some highway right-of-ways. This would be a self-serving, nuisance regulation. Given the different types of right-of-way, and different status situations, such a proposal would be confusing. There are already regulations addressing hunting and trapping on private land.

Proposal #77 We discussed this proposal at length over two separate meetings. There are so many potential unknowns and unpredictable outcomes, that we could not arrive at a decision we would be comfortable with. Therefore, we opted to defer to the wisdom and judgement of the Board of Game.

We SUPPORT proposal #78 which would preclude the requirement for identification tags on traps or snares anywhere in the State. Trap ID tags serve no useful purpose and can be mis-used in schemes against trappers. Our Board of Directors adopted a Position Statement in opposition to trap ID tags last year. A copy is attached for your reference.

We OPPOSE proposal #79 which would implement a mandatory 24 hour trap check period throughout the State.

- Density of many furbearer species is low. Thus, for traplines to be effective, they must often be long (50-100+ miles). It becomes impossible to check long traplines within a single day, let alone every 24 hours.
- In addition, snares and body-gripping traps typically kill animals quickly. The proposers' comments about animals alive in traps for extended periods are irrelevant.
- The proposers mention the potential for harsh weather to interfere with a mandatory minimum trap check period, and then recommend an unworkable system to accommodate it. The safety of trappers would be at



risk if they venture out in severe weather. That risk is unacceptable, especially because it would be for no valid reason.

- Trap check intervals of several days are customary and traditional.
- The adoption of a mandatory minimum trap check period would serve no wildlife management purpose.
- This is clearly an anti-trapping proposal and should be viewed as such.
- The ATA Board of Directors adopted a Position Statement pertaining to minimum trap check periods in April 2015. A copy is attached for your reference.

We OPPOSE proposal #80 which would restrict trapping near communities with more than 1000 residents.

- The proposers advocate a prejudicial use of public land, limiting the rights of trappers but not of other users.
- If trappers discontinue breaking and maintaining trails near communities, activities of other trail users will also be limited. Without trails, the other users will have nowhere to go.
- Set-backs from trails can have unintended consequences. Free-running dogs have been caught so far off of established trails that they could not be found.
- This proposal is an emotional over-reaction to a minor issue. Its only purpose is to deny trappers participation in a legal activity.

We SUPPORT proposal #81, with amendments. We propose that the new section of 5AAC 92.095 should read as follows:

In this section, “underwater traps and snares” means a portion of the trap or snare must be set below the waterline and a portion of the trap or snare must be in the water.

We appreciate the opportunity to participate in the regulatory process.

Sincerely,

Randall L. Zarnke, President



THE ALASKA WILDLIFE ALLIANCE

“LETTING NATURE RUN WILD”

March 4, 2016

Alaska Department of Fish and Game
Boards Support Section
1255 W. 8th St.
Juneau, AK 99811-5526
Via email: dfg.bog.comments@alaska.gov

RE: Comments for the 2016 Statewide Board of Game meeting

To the members of the Alaska Board of Game:

These comments are submitted on behalf of the Board of Directors and more than one thousand supporters of the Alaska Wildlife Alliance (AWA).

Incorporated more than 30 years ago, AWA is an Alaska-based, grassroots and mostly volunteer not-for-profit organization. Our mission statement reads in part:

The Alaska Wildlife Alliance advocates for healthy ecosystems, scientifically managed to protect our wildlife for present and future generations.

Our supporters represent all of Alaska, the Lower 48 and several foreign countries. Whether they currently, formerly, or someday hope to live in Alaska, or they already have or hope to one day visit, they share a common vision: Alaska’s wildlife scientifically managed to maintain biological diversity and integrity for the benefit of all user groups.

Photographers, hikers and wildlife watchers must be considered important stakeholders in Alaska’s wildlife management decisions. These non-hunters value sustainably and fairly managed populations of predators and prey. While recognizing the tradition of subsistence hunting, our supporters have repeatedly and will continue to ask this Board to include consideration of non-consumptive uses of Alaska’s wildlife in its decision-making process. Such uses of our wildlife resources are no less important than hunting or trapping. Non-consumptive uses of wildlife are equally deserving of consideration in the Board’s decision-making process.

We ask that you please give serious consideration to AWA’s comments on the following proposals:

* * *

PROPOSAL 78. OPPOSE. This proposal requests removal of existing trap-id rules and asks the Board to approve a pre-emptive statement opposing any legislation requiring trap ids.

Such ids are currently required only in a very small portion of the state – in Southeast (GMUs 1-5) and within one-quarter mile of publicly maintained roads in GMUs 20E and 12 (the Tok Cutoff and Taylor Highway, and about 30 miles of the Alaska Highway).

Trap-ids in these very limited areas are not a new requirement. The regulations have been in place for 10-15 years.

This is an attempt to let trappers remain anonymous while harvesting a public resource from public or private property. Abolishing current and future trap-id requirements would effectively end trappers' accountability for where traps are placed, and therefore any responsibility for incidental catch of wildlife or pets.

A small metal tag – or a single sign marking a trapping site – hardly constitutes a “cumbersome” burden on trappers. It is certainly no more bothersome than complying with the requirements for trappers to seal furs, or for fishermen to place id on their crab pots.

Conflicts between trappers and users of recreational trails/facilities are undeniably on the rise in Alaska. Most populated/urban areas in Alaska require dogs to be licensed and/or microchipped to identify the owner. Why should trappers - a few of whom recklessly endanger people and dogs on public trails – be exempt from id requirements?

Imagining that trapping opponents would move sets to get the trapper in legal trouble is ridiculous. Applying the same logic, someone caught trapping illegally could evade responsibility by simply claiming that an unknown “trapping opponent” moved and re-set his/her traps.

Trappers who follow the guidelines to avoid heavily used public areas should in fact support maintaining and expanding trap-id. It aids law enforcement in weeding out the scofflaws who inadvertently or intentionally foster conflicts – and gain an advantage over responsible trappers.

* * *

PROPOSAL 79. SUPPORT. This proposal would mandate that traps be checked at intervals of no more than 24 hours (with an exception allowed for delays due to severe weather). Currently there is no required trap-check interval in Alaska, except for a small area in Southeast where there is a 72-hour trap-check rule.

Absent a short trap-check interval, animals can suffer for very long periods before dying of starvation, dehydration, predation or injuries before the trapper eventually returns to the set to complete the kill. Establishing a short trap-check interval would also help reduce the incidental killing (waste) of non-target species.

The inhumane suffering of trapped animals fuels animosity among the general public toward trappers. Vigorous opposition to simple regulations designed to mitigate the suffering merely fuels the fire. By supporting and implementing a short trap-check interval, trappers themselves could diffuse some of the negative perceptions of trapping.

* * *

PROPOSAL 80. SUPPORT. Applying only to cities of 1,000 or more population, this proposal would prohibit trapping within one-quarter mile of a publicly maintained road, within 200 feet of a publicly maintained trail, and within one mile of a home, school or recreational facility. Trapping activities are clearly inappropriate in the above-mentioned areas. Reports of pets injured or killed in traps are increasing, and reports of traps found on or within a few feet of trails are not unusual. The traps may be baited, increasing the likelihood a pet will be lured off-trail to

investigate. Signs are not required to mark areas where traps are set, leaving recreationalists – hikers, bikers, ski-jorers, mushers – with no warning that dangerous traps are nearby.

The trapper's code of ethics, included on the very last page of the state's published trapping regulations, advises trappers to avoid high recreational-use areas and locations where a pet might be caught. Unfortunately, numerous reports (as mentioned above) reveal that these common-sense suggestions are not being followed. It is time for the Board to change these "suggestions" into "regulations" that can be enforced.

Public trails and recreational facilities are just that – public property. This proposal is not in any sense a ban on trapping. It would merely enact minimal and reasonable restrictions in areas where it is incompatible with – and dangerous to - the vast majority of users.

Yet again (echoing our comments supporting Proposal 79, trap-check intervals) the actions of a few trappers – and steadfast opposition to small mitigating regulations - help feed public animosity toward the group as a whole. Trapper/trail user conflicts are happening with increasing frequency. Simple no-trapping setbacks as proposed here will remove the conflict. Both trappers and recreationalists will benefit.

* * *

PROPOSAL 141. SUPPORT WITH MODIFICATIONS. Submitted by the National Park Service (NPS), this proposal would shorten the hunting season for wolves in a portion of GMU 20C adjacent to Denali National Park. If approved, the hunting season would be closed on April 15 (currently May 31) to coincide with the opening of the bear baiting season.

AWA concurs with the in-depth comments supporting this proposal submitted by the Denali Citizens Council. A map of the Stampede corridor showing the proposed closure area is included with its comments to the Board.

Briefly, both declining wolf populations in the park (which are now at historic lows) and the resulting low visitor viewability of wolves have been a major concern to AWA and other groups for many years. During that time numerous proposals to address the problem have been presented and rejected. (An exception was a two-week Emergency Closure of the Stampede area to wolf hunting issued last spring after two wolves from the park were attracted to and killed near a bear baiting station.)

A moratorium on proposals to re-establish a no-take buffer zone adjacent to the park apparently will be in effect until 2017, one year past the date the Board promised to revisit the issue.

The events that prompted the NPS to request this regulatory change and the sound rationale supporting it are detailed in its proposal.

AWA strongly supports the proposal as written, with the following modifications:

- 1. Make the April 15 closure date effective immediately for the current (2016) regulatory year.** As happened in 2015, the loss of even a single breeding female can exacerbate the population decline among park wolves. Absent a closure effective this spring, one or more breeding wolves could again be attracted and killed near a bait station.

2. **Include the entire Stampede Corridor (east to the Parks Highway) in the new regulation.** It is well documented that wolves from the park migrate through the Corridor in pursuit of prey as far as and across the highway. As shown on the DCC's map, the small remaining eastern-most section should be included in the closure.
3. **Change the hunting season closure to an earlier date.** NPS data shows that wolves in the park breed as early as the first week of March. Closing the hunting season on March 15 or April 1 would protect the wolves during breeding/denning season and contribute to a rebound in the population.
4. **Shorten the wolf trapping season to coincide with the shorter hunting season as indicated in #3, making the closing date either March 15 or April 1.** Currently trapping does not end until April 30, and wolves also can be shot at traplines. There is no harvest limit on trapping. If the trapping season remains unchanged, the wolves will remain vulnerable during the breeding/denning season, the very result that this proposal is intended to mitigate.

Although AWA strongly supports #141 as a necessary step in the right direction, we concur with what the Denali Citizens Council has written in its comments: "...only a no-wolf-kill buffer similar in size to what is shown on the map will adequately protect wolves who den in Denali."

Regardless of whether #141 is approved as proposed by the NPS, or some or all of the suggested modifications are added, these small regulatory changes are not sufficient to protect wolves migrating in and out of the park through the Stampede area. While it would be helpful in providing limited relief from hunting/trapping take, AWA does not view Proposal 141 as a substitute for a no-wolf-take buffer area.

* * *

PROPOSAL 142. OPPOSE. This ADF&G proposal would reauthorize and revise the existing GMU 13 Intensive Management Plan that will expire later this year.

This IM (wolf-killing) program was authorized in 2000, and yet by the Department's own admission "(m)oose harvest has been consistently below IM objectives" in three sub-units, and "IM objectives for Unit 13 have not been achieved".

Clearly, this IM plan has failed. Now is the time to end this prohibitively expensive 15-year experiment. All other IM programs in Alaska should be halted as well.

Regardless of its occasional, temporary success increasing prey, or more often failure, IM is merely "game farming" Alaska's wildlife populations. Alaska's wildlife must be shared equally to all Alaskans. IM results in an improper allocation of wildlife resources – both predators and prey – to a minority of residents who hunt. Manipulating public resources for the benefit of a few is not scientific management, nor is it sound public policy.

Not only is IM ineffective, it is extremely expensive. In light of the state's extraordinary budget deficit, it is time to eliminate this inefficient and unnecessary program. Analysis has shown that state-funded IM predator control costs can run as high as tens of thousands of dollars per predator killed. Millions of dollars are being spent on attempts to provide a few more moose for the minority of residents who hunt. In this time of budget crisis, the state's money can be better allocated to programs that will benefit all Alaskans.

Last but not least, the revised IM plan authorizes control methods such as chasing and killing wolves using motorized vehicles, and aerial wolf killing by private pilots. Most Alaskans, including many hunters, view these practices with disgust. They cast a very poor reflection on Alaska's wildlife management policies.

* * *

Thank you for this opportunity and for giving our comments serious consideration in your deliberations.

/s/

Edward Schmitt, M.D.
President
Alaska Wildlife Alliance

Submitted By
Fran Mauer
Submitted On
3/4/2016 3:48:06 PM
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COMMENTS SUBMITTED BY ALASKANS FOR WILDLIFE TO THE
ALASKA BOARD OF GAME, MARCH 2016 MEETING
FAIRBANKS, ALASKA

The following comments are submitted on behalf of Alaskans For Wildlife, which is a group of concerned Alaskans working to educate and advocate for respect and protection of wildlife. We have comments regarding the following proposals before the Board:

PROPOSAL 78 - 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

We do not support this proposal and urge the BOG to not pass it for the following reasons: This proposal if passed would essentially immunize trapping from accountability for inappropriate or illegal practices by banning any requirement for the use of identification tags on traps or snares. There are rising levels of conflict between some trappers who irresponsibly place traps and snares along heavily used recreational trails often in close proximity of communities, schools etc. This situation requires more accountability on the part of trappers, not less.

PROPOSAL 79 - 5 AAC 92.095(a). Unlawful methods of taking furbearers; exceptions. Require traps to be checked every 24 hours.

We support this proposal and urge the BOG to pass it. Proposal 79 would achieve much needed responsibility to trapping in Alaska. It is well known that in many cases certain animals that are caught in traps do not die immediately, and some may remain alive for prolonged periods. This results in unacceptable pain and distress for the animals. A 24 hour trap check requirement would place responsibility on trappers to minimize such conditions for trapped animals, and establish at least a minimal degree of respect for wildlife.

PROPOSAL 80 - 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

This proposal would restrict the placement of traps within ¼ mile of a publicly maintained road; and within 200 feet of a publicly maintained trail and within 1 mile of a house or permanent dwelling, business, or developed campground or recreational facility.

We support this proposal because it would significantly reduce the incidence of children, adults and pet from being caught in traps that have been irresponsibly placed in these zones of conflict. This problem is also increasing as urban areas expand, and people engage in outdoor recreation. The current lack of such restrictions of trapping, and irresponsible trappers needs to be addressed. We urge the BOG to fulfill its responsibility to all Alaskans, and pass this measure.

PROPOSAL 141--5 AAC 85.056 Hunting seasons and bag limits for wolf.

This proposal would change the season for hunting of wolves on lands in Unit 20C in the Stampede Corridor (Wolf Townships), adjacent to Denali National Park, from August 10 – May 31 to August 10 – April 15 to eliminate the overlap between the bear baiting and wolf hunting seasons.

We support this proposal, as it represents only a beginning step towards resolving a long standing issue regarding hunting and trapping of wolves that are primarily associated with Denali National Park and constitute a valued experience for many hundreds of thousands of visitors to the Park each year. We also recommend that the BOG reduce the wolf trapping season in the Wolf Townships for the same reason given for this proposal. Increased take of wolves in this area occurred following the decision by the Board to abolish the buffer

area in 2010. It is of the utmost importance to re-establish the buffer immediately. We urge you to enact proposal 141 and the wolf buffer as well.

PROPOSAL 142 - 5AAC 92.108 Identified big game prey populations and objectives and 92.121. Intensive Management Plan V

This proposal if enacted would renew the IM program for GMU 13 for another 10 years (2027).

We oppose proposal 142 for several reasons. Intensive Management was first implemented in Unit 13 fifteen years ago in 2000. After substantial effort and at very high costs during the past 15 years, objectives have only partially been met. If IM, and the Department's capability to implement it are effective, more "success" should be evident by this time. Furthermore, we believe that overly high objectives were set from the start, which were largely driven by unreasonable demands by hunters that are largely unobtainable and certainly unsustainable. This was bound to fail, and it has. Yet the Department is requesting the BOG to continue this failed endeavor for another 10 years. This unjustified, wasteful and ineffective subsidy for a limited number of people should not continue for another decade. With an extreme fiscal crisis facing Alaska, it is time for the BOG to act in a responsible manner and cut the losses by not approving Prop 142.

We are highly concerned about the deplorable state of wildlife stewardship in Alaska. There is a crucial need for reform at every level. You are encouraged to live up to your responsibilities and begin this much needed reform.

Thank you for this opportunity,

Fran Mauer

Submitted 4 March, 2016



Alaska-Yukon NAVHDA, 20508 Mark Circle, Chugiak, AK 99567

February 25, 2016

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

To Whom It May Concern:

The Alaska-Yukon Chapter of the North American Versatile Hunting Dog Association submits these comments in opposition to Proposal 5 - 5 AAC 92.990(a)(26); Definitions, and Proposal 69 - 5 AAC 92.080; Unlawful methods of taking game; Exceptions.

Alaska-Yukon NAVHDA is a sanctioned chapter of NAVHDA, one of the largest hunting dog organizations in North America, and is dedicated to fostering, improving, promoting, and protecting the versatile hunting dog. Alaska-Yukon NAVHDA has ___ members who are active in both training and hunting with dogs. These regulations would have significant negative impacts on our dedicated and responsible members.

Proposal 5 seeks to modify the definition of “edible meat.” We find this proposal without basis, over-bearing, and impractical. The proposed requirement would not significantly impact the conservation of the animals it seeks to protect. There has been no evidence presented that the meat from small game birds is being wasted or that there is a threat to these species. Our members are dedicated to preserving the birds that we hunt and consume, and we often harvest this additional meat on our own fruition. When this extra meat is not taken, the carcasses are consumed by other animals.

Proposal 69 seeks to prohibit the use of hunting dogs in taking game. This proposal is both ineffectual – the prohibition of hunting dogs will not stop the spread of diseases, and prejudicial – as it will only affect a small portion of the population. Hunting dogs are a small percentage of the overall dog population of Alaska. Mushing dogs, family pets, and hiking dogs will be unaffected by this proposal.

The trainers of hunting dogs are a highly dedicated and responsible group. Our dogs are not just pets. They are our trusted hunting partners who we spend hundreds of hours working with. Our dogs must be in peak physical and mental condition in order to perform while hunting and receive better treatment and care than the average dog. We regularly check our dogs for any sign of ill health. The likelihood of them spreading disease is minimal.



Dog training and hunting is a past time shared and enjoyed with our friends, families, and canine hunting partners. It increases the respect of and care for dogs, nature, and Alaska's many species. This proposal would entirely eradicate this long, proud tradition, something that has never been done in any state.

In summation, we ask that the Board reject both of these ineffectual proposals.

Sincerely,

Alaska-Yukon NAVHDA



Arctic Bird Dog Association
PO Box 90914
Anchorage, AK 99509

January 23, 2016

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 and Board Members:

Please consider comments from the Arctic Bird Dog Association (ABDA) regarding two proposals to be addressed by the Board of Game (BOG) at its March 2016 meeting in Fairbanks, Alaska. Proposals 5 and 69 could affect hunting activities enjoyed by ABDA members and other bird hunters using working dogs. ABDA is affiliated with the American Kennel Club and currently has about 77 memberships, including 25 family groups. Among other objectives, the association strives to promote conservation through education regarding the use of dogs for hunting.

PROPOSAL 5 -5 AAC 92.990(A)(26). Definitions. Modify the definition of edible meat for all game birds as follows:

For all game birds, the meat from the breast, back, thighs, legs, wings, gizzard and heart; replaces [IN THE CASE OF SMALL GAME BIRDS, EXCEPT FOR CRANES, GEESE AND SWAN, THE MEAT OF THE BREAST; IN THE CASE OF CRANES, GEESE, AND SWAN, THE MEAT OF THE BREAST AND MEAT OF THE FEMUR AND TIBIA-FIBULA (LEGS AND THIGHS);] however, "edible meat" of big game of small game birds does not include meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, incidental meat reasonably

ABDA Comments: We oppose this proposal. Though we applaud the conservation ethic of the proponent and many of our members strive to utilize all conceivably edible parts of game birds they take, we think the proposal goes too far. Some of the parts described by the proponent to be salvaged are extremely small indeed, and if a limit of birds in some game units is taken at 20 or 50 birds per day, then cleaning all tiny edible parts from these birds would be unreasonable. We agree with the BOG decision to require



salvage of leg meat from larger game birds like cranes, geese, and swans; however, the bag limits for these species is much smaller than for grouse, ptarmigan, and ducks and leg meat from the larger birds can amount to considerable meat that should not be wasted.

PROPOSAL 69 – 5 AAC 92.080. Unlawful methods of taking game; exceptions. Prohibit hunting with domestic dogs as follows:

The use or accompaniment of domestic dogs is prohibited while hunting. Dogs used as service animals as defined under Title II and Title III of the Americans with Disabilities Act are exempt if the hunter is in possession of a current official certificate of veterinary inspection for the service dog.

The proponent expresses concern that dogs will transmit diseases to Alaska wildlife populations, such as Rocky Mountain Spotted Fever, tularemia, canine ehrlichiosis, canine babesiosis, Lyme Disease, and Q-Fever and other diseases.

ABDA Comments: We oppose this proposal. Though we understand the concerns for disease transmission to wildlife, we think the proposal goes much too far and is discriminatory against trained hunting dogs versus other dogs that may be in the field such as free-running pets, mushing, and skijoring dogs. Wildlife could just as easily be exposed to these dogs and their feces as from hunting dogs. This proposal would not solve the issue and appears to be anti-hunting. Furthermore, we are not aware of any other state in the United States of America that outlaws the use of domestic dogs for hunting of birds and other small game. If this proposal passes, then Alaska would be uniquely opposed to bird hunting with domestic dogs. Should this issue become more severe in the future, then we prefer an expanded health certificate program, especially for dogs returning from areas outside of Alaska. A health certificate is already required for dogs flying out of and into Alaska, but dogs travelling across the Alaska Border by land or sea are only required to have rabies and other shot records. We do not think the BOG is the appropriate place to solve this issue because the exposure of wildlife to imported diseases is a much broader concern than can be solved at the BOG.

Thank you for the opportunity to comment and the public process you uphold.

Respectfully,

Tim Gallagher, President
Arctic Bird Dog Association

Submitted By
Brad De Noble
Submitted On
3/3/2016 11:22:09 AM
Affiliation

Phone
9076944338
Email
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Address
32323 Mt. Korohusk Cir.
Eagle River, Alaska 99577

I write to urder the BOG to vote yes on 141 and shorten the hunting season on wolves near Denali NP. As has already been demonstrated, wolves are attracted to baiting stations and have been killed as a result. Please end wolf hunting season on 4/15 to conincide with bear baiting. Stop the war on wolves!!

Bear baiting -- that should be banned outright. Disgusting and despicable.

Submitted By
Brad De Noble
Submitted On
3/3/2016 12:22:35 PM
Affiliation

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32323 Mt. Korohusk Cir.
Eagle Ribver, Alaska 99577

I apologize -- I submited comments earlier and accidentally hit the submit button before finishing my comments.

I would also like to comment on Proposals 78, 79 and 80.

I oppose 78 -- we should be increasing trap identification rather than decreasing it. Such requirements have been on the books for years. Those who trap legally should not be concerned. It helps law enforcement.

I support 79: it is outrageous that there are no requirements to check traps. Trappers should have to check their traps at least every 24 hours. Traps are non-discriminatory -- requiring mandatory checks not only is humane for the intended target but also could help the survival of unintended targets.

I support 80 -- trapping activities in the referenced areas are clearly inappropriate. This measure is pure common sense. Given the number of traps found near trails and roads, it is obvious the trappers are not taking the matter into their own hands and using common sense. Thus, an outright prohibit as called for in 80 is warranted and necessary.

Thank you for considering my comments.

Alaska Board of Game
Statewide Regulations Proposal Booklet
March 18-28, 2016

Brian D. West
1000 OCEANVIEW DR
ANCH., AK 99515
FEB 8, 2016

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FEB 03 2016
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Proposal 1. Oppose. Contrary to statements made in the proposal hovercraft are land vehicles. By definition, a hovercraft is a vehicle for traveling which is supported above the surface of land or water by a cushion of air provided by downwardly directed fans. It is clear that hovercraft are land vehicles and this proposal should be opposed.

Proposal 2. Oppose. There are a multitude of combinations of tires/tracks and vehicles that could be used if the definition is changed and based on ground pressure instead of gross weight. It would be impossible for troopers to enforce this new definition. The proposer also provides no viable alternative. Note the following ground pressures from the Caterpillar handbook: 963 track loader 9.6psi, standard D-8 10-13psi, D-6 LGP 4.8psi. A man weighing 200 pounds with a size 11-1/2 shoe will exert roughly 4.5psi.

Proposal 3. Oppose. The proposer appears to confused by existing regulations, the proposed new definition would be worse. The proposed new definition states "...a regulated hunt that lays outside a NON-SUBSISTENCE area...", effectively the proposer is saying that a general hunt only occurs in an area designated for subsistence. That is wrong. The current definition of a general hunt seems pretty clear and I see no reason to change it. As I understand it a general hunt is used when game populations are healthy enough to allow hunting by all user groups.

Proposal 10. Oppose. This proposal is contradictory to Proposal 12 by the Department of Fish and Game.

Proposal 11. Oppose. The stated reason for the proposed change is that everyone does not have the physical ability to use a bow. If a person lacks the physical strength to draw a bow it is highly likely that they will lack the strength to field dress the animal and pack it out and properly care for the meat. Lack of physical ability should not be the basis for changing regulations.

Proposal 12. Oppose. I opposed this because the proposal is unclear. Is the 300 grain weight total weight of the arrow including broadhead, or separate? As written it is the weight of the arrow including the broadhead.

Proposals 13 and 14. Oppose. Same comments as for proposal 11.

Proposal 15 and 16. Support. There is a proficiency requirement for archery and there should be some sort of hunter education/proficiency test for the use of a crossbow.

Proposal 17. Oppose. Proposer assumes that if you were born prior to 1986 that you are proficient in the use of a bow. This is not true. Being of a certain age does not make you proficient, only through practice can this be achieved. This proposal ignores the very real possibility of a person not being involved in archery until later in life. For example a person could have been born before 1986 but has not been involved with archery until January of 2016. Additionally I do not see how being required to carry your certification card in the field is a burden.

Proposal 27. Oppose. This proposal solves nothing. Full curl and broomed rams would still be legal. Counting growth rings in the field is extremely difficult and not recommended by the Department of



Fish and Game as a means of identifying a legal ram. In the interest of reducing the number of sub-legal rams taken it would be better to remove counting growth rings entirely as a means of identifying legal rams.

Proposal 28. Oppose. This proposal will encourage the taking of sub legal rams. The proposer assumes that the majority of individuals hunting sheep will continue to do so every year. I believe that most will quit hunting sheep after one or two successful hunts. Cost and difficulty of the hunt being limiting factors. A more effective means to prevent taking sub-legal rams would be strict enforcement at sealing and elimination of growth rings as a means of identifying legal rams.

Proposal 30. Oppose. This will have no effect on hunting pressure or the number of sheep taken by non-resident sheep hunters. Most hunters look at sheep hunting as a once in a lifetime opportunity. It is unlikely that they will return to hunt year after year unless they have been unsuccessful in the past. If the number of permits available to non-residents is 300 (to pick a number) then 300 will be given out. Limiting an individual non-resident to one permit every four years is irrelevant. The only way to reduce the number of sheep taken by non-residents is to reduce the number of sheep available to them.

Proposal 31. Oppose. Many have expressed the opinion that too few sheep are being chased by too many hunters. If some hunters are unable to utilize their permits that would tend to help in that regard. Additionally, someone who draws a permit should not be punished if they are unable to use it, emergencies happen. How would this even be enforceable? A person merely needs to report that he hunted but was unsuccessful. A better solution would be to allow permits to be returned to the Fish and Game for re-issuance. The person returning the permit would then be given a permit the following year.

Proposal 32. Oppose. The proposer is incorrect in his assertion that "no state in the country allows sheep hunting without a permit." It is allowed in Alaska. Permits should only be used if the population in question cannot sustain a general hunt. Why should a person be forced to pay to enter a drawing if the population is healthy enough for a general hunt?

Proposal 33. Oppose. The problem identified in the proposal is overcrowding, unfortunately, the solution offered will not solve that problem. The proposer assumes that overcrowding is a direct result of non resident hunters. Hunters are going to congregate by ease of access, cost of access and number of legal rams. A more effective way to reduce crowding is to issue permits based on sub-area, similar to what has been done in Unit 14. However, a permit system should only be used when the population cannot sustain a general hunt. Instead of putting in place a permit system for all sheep hunters statewide, institute a statewide permit system for non-residents with permits issued by sub-area. The number of permits would be restricted.

Proposal 34. Overcrowding is the issue identified. This proposal will not solve that problem and would be an enforcement nightmare. As the proposed seasons start one after another it would be easy to circumvent the ban on the use of airplanes, ATVs etc. I also oppose the requirement that permits be awarded via the internet on a first come basis. Not all hunters have access to computers. I do not.

Proposal 35. Oppose. This would have minimal impact on the number of hunters in an area. It assumes that overcrowding is an issue statewide and that the state knows beforehand the number of sheep hunters statewide and that their names are evenly distributed through the alphabet. I also do not think it is fair to use a persons name as the basis of when they can hunt.

Proposal 36. Support. This would benefit residents.

Proposal 37. Support. This would benefit residents.

Proposal 41. Oppose. If the population in an area supports a general hunt there should be no restriction on the non-residents. If a permit system for a unit is necessary there should be no permits issued to non-residents. The time has come where demand from residents is high enough that they would utilize all available permits. Game populations need to be managed for the good of the largest number of state residents.

Proposal 42. Oppose. No permits should be allocated to non-residents.

Proposal 43. Oppose. If the population in an area supports a general hunt there should be no restriction on the non-residents. If a permit system for a unit is necessary there should be no permits issued to non-residents. The time has come where demand from residents is high enough that they would utilize all available permits. Game populations need to be managed for the good of the largest number of state residents. I fail to see why, since demand from residents is so high, that non-residents are given permits. The State is not required to guarantee that guides have clients. However, the State is required to manage game for the benefit of Alaskans. And not just for the few.

Proposal 44 and 45. Oppose. See comments to proposal 41 and 43.

Proposal 46. Oppose. This is a blatant attempt to give one group of hunters an advantage. If they need a special season why can't it be after the general hunt? Why do groups looking for a special hunt always want to go before everyone else?

Proposal 47 Oppose. The current season opening dates of August 10 should be sufficient to give children and their parents the opportunity to hunt.

Proposal 48 Oppose. The allocation of seasons by last name is unreasonable. The Board assumes that hunters will hunt sheep year after year, I don't believe this is so. In areas that can support a general hunt why should a person be limited to when they can hunt by their last name? How is it fair to make someone wait for three years to get assigned to the best season especially, if as in the past, the Board scraps this system after two years? This is what happened for Nelchina caribou permits and that point system. This proposal also assumes that the names are evenly distributed throughout the alphabet. This proposal will fail in the future if the number of hunters increases. Overcrowding will still be an issue. Overcrowding is not an issue in all units only those where access is easiest. If someone feels an area is overcrowded they have the opportunity to hunt elsewhere.

Proposal 49. Support. This proposal appears to make sense.

Proposal 50. Support with modification. I would support this if it were changed to remove the requirement for evidence of sex for bag limits allow for the taking of either sex. And if it included bears. Most bear hunts are either sex yet there is a requirement to leave evidence of sex attached. You have to report the sex on the tag or at sealing so why is there a requirement to leave evidence of sex attached?

Proposal 51. Oppose. How can you penalize a resident hunter that hunts with a friend/relative who is a



non-resident? This denies an Alaskan his right to hunt. How could this possibly be enforced if the resident takes an animal before going hunting with the non-resident? How could this even survive the certain court challenge?

The second part of this proposal makes no sense. If the first part is approved then the resident cannot take an animal so how could the non-resident be allowed to fill the residents tag? If the non-resident is able to fill the tag of the resident then the non-resident would not actually have to buy a tag. In effect it would make the non-resident a defacto resident.

This proposal has numerous problems and was not well conceived. What problem is it attempting to address? The stated problem is second degree of kindred but it is not stated what the problem is. Second degree of kindred is defined in simple terms that all can understand in the regulations.

Proposal 52. Support. It is difficult enough to apprehend game violators in Alaska due to the small number of troopers, as this is a sensible proposal and makes their job easier, I support it.

Proposal 53. Oppose. Removal of this regulation would be bad for hunters in general. It effectively endorses taking bad shots or not following up wounded game. It allows for a hunter to wound an animal and just go shoot another if the wounded animal proves to difficult to track or retrieve. Also, how will the hunter know that the animal did not die of its wounds if he is not required to follow up? I fail to see how the existing regulation hinders ethical hunters as stated in the proposal. Seems their standards of ethics are less than mine as they are searching for ways out of dealing with a wounded animal.

Proposal 54. Oppose. What is the first thing most people learn as a young hunter?, know what you are shooting at. If you don't know, don't shoot. Why this is a burden to the proposer I can only guess. The proposer states he is trying to address the number of sub legal animals taken. However, if approved this proposal would increase the number of sub-legal animals taken. I would suggest this proposer learn how to identify legal from ill legal animals or hunt in areas where there are no restrictions as to sex or antler size.

Proposal 56. Support. Bear meat is delicious, including grizzly meat. Its salvage should be required. This proposal makes a good step towards that. The reason most people don't like bear meat is that it is not properly cared for in the field. The first thought of most is for the hide. If they can leave the meat for a day or more it becomes wasted. If people were required to take the meat from the field prior to taking their trophy maybe so much meat won't be wasted. I have never understood why bear meat is allowed to be wasted.

Proposal 57. Support with modifications. I would like to see this extended to areas where the bag limit is one bear.

Proposal 59. Support. This is a reasonable proposal, makes enforcement easier, and would remove any confusion on the part of the hunter.

Proposal 62. Oppose. Adoption of Proposal 59 would make this unnecessary. If Proposal 59 is not adopted then the condition for removing all contaminated soil should main. If a hunter dumps various oils he should have to remove the contaminated soil. Why should someone else have to deal with the mess? Some bear bait stations I have encountered are more akin to garbage dumps than bear hunting sites. Soil contaminated with oils to attract bears remain as an attractant long after the hunting season

has ended. The hunter can easily use baits that do not contaminate the soil.

Proposal 65. Oppose. Meat should always be salvaged. Additionally, it appears that, when considered in conjunction with Proposal 64, the Alaska Bow Hunters Association is trying to establish bait stations for brown/grizzly bears.

Proposal 66. Oppose. The proposer might do well to take ballet lessons to improve his balance. I have waded in streams for many years; hunting, fishing, panning for gold, and have never seen the need to wear anything other than rubber boots, with rubber soles. If banning felt soles has even the slightest chance of stopping invasive plants, I support it.

Proposal 67. Oppose. A right of way is just that, a right of way. If this group does not want people on their land, outside of the right of way, I suggest that they follow the law and properly post their land. A newspaper advertisement is not sufficient to properly post property.

Proposal 68. Support. Support for the reasons stated in the proposal.

Proposal 69. Oppose. This proposal would eliminate the use of dogs for hunting upland game and waterfowl.

Proposal 70. Support.

Proposal 71. Support. This proposal makes sense and eliminates a loop hole in the same day air borne hunting restrictions.

Proposals 72, 73, and 74. Support. These proposals all address the same issue. Setting a minimum caliber will help to reduce wanton waste. This past fall I came across two caribou that had been shot with a small caliber weapon. The animals had been shot through the gut, and there was a tiny entry wound. It is impossible to know how far the animals wandered before succumbing to their wounds. The incident was reported to the Fish and Game in Anchorage and the Troopers in Glennallen. Had a larger caliber been employed along with requirements for following up wounded game, maybe these two animals would not have been wasted.

Proposal 76. Oppose. I don't believe that air rifles should be allowed for the taking of big game.

Proposal 77. Oppose. Adoption of this proposal will add more fodder to anti-hunting and anti-trapping groups. Why is it even necessary? The proposal did not make this clear.

Proposal 78. Oppose. I fail to see how ID tags are onerous.

Proposal 80. Support. Unfortunate as it is, the population of Alaska is increasing, conflicts will occur and this proposal seems to be a common sense solution to the problem of "I have always done X in that spot so why should I change?". This proposal basically requires trapping to follow the same location restrictions used for bear baiting. This seems reasonable.

Proposal 83. Oppose. There are still many places in Alaska where computers are not available to all.

Proposal 85. Support. All hunters will benefit from better management.

Proposal 86. Support. Better data will insure better management.

Proposal 87. Oppose.

Proposal 90. Oppose. Not everyone has access to a computer. Requiring on-line permitting is a great burden for some. There are limited number of permits so there will always be hunters who do not receive a permit. The proposer assumes that everyone lives in a metropolitan area with internet access. Also, what does the proposer mean by "when testing becomes available?" If something cannot be defined it has no business becoming a regulation.

Proposal 96. Oppose. The fairest way to provide for permits is by a random drawing, all have an equal chance. There is a lot of crying by those who don't receive permits and believe that certain people always get them. So what, nothing says you must restrict your hunting to those areas where a permit is required. There are many hunting opportunities in the State that do not require permits. Having a point system does not insure that an individual will someday get a permit. All it does is increase their chance. I have lived and hunted in Alaska for nearly 50 years, have received one random drawing permit, and would not change the current drawing permit system.

Proposal 98. Oppose. The proposer wants a "simple, transparent, fair system." The existing random draw is by far the most transparent, simple and fair system. If some hunters draw so many permits that they cannot use them all, as stated by the proposer, then allow hunters to return them to the Fish and Game for reissue. Everyone that I know likes the existing system, unfortunately, you will not hear from the majority of people who agree with the fairness of the existing system, you will only hear from the minority who cry that they never get a permit.

Proposal 99. Oppose. Contrary to what the proposer states, the Department of Fish and Game will still have a verification burden, this proposal will not eliminate that. Additionally, why should non-residents incur additional expenses beyond the permit and license fees? If adopted this proposal will cause non-residents to incur additional expenses for the sure to come guide permit handling fee. If the guide is to file all the paperwork it is sure to come with a fee. Likely to be refundable to those that get a permit but what about the thousands who do not? This proposal seems to be more of a revenue generator for guides than an actual solution to some problem.

Proposal 101. Oppose. Non-residents should not be given permits. Permits are used because the game population in question cannot support a general hunt. Permit hunts should therefore be managed for Alaskan hunters not non-residents. If a hunt is under subscribed then permits could be issued to non-residents. How did we end up with a system where the needs of non-residents supercede the needs of residents?

Proposal 103. Oppose. This is an unnecessary burden to place on hunters. It will address nothing. This is no different than the old application for the Tier 1 caribou hunt in unit 13, other than requiring more writing skills. Who is going to have to read all these reports and catalog the data? How will that be paid for?

Proposal 104. Oppose. As for Proposal 103 this is an unnecessary burden and serves no real purpose.

Proposal 105. Oppose. The time frame of 180 is not reasonable. This rewards those who are poor hunters and fisherman. I have never purchased meat or fish from the store. I easily meet my subsistence needs in less than 180 days. At most a hunt takes 1 to 10 days, all the fish me and my

extended family need are caught in about two weeks. A true subsistence user will acquire the fish and game he needs as quickly as possible.

Proposal 107. Oppose. There should be no permits allocated to non-residents.

Proposal 108. Agree. There is no plausible reason for requiring guides for moose hunts. It is not required by law. Hunting regulations should be about hunting not providing work/income opportunities.

Brian D. West
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FEB 8 2016

Submitted By
Caleb Herkstroeter
Submitted On
3/1/2016 10:39:17 AM
Affiliation
Alaskan Resident

Board Members,

First I would like to thank you for your service and hard work of helping manage Alaska's big game. I would also like to thank you for taking time to read my comments.

The first proposal I would like to comment on is Proposal 23. I agree with this proposal, I believe the Board generated proposal 207 needs to be repealed. First this was a board generated proposal and did not reflect the public's opinion on this issue. The Brinkman sheep hunter survey drafted in 2014 shows that restrictions on aircraft was not a PRIMARY concern for the MAJORITY of Alaskan sheep hunters. The wildlife troopers are not in favor of it and is openly recognized as unenforceable. I talked to a wildlife trooper friend of mine on this subject and asked him how many violations or complaints related to 207 there were in 2015 and there was only ONE complaint in the entire state of Alaska that they pursued and it turned out the pilot was not in violation. This information tells me that the use of aircraft to spot sheep is not an issue, therefore this regulation is unnecessary and unpractical.

Proposal 32- I am adamantly opposed to this proposal. I am opposed to seeing drawing permits across the board for Alaskan residents until other issues have been addressed. I believe this is an extreme measure and do not support any proposal that limits Alaska resident hunters any further. I believe non-resident sheep hunters should have to draw a permit, but not residents. If we are going to start restricting sheep hunters to conserve our resource it should start with non-residents who have two to three times the success rate as residents.

Proposal 35- I am opposed to this proposal because not only does it limit when someone has to hunt it also limits who you can hunt with. This would be an overreach by the board to mandate that you have to hunt with someone whose name begins with a particular letter. Hunters have trusted hunting partners they hunt with and if they do not fall in line with this regulation then they will not be able to hunt. It is not the board's responsibility to regulate who I hunt with.

Proposal 36- I am in favor of this proposal. I believe it addresses the concerns voiced in the Brinkman sheep hunter survey. This proposal would help relieve early season crowding while giving residents priority yet would give non-residents ample opportunity to hunt sheep. I also like that residents hunt later in the season during the same time as non-residents if they so choose. With the exception of the flying regulation portion of this proposal, I believe it is a well-written option that would help alleviate some of the issues voiced by Alaska sheep hunters.

Proposal 38- This proposal is very similar to proposal 36 and is very simple and may be a better option than 36. I am in favor of this proposal for the reasons stated above. I have the understanding that the BOG may not be able to restrict non-resident allocation (I may be wrong on this), but can change season dates to give residents priority. This is a very good proposal. I would like to thank the Board for considering my comments. I appreciate what you do and the decisions you have to make. I would urge you to keep Alaska residents first and when it comes to sheep hunting, listen to the voices of Alaskan sheep hunters. Thank you.

Submitted By
Caleb Herkstroeter
Submitted On
3/1/2016 11:23:21 AM
Affiliation
Alaskan Resident

Board Members,

Thank you once again for considering my comments.

Proposal 67- I am opposed to this proposal because it impractical and unnecessary beurocratic regulation on where we can hunt or set traps. The way it is worded it also implies that we would not be able to hunt or trap in a road right of way that goes through our own private land.

Proposal 69- I oppose this proposal because it has no scientific basis. There is no documentation that domestic dogs have spread deseases to wild animals. It would also not allow the use of dogs for hunting waterfowl or upland game birds. That is rediculous. Dogs are some of the best hunting partners and restricting thier participation without solid scientific basis is way out of line.

Proposal 70- I am strongly appossed to this proposal. Just like proposal 207, this is an unpractical proposal that does not protect Alaskans choice of mode of transportation. There are already solid regulations in place to ensure fair chase and no harrasment of game. This proposal, just like 207 is simply a restriction on a single usergroup and is extreamly hard to enforce. Wildlife enforcement would be distracted by percieved violators and taken away from thier dutys of making sure actual wildlife violations are attended to. I can see this proposed regulation creating a lot of " wild goose chases" if a pilot was simply flying low due to weather or circling looking for a safe place to land. I believe our valuable wildlife enforcement energy would be wasted looking into percieved violators.

Proposal 78- I support this proposal. Requiring identification tags on all traps and snares is impractical and unnecessary. Alaskan trappers may have hundreds or thousands of snares and traps that are spread out on miles of trapline that is know to be thier trapping area, having a tag on each one to identify who it belongs to is not practical.

Proposal 79- I strongly appose this proposal. Checking traps every 24 hours in Alaska is simply not practical. Some Alaskan trappers run many miles of trapline and could not physically check thier traps every day. This would force these trappers to stop thier trapping and would end an era of real trappers in Alaska. Trapping is part of our Alaskan heritage and I believe it should be protected. This proposal is designed to make it impossible for anyone to legally trap in this state unless it is out your back door in your yard. Please protect our Alaskan herritage and keep these anti trappers out!

Submitted By
Caleb Herkstroeter
Submitted On
3/1/2016 11:58:40 AM
Affiliation
Alaskan Resident

Board Members,

I respectfully submit my comments and thank you for taking time to consider them.

Proposal 80- I appose this proposal. There are already trapper ethics in place that detuer trappers from trapping too close to populated areas. Some of the wording in this proposal makes no sense, such as a trapper can place a trap or a snare on the other side of a river from a cabin. The river is frozen! What good will that regulation due? Why cities with a population of 1,000 or more? If they are worreid about accidentally catching a dog, they have never been to a village or small town in Alaska, they have loose dogs running everywhere out there, do they not care about those pets? Proposal 107- I support this proposal. In all areas open to drawing hunts for both residents and non residents, the non resident allocation should not excede 10%. Without a points system in place it can be extreamly difficult for an Alaskan resident to draw some tags and without a non resident cap it makes it even harder. I do not believe a ten percent cap like we have on some trophy managemant areas is unreasonable. Proposal 138- I strongly agree with this proposal. This is a well written proposal that exposes deficiencies in the current system and calls the BOG to support Alaska resident sheep hunters and restrict guided non residents on state and BLM lands. I believe this proposal would help reduce pressure and make resident sheep hunting a better experience. Thank you for considering my comments want to encourage you to keep Alaskans first. Thank you.

Submitted By
Caleb Herkstroeter
Submitted On
1/29/2016 3:11:43 PM
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Board members, I am writing a comment on behalf of myself regarding the Alaska Sheep Hunter Survey. I would like to draw your attention to a few things in this survey and ask you to listen to the voices of Alaska resident sheep hunters who responded to this survey. First I see a bit of a contradiction in some answers on this survey that led to proposal 207, restricting the use of aircraft for spotting sheep during season. The contradiction I see is: on page 14 when asked how tolerant hunters were of disruptions to their hunt, they said they were tolerant of a small plane flying over the area they are hunting. Then on page 19 there seems to be approval by the hunters to perceive a sheep hunting problem to ban the use of aircraft for spotting sheep. These seem to contradict one another and does not seem like proposal 207 is the best solution to improving our sheep hunting experience. The data on page 19 indicates the majority of sheep hunters agree that the same day airborne regulation should stay the same. So why proposal 207? The other issue I would like to draw your attention to that Alaskan residents have spoken very strongly on is on numerous pages, but for simplicity I am referring to pages 21 through 23. When asked what sheep hunters believe would help reduce sheep hunting pressure in the range they hunt, they agree reducing the allocation to guided nonresidents! I think that is plain and simple. They also said on page 18 (sorry I am a bit out of order) that requiring non residents season to start a week later would improve resident sheep hunting experiences. These are just a few of the things that stuck out to me as I reviewed the survey and would like to encourage you to listen to what Alaska's resident sheep hunters say and make changes to improve the experience and success of Alaskans first! Thank you for your time. Caleb Herkstroeter

Cliff Eames and Ruth McHenry
HC60 Box 306T
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(907) 822-3644

March 1, 2016

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

Re: Comments on Proposals

Dear Board of Game Members:

Proposal 59 Clarify and restrict the use of liquids at bait stations--Support

We support the Fairbanks AC in this proposal. For the safety of ourselves and other public land users, it is important to prevent non-active bear bait stations from being attractive to bears when the station is not active.

Proposal 63 Permit for hunting bear with the use of bait or scent lures—Support with modifications

We support the Department of Fish and Game in this proposal.

We ask that the proposal be modified to clarify that the site location information be available to the public. We have sometimes had to abort a planned hike, after driving for a half hour or more to an area and then discovering that it has an active nearby bait station. We would have been saved the trouble if we could have checked with ADFG in advance.

Proposal 79 Require traps to be checked every 24 hours--Support

We support this proposal.

There is an old belief that animals other than humans do not have emotions and do not suffer pain. New work by many scientists has found these assumptions to be false. The nervous systems of humans and other animals have a common evolutionary history, so we should not be surprised at these results.

I (Ruth) once found a wolf in a snare. The flesh of its leg was shredded. This animal was clearly suffering. We called the trapper (we happened to know who might be trapping there) and asked him to come and end the wolf's suffering. The weather was good and the trapper was at home. He could have checked the snare sooner.

Proposal 80 Move trapping away from cities with a population of 1,000 or more—Support with modification

We support this proposal.

Additionally, we ask that the provision for not trapping within 200 feet of a publicly maintained trail be extended to all communities. Kenny Lake, where we live, has a population that is only in the hundreds; but pet owners have the same concerns about their pets being caught in traps, and for good cause.

PAGE 1 OF 2



I (Ruth) have had my dog caught in a trap that was set right on a 17(b) easement. Fortunately, we were right behind him and able to release him immediately. Another time, we found two traps on another 17(b) easement.

I (Ruth) have also helped care for friends' dogs who were injured in traps. Neither of these dogs was likely to have been more than a mile from a permanent dwelling. Both dogs had to have a foot amputated.

We have always taught our dogs to stay close to us. However, if traps can be set almost anywhere, we usually have no way to protect them from stepping into a trap or snare although they are under our control by voice, shock collar, or even leash.

Sincerely,
Cliff Eames
Cliff Eames

Ruth McHenry
Ruth McHenry

PAGE 2 OF 2

March 2, 2016

To Alaska Board of Game

Comments on regulation proposals for the March 2016 meeting.

Submitted by Dan Dunaway,
PO Box 1490
Dillingham, Alaska.

These are strictly my personal comments. I do a little bit of trapping, as well as sport and subsistence hunting.

Proposals

5 OPPOSED: As written and since I trap, I am very concerned how this might be applied for use of game bird wings, guts for trapping bait. I don't want to lose that option. I generally salvage legs, breast, inner wings of large birds, and sometimes innards but don't want innards mandated.

20 SUPPORT I support ADFG's concerns and hope BOG can resolve this.

21 to 26 SHEEP / Goat Hunt and aircraft: I hope some enforceable resolution can be found. A friend of mine felt harassed and had sheep spooked in the middle of a stalk because of a guide in a plane. This occurred more than once in the course of his week long hunt. I believe my friend reported the plane N number.

35 OPPOSED I don't want my hunting opportunity and time controlled by the alphabet. It might be that my only available time would be "out" on a particular year.

46 / 47 OPPOSED I am not in favor of widely fragmented seasons based on gear type or hunter category. Sometimes seems gear makers promote this to sell more stuff. I'm concerned that this might motivate hunters to use gear they are marginally proficient with AND this fragmentation slices the pie too thin for all hunters.

52 SUPPORT I always prefer regulations that are as clear as possible.

54 OPPOSED Mulligan Bull. This is silly and would quickly result in a decimation of smaller bulls and a total disruption of good management.

56 SUPPORT Only for those GMU or subunits where salvage of bear meat is required.

61 SUPPORT I support allowing fur bearer carcasses for bear bait as long as all other laws are followed in obtaining and deploying those carcasses.

63 SUPPORT clarity is always better.

66 OPPOSE The author grossly overstates the health hazards and ignores the much greater hazard of importing unwanted species. Non-felt sole waders are improving tremendously and felt isn't essential. I only wish the State could address this concern for all users as non anglers, non hunters apparently can still use felt soles - such as for archaeology, geology, photography or other activities.

68 SUPPORT. To use FLIR and other electronic lights and aids seems very unsporting, and give an unfair advantage, may risk injuring animals.

69 OPPOSED Often it is more responsible to hunt birds and waterfowl using dogs to find and retrieve downed birds.

72, 73, 74 UNCERTAIN While I sympathize with the sentiment and the concerns of the authors, caliber size is not a guarantee of better hunting. There are wimpy 30 caliber cartridges and very powerful .223- .243 caliber cartridges. Especially now a days when ammunition has become so sophisticated. Caliber is no substitute for ethical hunting practices and good marksmanship. I personally think it is more responsible to use a cartridge more powerful than a .243 Winchester for caribou and larger game. I have friends who quit using the .243 Win because at times they found it to be too marginal on caribou. But I have witnessed a .222 Rem Magnum be very effective on caribou. I have also found dead , lost caribou that were likely herd shot with full metal jacket .223 / 5.56 NATO or 7.62x39 Soviet ammunition.

75 Worth consideration & discussion for black powder cartridge rifles (BPCR) but I don't know about cross bows. I sympathize with the author on BPCR; the author is very knowledgeable on BPCR.

76 SUPPORT I hope the Board gives this some consideration as air rifles have become extremely sophisticated in the last 10 years. It would be good to get ahead of the new technology. I recommend seeking comments from those knowledgeable and experienced with such rifles. I sometimes hunt small game with .177 and .22 cal air rifles, there is a learning curve and more limitations compared to a .22 rimfire ; I suspect the situation is similar with larger caliber air rifles. I'm concerned there is higher potential for wounding so hunter ethics are crucial and possibly some regulation would be appropriate.

79 TOTALLY OPPOSED This is totally unrealistic and would be impossible for many many trappers, especially the serious and long line trappers. A trapper has enough details to attend each set, I can't

imagine what sufficient documentation would entail. With trail cameras, I have found that if I check my sets too often it can greatly reduce their effectiveness. I check my traps every 2 to 4 days, once in a while 5 days due to weather or other obstacle. It IS frustrating to find traps left by neglectful and unethical people but this regulation is over the top.

80 TOTALLY OPPOSED This should be up to each community. In addition, trappers can't always know where every permanent dwelling, cabin etc. might be in an area. Many folks don't know where my cabin is and I'm not interested in advertising its location. In our area new cabins crop up as the state sells some land and other people choose to build on their allotments. This would be a gross over-reach. ADFG should and does encourage ethical trapping at every opportunity.

81 OPPOSED While this merits discussion, I have had considerable trouble these past 2 winters keeping my traps at the right water levels to be effective let alone meet some silly rule. We have had rain events and melts that flooded my sets and other times I've found my traps high and dry only 2 days later. At times this winter I was expecting my traps to be flooded only to find them a foot out of the water – it has been a very frustrating winter. I understand the intent but this would be an undue burden on trappers. Ethical trappers will attempt to meet the intent of this regulation just to be effective trappers and don't need a regulation hanging over their heads.

82 AMEND to read affix tag (harvest tickets) "immediately upon ARRIVING at the kill site (where animal finally succumbs)". Should an animal die in a lake, river or other hazardous situation, it should not be a violation to first secure the animal in a safe spot; I had a moose run into a river once. I do not want to allow hunters to delay affixing a tag for an extended period once reaching the kill. Butchering and skinning is no excuse but a person who delays for a few minutes (10-30?) to take a photo or to retrieve a pack, secure equipment which might contain the tags should not be penalized. I usually keep my tags in my back pack to assure they aren't ruined beyond use. A few times I have gotten separated from the pack at the time of the shot.

84 This proposal raises some items that might deserve consideration. Civil rights must be preserved but this may demand a process that could cause untimely delays, be extremely difficult in remote locations and might facilitate violators and severely hinder enforcement officers. I suspect this is brought on by a few aggressive officers who need to improve their public contact skills and / or the more extreme even aggressive personal rights advocates. I have experience enforcing commercial fishing regulations as a lone agent of the State at the extreme borders of the Bering Sea (near the dateline). There may be case law that supports the state's ability to inspect commercial fishing catches, and commercial fishing processors without warrants that might apply to hunting situations as well.

85 SUPPORT I live in south western Alaska where ADFG has instituted registration hunts and harvest report cards. There has been a learning period but now reporting is generally good, & most people understand the benefits of better hunt and harvest data. This proposal would have to allow for a learning period and may need some accommodation for larger bag limits or remote situations.



Communications throughout the state are greatly improved and I think it is reasonable ask northern hunters to help with better data collection for the benefit of all.

87 OPPOSE I think in some cases the BOG should be able to regulate a hunt for those who don't want to have to compete with ORVs or other concerns related. I think habitat damage should be a consideration as well. These modern ORVs go so many places and often leave significant ruts, marks noise and stink. In some places repeated use contributes to tundra or ground damage, bank erosion and mud flowing into creeks. I hunt and trap on foot a lot of the time. I also use motor boats & snowmobiles to access hunting areas. Noisy stinky fast moving ORVs, evens snowmobiles can be a real frustration at times. I appreciate the proposer's concern but the views of others need to be respected as well.

96 /97 OPPOSED - EXTREMELY OPPOSED I know several people who live in states where this system is used and it ends up being dominated by the rich folks and the special services that submit permits for them nation-wide. I would much rather take my chances yearly and know I have a fair chance every year. This would also give new comers and young people a fair chance to be drawn. NOTE it took me over 20 years to get drawn for a Delta Bison hunt so I know what it means to wait. DO NOT go to the point system please. I am ok with restricting hunters who DO get drawn from applying for some set time depending on the species, location, population etc.

98 Opposed to point system as for 96 & 97. **NO NO** But, I support allocating more permits to Alaskan residents and fewer to Non-residents is acceptable.

Thank you for your consideration of my opinions.

Submitted By
Dan Montgomery
Submitted On
3/4/2016 4:52:14 PM
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Self

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Thank you for this opportunity to comment on these proposals. I have lived in Alaska for 34 years and have hunted or guided for sheep everyone of those years.

Proposal 22: i support this proposal and its language change but I would also add : a aircraft must remain at least 1500 feet from sheep at all times during this period and can not make multiple passes by any sheep to avoid altering the hunting experience of other hunters. This will stop the buzzing of sheep during the season and the disrupting of other hunters and that is what the board said they wanted to stop. Please consider this change. The public was 2 to 1 against the boards proposal and they were very upset with this board when they passed it anyway.I think this language change will really help alleviate some of this anger. It is impossible to fly through sheep country during the season and not see sheep at a distance. I'm afraid to even acknowledge seeing a sheep while flying in hunters during the season for fear of being prosecution. I shouldn't have to worry about it if I'm not buzzing sheep.

Proposal 99: I strongly support this proposal. The B.G.C.S. board has done everything that the Dept. of Fish And Game ash us to do. With the U.V. C. in place The Dept. of Fish And Game does not have to do anything now to verify a non- resident application. Please leave the language that requires a guide-client agreement in place.

Thank You

Dan Montgomery

Submitted By
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3/4/2016 4:58:49 PM
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I lost a lot of my comments before I pressed submit so this is short and to the point.

Proposals I Support: 19, 21, 22, 23 ,24, 25, 29, 30, 31, 35, 48,49,50, 51, 52, 62, 63,

Submitted By
Dan Montgomery
Submitted On
3/4/2016 11:57:28 PM
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wasilla, Alaska 99687

Thank you again for this opportunity to comment on the statewide proposals. I have been having trouble with my computer, things disappear before I get to send them. So I'm trying again.

Proposal 139: I strongly oppose this proposal. At the Mat Valley A/C meeting the area biologist Dave Battle was asked by me if there was a biological concern with this goat population. He said there is none. I have guided hunters to goats in this area since 1993 and I have never seen the population decline in all those years. We had record bad winters in 2012 and 2013 and the dept. goat count was 440 in the summer of 2013. They counted again in 2015 and got a hard count of 471 goats. When I say hard count I mean they actually observed 471 goats. So there could have been easily 500 goats in this hunt area. I have been told by dept. staff that they manage for a 5% to 7% harvest. and 5% harvest is to grow the herd and 6% is to maintain the herd size and 7% harvest is to decrease the herd size. This areas goats have always been managed for a 5% harvest because until 5 years ago they never counted them. I suggest that they be managed for a 6% harvest because the dept. is not trying to grow this herd. This area was put on draw in 2007 or 2008 because the dept. thought it was going to receive more pressure when the joining area was put on draw. I don't believe the dept. ever reached their harvest goals when it was drawing permits only. I put proposals forward to take this area off of draw and back to registration permits and the B.O.G. approved them. There is currently a 65% resident and a 35% non-resident allocation for this area. At 5% harvest that would be 16 goats for residents and 8 goats for non-residents. At a 6% harvest it would be 20 goats for residents and 10 goats for non-residents. In 2015 the total goat harvest was 17, 11 by residents who had a 45 day season and 6 by non-residents that had a 3 day season. In 2014 the total harvest was 16 by residents and 12 by non-residents who had a 5 day season. I admit the guides in this area can reach our harvest goal very quickly but the reason we can do this is because there are so many goats. We can control the harvest by having a short season as demonstrated in 2015. The only year we harvested more than 10 goats was 2014. There is no over harvest by non-residents in this area and we don't need to go to draw permits for non-residents in this area. Almost all goats harvested by non-residents in this area are billies. I believe we could cut down on the guide participation in this area if we didn't open the non-resident season until the 15th of Sept. This would also give the residents a 2 week head start. Some of the guides in this area are guiding for other animals by that time of year and couldn't participate if it started then. By having just a 3 day season for non-resident hunters it makes it a lot harder for the guides to book hunters. There are lots of ways to control the non-resident harvest without going to draw permits. This proposal should never have been accepted as a ACR because there is no conservation concerns for this goat population and please reject it now. If there is an over harvest by non-residents the dept. can re-submit it in cycle in 2018. That will give the dept. more time to see what the harvest is with a short season.

I support the following proposals: 71,78, 82,94,96,97 and 135.

I strongly oppose the following proposals: 27,32,34,36,37,38,39,40,41,42,43,44,45,46,47,53,54,55,56,57,59,70 very,very strongly,79 98, 101,102,107,108 and 136.

Thank you for considering these comments.

Dan Montgomery

Chairman: Ted Spraker,
Alaska Board of Game Members.

This is a request to the Board of Game to make a house keeping change to the current agreement between the Alaska Board of Game and the Alaska falconry community that is currently in place regarding the four year cycle that falconry regulations come up before the Board.

- Currently falconry regulations come up every four years; two statewide cycles.
- The Board of Game recently changed their statewide meeting cycle to a three-year cycle.
- This request is to adjust the falconry cycle to six years, two statewide cycles.
- This house keeping change meets the intent of both the Board of Game and Alaska falconers.

Alaska falconers are very happy with the suite of regulations that the Board of Game recently put in place. Those regulations are detailed in the “Alaska Falconry Manual #9”.

At the March 2016 statewide meeting, which is open to falconry proposals, the only two proposals before the Board addresses a change to non-resident take. One proposal is from a group from the lower 48 states, and the second proposal is from a Kodiak falconer. These proposals will be dealt with at this meeting.

No other proposals on falconry have been submitted to the Board at this meeting. Falconry has many complex regulations governing the sport and if changes needed to be made, the Board of Game would have seen proposals addressing those requested changes. One of the Boards concerns in creating a “two cycle plan” was the amount of time it takes Board members and falconers to get every one up to speed on falconry issues for such a small number of resource users. Adjusting to the new “three year cycle” adopted by the Board of Game meets the original concerns addressed by the Board.

This request is to place falconry regulations on a six year cycle with the next call for falconry proposals to come up six years from this March 2016 meeting or the nearest statewide meeting after six years from March 2016.

Thank you for your attention to this request

David Lorring
Fairbanks
907-687-4858

Mr. Ted Spraker, Chairman Alaska Board of Game, and Alaska Board of Game members.

For Proposal numbers 21 through 26.

I would like to ask the Board to consider a comprise to language incorporated in 5AAC 92.085. I believe that a comprise to language developed from proposal #207 could alleviate most of the problems that the proposal addressed while still allowing traditional aircraft use in sheep hunting activities. The proposed language is as follows.

5AAC 92.085. Change current language from (From August 10 to September 20); to From August 10 to August 25 aircraft may only be used to place hunters and camps, maintain existing camps, and salvage meat and trophies while used for the purposes of Dall sheep hunting. Using an aircraft for the purpose of spotting sheep or locating Dall sheep from August 10 through August 25 is illegal.

This compromise will change the season long closure for spotting sheep with aircraft to a shorter closure period that covers the first 15 days of the season. The new regulation will keep sheep spotting by aircraft closed from August 10, through August 25th and allow spotting of sheep with aircraft after August 25 of each sheep season.

Hunter success information provided by DFG (Trends in Alaska Sheep Populations, Hunting, and Harvest) show that up to 50 percent of sheep are killed by hunters in the first 10 days of the hunting season and approximately 70 percent of the sheep are taken by hunters in the first 15 days of the hunting season.

It would therefore be logical to conclude that generally after the first 10 days of the hunting season, 50 percent of the hunters have concluded their hunting activities for sheep and after the first 15 days of the hunting season approximately 70 percent of the hunters have completed their hunting activities for sheep.

By changing the dates in the current language located in 5AAC.92.085 to incorporate a closure to spotting sheep from aircraft from August 10 through August 25th, the Board would be separating by time the actual or perceived conflict that some hunters have with reducing the quality of their sheep hunt by other hunters spotting sheep with an aircraft.

- Currently, the egregious behavior of buzzing, molesting, or driving sheep is prohibited by both the Federal Airborne Hunting Act, and State statutes and regulations as follows: AS 16.05.790(A) & (B) Obstruction of lawful hunting, 5AAC 92.080(5) Unlawful methods of taking game, and AS 16.05.940(34) which defines “take” to include disturbing game.

- With most of the sheep hunts completed, hunter conflict will almost be eliminated in northern sheep populations and reduced by at least 70 percent across most of the remainder of the state.
- Generally legal rams start to move more often from traditional early season ranges and locating sheep becomes harder. Aircraft use to spot sheep during a later period in August and in September, helps somewhat in hunter success but does not guarantee that the ram will be in the same general location eight hours later.
- Split uses are already in regulation with successful application. See Delta Controlled Use Area 5AAC 92.540 (3)(A)(ii) which separates the hunting season for big game into walk-in/motorized, pack animal uses temporally.

By adopting this compromise, the Board will significantly reduce the hunter/ aircraft complaints and still allow some traditional uses by allowing sheep spotting by aircraft. The board could also incorporate into this compromise other ideas such as prohibiting spotting sheep for the purpose of taking an individual sheep as detailed in Proposal 22, and have DFG develop a sheep hunter ethics publication such as the type required in GMU 23 as detailed in Proposal 26.

Thank you for your consideration of this compromise solution to language in 5AAC 89.085 (Proposal 207)

David Lorring
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Submitted By
Dave Lorring
Submitted On
2/20/2016 6:22:01 PM
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self

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Mr. Ted Spraker, Chairman, Alaska Board of Game; Board members.

My name is David Lorring and I reside at 3530 Holden Road in Fairbanks, Alaska. I am a Master class Falconer and member of the Alaska Falconers Association and the North American Falconry Association.

I am submitting these comments for proposals 92 and 93 which both deal with requested changes to the allocation of non-resident falconry permits in Alaska.

Current regulation under the provisions set out in the Alaska Falconry Manual #9 set out an allocation of up to five non-resident falconry permits for passage birds (current year hatchlings that have left the nest and are flying on their own) with a take season of August 15 through October 31 of each year. Any allowable species as listed in the Alaska Falconry Manual #9 is available for take, and there were no area closures implemented. 2015 was the first year that the non-resident allocation was implemented. DFG put into place a drawing permit system with a set of application guidelines found at http://www.adfg.alaska.gov/index.cfm?adfg=otherlicense.nonresident_falconry_permit, for administering the issuance of the permits. DFG made available 3 non-resident permits for which there were 23 Applicants.

In 2015, all three permit winners were successful in taking a bird. Each permit tee trapped a Gyrfalcon and two of the three birds were legally exported from Alaska. The third Gyrfalcon was trapped and allegedly released back to the wild by the permit holder prior to the bird being exported. Since the required reporting documents were not completed after the release, the circumstances around the release are not known.

Both the Board of Game and DFG entered into this new arena of controversial non-resident take with an appropriate conservative approach by keeping the number of non-resident permits at a low number and by only allowing a passage raptor take. DFG did not restrict the permit winners in any other way except to require that the permit tee gain permission from the landowner if required prior to the take. This non-resident take opportunity meets and exceeds the constitutional requirements allowing for non-resident access to the raptor resource according to legal interpretations presented by the Department of Law.

Several observations that I see after the first drawing are:

- Passage birds are still very desirable to breeders since 8 of the 23 applicants are known falconry propagators (commercial breeders).
- Of the thousands of licensed US falconers, only 23 falconers applied for the three available permits. The chances of winning a permit for the 2015 season was 13%, which is far better than the chances of winning most resident drawing hunts.
- Of the three permit winners, at least one did not follow reporting stipulations that are under regulation and detailed in Alaska Falconry Manual #9.

I think that it is very important for the board to maintain its current language, which includes an allocation of “up to five non-resident permits for passage birds from the period of August 15 through October 31”. The Board can then look at the permit process by reviewing and analyzing statistics over an extended period of time; of at least five years, and then decide if the current opportunity is satisfactory or needs to be adjusted slightly up or down. We only have one year of non-resident take statistics to look at for this board meeting, and that data is simply not enough to make any changes at this time.

Thank you for your willingness to learn about the complexities of falconry and your insight into letting a new nonresident quota system work is way out over a period of years before making any changes.

David Lorring
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Alaska Department of Fish and Game
Boards Support Section
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Delivered by email to: dfg.bog.comments@alaska.gov

March 4, 2016

Dear Alaska Board of Game Members;

On behalf of the board and more than 300 members of the Denali Citizens Council (DCC), I am submitting these comments on Proposals for the Statewide Regulations Meeting in Fairbanks from March 18-28th.

Most of DCC's Alaskan members live in communities near Denali National Park and Preserve, and are especially concerned with proposals on lands in GMUs 20A and 20C. Our goals include protection of wildlife crossing the boundaries between the national park and state lands, managing of off-road motorized access to retain quality backcountry experiences, and, overall, ensuring that intensive management is applied according to sound science. We've appreciated it when the Board took positions that support our goals.

As you know, we submitted two ACRs to bring a 'wolf buffer' proposal before the Board of Game in March 2016. The ACRs were considered in August 2015 and in January 2016, and were not forwarded. We support a 'buffer' to provide protection for wolves who den in Denali National Park and venture onto state lands adjacent to the park. The movements of these wolves have been plotted and mapped by the National Park Service under its ongoing wolf ecology program, which has collected an unbroken stream of data since the mid-1980s. These data show that, in general, wolves venture a certain distance, then return to the park, and a relatively limited buffer zone on state lands adjacent to the northeast corner of the park could effectively prevent pack disruption without significant loss of hunter/trapper opportunity. The Board of Game has established buffer zones in the past, and has the authority to do so now and in the future. We feel that buffer zones are the only way to ensure the ultimate protection of vulnerable wolf packs, especially those wolves who den in the eastern portions of the park. This in turn will increase the opportunity that tourists from around the world can view them.

Although a buffer will not be available as a proposal to the Board of Game in 2016, there is another proposal that could help these wolves, and we support it, as does the Middle Nenana Fish and Game Advisory Committee.

Proposal 141, submitted by the National Park Service, would shorten the wolf hunting season in a portion of Unit 20C, ending it on April 15 rather than May 31st.

Shortening the season will remove hunting pressure on wolves in this area during one of the most vulnerable times in their year, when more hunters are in the field and when pregnant wolves are afield. This proposal was intended to deal with the unanticipated effects of recently adopted bear-baiting regulations, bringing brown bear baiters into the field as early as April 15th, thereby increasing the number of hunters and the risk that a wolf would be shot. This risk is not theoretical. In spring of 2015, two wolves of the East Fork Pack, a well-known and viewed pack, were shot on state lands north of the park, near a bait station. Another died with a snare around its neck. The East Fork Pack did not den in 2015. Pack disruption through the death of a breeding female, one of the two shot, was suspected. Over the spring-fall 2015 season, the number of individuals in the five wolf packs that inhabit the eastern part of Denali Park experienced no increase and remained at very low numbers.

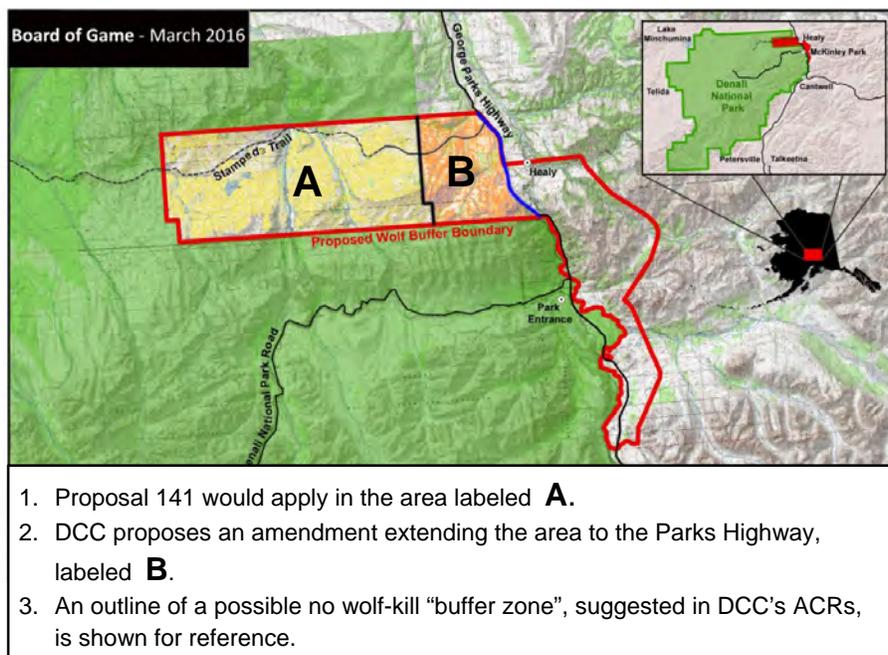
Although hunter take is not the only cause of population decline in wolves, and is considered to be low in this area, the NPS makes a good point in this proposal, as follows; "*Although wolf populations may be able to compensate for losses from low levels of harvest through increases in reproduction or immigration or reductions in emigration,*

at low densities, the ability for the wolf population to compensate through movement in or out of the population is limited by fewer wolves available. The wolf population in Denali National Park and Preserve is currently low and the effect of additional harvest, particularly during the season when females are pregnant, can remove the reproductive capacity for entire packs as seen this previous spring.”

We have been told that the Department of Fish and Game “does not manage for individual packs,” however these individual packs in Denali National Park have added value because of their importance for tourism and scientific study, and because Alaskans have written and petitioned you countless times on their behalf. Given their low numbers and the risks to them at this moment, we think the solution provided in Proposal 141 is essential and we support it.

Below we present four amendments designed to enhance Proposal 141. Every amendment can be implemented by itself, or they can be taken together. We ask that you consider each one closely.

1. **Apply this change in hunting season length to the 2016 hunting season.** This would avoid having to perform an Emergency Closure in 2016, as happened last year. The current hunting bag limit of 10 wolves makes it possible for additional pack disruption to occur this year, especially if more than one wolf is attracted to a bait station.
2. **Enlarge the size of the area covered by the regulation to include the entire Stampede townships up to the Parks Highway.** This incorporates more of the wolves’ range directly north of the park, all of which is open for bear-baiting. *See map below for a depiction of this amendment.*
3. **Change the date of hunting season closure to an earlier date, to better protect pregnant females.** Pregnant wolves can be afield as early as mid-March. Please discuss among yourselves the possibility of closing wolf hunting earlier, to protect these wolves - on April 1st or March 15th.
4. **Close wolf trapping earlier, to coincide with the closure of hunting.** Under current regulations, trapping does not end until April 30th, there is no bag limit, and wolves can be shot from the trap line, putting pregnant wolves at significant risk. Whatever date you determine for closure of wolf hunting, we recommend that you close wolf trapping on that date as well.



The above amendments make Proposal 141 stronger, and we hope you will support them. We also support Proposal 141 without amendment. However, Denali Citizens Council believes that only a no-wolf-kill buffer similar in size to what is shown on the map will adequately protect wolves who den in Denali.

We have a few more recommendations, given below:

Proposal 67 - Support

This proposal is a common sense offering preventing hunting/trapping on a public right of way without consent.

Proposal 68 – Support

This proposal would make it unlawful to use high-tech night imaging and scoping devices for hunting. We agree.

Proposal 71 – Support

This proposal makes it unlawful for a hunter to get advice about a hunt from someone else who had been airborne that day, making it a penalty for both the hunter and the same-day-airborne adviser. This will prevent the advantage created for hunters when a transporter or other individual who had flown that day could spot animals and then land and advise the hunter.

Proposal 78 – Do not support

This proposal would eliminate the use of trap ID tags now and into the future. It is too broad and works against a common sense regulation that is already enforced in many states.

Proposal 79 – Support

Requires a 24 hour trap line check. This will help to ensure the quality of the fur, prevent needless suffering, and ensure public safety in areas where people might be recreating near a trap line. As of now, trappers have no regulation requiring that they visit the trap line at any interval, although in several states a 24 hour check is law.

Proposal 80 – Support

Keeps trap lines out of cities larger than a certain size, and establishes setbacks from public trails. This is a common sense public safety regulation.

Proposal 87 – Do not support

This proposal would prevent the Board of Game from considering banning off-road vehicles using “quality of outdoor experience” reasoning. We do not agree. We think “quality of experience” is a strong and effective criterion to be used frequently in Board of Game decision making. We also strongly oppose the use of the intensive management law (AS 16.05.255(f)) to preferentially dictate land management decisions that most certainly involve “quality of experience” considerations.

Proposal 123 – No recommendation

With respect to reauthorization of the Unit 20A antlerless hunt, we understand that the department may not issue permits unless data shows an antlerless hunt is needed. This hunt has been suspended for two years. As you know, antlerless hunts have been exceedingly unpopular with local citizens who have felt that they put unnecessary pressure on limited trailheads and hunting areas.

Proposal 142 – Do not support

We do not favor using predator control to reallocate moose from wolves to hunters, but only as a way to assist a truly diminishing ungulate population. The IM law should not be dictating this type of allocation management. We are particularly concerned about the length of time that predation control can be authorized, until 2027. We think

the board should require financial analysis of this form of “hunter opportunity promotion.” Can the Department afford it?

Proposals 132-133 – Support

We understand that these proposals are intended to comply with Federal Regulations by moving from “no closed season” for hunting snowy owls and cormorants to seasons that span some months. We hope that the Department will continue to monitor these species and provide additional guidance to the board for conserving them. . They are listed in the ADF G Draft Wildlife Management Plan as “species of conservation need.”

Thank you for the opportunity to comment here. If any Board of Game member has questions, you may call me at the number below.

Sincerely,

Nancy Bale
DCC Board of Directors
907-244-2510 nancy@denalicitizens.org

Board of Directors

David Arnold
Nancy Bale
Nan Eagleson
Brian Napier
Michael Raffaelli
Hannah Ragland
Erica Watson

Submitted By
Donald Lietzau
Submitted On
3/2/2016 7:16:39 AM
Affiliation

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Regarding Proposal 69-5 AAC 92.080 Prohibit hunting with domestic dogs. This is the most ridiculous proposal I have seen in a long time. OK, off my soap box. This proposal must be tossed out as I feel it goes way to far and singles out the hunting dog and it's owner. No where in any state in the USA is such a law in place or has any base of merit. This proposal is an anti-hunting proposal and introduced to chip away at the very fabric of what Alaska is built upon. This proposal must be thrown out. Thank You. Don Lietzau

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Regarding Proposal 5-5 AAC 92.990 (A) 926) Modify the definition of edible meat for all game birds. I feel this proposal over steps the bounds of reasonable use for game birds. We do not even require the collection of organ meats from Big Game and the small amount of meat that could be recovered from the neck or back of a Ptarmigan is minute. This proposal is over reaching authority of the Government and should not be adopted. Thanks you for your consideration. Don Lietzau

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Proposal 5 OPPOSE

Current regulations are adequate concerning salvage of game bird meat. They are in concert with other states requirements for salvage. I always apply my customary practices to all the game I take. Do not waste what you expend energy on pursuing. Thank You

G Origer

Proposal 21,22 OPPOSE

not enforceable. The Board of Game should concentrate on ways to make the herd more healthy not ways of marginalizing a segment of the hunting population. Thank You

G Origer

Proposal 23-25 ADOPT

Every interested party pertaining to sheep hunting wants this regulation rescinded, except the guiding community. The troopers say it is unenforceable, the resident hunters think it is dangerous and unfairly limits their ability to look for a place to land, the local advisory councils are opposed to it. Again, the Board of Game should look for ways to improve the strength of the game populations, not at the expense of one segment of hunters but equally. Thank You

G Origer

Proposals 40,41,43-45 ADOPT VERSION OF

Our sheep populations are declining due to many factors. It has become more and more difficult for those of us who are residents to find a quality hunt with a fair chance of success. We full time residents do not have the luxury or "buying" a trophy with a guide. We are busy trying to make our livings in our state of Alaska. We deal with all the blessings and inconveniences that come with living here. We raise our families here, introduce our children to hunting, and expend proportionally much of our resources to enjoy our passion of hunting. For the majority of us residents, a big part of the decision to move up here was because of the hunting opportunities. This is our state and the resources belong to us first. We can share with those who want to enjoy what Alaska has to offer, but it is not fair that nonresidents take a grossly higher proportion of sheep compared to residents. Please consider leveling the playing field for your fellow residents. It is your responsibility to manage our resources for us, not special interest groups. I know we can not restrict nonresident guides because of our constitution, but you can essentially do the same thing in other ways. Do not allow the misallocation of state resources to non-residents.

Currently, the makeup of the Board of Game is favored by the guiding interests. Be fair with your allocation, the residents are watching and seeing some special interests being reflected by your decisions. Exercise good judgment when deciding the best course of action and be fair to all interested parties. That is why you were appointed to your positions. Thank You

G. Origer

Proposal 69 OPPOSE

Domestic dogs have been in the state of Alaska for centuries. Dog mushing was the mode of transportation up until the advent of snow machines. Domestic dogs have been beasts of burden and companions of ours for a very long time. Countless people enjoy the outdoors



with their pets everyday. Some of us use our dogs for hunting. Restricting only hunters from using dogs would be folly. What after that? no more mushing? No more Iditarod? No more walking your dog outside of town? Hunting dogs are a passion for many people. What if it was proposed to outlaw hunting dogs in the Pheasant belt? Please do not marginalize the few of us bird hunters that enjoy the great experiences that Alaska has to offer. Thank You

G. Origer

Proposal 71 ADOPT

In addition, I would restrict any hunter in a hunting camp that has an aircraft fly into it from taking any big game animal until 3 am the next day. That means all hunting camps. Thank You

G Origer

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Comments on Proposal #14: Allowing the use of crossbows in restricted-weapons hunts; from the proposer, Howard Delo

First, I want to make it abundantly clear that this proposal, if passed as written, would **not** allow the use of crossbows in any current hunts which are designated as “bow-and-arrow” only hunts – this would include the “archery only” early bow season and any permit or restricted-weapons hunts which only allow archery equipment and not firearms of any sort.

The Board of Game has defined crossbows in regulation into their own category with requirements on power, bolt (arrow) length, etc. This was done because crossbows as hunting tools are gradually increasing in hunting use for big game in Alaska during the general season and have become the fastest growing hunting tool in the Lower 48 for hunting animals like whitetailed deer and black bear. Currently, only the state of Oregon prohibits the use of crossbows in some form for hunting. It was felt that a distinction between bow-and-arrow, or archery gear, and crossbow equipment was necessary in Alaska. Over half of the other states classify crossbows in the same category as “bow-and-arrow.”

Since crossbows are defined separately from bow-and-arrow in Alaska, current regulations specifying the use of bow-and-arrow do not include the use of crossbows in a non-general season hunt. The category of crossbow would need to be added to the allowable list of hunting tools in those hunts for legal use.

In Alaska general season hunts, the crossbow hunter uses his/her crossbow at the same time the majority of hunters are using their high-powered, modern rifles. This is exactly the same situation that “vertical bow” archers try to avoid and why there are “archery only” specified hunts. Crossbows are also currently not legal to use in any “special weapons” (bow-and-arrow and shotgun or muzzleloader), drawing permit, and registration permit hunts, or any other hunt which is not a general season hunt.

This proposal asks that crossbows be allowed in non-general season hunts where a firearm like a shotgun, muzzleloader, or modern firearm is allowed along with bow and arrow equipment. This includes places like the Palmer-Wasilla Management Area, and hunts like the “targeted” antlerless moose hunts along highway corridors in GMUs 14 and 20 and the various bison permit hunts around the state.

Crossbows have some distinct advantages and many real disadvantages as a hunting tool when compared to “bow-and-arrow” equipment. The main advantage of a crossbow is that the unit is held and fired similar to a rifle and the horizontal bow is mechanically held at full draw until the trigger is pulled. Depending on the sighting equipment used on the crossbow and the shooter’s ability, this arrangement allows for a potentially very accurate first shot.

Crossbows, in general, can shoot their arrows slightly faster than vertical compound bows and have maybe a 10-yard advantage in range for the average user. However, the two hunting tools are comparable in power and range and both are still short-range tools by nature of what they are. Both vertical and horizontal bows kill using the cutting edge of a broadhead, resulting in penetration, cutting and hemorrhaging of vital organs. We’ll present a comparison of some specifications for crossbows and compound bows later.

Some disadvantages are that the crossbow weighs almost twice what a modern compound bow does. The crossbow, because of its shape, is an awkward tool to carry through brush and cannot be safely carried in a “cocked” configuration. Cocking a crossbow can be a tedious process involving a rope “cocker” or a mechanical “winch” affair designed to deal with the heavy draw weight of the much shorter crossbow limbs. Either method of cocking is time consuming in readying a follow-up shot. Typically, a “vertical” bow shooter can accurately fire up to six arrows for every one the crossbow shooter can shoot.

A crossbow would work very well for hunters who are stationary, i.e., in a tree stand or a blind, and waiting for the animal to come to them. If the distance a hunter needs to move while carrying a cocked and loaded crossbow is limited, like traveling from a vehicle to a shooting position not far off a road or waterway, then a crossbow would also work. Any long distance walking with a crossbow would require the limbs to be uncocked for safety. If a shot presented itself, the shooter would have to stop and cock and load the crossbow, involving significant movement and possible noise.

In addition to those wishing to hunt with a crossbow, there are those older or smaller hunters who, for whatever reason, cannot draw and hold a vertical bow that meets the existing requirements for the animal they are hunting. A person who cannot use a vertical bow because of age, injury, or size can normally use a crossbow if that tool was legal.

In order to allow more opportunity for those hunters wishing or needing to use a crossbow while hunting during special hunts like the roadside "targeted hunts" for moose in Southcentral and the Interior, or while hunting in specific game management areas or state refuges around the state where either muzzleloaders, shotguns or modern firearms and bow-and-arrow are the approved hunting tools, I would ask the Board to include the use of crossbows as an additional approved hunting tool.

A crossbow does not come close to a muzzleloader or shotgun in range and power by comparison. If a muzzleloader or a shotgun is legal to use, along with bow-and-arrow, then there are no practical concerns for not allowing a crossbow along with bow-and-arrow in those areas or hunts which also allow a firearm of some sort.

I think the bias against crossbows comes from a lot of longstanding misconceptions and misunderstandings about what a crossbow can do and how it compares to current "vertical bow" equipment. Let's look at a comparison. These compound bows and crossbows listed below are some of the newer 2016 models and are, for the most part, aimed at hunters looking to either upgrade their current tool to top-of-the-line models or get into bowhunting with a higher quality implement. These are all adult bows or crossbows.

The following tables were developed from information provided in the March, 2016 equipment issue of *Bowhunting Magazine*:

2016 Compound Bows

Make	Arrow Speed	Unit Wt.	Draw Wt.	Draw Lgth.	MSRP
Elite Impulse 31	343 fps		4.2 lbs	40-80 lbs	26-30 in. \$999
Mathews Halon	353	----	---	---	\$1099
Bear Escape	350	----	45-70	25.5-30	\$900
Hoyt Carbon Defiant	331	3.6	40-80	24-30	\$1499
PSE Carbon Air	340	3.2	50-70	24.5-30.5	\$1500
Bowtech BT-X	350	4.1	50-80	25.5-31	\$1099
Prime Rize	335	4.3	40-70	26-30	\$1049
Martin Hellfire 35	328	4.75	50-70	27.5-31	\$949
New Breed GX2	335	---	----	25-30	\$949
APA Mamba M32TF	358	3.8	----	-----	\$979
Mission Hype DT	310	3.9	13-70	19-30	\$599
Obsession Def-Con 6	360	4.2	30-70	23.5-30	\$999
Cabela's Credence	325	----	50-70	26-30	\$429
Bear BR33	330	----	45-70	27-32	\$900
Elite Impulse 34	340	4.4	40-80	27-31	\$999
PSE Inertia	348	3.9	50-70	24.5-30	\$800
Mathews No Cam	326	<4.0	----	----	\$999

HXT

Diamond Deploy SB	330	3.2	50-70	26-31.5	\$749
Hoyt Defiant	331	4.0	40-80	24-30	\$1099
SA Sports Vulcan	310	-----	25-70	17-31	\$349

2016 Crossbows

Make	Arrow Speed	Unit Wt.	Draw Wt.	Draw Lgth.	MSRP
TenPoint Carbon	385	7.8	165	----	\$1799
Nitro RDX					
Barnett Whitetail	340	6.2	160	12.5	\$449
Hunter					
Wicked Ridge	320	6.6	155	----	\$449
Warrior G3					
Horton Storm RDX	370	----	165	----	\$1049
PSE RDX 400	400	7.9	165	17	\$1100
Browning Zeroseven	370	7.2	145	14 5/8	\$1400
Onesixtwo					

2016 Crossbows (con't)

Make	Arrow Speed	Unit Wt.	Draw Wt.	Draw Lgth.	MSRP
Darton Toxin 180	400	----	185	18	\$1050
Stryker Katana	385	6.5	155	13	\$1149
Excalibur Matrix	400	----	280	14	\$1299
Bulldog 400					
Mission MXB-Sniper	310	<6.0	150	14	\$599
Lite					
Carbon Express	320	6.9	165	----	\$400
X-Force Advantex					
Cabela's Instinct	350	6.4	----	----	\$1200
Order					
Arrow Precision	385	7.85	185	14	\$550
Inferno Flame					
Scorpyd Ventilator	440	8.1	175	18.5	\$1530
Extreme					
Velocity Archery	370	8.0	185	14	\$540
Justice					

TenPoint Turbo GT	350	6.5	----	----	\$799
Killer Instinct	370	>7.0	----	----	NA
Furious 370FRT					
Barnett Razr Ice	380	7.2	185	14.125	\$1300

The average velocity of an arrow shot from the 20 compound bows listed is 337 fps. The average velocity for a bolt (arrow) fired from the 18 crossbows listed is 369 fps. These velocities were taken using industry standards and are comparable. The compounds averaged 4 pounds in weight while the crossbows averaged 7 pounds. The compounds averaged \$947 as MSRP while the crossbows averaged \$980. **The crossbows (all considered hunting crossbows) also averaged a draw weight of 175 pounds.** As you can see, crossbows do not have a significant advantage in velocity or shooting distance over compound bows, which are currently legal for use in any “bow-and-arrow” hunt.

A couple of decades ago, traditional archers had a problem with allowing compound bows as legal archery hunting equipment. That issue was eventually resolved. But by comparison, most traditional bows (long bows and recurves) average arrow velocities between 160 to 250 fps, depending on arrow weight. Compare that to the average listed velocity for compound bows. There is a much larger disparity in velocity between traditional bows and compound bows than between compounds and crossbows.

Fish and Game is neutral on allowing the addition of crossbows to the mix of gear types, but opposes making the regulation statewide. That puzzles me! What’s more unique about an antlerless moose hunt in Unit 20 that distinguishes it from a similar hunt in Unit 14, for instance?

A somewhat similar analogy would go like this: if you fish with rod and reel, you can use fly fishing, spinning and baitcasting gear in one region, but only fly fishing and spinning gear in an adjacent region – no baitcasting gear allowed there. Why? What’s the difference? Does that make sense?

Basically, all I’m asking is to allow a specific type of hunting tool to be used during certain types of non-general season hunts where it is not currently legal to do so.

Submitted By
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3/2/2016 1:53:35 PM
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Comments on Proposal #75: Allowing the use of crossbows and blackpowder cartridge rifles in bison hunts, from the proposer,

Howard Delo

My commentary on allowing the use of crossbows to hunt bison is the same as what I submitted in my comments on Proposal #14. I would refer you to that public comment and I will not repeat it in depth here.

The bison hunts are currently all drawing permit hunts. Thousands of applicants apply every year for the very limited number of permits. For many resident hunters and all non-resident hunters, drawing an Alaskan bison permit and being able to hunt the animals is a once-in-a-lifetime opportunity. Given this unique situation, many permit holders would like to use the hunting tool of their choice, providing the selection meets criteria specified by ADF&G.

Quoting from the ADF&G website which outlines "Weapons Legal for Bison Hunting:"

"Bison may be shot with any centerfire rifle or handgun, muzzle-loading rifle, or bow-and-arrow that meets the criteria listed below:

Rifle/handgun: must fire a 200-grain or larger bullet, which retains at least 2000 foot-pounds of energy at 100 yards. A .30-06 with a 220-grain bullet is about the minimal weapon that meets this specification.

Muzzleloader: Muzzle-loading rifles must be .54 caliber or larger, or at least .45 caliber with a 250-grain or larger elongated slug. Further, for safety reasons, those hunting with muzzleloaders must also have within easy reach a smokeless powder rifle meeting the centerfire rifle requirements listed above.

Bow: Longbows, recurve bows, or compound bows are permitted, but they must have a peak draw weight of 50 pounds or more. Arrows must be at least 20 inches in overall length, and tipped with unbarbed, fixed or replaceable-blade type broadheads. Arrow and broadhead together must weigh at least 300 grains total weight. ADF&G strongly recommends that bowhunters have a rifle close at hand."

Since crossbows are classified in a separate category and can only be used in general season hunts, they are not legal to use for hunting bison. As my commentary on Proposal #14 states, crossbows can shoot arrows a little faster than compound bows which results in a small practical range increase, making crossbows every bit as effective as currently legal bow-and-arrow equipment for hunting bison.

The regulations governing the rifle/handgun category are based on kinetic energy calculations as applied to modern, smokeless powder firearms. In the early years of bison permit hunts, the ADF&G biologists were seeing a high wounding loss, most likely because of poor bullet penetration on these large animals. A lot of the wounding loss was caused by hunters using the 7mm Remington Magnum cartridge – a cartridge which relies on a very high velocity to deliver hydrostatic shock and hemorrhaging to the vital organs. Hunters were often utilizing a relatively light-weight bullet while hunting (personal communications from ADF&G biologist).

However, to perform properly, the bullet needs to hold together to provide the penetration necessary to kill the animal. Bullet technology has come a long way in developing bullets which don't fragment and penetrate much better than most bullets used 20-30 years ago. The current modern cartridge kinetic energy calculations rely heavily on the high velocity of the modern cartridge (usually around 2800 fps or more) and less on the bullet weight to develop the energy necessary to humanely kill the bison.

Blackpowder cartridge rifles, on the other hand, fire a large, heavy-for-caliber weight lead bullet at a much more moderate velocity (in the range of 1200-1600 fps) and rely on the momentum of the large bullet to assure deep penetration. The heavy lead bullets rarely fragment and deep penetration is the normal result. See the accompanying data sheet from the ADF&G Hunter Education muzzleloading course comparing blackpowder cartridge rifle bullet weights and penetration in the same test medium to both 50 and 54-caliber muzzleloaders (Appendix A). I participated in this shooting experiment and all the data for the 54-caliber muzzleloader was fired by me from my rifle.

The test medium used in the Appendix A penetration test consisted of a piece of truck tire intertube, to simulate skin, stretched over a piece of ½-inch plywood, which simulated the shoulder blade. Immediately behind the plywood, approximately 20+ inches of water-soaked telephone books were tightly packed into a wooden framed box. The idea was to attempt to simulate a broadside shot at an animal the size of a moose. As the phone books became shot-up, they were replaced with undamaged, water-soaked books.

The loads showing 21.5+ inch penetration in the table were total pass-throughs, exiting the back of the box. The blackpowder cartridge loads used for the two blackpowder cartridges represented (45-70 and 50-90) would be typical hunting loads (using the heavy lead bullets) and showed much better penetration than any of the muzzleloader loads in both 50- and 54-caliber shooting round balls (the 54 caliber loads, with round balls, are currently legal to use when hunting bison). Regarding penetration, the blackpowder cartridge loads tested equaled the 375 H&H modern cartridge by comparison.

During the main commercial bison hunting period of roughly 1865 to 1880, literally millions of bison were slaughtered for their hides or, sometimes, only their tongues. All of this killing was accomplished using blackpowder cartridge rifles, for the most part -- some muzzleloaders were used early in the period. One of the larger blackpowder cartridges (50-90; commonly referred to as the Big 50) was developed specifically to provide greater range and penetration to kill bison, often with a single shot, at ranges as far away as 600-700 yards. Most professional hunter tried to keep shots under 200 yards if possible, to assure good shot placement.

Blackpowder cartridge rifles are currently viewed under the bison firearms requirements as modern centerfire rifles, however, the ballistics generated here are essentially the same as an equivalently loaded muzzleloading rifle. As a certified ADF&G Hunter Education Muzzleloading Instructor, I teach in my classes that the ballistics are essentially the same in equivalent loadings between the two types of firearm.

Here's a quote from the 1/2007 version of the ADF&G Hunter Education Muzzleloader Instructors Notebook: "Let's talk briefly about blackpowder cartridge rifles. **Can a blackpowder cartridge rifle have a more effective range than a muzzleloading rifle? The answer is no.** Even though the cartridge rifle has a cartridge that is fully assembled prior to the hunt and a muzzleloading rifle is loaded in the field with all the components separate, the end results (velocity) will still be the same. **If you take 90 grains of blackpowder and a 400 grain 50 caliber bullet it will have the same ballistic properties (velocities, trajectory) regardless if it is shot from a sidelock [percussion], flintlock, in-line, or blackpowder cartridge rifle.**"

This same point is made in the current student manual, *Today's Muzzleloader Hunter*, on page 18, under the heading: Comparing Muzzleloaders to Conventional Firearms: "The practical logistics of loading and firing are much slower [for a muzzleloader], reducing the number of shots that can be taken. **Shooting a blackpowder cartridge rifle can reduce the time lost in the traditional loading process, although velocity is not improved.**" Material from these two quotes appears in two test questions on the muzzleloading course written test.

While a blackpowder cartridge rifle might look and operate similarly to a modern, smokeless powder firearm, the ballistics are virtually the same as what would be generated from a muzzleloading rifle of equivalent caliber and barrel length, and using the same components. The statements above refute the last sentence in the department's comments about how "Blackpowder cartridge rifles...are closer to modern centerfire rifles than muzzleloaders." Maybe in looks and operation, but not in ballistics!

In the original proposal, I specified specific calibers to become legal which were used in the second half of the 1800s to hunt bison. However, as I researched the topic in more depth, I discovered a lot more blackpowder calibers which were also used to hunt bison. Rather than specify specific calibers and possibly deny some permit holder the use of a preferred blackpowder cartridge rifle in his once-in-a-lifetime hunt, I would like to propose a little different intent language for how the regulation could be worded:

Any blackpowder cartridge 45-caliber or larger, using a lead grease-grooved or lead paper-patched bullet weighing 350 grains or more, and loaded with 70 or more grains of blackpowder or a recognized blackpowder substitute can be used.

I considered specifying a true 44-caliber minimum (.446) which would then include the 44-77 and 44-90 blackpowder cartridges, both of which were popular bison hunting calibers back in the day, but to stay comparable to the muzzleloading requirements, I bumped up the caliber to 45.

In his book, *Shooting Buffalo Rifles of the Old West*, author Mike Venturino, arguably the preeminent blackpowder cartridge rifle expert currently writing for the modern gun press media, quotes the 1878 Remington catalog about what constitutes a buffalo rifle, “ To all classes of hunting rifles previous remarks apply, except for Buffalo and other wild game usually hunted for their hides and fur. For such a heavier ball is necessary. For this purpose the .44 cal., 77 grains; .45 cal., 70 grain; or .50 cal., 70 grains are best suited. These should be centre-fire, on account of the convenience in reloading in the woods. The barrel ought to be not less than 30 inches to 34 inches in length, and weight of the rifle not less than 10 to 12 pounds.”

All other provisions currently specified for hunting bison, like having a modern backup rifle handy that meets requirements and having a backup hunter, would remain the same. All I am asking is that two new categories of hunting tools be added to the list of legal “weapons” with which to hunt bison.

Appendix A

HUNTER INFORMATION AND TRAINING PROGRAM

Firearm/caliber	Bullet diam/style	Weight	Rec. wt./diam.	Velocity	Penetration	Propellant	Temp	Date	Distance	Caliber
1874 Sharps 50/90	510 cast lead flat nosed	450	Unrecovered	1459	21.5+	100 FFg	19			50/90
1874 Sharps 50/90	510 cast lead flat nosed	515	Unrecovered	1268	21.5+	90 FFg	19			50/90
1874 Sharps 50/90	510/cast lead flat. Pt.	500	Unrecovered	1309	21.5+	90 gr. FFg				50/90
1885 Browning 45/70	458 cast lead flat nosed	300	298.8/458	1429	19.5	70 FFg	19	11/2/1999	50yd.	45/70

1885 Browning 45/70	458 jacketed hollow point	300	251.6	1786	12.75	Factory smokeless			45/70
1885 Browning 45/70	Diam?/ 400 gr. Cast lead ft. Pt.	400	Unrecovered	1216	21.5+	66.3 CTG			40/65
1885 Browning 45/70	458/cast lead flat pt.	411	Unrecovered	1249	21.5+	65 gr. FFg			45/70
1885 Browning 45/70	458/cast lead flat pt.	492	Unrecovered	1146	21.5+	60 gr. FFg			45/70
Knight Disc .50	.429 jacketed hollow point sabot	259		1746		150gr. Pyro pellets			50 cal.
Knight Disc .50	Diam?/374 sp. Pt. Lead sabot	374	374	1274	12.25	100 gr. Pyro.pellets			50 cal.
Knight Disc .50	diam?/Cast lead H.P.	410	406.2	1170	19.75	100 gr. Pyro.pellets			50 cal.
Knight Disc .50	.429 jacketed H.P. (XTP)	240	199.5/?	1983	10.5	150gr. Pyro pellets			50 cal.
Knight Disc .50	diam?/Pt. Lead w/ sabot	374	374	1357	12.25	100gr. Pyro pellets			50 cal.
Knight MK- 85 .50	diam?/jacketed H.P w/ sabot	269	257.9/.750	1420	10.6	100 gr. Pyro RS			50 cal.
Knight MK- 85 .50	.490/round lead ball	177	177	1800	9.25	100 gr. Pyro RS			50 mzd
Knight MK- 85 .50	.490/round lead ball	177	177	1530	10.13	75 gr. Pyro RS			50 mzd
Knight MK- 85 .50	.490/round lead ball	177	177	1234	11.5	65 gr. Pyro RS			50 mzd
Knight MK- 85 .50	.490/round lead ball	177	177	1175	9	55 gr. Pyro RS			50 mzd
Knight MK- 85 .50	.490/round lead ball	177	177	882	6.88	45 gr. Pyro RS			50 mzd
Lyman Great Plains .54	.530/round lead ball	226	225.9	1623	10.9	100gr. FFg			54 mzd
Lyman Great Plains .54	.530/round lead ball	225	224.2	1412	13.4	65gr. FFg	22	11/3/1999	54 mzd
Lyman Great Plains .54	.530/round lead ball	225	225.7	1494	11	75gr. FFg			54 mzd

Lyman Great Plains .54	.530/round lead ball	225	224.7	1536	12.75	85gr. FFg	54 mzd
Lyman Great Plains .54	.530/round lead ball	225	225.2	1701	11.13	110gr. FFg	
Lyman Great Plains .54	.530/round lead ball	225	225.1	1762	8.68	120gr. FFg	54 mzd
Sako 75 .375 H&H	.375 Winchester Fail-Safe h.p.	270	Unrecovered	2657	21.5+	Factory smokeless	.375 H&H
Savage 116 FSS .308 W.	.308 Nosler sp. Pt.	180	134.4	2625	18.63	Factory smokeless	308 Win.

Submitted By
 Ivan Clark
 Submitted On
 2/8/2016 2:05:08 PM
 Affiliation

Dear Board of Game members.

I appreciate the opportunity to comment and am submitting the following comments for consideration.

Thank you.

Ivan Clark

Proposal 21-26 - Spotting sheep from the air – Oppose All

I oppose all proposals. The BOG should take no action and leave the rule as currently adopted until a justifiable hardship is actually documented. I would like to see what the actual effect of this has on success vs. anecdotal evidence. According to ADFG harvest stats 2014 and 2015, residents using private or contract aircraft (air taxi) had the same success, at about 40% during both 2014 and 2015 seasons. Private aircraft users had a shorter time (days hunted) for success, and actually had a shorter time of success over guided non-resident hunters.

NR success attributed to aircraft is difficult to determine, but comparing 2014 to 2015 data, the success rate was basically unchanged.

I oppose all these proposals because the use of aircraft does not appear to hinder success rate, and adds to a more aesthetic hunting experience for all. Last fall what the least amount of air traffic I've encountered during sheep season.

Proposal 27 – change legal age of sheep to 9 years - Oppose

This proposal (and others similar) is unnecessary. Until we have actual data to prove that harvest of 8yo rams is a significant biological factor to herd health, no change should be considered.

ADFG has accumulated harvest data on horn curl approximation since 2006 (see summary table below). Length of curl is determined by trained eye, and is segregated by: less than 3/4, 3/4 - 7/8, and 7/8-FC. I've reviewed and summarized this data from harvest information supplied by ADFG. The total number of rams harvested which are sub-full curl, but age legal, averages approximately 45 per year. The total take of age legal, sub-full curl rams averages about 5-6% of total take each year. I believe the first year of data (2006) may have some error included in the reporting due to a new policy of sealing and difficulty determining age and FC by biologists unfamiliar with a structured method. The following years 2007-2013 appear to be more representative and within expected deviation.

ALL	Total number of Rams NOT full curl or broomed, killed in HT areas														all harvest	% of Total Harvest		
	4	5	6	7	8	9	10	11	12	13	14	15	16	17			Total	
Age																		
2006					31	36	21	2	0	0	0	0	0	0	0	90	777	12%
2007					20	14	5	4	2	2	0	0	0	0	47	869	5%	
2008					19	11	11	3	1	1	0	0	0	0	46	799	6%	
2009					17	11	1	2	0	0	0	0	0	0	31	787	4%	
2010					31	17	9	4	0	0	1	0	0	0	62	740	8%	
2011					23	19	11	5	1	0	0	0	0	0	59	797	7%	
2012					18	11	5	1	1	0	0	0	0	0	36	712	5%	

2013				14	14	1	0	0	0	0	0	0	0	0	0	0	0	29	692	4%
Average				20	14	6	3	1	0	0	0	0	0	0	0	0	0	45		6%
% of all Sub-FC				46%	31%	14%	6%	2%	1%	0%	0%	0%	0%	0%	0%	0%	0%			

Data provided by ADFG 2014

Proposal 28 – Change Definition of Bag Limit – Oppose

See response to Proposal 27. There is no biological need for changing the definition of a legal ram. Further this proposal wishes to justify trophy hunting as a means to increase the number of larger rams on the mountain. Increasing harvestable surplus, does not comply with sustained yield. Further it assumes that all rams will achieve a curl length of 38 inches. Judging curl is difficult enough in the field as is age, adding a layer of complexity could lead to an increase the instances of shoot and leave on the mountain. Neither age nor length of curl could be determined for certain until the animal is dead. Further, horns shrink.

“What is the issue,” includes anecdotal information, with zero substance to back up percentages. I’ve heard the 10% sub-legal harvest number tossed out. I’ve also heard ranges of 5-12%. Which is correct? I believe this number is continually inflated to justify reduction of harvest. I recently reviewed Trooper reports for the last 2 years (and have reviewed them previously for years 2012 and 2013), and on average there are approximately 3-7 sub-legal rams reported (7 in 2014, only 3 in 2015). I’m unsure if others are cited and not reported/registered in the Trooper Reports, but I don’t think we have an epidemic of sub-legal rams being harvested. 10% would be 60+ rams a year! Further, there is no evidence to suggest that 10% of sheep are shot and left after harvest. An assumption based on anecdotal evidence of sub-legal harvest is just that... an assumption. I like to think most sheep hunters have more integrity than this. I have no other means to determine actual count of sub-legal ram harvest, the Department or Troopers may, but I don’t think they specifically track this number. In the future this is something that may be helpful for management in the future. ADFG reports sub-legal rams as “red tag” and they are then turned over to the Troopers, who issue a citation or not. I do not know if an actual record of the red tags are kept. I believe the 10% harvest of sub-legal rams stems from ADFG biologists remarking that they “red tag” 7-10% of rams? I’ve heard this number from biologists in Anchorage and Fairbanks. Red tag does not equal actual sub-legal harvest.

Additionally, the total number of hunters who kill more than 1 ram in 4 years is approximately 3-4% of all hunters. This data is readily available and could be mined by ADFG, they can analyze these hunting records to determine the actual impact to harvest or hunter reduction. I urge the Board to ask for this analysis before any such restrictions are applied to justify harvest or reduction in perceived hunting pressure. I think you would see the impacts being negligible, but rather “feelings” being validated.

If hunters are limited to 1:4 then guides should as well, not just their hunters who 98% will never return to hunt sheep anyway. How else would this have an impact on NR hunters? Lastly, upon speaking with ADFG staff involved with brown bear regulations in unit 9, specifically about the 1:4 regulation and spring/fall split seasons. The consensus was the 1:4 had little impact on actual harvest; the majority of impacts to harvest were due to the split seasons. The 1:4 was adopted first followed by the split seasons. The 1:4 was perpetuated and the perception is that it had an effect on harvest, whereas, it has very little effect. Nonresidents account for roughly 80% of all brown bear harvest in the state, very few hunters shoot more than one bear in their lifetime. The 1:4 rule was feel good regulation with a minor impact to a very small population of hunters.

I urge the Board to research this data further before making an assumption that a 1:4 or similar harvest suggestions (1:3 etc.) as it will have very little impact on hunting pressure. Further it will only serve to ostracize the hunters who are passionate about sheep and sheep hunting. A 1983 survey on sheep hunting was conducted by ADFG (Sarah Watson, ADFG staff), the result was 45% of resident sheep hunters are hunting their first time each year. I reviewed the last 11 years’ worth of historical harvest data with similar information from ADFG (2005-2014) and inferred that about 65% of resident hunters are going for the first time each year. Also, 78% of all resident sheep hunters have hunted 2 times or less in the last 11 years, **67% have not killed a sheep**. Approximately 8% of all resident sheep hunters have killed more than one sheep in the last 11 years, and **only 3% have killed more than 2 in the last 11 years!** It’s clear that we have a really small population of sheep hunters who are truly “sheep hunters,” and a revolving door of first-timers. The vast majority are complaining (lack of harvest, or crowding) about something they can personally control (their effort) without regulation.

Proposal 30 – Support

See my response for Proposal 29 for 1:4 year restrictions. For NR, the amount of NRs who harvests more than one ram in 4 years is about 30 hunters, or a reduction in non-resident hunters would be about 10 a year. This proposal will have basically zero effect on sheep harvest, or hunters in the field. It will have a bigger impact to next-of-kin hunters who seem to return to hunt more than guided hunters.

Proposal 31 – Oppose

Keep draw allocations as are, no restriction on time beyond the current one year wait. Trying to make people hunt the tag they draw, will

increase the number of people who are actually in the field and consequently it will likely increase harvest. By increasing harvest, the Department would need to reduce permit numbers, in effect, reducing draw odds.

Proposal 32 – Strongly Oppose

Justifying a draw because other states have a drawing is no reason for a draw. No biological need exists to support drawing for everyone. 67% of resident and 88% of NR hunters are going on their first and likely only hunt each year. What exactly will a draw provide?

Proposal 33 – Oppose

I oppose this due to extending the season. We don't need to kill more sheep; no do I believe we should have a NR only season.

Proposal 34 – Support with Amendment

I support this proposal with one exception. The start date should remain August 10th, extending the season is unjustified. The limitations on permit allocations could be challenging to manage, but overall I like the concept. I'm not sure how much it will reduce crowding, though; it will just push out majority to the rifle season "opener." Not many hunters chase sheep with short range weapons and we have ample opportunity in a dedicated archery only corridor for sheep, already. The hunters who walk in, will get to go a week earlier, the result will be no change in crowding. The walk-in and short-range hunters will have very little impact the guys who fly or use other means of transport. It will spread out time of opportunity, but I don't see it reducing crowding, but may slightly reduce harvest.

Proposal 35- Support

I like this concept, however lets let hunters decide on what season they want to hunt. If you look at last names starting letters, you'll find that statistically half are not A-M and the other half N-Z. About a 67/33 split. That split could be adjusted however.

I would much rather be able to choose which season I can hunt, so that my hunting partner can hunt with me. Tracking by computer would be simple.

Proposal 36-49 – Take no action.

Please take no action on these proposals until the Sheep Working group has made a decision.

Proposals 96, 97, 98 – Drawing, point systems – Strongly Oppose

I strongly oppose any sort of point system for Alaska special permits. Point systems continue to fail in the L48, and are subject to reevaluation and consequently adjustment on a regular basis. There isn't a point system in the L48 that hasn't been changed at some point to make it more "fair" to those who still can't draw a permit. I'm opposed, mostly due their ineffectiveness, and the amount of people they eventually eliminate by sheer odds. No one should be eliminated from a chance at a once in a lifetime permit. Longevity of application failure is no reason for selfishness.

Please keep the drawing system the way it's currently regulated. It's fair for everyone, young and old, novice and expert alike. No one deserves a permit because they've applied for so long. Those hard to draw tags will get easier to draw for those who get in on the ground floor of a point system, but after a few years the demand will far outpace the supply, point holder numbers will rise and you'll see point creep. The creep will eventually outpace attrition, and the odds of drawing those same tags will return to pre-point draw odds. Children who are 10-15 points behind the max point holders will never have an equal chance at those permits. With a straight lotto system, it's fair for everyone, now and forever.

An option to increase draw odds would be to reduce the total number of permits an individual can apply for. Reduce it to one application for hard to draw tags such as Kodiak bear, goats and sheep. That will increase draw odds much greater than the point system. In some cases draw odds could increase by 2-3 times.

I would urge the Board to pass a regulation to ban the implementation of any sort of point system, now and in the future.

Proposal 101, 107 – Support and/or amend.

I support these proposals. We have set precedence on many draw permits throughout the state (Tok sheep as recent as last year) for 10% of permits issued to NR. All draw permits should be issued similarly, and I believe that the BOG has established a minimum allocation.

If no action is taken, I propose a minor change, to allow any unissued NR tags to be allocated to the resident draw. Meaning leftover NR tags could be issued to residents, or allow residents to apply for the NR permits if they purchase a NR locking tag upon success.

The Alaska Board of Game Must Go 3/14/2015
Alaska Dispatch News Opinion by James Kowalsky

The Alaska Board of Game must be replaced. Denial by the board of the petition for reinstatement of the Denali wolf buffer following its removal of that buffer in 2010, and earlier repeated denials to even consider reinstatement, is hard core warfare on wildlife and the Alaskan public. Alaska has a long history of blatant non representation of its larger public and of our spectacular wildlife legacy by decades of boards made up entirely of a small sector of our public. Hunting and trapping interests have dominated past and present boards appointed by past governors and approved by legislatures. However, upwards of 80% or more of our Alaskan public are non consumptive wildlife “users.” Unrepresented for so long, many are likely even unaware of any such board.

Our Alaska Constitution states wildlife is intended for “common use” by all Alaskans. Clearly all Alaskans are stakeholders in how Alaska wildlife is managed. Beneficial uses besides those of the hunter and trapper that should be available to all Alaskans include wildlife viewing, photography, wilderness adventuring, scientific research and of course tourism which is a large presence in our Alaskan economy. In a changing world growing enormous urban populations, Alaska’s wildlife and wilderness profile if really cared for wisely will drive a fierce demand for access to its wild country and wildlife and surely become the major presence in Alaska’s economic future.

In contrast only a small public is usually accommodated by this board, this exclusive little exclusionary fiefdom known for arrogance and dismissive of requests for non consumptive scenarios. Board refusal to hear years of past buffer reinstatement requests and the recently denied emergency petition to reinstate the Denali wolf buffer is a reminder of the difficulty of having to go before what has become a rogue agency to make pressing non hunting non trapping requests.

And who represents the interests of wildlife in all this? Were I a wildlife creature I would consider the Board of Game wallowing in its extremist

ethical and moral squalor to be a veritable wildlife terrorist cell, a predator, a virtual death panel ordering wholesale slaughter of bears and wolves chasing them by aircraft to exhaustion, killing entire families. An ongoing predator holocaust is what Alaska has to show to the world! Effort to ensure that the nation and the world sees this board inflicted ongoing carnage is absolutely guaranteed. For Alaska and for business, it will be an earned but unnecessary black eye and it won't be pretty.

Governor Walker has indicated in recent actions that he wishes to see boards and commissions as representative bodies; boy does he ever have one that is so clearly out of whack! This Alaska Board of Game is a virtual proxy hunting and trapping club. Now Governor is your chance. Board members would do the larger Alaska stakeholding public its only true public service: walk out, never ever come back. Alaska's wildlife legacy is ours not yours, all us Alaskans, not just that of the 15% and not that of this little club of regulatory extremists. All Alaskans must be welcomed as the stakeholders that they truly are.

James Kowalsky

Is a 45 year Fairbanks resident, wildlife advocate and activist.

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Comments to Alaska Board of Game on proposals it will consider March 2016

Submitted by James Kowalsky representing self

PO Box 10640 Fairbanks, AK 999710

907 488 2434

submitted 3/4/2016

Proposal # 78: OPPOSE Remove requirement to ID traps. This proposal is ridiculous on its face asking that trappers remain anonymous in face of rising trapping conflicts involving a growing disapproving public. What quicker way to trapping's demise than to ask to be excused from accountability?

Proposal # 79 SUPPORT. Require 24 hour limit on checking traps. Guidelines exist now only as suggestions, made by trapping organizations and the ADFG which indicates knowing concern over abuse. Guidelines need become actual regulatory requirement to have any meaningful result. Abuse results in absence of requirement as trapping conflicts with public uses of public lands also used for trapping are rising dramatically. Trappers themselves should be asking for this regulation as a matter of survival.

Proposal # 80: SUPPORT Require distances for traps set in proximity to public use areas and communities. Trappers need standards required, not only as advice. Trapping conflicts arise from traps set too close to other public users. Bring some standards to trapping and make reasonable requirements for distances such as proposed here. Do not leave this to trappers' discretion as advice only. .

Proposal # 142: OPPOSE Reauthorize Intensive Management (IM) predator control, GMU 13, A through E. The excessively



high costs of IM predator control throughout Alaska vs. the limited to even no results over many years is becoming general public knowledge. This situation by itself is untenable. But given the budget chaos faced by our state, its an ESPECIALLY ridiculous. Proposal. The ADFG who made this request should know better than to ask. ADFG judgement seeking outrageously expensive actions as this is highly questionable on its face.

Submitted By
James SHERIDAN
Submitted On
1/30/2016 2:01:48 PM
Affiliation

PROPOSAL 5-5AAC 92.990(a)(26). Definition. Modify the definition of edible meat for all game birds. **OPPOSED** to the proposal. Proposal 5 intends to apply the same rules to small game birds taken for sport and personal use as those small game birds taken for the subsistence purposes. The definition of subsistence as found in Webster Dictionary speaks of that which furnishes support to the existence to life. Apparently the AMBCC adopted the regulation that almost the whole bird must be kept when the bird is taken in the Spring hunt because that bird is supposed to be needed to meet the hunter's need for food. It should be noted that the birds referred to here are referred to as GAME birds, not subsistence birds. Webster in defining "game" birds refers to animals usually taken in the "chase" or in the sports of the field, it does not refer to animals taken for subsistence. The AMBCC apparently recognizes the difference between the Spring hunt being for birds taken primarily for food and in the Fall hunt the birds being taken for sport and food. No hunter I know can justify the cost it takes to obtain a bird in the Fall hunting season as needed for food, whether it is an upland bird or waterfowl. Therefore I believe the AMBCC recognize that the birds taken in the Spring are solely for food and there should be a higher standard in what parts of the birds must be utilized. Also I never eat the gizzard, heart or liver of a bird, whether it is from the Thanksgiving turkey or Mallard duck. And also there are suggestions that eating organ meat can be harmful.

PROPOSAL 60-5 AAC 92.080. Prohibiting hunting with domestic dogs. **OPPOSED** This a poorly thought out proposal that only applies to a dog when it is taken hunting. The same dog or any dog can be running in the woods, at a competitive event, or simply be taken for a walk and what this proposal is supposed to protect the wildlife from, the wildlife would still be exposed to. Also I expect that there are more dogs being taken for walks in the woods or being used to pull a dog sled, than there are being used for hunting. A Labrador Retriever that is being taken for a walk is more likely to pass a tick to wildlife than one being used in the marsh.

Submitted By
Jed Zimmerman
Submitted On
3/3/2016 5:24:10 AM
Affiliation
Mr.

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Vote YES to approve a shortened hunting season adjacent to Denali National Park to help protect wolves. Vote yes on Proposal 141.

Submitted By
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3/1/2016 6:47:53 AM
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To the Board of Game. Vote YES to require frequent trap-checks and ban trapping near cities and recreational areas, and vote NO to removing trap id requirements, OPPOSING PROPOSAL 78. AND PLEASE SUPPORT PROPOSAL 79 AND PROPOSAL 80.

Thank you,

Jed B. Zimmerman

Submitted By
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1/15/2016 9:50:32 AM
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I support proposal 55; the statewide limit of 1 Brown/Grizzly Bear every regulatory year. I believe that the population in Region 1 where I do most of my Brown Bear hunting has greatly increased. Other than the Mountain Goat in the high country, the two major animals you encounter are the Brown Bear and the Wolf. I believe from personal experience that the Black Bear and Deer are on serious decline due to predation from the Brown Bear and Wolves. One other point I would like to make is that for older hunters over 60, like myself, a four year wait is just too long.

I strongly support proposal 64 for the statewide baiting season of Brown/Grizzly Bears where they co-exist with Black Bears. I have hunted exclusively with a bow and arrow for the last 35 years. Hunting in an elevated stand would be a very safe way to hunt Brown Bears. One could judge size, hide condition and whether or not a sow had cubs with it or not. This is much the same as a bowhunter judges a Black Bear from an elevated stand over bait. Guides that I have talked to that have baited Brown Bears in the open units say that the bears become very wary and success is actually low. This would not decimate the bear population.

I strongly oppose proposal 69 banning the use of hunting dogs in Alaska. Obviously, the person proposing this hates dogs. In the Alaska department of Fish and Game manual (A Field Guide to Common Wildlife Diseases and Parasites in Alaska) it lists several parasites that have to cycle through a canine (ie; Wolf or Fox) before a herbivore becomes infected. These parasites and diseases are already here. He also mentions the spread of ticks from dogs. In a remote fly in area of Unit 1B, I shot an unhealthy looking Pine Squirrel in 2014. It had several ticks on it. They were not the classic wood ticks that get on humans but smaller, more like the deer tick. I would imagine the ticks are working their way into Southeast Alaska via wild animals from British Columbia. A well cared for hunting dog has way less chance of harboring parasites than the uncared for pot licker roaming around loose. This proposal discriminates against hunters and their dogs. What about all the sled dogs in Alaska running through the country?

Thank you for taking the time to read these comments.

Submitted By
Juliette boselli
Submitted On
3/3/2016 4:05:03 PM
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I would like to comment on proposal 141, to shorten the hunting season for wolves on state lands north of Denla National Park. Protecting wolves in the spring could have a big impact since many hunters are then in the field and also potentially would protect pregnant females. Denali Park wolves often leave the boundary of the park and it is vital that the state takes a roll in protecting these wolf populations that are important to a huge tourism industry in our state that relies on their very existence and values their protection. I support this change and encourage it being effective this year. I also would go further and request that the hunting season be shortened to end March 15 and also end the trapping season then as well. I also think the area should be enlarged even further to better protect wolves that wander across The Park's boundary. I have been a Denali resident for over 20 years and I own and operate tourist based businesses. It is clearly evident to me that Denali wolves are a huge part of what makes our state special and serves a large tourism industry that values their presence. The state has an obligation to our tourism industry, to the residents of our state and to anyone who has ever bragged about our states vast wilderness to protect the very essence of what makes our state special, free roaming wild wolves.

Submitted By
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Submitted On
3/3/2016 4:23:32 PM
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Thank you for taking my comments,

I would like to show my opposition to proposal 78: trappers have an obligation to clearly mark their traps and post that traps are in the area for the safety of everyone who may come in contact with them, including their pets. It is hard to imagine that this is a hardship given the seriousness of a deadly trap.

I support proposition 79: traps should b checked within 24 hours for obvious humane reasons! Animals can suffer long painful deaths for days, sometimes weeks, when traps are not checked often.

I support proposition 80: for safety of people and their pets traps should be a safe distance from roads , residential areas and trails. I personally know of several pet dogs that have died in traps adjacent to residential areas and pubic trails, several of them with their owners right there. There is simply no excuse for this careless thoughtlessness and it is time it officially deem it illegal to place innocent people and their pets at risk due to inconsiderate trapping practices.

Thank you again for considering my comments,

Juliette boselli



KAWERAK, INC. • P.O. Box 948 • Nome, AK 99762

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ERVING THE
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HISHMAREF
OLOMON
JTEBBINS
ST. MICHAEL
ELLER
JNALAKLEET
VALES
WHITE MOUNTAIN

March 4, 2016

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

Kawerak, Inc. is the regional non-profit tribal consortium of the Bering Strait Region. Kawerak's Board of Directors is comprised of the Presidents of the 20 tribes of the Bering Strait Region. Kawerak offers numerous programs and services to the 16 communities in the region. We offer the following recommendations to the Board of Game regarding proposals up for review in March 2016.

Kawerak, Inc. supports the following proposals and offers comments following each proposal, for the Board of Game's consideration.

Proposal 2 - 5AAC 92.990(a)(5)(A) Definitions. *Modify the definition of ATV as follows: Amend 5AAC 92.990(a)(5)(A) by deleting "operated on land weighing less than 1,000 pounds dry weight". As the proposal suggests leaving the current regulation in place will limit hunters in terms of what type of vehicles one can use. For example a side by side utility vehicle such as a Polaris Ranger 6x6 weighs an estimated 1,550 pounds. However this weight is distributed more evenly over the ground due to its extra set of wheels. Side by side utility vehicles are generally geared lower for towing/pulling and this makes them more suitable for hunting travel as they are less likely to disturb vegetation. Pounds per square inch of surface area is a more appropriate standard for All Terrain Vehicles and Utility Side by Side Vehicles.*

Proposal 5 - 5AAC 92.990(a)(26). Definitlons. *Modify the definition of edible meat for all game birds as follows. For all game birds, the meat from the breast, back, thighs, legs, wings, gizzard and heart. Example, in the fall sport hunting season for migratory birds Tundra Swans have been shot with only the breast meat removed and everything else left to waste. Swans, geese and some sea ducks are very large migratory birds. Tundra Swans can reach a weight of 20 pounds sometimes more. Besides the meat from the breast the meat of the back, thighs, legs, wings, gizzard and heart all yield a substantial amount of meat for harvest. By putting this regulation into place this will also align the sport hunting regulations with the Federal Spring/Summer subsistence regulations that are up for consideration by the US Fish & Wildlife Service Regulations Committee and eliminate any*

confusion on what has to be taken when the season changes or federal/state management authorities change.

Proposal 52 - 5 AAC 92.220(i). Salvage of game meat, furs, and hides. Clarify the requirements regarding retrieval and salvage of wounded game as follows. Repealed 7/1/2016 [A PERSON WHO HAS WOUNDED GAME SHALL MAKE EVERY REASONABLE EFFORT TO RETRIEVE AND SALVAGE THAT GAME.] Support as written.

Proposal 57 - 5 AAC 92.200(b). Purchase and sale of game. Allow the sale of brown bear hides and/or skulls by resident hunters as follows. Statewide: allow resident Alaskan hunters to sell the hides with claws attached and/or skulls of legally taken brown bears harvested in units where the bag limit is two or more bears per season. We offer the following amendment to include brown bear hides with claws attached and/or skulls may only be sold in a manner in which they were harvested. Example: when one harvests two bears in a unit which allows this the maximum number of hides with claws attached and/or skulls would be two a year. This could be traceable/enforceable by the sealing and tagging process that is already in place. The sale of hides with claws and/or skulls would include the sealing/tagging information in the transaction.

Proposal 105 - 5 AAC 92.070(a). Tier II subsistence hunting permit point system. Modify the qualification under the Tier II subsistence hunting permit point system as follows. Amend 5 AAC 92.070(a) by deleting 5 AAC 92.070(a)(1)-(3) and replace 5 with: **92.070(a) (1) the number of consecutive years in which the applicant has spent over 180 days per year in the noncommercial harvesting and preserving of wild fish and game within Alaska: 5 points are given for each year, up to 85 points.** Hunters in rural Alaska that reside in the region in which they harvest fish and game are heavily dependent upon those resources. One simply cannot go to a big chain grocery store, Wal-Mart Supercenter or a Costco to supplement their harvest if they are not as successful compared to previous years.

Proposal 106 - 5 AAC 92.062. Priority for subsistence hunting; Tier II Permits. Provide for changes in hunt type (Tier I and Tier II) to occur during the regular cycle. As the proposal suggests hunters participating in either Tier I or II are heavily dependent upon the most up to date information that does or does not allow them to participate in a harvest. Having information available on a regular cycle basis would be the most beneficial.

Proposal 131 - 5 AAC 92.015. Brown Bear tag fee exemptions. Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A.

Proposal 135 - 5 AAC 85.020(A)(20). Hunting seasons and bag limits for brown bear. Increase the number of nonresident drawing permits for brown bear in the Remainder of Unit 22. As the Proposal suggests the additional harvest of brown bears is sustainable.

Proposal 140 - 5 AAC 85.025(17) Hunting seasons and bag limits for caribou. Change the hunting season and bag limits in Unit 22. The Western Arctic Caribou Herd population has



been in decline. In the essence of conservation, residents in Unit 22 have expressed that they would be willing to have an annual limit of 20, a daily limit of 5 along with the harvest of both bulls and cows. The latest caribou data from the Alaska Department of Fish & Game indicates that the bull to cow ratio is around 40 to 100. An unforeseen result of the current regulation is hunters being cited for shooting bulls during a closed portion of the season. Adopting the new regulation would benefit all user's throughout Unit 22 by putting the old regulation back in place and would be willing to reduce harvest by about 3 percent.

Kawerak, Inc. opposes the following proposals and offers comments following each proposal, for the Board of Game's consideration .

Proposal 50 - 5 AAC 92.150 -Evidence of sex and Identity. *Remove the requirement for evidence of sex for hunts with bag limits of only one sex.* Leaving evidence of sex naturally attached to an animal in hunts where harvest is limited to one sex is the least expensive way of proving if an animal is male or female. DNA testing would be very expensive to verify whether the harvest was legal or not.

Proposal 53 - 5 AAC 92.130. Restrictions to bag limit. *Remove the restriction that wounded game counts against the annual bag limit.* If this proposal passes it would have negative impacts on all game species. If this proposal passes a hunter may shoot a moose thinking it large however once they actually step near the downed animal they realize it is smaller than what they expected. All the hunter would have to do is claim that they wounded it and move on to the next moose.

Proposal 69 - 5 AAC 92.080. Unlawful methods of taking game; exceptions. *Prohibit hunting with domestic dogs.* Before Alaska was even a state, domesticated dogs have been used in some way shape or form for hunting. Many people today still use dogs when they go hunting, fishing and camping. Example of dogs still being used today is when hunting for migratory waterfowl. Specific breeds of dogs have a sole purpose to retrieve birds in the water. If this regulation passes an unforeseen side effect of this proposal is, hunters would no longer be able to bring their dog camping or fishing with them. Dogs have not only proven to be useful for hunting, but have also proven to be excellent guard dogs keeping hunters safe and informed if any wild animals are getting too close to camp. Many people in Alaska have dog teams, and if this regulation passes it would negatively impact many kennel owners throughout Alaska as some dog team owners travel by dog team to their hunting camps.

Proposals 72, 73 & 74 - 5 AAC 92.085 Unlawful methods of taking big game; exceptions. *Establish a minimum caliber ammunition for moose, caribou & black or brown bear. Use any caliber .243 or larger for the above mentioned big game animals.* In many of the villages in rural Alaska a .222 Remington Magnum or a .223 Remington may be the only rifle that the individual owns and was probably handed down to them by their father. If this regulation is adopted it will cause an undue hardship to many rural Alaskan residents by having to travel to a larger hub community and purchase a bigger caliber rifle that more



often than not is two to three times more expensive than a smaller caliber rifle. As the price for a higher caliber rifle goes up, so does the price of ammunition. Whether using a small or large caliber center fire rifle for hunting big game, it is all about bullet selection, shot placement and knowing ones capabilities. Small caliber center fire rifles like the .222 Remington Magnum or the .223 Remington are more than capable of hitting the vitals of a moose, caribou or bear.

Proposal 79 - 5 AAC 92.095(a) Unlawful methods of taking furbearers; exceptions. *Require all traps to be checked every 24 hours.* If this proposal passes it would cause an unnecessary burden to trappers. Trappers would have to frequent the area more saturating the entire area with their scent this in turn would lessen the chance for a trapper to harvest a furbearer.

Proposal 80 - 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. *Move trapping away from cities with a population of 1,000 or more.* Trapping is proven to be a very effective means of controlling predator populations and preventing spread of dangerous diseases to humans and domesticated animals. Example, Red Fox can very easily be trapped in and around city limits in a manner that is respectful to others. A high percentage of Red Fox also carry rabies a disease that can be life threatening to not only dogs but humans as well.

Proposal 103 - 5 AAC 92.071. Tier I subsistence permits. *Require Tier I subsistence permit holders to report harvest information.* There is already a reporting system in place for Tier I that is more than sufficient. If passed this proposal will cause an undue burden to subsistence users. In rural Alaska customary and traditional uses of fish and game are already well documented and the user's have shown that they rely on the resources.

Proposal 104 - 5 AAC 92.010. Harvest tickets and reports. *Require hunters to submit a subsistence hunt report.* Customary and traditional uses , reliance of the resource, hunting and fishing areas and patterns of use for fish and game are already very well documented. This will cause an undue burden to subsistence user's.

KAWERAK, INC.

Sincerely,

Melanie Bahnke, President

Submitted By
Kendra Zamzow
Submitted On
2/23/2016 10:30:48 PM
Affiliation

ATTN: Board of Game Comments, ADFG Boards Support Section

Re: proposed changes to BOG regulations

I support the following:

2 -- defining ATV by weight limit. ATV's that weigh over 1,000 lbs, as well as those under 1,000 lbs, can damage habitat and should have restrictions placed on areas they can access.

15, 16 -- certification for crossbow hunters. This would increase hunter safety, the safety of non-hunters in the same area, and the quick and ethical killing of animals.

18 -- prohibit the use of slingbows. This would decrease wounding and increase the quick and ethical killing of animals.

27 -- change definition of legal Dall sheep. Leaving more older rams may be helpful for the populations.

58 - prohibit the use of chocolate for bear baiting. Consuming chocolate can be dangerous for dogs and other pets if they get into a bear bait area.

60 - use of northern pike as bear bait. This is a good way to dispose of an invasive species, and conforms with the "biodegradable" requirements.

67 -- right of ways. Right of ways frequently run adjacent to private property and are areas regularly accessed by people that do not hunt or trap. Prohibiting hunting and trapping in this area increases the safety of non-hunters and pets, and better protects private property.

71 -- changing this regulation allows for a better adhesion to the spirit, as well as the letter of the law regarding limits on same day airborne assistance in hunting.

79 - trap check time limit. I support this for leghold traps and snares, but believe more than 24 hours should be allowed when conibears are the trapping method, as most animals are killed immediately in a conibear. Requiring a 24 hour limit on all trapping puts an unrealistic burden on traditional trappers running long traplines in remote, unpopulated areas. A 24 hour limit on legholds and snares is particularly needed near populated areas, where there is a greater chance of pets being accidentally trapped, and a one day check requirement could increase the number of pets rescued from traps.

80 -- minimal distance from trails in populated areas. This would not only reduce the number of pets trapped, but improve relations between trapping and non-trapping communities. I used to trap, and it is not onerous to put in a trail with a sno-go or walk up a frozen creek to set traps in areas not frequented by hikers and pets.

I oppose the following:

11, 13, 14 -- proposal to include crossbows in archery only or restricted weapons hunts. Archery requires skills that crossbows do not, and some crossbows are not adequate to kill game quickly. Residents who are unable to use the bow and arrow can still participate in crossbow hunting, outside the archery only and restricted weapons periods/areas.

17 -- remove requirement for bowhunter education for those born before 1986. Age does not equate to hunting knowledge; some may be well-versed in bowhunting but others may not. An education requirement would ensure that all hunters, regardless of age, are familiar with their weapon and more likely to make a quick and ethical kill.

46 , 47-- early August hunts for sheep. Adding an extra hunt will not help the sheep population or overcrowding.

62 -- requirement to remove contaminated soil. Responsible hunters should treat the area with respect, and leave it the way they found it. There is no reason to leave smelly soil behind as an attractant.

65 - salvage of brown bear meat at black bear stations. No parts of an animal should be wasted.

66 - felt soles. The ban on felt soles should be maintained to discourage the spread of invasive species across streams.

78 -- remove identification from traps. Identification will allow law enforcement to identify trap owners if traps are set illegally. Placing identification on traps should not be a burden to trappers.

87 -- ORV use. I strongly oppose language that encourages ORV use for hunting and trapping. ORVs have made significant encroachments into areas where they have not been present before, and generally degrade tundra into mudpits, reducing habitat and the



experience of those that are not using ORVs. While it is reasonable to use ORVs to access trailheads and some areas, there should be limits to what is allowed.

94 -- require implementation of state wildlife plans before allowing radio telemetry etc. This is part of the battle between the state and federal government, and would detract from, rather than enhance, our understanding of wildlife populations and wildlife movement, and detracts from educating people about wildlife, ecology, hunting, and so forth. This proposal has no purpose in the Board of Game regulations.

Thank you,

Kendra Zamzow

Chickaloon, AK

Submitted By
Keri Gardner
Submitted On
3/3/2016 6:04:08 PM
Affiliation

Proposal 141 - Support with the addition of the four modifications as detailed in the comments submitted by the Alaska Wildlife Alliance and the Denali Citizens Council. Please protect our wolves! They are a tremendous state resource. And please reinstate the Denali buffer zone!!

Proposal 80 - Support. I want to recreate with my dogs in the Alaska backcountry without worrying about them being injured or killed in a trap. There is no reason for the hundreds-thousands of recreational users being subjected to the dangers of traps for the benefit of a handful of trappers. Traps should only be placed far away from where recreational users are.

LAW OFFICE OF KNEELAND TAYLOR, P.C.

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March 3, 2016

Board of Game
P.O. Box 115526
Juneau, AK 99811
BY EMAIL: dfg.bogcomments@alaska.gov

Re: Statewide Meeting: March, 2016

To the Members of the Board of Game:

Please consider these comments at your meeting:

Proposal 39. Support. This proposal would provide for resident Dall Sheep hunt August 10 - Sept. 20, and a non-resident sheep hunt season from Sept 1-20. In essence giving residents a head start. I am a member of the Dall Sheep Working Group, and have attended six days of meetings on Dall Sheep. As the only member who does not hunt, and represents an organization of mostly non-hunters, I believe I have a unique perspective on the dispute over allocation. For that reason, I want to weigh in with my opinion. First, the truth is that a full curl ram on the mountain is worth more than a trophy on a wall and some meat in a freezer. The value to the hunter lies in knowing that the full curl ram is there. Knowing that the full curl ram is on the mountain provides the hunter with a goal, and motivates the sheep hunter to spend a great deal of money, time and effort going after the full curl ram. There is also great value to the non consumptive user, for instance the tourist on a bus, or a back packer. The value lies in just seeing the full curl ram. Non residents should not be excluded entirely by allocating virtually all the full curl rams to residents. In essence, that would be a misallocation of publicly owned resources. On the other hand, giving residents a head start on sheep hunting is a nice way of giving recognition to Alaskans and our closer relationship to our land and resources. To summarize, I support a head start for residents, but oppose all the proposals that would allocate a certain small percentage of the harvest to non-residents. Finally, I want to emphasize that I would like to see an Alaska focused study on the question of whether harvesting only full curl rams will over many decades reduce both the size of Dall Sheep and the incidence of rams attaining full curl horns.

Proposal 63. Support. Because bear baiting stations are sometimes surrounded with traps and snares, I would appreciate it if clearly visible signs were posted near bear baiting stations so that I can stay far away. I don't want to lose my dog to a snare or trap.

Proposal 66. Oppose. Our wildlife should come first, and the use of felt soles poses the threat of bringing invasive plants and fish into our state, and harming our wildlife. We need to do what is necessary to protect our wildlife.

Proposal 67. Support. Hunting and trapping should not be permitted in rights of way or on private lands, without specific, written authorization from the landowner.

Proposal 78. Oppose. This proposal would remove any requirement of identification tags on traps and snares statewide. The Alaska Trappers Association alleges that requiring tags "can lead to interference with lawful trapping", and alleges that "opponents of trapping can steal tagged traps and snares and re-set them illegally...". These allegations are nonsense. I have personally been involved for twenty years with groups who want limits on trapping, and not once have I heard anyone suggest interfering with lawful trapping by moving tagged traps and snares into closed areas. Indeed, there are several areas of the state where tags are required, and there have been zero reports of anti-trapping activists moving tagged traps into closed areas. The ATA's allegation is not only ridiculous, but it is an insult to those of us who want to see responsible regulation, and responsible law enforcement. The real reason the Alaska Trappers Association put forward this proposal is because some of its members break the law, and do not want to get caught. Responsible trappers should support tags on traps. Responsible trappers should not support law breakers.

Proposal 79. Support. This proposal would require trappers to check their traps at least as often as every 24 hours. There would be exceptions. Trapping can be cruel because the animal is not given a quick death. Trapping differs from hunting in that respect. It is because of the suffering of trapped animals as they struggle and die, and because of the trapping of pet dogs that I oppose trapping as it is conducted in Alaska. Indeed, it is this suffering and the trapping of dogs that has been at the heart of voter initiatives in Colorado, California, Arizona, Oregon and Alaska. I speak from experience having volunteered to support one of those initiatives. Reasonable regulations aimed at reducing the suffering of trapped animals and reducing the wounding and killing of pets would be a giant step toward addressing my reasons for opposing trapping as it is conducted in Alaska.

Responsible trappers who wish to see trapping continued for generations should support reasonable proposals such as this one because reasonable regulation will reduce the animosity that many Alaskans feel toward trapping and trappers.

Proposal 80. Support. This proposal would move trapping away from publicly maintained roads, publicly maintained trails, permanent dwellings, businesses and schools. As noted in my comments supporting Proposal 79, the trapping of pet dogs is a problem that has motivated me to take up the cause of pressing for restrictions on trapping in Alaska. Trapping in Alaska should be something conducted far from roads, trails and homes. That's because people use these areas to walk, hike, and ski with their dogs. The Board of Game for 15 years has steadfastly refused to enact responsible limitations on trapping in populated areas. That refusal is a poke in the eye to persons like me. The members of the Board who allow trapping at schools, small urban parks, ski areas, road accessible trail heads, and along popular recreational trails demonstrate by their actions a profound and disturbing disrespect for their fellow citizens who own dogs.

Proposal 87. Oppose. This proposal would prohibit the Board of Game from closing areas to motorized access. First, the Board of Game is established and governed by statutes passed by the Legislature and enacted into law. Under the statutory scheme the Board cannot limit the authority of future boards to enact regulations authorized under the statutory scheme. Second, and more importantly, the ongoing advances in the use of motorized access and technology are destroying the quality of what makes Alaska wonderful. I am not a hunter, but it seems to me that quality is important, and that Alaska is one of the last places on Earth where people can experience the wonder of hiking into a remote area, and experiencing nature as our ancestors did for thousands of years.

Proposal 141. Support. This proposal would shorten the wolf hunting season in the Stampede trail areas adjoining Denali National Park. I support it, but note that it is not enough to solve the problem created by allowing opportunistic hunting and trapping so close the road inside the Park. As many member of the Board know, I strongly support a controlled use area in the Stampede trail area, and have advocated for a controlled use area for 15 years or more. Indeed, I was a member of the BOG subcommittee on this issue in 2000-2002. I want to make it clear that I find it a grotesque misallocation of resources to allow a handful of trappers and hunters to kill wolves that 100,000 - 200,000 people look for as they ride the Park buses. No other misallocation of resources is so absurd. That the Board should have prohibited for 5+ years any proposals to establish a controlled use area adjoining the Park is discourteous to the thousands of Alaskans and Outsiders for whom this is a very important issue. Refusing to even air the issue



stands as a stark reminder to me that most of the members of the Board of Game don't care about non-consumptive uses of the wildlife that belongs to all of us.

Before closing, I want to thank you all for your hard work. I genuinely mean that. I recognize that service on the Board of Game is a burden. But I do stand by my view that Board members need to treat all Alaskans with courtesy; and that it is discourteous for Board members to refuse to give serious attention to the issues that are important to Alaskans who do not hunt or trap.

Very truly yours,

Kneeland Taylor

Submitted By
Kurt McKinney
Submitted On
2/8/2016 11:03:32 AM
Affiliation

Alaska Board of Game

Proposal Comments

Regarding the following Proposals 21, 23, 24, 25 and 26.

I support these proposals to repeal Proposal 207 for the following reasons,

When you locate sheep in a hunting area and find a landing zone prior to sheep season, if they haven't moved out of the area when you fly in, things are good. But what if they have moved out of the area, what do you do, end your sheep hunting year right then? How would you go about finding an area that has sheep and not break the law as it reads now?

Or what if you can't hunt the opening days of the season, how would you fly in later and not be turned in for spotting sheep.

Or what if the weather is bad and you have to take an alternate route thru the mountains, this may involve flying up to the passes to check the weather on the other side. Someone will take this for spotting sheep.

Or what if you want to hunt later in the season. Flying into your sheep hunting area that was found prior to the start of the season could be seen as spotting sheep.

As pilots we should be able to look a landing zone over as much as needed for safe operation. If you fly under the fear of being turned in, there is a good chance you may miss hazards on the ground that may have not been there before or misjudge wind direction, velocity and stability.

How do you fly into an area and not notice sheep and disqualify yourself from hunting.

I do think that Proposal 207 targets Alaska resident, not the guides and there clients.

It does not look like the Alaska State Troopers are in favor of this based on comments.

Proposal 22, Oppose due to the wording. I support that it wants to repeal Proposal 207.

Proposal 28, Oppose, I think this will result in more sheep taken that are less than full curl. Meaning that I don't have to look as hard, just shoot the first ram I like.

Proposal 30, Support, Non-residents should have limits.

Proposal 31, Oppose, They are two different animals don't tie them together.

Proposal 32, Oppose, Unless there are so few sheep that they can't maintain numbers. If that is the case then you have to determine if the reason for low sheep numbers is over-hunting, predators, weather extremes or disease. The first two can be controlled, the second two can not.

Proposal 33 and 34 Oppose, The different start times may not be to bad but I do not like the reasoning. On Proposal 34 it looks like all motorized access is gone.

Proposal 35, Oppose, If my hunting partners name doesn't start with the right letter we hunt opposite years for the early season, we would have to take twice as much time off work for both to hunt.

Proposal 36, Oppose, Unless Proposal 207 is repealed, I would "Support" Proposal 36.

Proposal 37, Support, Alaska first.

Proposal 38, 39, Support.

Proposal 40, 41, 42, 43, 44, 45 Support, I think all Alaska guides should be Alaska Residents Only. We make a non-resident sheep hunter use a guide (or Alaska resident that is next of kin) so shouldn't we require the guide to be an Alaskan resident. On Proposals 40 and 43 there is a note that says, "The board does not have authority to restrict nonresident guide services in Alaska". Why not, it is



Alaska's game.

Proposal 46, Oppose.

Proposal 47, Support.

Proposal 48, Oppose, I think the comments above answer the options in this proposal.

Proposal 138, Support.

Proposal 70, Oppose, Like my objections to Proposal 207 from last year for sheep, (which were not recorded for unknown reasons, I talked to Kristy Tibbles).

Thank you,

Kurt McKinney

Submitted By
Loren J Karro
Submitted On
3/4/2016 4:46:24 PM
Affiliation

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26239 E Buckshot Drive
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Thank you for the opportunity to comment.

I **support option 1 of Proposal 21**, and likewise support **proposals 23, 24 and 25**. If these proposals are not adopted, I would support with reservations one of the following proposals:

Proposal 22 with modifications: I believe it should include a caveat that, while flying over sheep for the purpose of hunting during the open season, an altitude of 1,500 feet should be maintained and multiple passes to judge sheep are prohibited: **or Proposal 26**, with wording such as I suggested adding above plus the 12 inch number requirement. I believe either of these proposals more specifically addresses the supposed problem that the Board of Game wanted to solve with their "Prop. 207". As I have testified many times in the past, the existing regulation is so broad as to be unenforceable; it was not supported by a majority of the residents represented by the Advisory Committees or who testified in writing or in person to the Board of Game; it was not supported by the Department of Public Safety; it could increase early season crowding, which is one of the major other problems commented on in the sheep survey, by having hunters hunt the early part of the season closer to when they could have spotted and assured the availability of game; and it unfairly targets airplanes when the use of other mechanized forms of transportations such as boats, atvs and snowmachines has increased greatly to spot and locate game and transport hunters close to their target, and without the "same day airborne" type of restriction. The same day airborne restrictions have worked for decades, and big game killed legally under that restriction is eligible for inclusion in both Boone and Crockett and SCI record books.

I **support Proposal 30**, to establish a one every 4 year bag limit for sheep for non-residents, **if a similar restriction of 2 to 4 years was added to apply to resident sheep hunters** also. No one needs a sheep every year; and having to wait out a season of hunting after killing a sheep would make most hunters more selective, targeting larger/older rams or waiting yet another year to pull the trigger. As a sheep hunter myself I would have no problem with such a restriction.

If this proposal is not adopted as amended, I would **support Proposal 31**, limiting the draw permits for sheep or goats to one each per hunter every three years i.e. a hunter could draw a sheep permit and then a goat permit in the same or consecutive years but must wait three years from the awarding of each permit to apply for a permit of that particular species again.

I **oppose Proposal 33**. Although I applaud the "out of the box" thinking, I believe the particulars of this proposal would result in killing too many sheep; and that the field would be overcrowded during the residents only early period as even the guides would then be able to be out hunting, and residents would be further encouraged to hunt the early season and not spread out their effort (bear in mind that although the figures change from region to region, overall the residents account for 80% of the sheep hunters).

I **oppose Proposals 36 - 39**, all of which seek to have the sheep hunting season open earlier for residents than for non-residents. Again this would create more overcrowding, as the 80% of the sheep hunters statewide who are residents would all have a very good reason to hunt that short period, as would the resident guides who now cannot take clients until later. It would run the sheep around extensively, and then they would be very difficult to find for later hunters especially if some form of Board Proposal 207 is still in effect.

I **oppose Proposals 41 through 45**, seeking to limit non-residents to a set, low amount of permits for sheep hunts. Non-resident sheep hunting has a long history in Alaska, and non-resident hunting is responsible, through the sale of tags and licenses and the resulting Pittman-Roberts funds, for a large proportion of the funding for Fish and Game. Additionally, non-resident guided hunting in Alaska brings in considerable funds statewide through hotels, food sales, transportation, and supporting resident guides and their subsequent spending on everything from housing and food to vehicles and airplanes.

I **oppose Proposal 46**, establishing an early archery season for sheep. I am against special limited weapons seasons on principle, believing they pit different types of hunters against each other. If you are an archery or black powder hunter, as well as a long rifle or pistol hunter, every general hunting season is your open season. It is a matter of personal choice what weapon you use, and hunters should be personally responsible for the effects of their choices. Additionally, having an earlier season for bow hunters would encourage more bow hunting and not necessarily by the best of archers. I don't believe that bow hunting has any moral edge over any other type of hunting, it is a personal choice of means and, in fact, results in more wounded animals per hunter than does hunting with conventional means.

I **support Proposal 65**, which would remove the bear meat salvage requirement from bait station permits. Salvage of bear meat is not required in general season fall hunts, and is not needed here either. As with general season, salvage of hides **or** meat should be required.

I **strongly oppose Proposal 70**, restricting the use of aircraft for all hunting. This proposal is way too broad. It unfairly places limits on aircraft users, while those with airboats can jet upriver, spot a moose, run up close and shoot it the same day or same hour. The same is true for the users of atvs and snowmachines in season. To unfairly limit one form of transportation needlessly takes away hunter choice. I would like to offer the language being considered by the Big Game Commercial Services Board for guide ethics, which at this writing is proposed to read: Guides shall "refrain from using any mechanical powered equipment to knowingly herd, drive, chase, harass, or repeatedly approach game animals in a manner which results in significantly altered behavior, and refrain from [looking at wildlife from less than 1,500 feet agl or] making multiple, consecutive approaches in any mechanical powered equipment, near any game animal or group of game animals during any open hunting season for that species, to avoid altering the hunting experience of other hunters" [language added is mine]. It further goes on to expressly allow airplane tracking for bears under 5AAC85 and 5AAC 92.

I **strongly support Proposal 99**, in favor of guide client agreements and the use of an assigned verification code. The UVC, created by the Department of Commerce, who is responsible for verifying guide eligibility, takes the burden for any verification off of the ADF&G. It has been incorporated into the drawing permit computer programs already. It has worked well in the two years since it was instituted, and should be applied to all non-resident applications for drawing permit hunts.

Submitted By
Loren J Karro
Submitted On
3/4/2016 9:27:04 PM
Affiliation

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I would like to strongly **Oppose Proposal 139**, to move the non-resident goat hunt in unit 14C to a drawing permit hunt.

This proposal should never have been accepted as an Agenda Change Request, as I shall show. There has been no overharvest of goats, the goat population is increasing, and there is absolutely no conservation concern. Dave Battle admitted this at the Matanuska AC meeting on March 2.

The Department has set a sustainable harvest level and management goal of between 5 and 7%. The Anchorage biologists have been setting their harvest goal at a very conservative 5%. In 2013 they counted 440 goats in the unit; in 2015 they counted 471. These are hard count numbers, not extrapolated figures, so there are easily 500 plus goats in the unit. In 2014 the non-resident harvest was 12 goat units; every other year it has been 10 or less. The non residents are allocated 35% of the total harvest quota. The resident quota is seldom met. For instance, last year (2015) the residents killed 11 goats; the non-residents harvested 6 goat units in a three day non-resident season, for a total harvest of 17 goat units. A 5% harvest would have been 24 units; a 6% harvest would have been 30, with 11 of these allocated to non-residents, so the non-resident quota did not exceed their allocation if a 6% harvest goal was used. The existing overall 5% harvest quota was not met.

Back when the goats were on a drawing permit, the division never issued enough permits to achieve their very modest harvest goal. The harvest quota was never met and there ended up being a general season in November. As many of you know, the goat meat is unedible in November, and this is a waste of the resource.

It would be much more preferable for the division to set a shorter season rather than go to drawing permits. Drawing permits would be an unnecessary limitation of opportunity for a wonderful and plentiful resource that the Department's own count shows is healthy and growing. No overall overharvest has been occurring, and this with a very conservative harvest goal at the bottom of the designated management range. The Department's figures in their Proposal are misleading as they only represent part of the total harvest and do not show the harvest goals by number or percent or the total harvest as compared to the harvest goals. The 14C goat hunt is a wonderful opportunity to hunt in some beautiful and rugged country amidst glaciers and ice fields, with a plentiful resource that is under no threat. This proposal should not have been accepted as an ACR as it has no conservation concern, and obviously leaving any consideration of the hunt until the next Region 2 meeting would create no threat to the resource. In addition, the total figures show no reason to even consider further limiting hunting opportunity.

Submitted By
Margaret McGinnis
Submitted On
3/1/2016 5:27:01 PM
Affiliation

Proposal 78 - Oppose.

Trap ids consist of either small metal tags attached to traps or signs posted near trap sites bearing the owner's identification information. Such ids are required only in Southeast (Game Management Units 1-5) and within one-quarter mile of publicly maintained roads in GMUs 20E and 12 (the Tok Cutoff and Taylor Highway, and about 30 miles of the Alaska Highway).

Proposed by the Alaska Trappers Association (ATA), this is an attempt to let trappers remain anonymous while taking a resource from public or private property for their benefit. ATA clearly wishes to pre-empt any additional trap-id requirements which would effectively end any accountability for where they place their traps or any incidental catch of wildlife, pets or people.

Proposal 79 - Support.

Absent a required trap-check, trapped animals can suffer for very long periods before dying of starvation, dehydration, predation or injuries before the trapper eventually returns to finish the kill. A required short trap-check interval would also help reduce the incidental killing of non-target species (for example moose), which could be released.

The trappers' code of ethics (written by Alaska Department of Fish & Game (ADF&G) and the Alaska Trappers Association) addresses the issue in just three words: "check traps regularly."

* Animals caught in traps are not always killed instantly. To allow them to languish for an indefinite period of time subjects them to inhumane suffering as a result of injuries, starvation, dehydration or predation by other animals.

* The mere advice to "check traps regularly" is hardly a sufficient instruction for trappers. "Regularly" can be interpreted as daily, weekly, monthly, or "as time permits" - entirely at the trapper's discretion.

* A short trap-check interval benefits fur trappers by ensuring that the animals' pelts will be in good condition rather than wasted as unusable. It would also lessen the stigma attached to trapping for killing non-target species and allowing excessive suffering.

Proposal 80 - Support.

A section of the state's published trapping regulations advises trappers to avoid high recreational-use areas and locations where a pet might be caught. Numerous reports of traps set on or adjacent to trails clearly indicate that these common-sense suggestions are not being followed. It is time for the BOG to make these "suggestions" into "regulations" that can be enforced.

* Hikers, mushers and other trail users should not have to worry that their dog(s) might step into a trap set just a few feet off of a heavily used trail. Public trails are just that - public - and not the exclusive domain of trappers.

Trapping adjacent to trails and public facilities is a danger to people as well as pets. Large traps are almost impossible to release without tools and expertise, and can inflict fatal injuries to a pet instantly. A person stepping on such a trap would be unable to free themselves and likely would suffer serious injuries.

* Conflicts between private property owners, recreationalists, etc., and trappers are growing, and resentment between the groups will escalate unless rules to restrict - not eliminate - trapping are enacted. Specific regulations would benefit both user groups.

Submitted By
Margaret McGinnis
Submitted On
3/4/2016 4:40:46 PM
Affiliation

Proposal 141 - I support with the addition of the four modifications as detailed in the comments submitted by the Alaska Wildlife Alliance and the Denali Citizens Council.



United States Department of the Interior

NATIONAL PARK SERVICE

Alaska Region
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:
I.A.2. (AKRO-ARDR) 20160230

MAR 01 2016

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:

There are a number of proposals before the Board of Game during the March 18-28, 2016, meeting in Fairbanks that affect or have the potential to affect National Park Service (NPS) areas in the state. We appreciate your consideration of NPS comments.

As you have heard from the NPS in the past our mission, and mandates, differ from the State of Alaska and other federal agencies, and may require different management approaches consistent with NPS enabling legislation and the Alaska National Interest Lands Conservation Act (ANILCA). Consistent with past letters and testimony, the NPS asks that NPS areas be excluded from any regulations you may authorize that implement intensive management objectives in Alaska's hunting regulations. We recognize and appreciate previous Board actions that have not authorized intensive management and predator control activities on NPS-managed lands.

Specific comments are below:

Proposals 33, 34, 46: NPS Recommendation: Oppose.

These proposals would open sheep hunting seasons earlier for residents (proposal 33, 34), and bowhunters (proposal 46) statewide. The NPS does not support extending the season in areas where harvest is not limited by quotas and sheep populations are in decline. For example, Gates of the Arctic National Preserve (GMU 26A) has a popular general hunt and extending the sheep hunting season has the potential of increasing harvest following a large decline in 2013. These proposals should be evaluated on a unit-specific basis to ensure conservation of specific populations rather than applied state-wide. Because these proposals create a potential for increased sheep harvest in a number of NPS Preserves, we ask that NPS lands be excluded if this proposal is adopted.

Proposal 57: NPS Recommendation: Oppose.

This proposal would allow the sale of brown bear hides and/or skulls taken by resident hunters in units where the bag limit is two or more bears per season as a method to support the reduction of predation on moose and caribou. Management practices that seek to increase the harvest of predators to increase populations of prey species are



prohibited in NPS areas. In addition, National Park System-wide regulations prohibit the sale of wild resources not associated with subsistence uses. Because this proposal would affect areas of Yukon-Charley National Preserve, Lake Clark National Park and Preserve, and Denali National Park and Preserve, we ask that NPS lands be excluded if adopted.

Proposal 66: NPS Recommendation: Oppose.

This proposal would allow the use of felt soles for hunting statewide. The NPS supports the 2012 Board of Game decision to ban the use of felt soles (55 AAC 92.080(16)) and is opposed to the current proposal to reverse it. Sufficient research has shown that *Potamopyrgus antipodarum* (the New Zealand mudsnail), *Didymosphenia geminata* (rock snot), and *Myxobolus cerebralis* (which causes Whirling Disease) can be transported by the use of felt soled boots and waders because the fibrous material absorbs water and some organisms fit within its interstitial spaces; neither apply to rubber boots. The time and effort sportsmen must invest to properly clean and dry their gear to prevent their spread is unrealistic, particularly when the suggestions include soaking in hot water and drying for several days before use. For these reasons, and to remain proactive in minimizing the spread of invasive species in Alaska, we encourage the Board not to adopt Proposal 66.

Proposal 92-93: NPS Recommendation: Oppose.

This proposal would increase the take of live raptors for falconry by nonresidents statewide. Collecting living wildlife including adult raptors and their eggs or chicks is not authorized in NPS units including national preserves. The NPS does not consider the collection of live raptors to be hunting or trapping and considers this activity prohibited in units of the National Park System by federal regulations that prohibit the intentional disturbing of wildlife nesting, breeding, or other activities. Should the Board adopt this proposal, we ask that NPS lands be excluded.

Proposal 94: Recommendation: Oppose.

This proposal would require the implementation of state wildlife plans before issuing permits for education and telemetry, including for ANILCA areas managed by federal agencies. The NPS recognizes the primary role the State plays in wildlife stewardship in Alaska and we look forward to cooperating and collaborating on projects whenever possible; however, the NPS does not require state permits to conduct research on wildlife on NPS lands.

Proposal 135: NPS Recommendation: Oppose.

This proposal would increase the number of nonresident drawing permits for brown bear in the remainder of Unit 22 (D&E) which includes Bering Land Bridge National Preserve. In May 2015, biologists from ADF&G and the NPS collaborated on an aerial survey to produce a population estimate for brown bears over a 20,000 km² area of the Seward Peninsula. Based on preliminary results from this survey, and harvest and population information presented in the most recent ADF&G Species Management Report, increasing the number of bear permits could result in an unsustainable harvest rate. We ask that ADF&G analyze harvest rates with new population data prior to the Board adopting an increase in the harvest of bears in this area.



Proposal 141: NPS Recommendation: Support.

This proposal to change the wolf hunting season in a small area near Denali National Park and Preserve was submitted by the NPS and we continue to support this proposal and recommend adopting it as submitted. A representative from Denali will attend the March meeting to testify and answer any questions you may have.

Again, we appreciate the opportunity to provide you with comments on these important regulatory matters and continue to look forward to working with you on these issues. Should you or your staff have any questions, please contact me at 907-644-3505.

Sincerely,

Debora R. Cooper
Associate Regional Director, Resources and Subsistence

cc:

Sam Cotton, Commissioner, ADF&G
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Dean Williams, Special Assistant to the Secretary for Alaska
Geoff Haskett, Regional Director, FWS
Chuck Ardizzone, Deputy Assistant Regional Director, FWS-Office of Subsistence Management
Superintendents, National Park Service, Alaska Region

Submitted By
Patricia OBrien
Submitted On
3/4/2016 10:19:23 AM
Affiliation

Oppose ~~PROPOSAL 78 - 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

The proposal targets Juneau and the Tok Cutoff and Taylor Highway, and about 30 miles of the Alaska Highway. A Juneau AC member bristled at this proposal saying *it is only fair and appropriate that traps be marked, as we mark crab pots*. The proposal was rejected by the Juneau AC. Certainly it is an enforcement issue as well. I recommend marking traps be required statewide.

Submitted By
Patricia OBrien
Submitted On
3/4/2016 11:17:15 AM
Affiliation

SUPPORT PROPOSAL 79 – ~~This proposal would mandate that traps be checked at intervals of no more than 24 hours (with an exception allowed for delays in severe weather).

Currently there is no required trap check interval in Alaska, except for the Community of Gustavus in Southeast, where there is a 72-hour trap-check rule. That is moose country. Gustavus and people in nearby communities count on moose in Gustavus to fill their freezers. The trap check requirement means that moose caught in traps can be freed before dying. Without any statewide time interval to check traps, Gustavus obtained a trap check requirement for their community.

On a personal note, when my oldest son was a teenager, he came upon a young wolf caught in a trap on a popular Juneau trail. While he is an outdoor enthusiast, he is sensitive to suffering. I clearly remember his pale face and shaken demeanor on relaying the experience and the lasting effect it had on him.

You may quibble that a 24 hour check is unreasonable, even with an exception for severe weather delays. It is not unreasonable for the animal in the trap. However I urge you to mandate a fair minded statewide trap check requirement.

Thank you for your service and consideration in reviewing proposals.

Submitted By
Patricia OBrien
Submitted On
3/4/2016 12:16:51 PM
Affiliation

Support proposal 80. ~~ Juneau has some off limits areas, but most of Alaska does not. When researching to draft these regulations I found your commonsense requirements in 5 AAC 92.044(b)(5) related to hunting bear with the use of bait or scent lures and modeled this proposal after your regulations on scent lures.

By now you must be aware that a growing number of Alaskans are dismayed that they and their pets are not protected from traps near their homes, trails and more. The time is right for the Board of Game to make the responsible decision and adopt proposal 80.

Many thanks for your time and consideration of this and other proposals.

Submitted By
Patricia OBrien
Submitted On
3/4/2016 12:41:35 PM
Affiliation

~~Support proposal 141. I strongly support this proposal. You may be unaware of the value of wolf viewing to tourism.

The Alaska Department of Fish and Game's publication *The Economic Importance of Alaska's Wildlife in 2011* includes eye openers on the value of Alaska's wildlife for wildlife viewing.

Almost one million households, residents and visitors took at least one trip in 2011 to hunt or view wildlife... outside visitors primarily sought wildlife viewing... Species Sought by Viewers: The top mammals except for Moose at (#1) are predators: Brown (Grizzly) Bear, Black Bear and Marine Mammals. Wolves came in for desired viewing at 40%...

Wolves near the most valued tourism destination in Alaska need to be protected, if for no other reason than respect for the tourism industry. Alaska is getting a black eye when a trapper brags to reporters of National Geographic that he just ruined seeing a wolf for tourists visiting Denali.

Please make the respectful decision and support this proposal.

Thank you for your careful consideration of this request.

Submitted By
Paul Flint
Submitted On
3/4/2016 9:08:37 AM
Affiliation

I support all the proposals that functionally recind the adopted proposal 207 regading use of aircraft for sheep hunting. this includes proposals 21,22,23,24,25 and 26.

Submitted By
Paul Flint
Submitted On
3/4/2016 9:06:39 AM
Affiliation

I oppose proposal 70. This is a slippery slope. would we consider a ban on scouting or locating game from ATV's, boats, highway vehicles, horseback? Where does this logically end? What is the biological need?



Resident Hunters of Alaska (RHAK)
Comments to the Alaska Board of Game
Statewide Meeting
March 18-28, 2016

Sheep Issues – Proposals 21-49, and 138

Background:

For nearly a decade and through many Board of Game cycles, proposals have come before the Board asking for some kind of resident priority or preference when it comes to Dall sheep hunting. Generally, these requests revolve around declining sheep populations, competition and conflicts between guided nonresident and unguided resident hunters, fewer legal rams on the mountain, and the marginalization resident sheep hunters feel over the continued allowance of unlimited nonresident sheep hunting opportunities along with the unlimited big game guides most all nonresident sheep hunters are required to hire.

Resident sheep hunters feel like they’ve been unfairly treated, that for too long the state – via the Board of Game – has not had their best interests in mind. How else to explain the Board of Game continuing to avoid taking action on the numerous public proposals that have come before them asking for changes to our sheep hunting regulations, when the Board itself has acknowledged how resident sheep hunters are being disenfranchised under our current management and allocation plans?

No one denies that Dall sheep populations have been declining statewide.¹ No one denies that resident & nonresident sheep harvests and success rates over the last few decades has decreased.² No one denies that there are areas in the state where guided nonresident sheep hunters take 60-80% of the Dall sheep harvest annually.³ No one denies that statewide, nonresident sheep hunters harvest 40% of the sheep annually. The Board has even said on the record that this 40% statewide nonresident sheep harvest needs to be looked at: (*“There’s a lot of residents concerned that they’re taking 40%. And I think that’s something we should address.”* – Chairman Ted Spraker, Board Work Session January 2015)

No one denies that there are issues of crowding, of competition between the unguided resident sheep hunter and the guided nonresident sheep hunter, and conflicts between unlimited guides operating in the same areas.

¹ ADF&G Sheep Population Trends across Alaska (page 12)

² ADF&G Alaska Total Sheep Harvests 1985-2015 (page 13)

³ ADF&G Interim Reports GS000 Sheep (page 14)

Resident Hunters of Alaska – Alaska Board of Game 2016 Statewide Comments

Perhaps the best example of the problems we have surrounding sheep hunting in Alaska came from the Board Chairman himself, when he testified before the legislature in 2013 in support of a Guide Concession Program (that never came about and likely never will) to limit big game guides. It needs to be stressed that Chairman Spraker, when he testified before the legislature, was **not** speaking for himself; these were **not** his personal comments. Chairman Spraker was representing the thoughts of the entire Board of Game when he said: *“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.”*⁴

And yet, in the face of known sheep declines the Board for years has refused to take action on the myriad problems they themselves acknowledge, instead time and time again asking for more studies and more data while continually deferring sheep proposals out of cycle and out of region, forcing the public proposers and Advisory Committee representatives to travel to different regions at great time and expense.

And if that were not enough to cause the acid in resident sheep hunter’s bellies to rise, the Board went one step further in January 2015 at a Work Session meeting and introduced a board-generated proposal of its own that for the first time ever included restrictions to resident sheep hunters. The Board also generated at that same meeting, and subsequently passed, another proposal to restrict the use of aircraft during sheep season in ways that were never before proposed by the public.

This clearly went against the Joint Boards policy and criteria on Board-generated proposals that says any Board-generated proposal has to be in the public’s best interest, that there is an urgency in considering the issue, that current processes are insufficient to bring the subject to the Board’s attention, and that there will be reasonable and adequate time for public comment.⁵ The one Board member who voted against the Board-generated proposals (Teresa Sager Albaugh) explained her position on the record: *“I guess I don’t see the same sense of urgency to necessarily adopt a board generated proposal and put some of these concepts out for public comment at this point. Simply because we’ve got a backlog of proposals and current proposals that are gonna be before*

⁴ House Resources Committee testimony, March 11, 2013 (full transcript page 24)

⁵ Joint Boards Criteria for Development of Board-Generated Proposals (page 27)

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us in February and March that we need to act on. All of those proposals came to us through the regular anticipated process by the public. And I think there is close to thirty on sheep alone if you combine the two meetings and the deferred proposals.”⁶

These Board-generated proposals were promulgated ahead of the February 2015 Region IV meeting in Wasilla that Board member Sager-Albaugh mentioned, the venue where the sheep proposals deferred from the 2014 Region III meeting were to be heard. As stated, there were already many public proposals before the Board requesting changes to sheep hunting regulations, yet the Board added two of their own that (again) contained recommendations never before expressed by the public.

In the end, the Board of Game expressed that they wanted statewide solutions to the sheep issues, deferred all the sheep proposals (including the Board-generated proposals) to the March 2015 Region II March meeting in Anchorage, where they took no action or voted down all but their own Board-generated proposals. The Board passed the Board-generated proposal restricting how aircraft could be used during sheep season, even though the vast majority of Advisory Committee and public comments were against it, and even though the Alaska Wildlife Troopers strongly opposed it, and then deferred their other Board-generated sheep proposal to the 2016 Statewide meeting.

The only proposal regarding sheep issues, then, before the Board at the Statewide 2016 meeting, was the Board’s very own proposal that contained never-before suggested restrictions on resident sheep hunters! And if that wasn’t enough, the public was told that they could not submit any proposals for the 2016 Statewide meeting regarding sheep.

It wasn’t until another organization sent in a letter to the Board and to the Department of Law demanding the public also be allowed to submit sheep proposals for the 2016 Statewide meeting that a costly special meeting of the Board was conducted where the decision was changed and the public was allowed (like the Board) to submit their own statewide sheep proposals.

However, the public was told that even though the 2016 Statewide meeting included statewide regulations under 5AAC Chapters 92 & 98 (the new 3-year Board cycle now combined Cycle A & B statewide call for proposals), some of the statewide regulations under 5AAC Chapter 98 were not allowed on the call for proposals. In particular, 5AAC 92.008, which sets statewide harvest guideline levels that many of the sheep proposals sought to address, was not allowed on the call for proposals. Neither Board support nor ADF&G nor the Board of Game had an answer as to why 5AAC 92.008 was specifically not allowed on the statewide call for proposals.

By the deadline to submit sheep proposals for the Statewide 2016 meeting, the Board received yet again many of the same types of proposals from the same members of the public and organizations that they’d received in the past decade yet taken no action on. And some proposals were refused because they asked to address nonresident sheep harvest levels that fell under 5AAC 92.008.

⁶ January 2015 Board of Game Work Session comments

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Further complicating things, in the latter part of 2015 the Board supported and sanctioned a Sheep Working Group (SWG) made up of members of the public and various organization representatives and Advisory Committee representatives, that was supposed to reach a 100% consensus on solutions and recommendations on sheep issues to the Board prior to the 2016 Statewide meeting.

ADF&G stated that they would wait for the recommendations of the SWG before making final comments on the sheep proposals before the Board at the 2016 Statewide meeting. The Board also expressed that they wanted to see the recommendations of the SWG before making any decisions.

The SWG ended up with nearly a quarter of its membership comprised of big game guides. Some other members were obviously not there to compromise on already hardened positions their ACs or organizations had taken in the past. Many of the SWG members expressed distrust of the Board of Game because of years of taking no action on sheep issues and for the two Board-generated proposals they felt went against our public system of wildlife management. It was evident early on that there would be no “100% consensus” from the group. The rules everyone who signed onto the SWG agreed to were changed; a majority vote would now suffice as long as it was somewhere in the 80/20 range or higher. Over six days of meetings that cost tens of thousands of dollars, the SWG did not come up with any recommendations to the Board of Game, and won’t meet again until **after** the 2016 Statewide meeting.

So here we are in the present, a little more than two weeks before the 2016 Statewide Board of Game meeting in Fairbanks when these comments are due. We know now what we knew several years ago, that sheep populations have declined, that unlimited nonresident sheep hunting opportunity in conjunction with unlimited guides is causing conflicts and competition between user groups and can lead to overharvests and restrictions for all, that nonresident sheep harvest rates greatly exceed that of residents in some areas, and that nonresidents continue to take 40% of the sheep harvests statewide.

The Board of Game chairman expressed in 2014 at the Region III meeting in Fairbanks that if any changes to sheep hunting regulations were to take place, it should be a “shared burden” between resident and nonresident sheep hunters.⁷ Which is exactly what the Board-generated proposal (#48) before the Board at this Statewide meeting includes.

We argue that for far too long resident sheep hunters have unfairly shared the burden with an unlimited number of nonresident guided hunters, which the Board acknowledges has led to draw-only restrictions for all in other areas of the state. It is well past time for the entire Board of Game membership to recognize and acknowledge that resident sheep

⁷ “Most of the emphasis in these [sheep] proposals is to do something with nonresidents. I strongly believe it needs to be a shared burden. I think there needs to be residents doing something as well, because we’re all looking out to protect sheep. We want to keep sheep on the mountain and keep the hunting opportunities available.” – Chairman Spraker 2014 Region III meeting

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hunters have been disenfranchised and that their opportunity to hunt sheep is threatened if we don't deal with the unlimited nonresident sheep hunting component.

It is clear that if any restrictions to hunting opportunity should be considered that nonresident hunters are limited first. It says so right in the “handy dandy” Hunting Regulations on Page 7: *“When there isn't enough game, nonresident hunters are restricted or eliminated first.”*

It also states in statute (16.05.256) that: *“Whenever it is necessary to restrict the taking of big game so that the opportunity for state residents to take big game can be reasonably satisfied in accordance with sustained yield principles, the Board of Game may, through a permit system, limit the taking of big game by nonresidents and nonresident aliens to accomplish that purpose.”*

We further posit that our Alaska state constitution gives a clear preference to all Alaskans over nonresidents in terms of the ability to harvest the vast bulk of our state wildlife resources. As our Alaska Supreme Court found: *“The State of Alaska devotes substantial resources to the protection and management of fish and wildlife. As the trustee of those resources for the people of the state, the state is required to maximize for state residents the benefits of state resources.”*⁸

The logical and fair product of the 2016 Statewide Board of Game meeting should be the restriction of nonresident sheep hunters based on harvest levels in order to better conserve Dall sheep populations and to continue to provide resident general sheep hunting opportunities.

Comments on Sheep Proposals

Proposals 21-26 – Amending or Rescinding Board-generated proposal #207 that restricts how aircraft can be used during sheep season

Resident Hunters of Alaska (RHAK) **supports** Proposal 23 from the Mat-Su Advisory Committee to rescind Board-generated proposal #207 that was passed and adopted by the Board into regulation.

We completely agree with the Mat-Su Advisory Committee that the Board of Game did not follow their own criteria when generating Proposal 207. This alone should invalidate it completely.

We also completely agree with the Alaska Wildlife Troopers on their position in support of Proposal 23, that the aircraft restrictions now in place during sheep hunting season are unenforceable and will add unnecessary costs to AWT.

⁸ Shepherd v. State, Alaska Dept. of Fish & Game

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A better avenue to address the use of aircraft during sheep seasons would be educational programs like we currently have in place for pilots and air-taxis operating in Unit 23 during caribou hunts whereby they take an online course from ADF&G about the proper use of aircraft for hunting purposes in that area. The same thing could be done for pilots and commercial carriers who use aircraft for sheep hunting purposes.

Proposals 28, 30 & 35

RHAK **opposes** any statewide changes to resident sheep hunting opportunities, including any 1 in 4 or 1 in 3 years opportunity, or any restrictions having to do with first 10 days of the season based on last name or any other criteria.

At the 2015 Region IV meeting, data on Hunter Effort by sheep hunters (resident & nonresident) was presented to the Board in order to inform the deliberations on any 1-in-4 year sheep hunting opportunity regulation.⁹

The bottom line is that any changes to sheep hunting opportunity based on a 1 in 4 or 1 in 3 year opportunity are negligible in terms of reducing perceived crowding or harvests and unfairly target a very small minority of resident sheep hunters who utilize the opportunity to hunt sheep every year under a general open season.

Regarding proposal 35, allowing resident sheep hunters to only hunt the first ten days of the season every few years based on their last name unfairly restricts resident sheep hunting opportunities and as the majority of resident sheep hunters hunt in pairs, it has the potential to break apart hunting partners with different last names.

Proposal 31

RHAK **opposes** proposal 31. ADF&G takes into account hunters who do not hunt after winning a sheep or goat draw permit and allocates a higher number of draw permits based on that knowledge. Allowing only one sheep or goat draw permit every 3 years also has a much greater negative effect on the resident hunter than it does the nonresident hunter.

Proposal 32

RHAK **opposes** proposal 32 to put all sheep hunts for residents and nonresidents on draw-only permits. This proposal does the exact opposite of what the proposer states (“Residents will have their priority”). It would negate a resident priority to general sheep hunting opportunity. We don’t believe that resident sheep hunters currently need to be restricted in any way

⁹ RC 53, compiled by Lohuis and Clark -
http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/pdfs/2014-2015/Central_Southwest_02_13_15/rcs/rc053_Tom_Lohuis_Sheep_Hunter_Effort.pdf

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Furthermore, big game guides with concessions on federal lands such as Refuges and National Preserves **do not** have “their permit numbers issued by the federal land manager” as the proposer states. On USFWS and NPS lands where sheep hunting takes place, the Board of Game sets allocation levels via general season or draw-only hunts. Federal guide concession holders are bound by their own prospectus plan document that states how many clients for each game species they will run each season.

Proposal 33

RHAK **opposes** proposal 33. The very last thing we need is a nonresident-only sheep hunting season, no matter what part of the season it falls under and no matter if it is once every ten years or once every two years. We’ve already pointed out that 90% of nonresident sheep hunters only hunt sheep one time. \

Proposing a resident-only early season that is allowed only once every three years as a way of reducing crowding and as a selling point for a nonresident-only season August 10-17 doesn’t make sense in the face of the declining sheep populations the proposer mentions. Any nonresident-only sheep season would likely exacerbate the problems we already have in general-season areas on state and BLM lands with unlimited guides. Guides would likely hire more assistants and book more clients and take more sheep.

Nonresident sheep hunters need to be reduced, not given their own special hunting season.

Proposal 34

RHAK **opposes** proposal 34, from the same proposers as proposal 33. It would seem they are trying to throw as much at the wall as possible in hopes that something will stick, in order that nonresident sheep hunters don’t go to draw-only permits statewide.

The access and weapons restrictions in this proposal unfairly impact the resident sheep hunter and his or her opportunity to access sheep country and successfully harvest a legal ram.

Proposals 36, 37, & 38 – Resident-only early season and shortened nonresident sheep season

RHAK wants to stress that our preferred solution to the problems surrounding sheep hunting is to restrict all nonresident sheep hunters to draw only hunts with a set harvest allocation of 10% of the total sheep harvest annually, with no change to resident sheep hunting opportunity.

It’s imperative that the Board recognize that nonresident sheep hunters need to be limited to draw only hunts as a starting point in trying to mitigate the issues of crowding, conflicts and competition, as well as reducing harvests in the face of declining sheep populations.

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While an early resident only season would appear to give a priority to resident sheep hunters, we don't know how guides would respond. In the past when this issue was before the Board, many resident guides testified that they would hunt the early resident-only season (which certainly is their right), and most guides also said they would still be in the field prior to the resident-only opening day (Aug. 10), have aircraft in the field and on airstrips, do some pre-season scouting, set up camps, bring in packers and assistants etc. The potential for continued conflicts and crowding is still there, as well as the potential for reduced resident access because guides and the commercial air carriers that fly for them tend to lock up some areas. And we don't know if an early resident-only season would end up reducing harvests for nonresident guided sheep hunters.

It's well past time that the Board use their authority to restrict nonresident sheep hunters to draw-only hunts. That is the right thing to do according to statute and policy.

RHAK therefore cannot support an early resident-only season because we don't believe it fixes the main problem of unlimited nonresident sheep hunting opportunities.

Proposal 39

RHAK **supports** the preferred solution in proposal 39, for the Board to put all nonresident sheep hunters on a draw-only system with allocation levels set by total statewide harvest guidelines.

The Board has repeatedly stated that they want to deal with sheep issues on a statewide basis, yet they refuse to accept any statewide proposals that fall under the statewide harvest guideline levels in 5AAC 92.008. This makes absolutely no sense and no one at Board support or Department of Law or the Board of Game knows just who or what entity disallowed 5AAC 92.008 on the statewide call for proposals under the new conjoined three-year Cycle A & B statewide meetings.

Nonresident sheep hunters currently take 40% of the statewide harvest of Dall sheep annually, and in other areas take 60-80% of the total harvest. The Board has stated in the past that the 40% nonresident statewide sheep harvests is a concern that should be addressed.¹⁰

The best way to limit nonresident sheep hunters is to base it on total statewide harvest levels, broken down by subunit. We advocate for a 10% maximum nonresident statewide sheep harvest using 5AAC 92.008 as a vehicle to do so, using the last 5-10 years of historical nonresident harvests as a dataset to initially determine allocation levels.

The Board's position that 5AAC 92.008 only applies to specific regions and can only be allowed on the call for regional meetings confounds the fact that 5 AAC 92.008 is under **statewide regulations** and that the Board repeatedly has stated that they want to deal

¹⁰ "There's a lot of residents concerned that they're taking 40%. And I think that's something we should address." – Chairman Ted Spraker, Board Work Session January 2015

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with these sheep issues on a statewide basis. The Board can certainly base draw-only hunts for nonresident sheep hunters on harvest levels by subunit statewide.

The Director of ADF&G Division of Wildlife Conservation has also stated to the Board-sanctioned Sheep Working Group: “*The Department is not opposed to dealing with sheep on a statewide basis.*”

Again, if the Board and the Department want to deal with sheep issues on a statewide basis, then 5AAC 92.008 would seem the right regulatory framework to do so.

Proposal 48 (formerly proposal 208) – Board of Game-generated proposal

RHAK strongly **opposes** proposal 48.

As we previously stated in our comments on sheep issues, we believe this Board-generated proposal did not meet the criteria for Board-generated proposals. It was an end-around our public system of wildlife management for the Board to propose changes to sheep hunting never before offered by the public, and to defer their own proposal to the 2016 Statewide meeting while taking no action on or voting down all the other sheep proposals from the public before them in 2015.

The very fact that this proposal is before us now is a testament that the Board of Game is broken. This proposal should not be on the docket and should not even be heard or deliberated on. It takes time and attention away from the other sheep proposals from the public and gives the impression that the Board-generated proposal is more valid or has more chance of passing in some form.

We urge the Board to pull proposal 48 from the 2016 Statewide meeting proposals.

Proposal 138

RHAK **opposes** proposal 138 to restrict all nonresident sheep hunters to draw-only hunts with a harvest allocation level of up to 30% of the total harvest

We support the concept, however, to restrict all nonresident sheep hunters to draw-only hunts with an allocation based on harvest levels. But we don’t believe nonresident sheep harvest levels by subunit or statewide should be higher than 10% of the total harvests.

Comments on other Proposals

Proposal 19

RHAK **supports** proposal 19 to codify the Joint Boards policy and criteria for Board-generated proposals, and to include new language in the criteria that there shall be an adequate opportunity for public comments of no less than 65 days.

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We also support language that the Board of Game shall meet **all** the elements of the criteria for Board-generated proposals.

Proposal 71

RHAK **opposes** proposal 71. We have concerns that pilots may be unfairly accused of violating same-day-airborne regulations with this additional language in the SDA regulations. The SDA regulation has been in place for a very long time, along with prohibitions covering the use of radios or communications to assist in the taking of game, and we see no reason to adopt this new language in the SDA regulations.

Proposal 101

RHAK **supports** proposal 101 to limit the limit the allocation of draw permits awarded to nonresident hunters to a maximum of 10% of the available permits. Resident Alaskan hunters should always have a clear priority to our game resources.

Proposal 102

RHAK **supports** proposal 102 to require all nonresident drawing permits – specifically those allocated to Next-of-Kin (NOK) hunters who will hunt with an Alaskan resident relative – to be placed in a nonresident category or pool. A nonresident is a nonresident regardless if he or she has a relative living in Alaska, and resident Alaskan hunters should not have the chance of being awarded a draw permit reduced by including NOK nonresident hunters in the resident pool of available draw permits.

Proposal 108

RHAK **supports** proposal 108. It seems that the requirement for most all nonresidents to utilize a licensed big game guide when hunting brown/grizzly bear, sheep & mountain goat, has been unfairly extended to other species such as moose and black bear. The State of Alaska should not be in the business of subsidizing the guide industry by forcing nonresidents to be guided for species other than currently in statute. If and when there are conservation concerns or other concerns for species other than brown/grizzly bear, sheep and mountain goat, the way to address those is through allocation of permits or reduced opportunity, or other means other than the requirement that a nonresident must hire a licensed big game guide.

The entire must-be-guided regulation and rationale for it is called into question when species other than those currently in statute are added to the must-be-guided list. We would also add that the entire must-be-guided law and the rationale behind it is continually called into question with the Next-Of-Kin regulation that allows someone 19 years or older only in Alaska one year and with absolutely no hunting experience to “guide” a nonresident relative for grizzly/brown bear, sheep and mountain goat.

Proposal 135 – ADF&G proposed increase to nonresident brown bear permits in Unit 22

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RHAK **opposes** and is confounded by proposal 135 from the Alaska Department of Fish & Game. In all the sheep proposals that ask to limit nonresident sheep hunters, the Department has said they are **neutral** on allocation matters. Yet this proposal from the Department seeks to increase the nonresident allocation of brown bear permits awarded for DB690, using the rationale that the while the Department does not have a population estimate for brown bears in Unit 22, the population can support additional nonresident drawing permits. Also, the Department “anticipates there will be an increased harvest of brown bears” by nonresident hunters if this proposal passes.

This proposal calls into question the Department’s position on neutrality on allocation issues when it comes to limiting or restricting nonresident hunters. The Department can’t have it both ways, be neutral on allocation matters that restrict nonresidents on one hand but actually espouse allocation increases to nonresidents on the other.

This proposal clearly would result in less harvest percentage going to resident brown bear hunters. It is plainly allocative in nature in favor of increased nonresident opportunity and harvests.

End of Proposal Comments

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Footnote Documents Begin Next Page

Footnote Documents

¹ ADF&G Sheep Population Trends across Alaska

Sheep Population trends across Alaska:

Survey and Inventory Report Area	Population Trend
Kenai Peninsula	Decreasing
Alaska Range west	Stable
South Wrangell Mountains	Stable or Increasing
Chugach Mountains	Stable at low levels
Mentasta, Nutzotin, and N. Wrangells	Stable or Decreasing
Tok Management Area	Stable or Decreasing
Talkeetna Mtns., Chulitna-Watana Hills	Stable at low levels
Delta Controlled Use Area	Stable
N. AK Range, E. of Nenana Riv., W. of Delta Riv.	Stable
White Mountains	Stable
Tanana Hills	Stable
Western Brooks Range	Decreasing
Central Brooks Range	Stable or Decreasing
Eastern Brooks Range	Stable or Decreasing

<u>1990</u>	<u>2000</u>	<u>2010</u>
56,740 (53,900-62,400)	50,850 (48,300-55,900)	45,010 (42,800-49,500)

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² ADF&G Alaska Total Sheep Harvests 1985-2015

ALASKA TOTAL SHEEP HARVEST 1985-2015 (GEN AND DRAW)										
	RESIDENT			NON-RESIDENT			UNKNOWN		TOT HARV	Success %
	SUCC	UNSUCC	%	SUCC	UNSUCC	%	SUCC	UNSUCC		
1985	784	1532	34%	330	103	76%	15	18	1129	41%
1986	866	1666	34%	381	104	79%	53	70	1300	41%
1987	869	1771	33%	434	117	79%	61	63	1364	41%
1988	886	1651	35%	491	139	78%	64	91	1441	43%
1989	930	1696	35%	475	145	77%	49	42	1454	44%
1990	852	1819	32%	493	160	75%	62	64	1407	41%
1991	944	2028	32%	447	164	73%	30	32	1421	39%
1992	716	1988	26%	368	164	69%	25	41	1109	34%
1993	758	2157	26%	323	171	65%	24	30	1105	32%
1994	661	2083	24%	347	168	67%	19	20	1027	31%
1995	729	2035	26%	402	183	69%	5	23	1136	34%
1996	701	2032	26%	365	184	66%	24	31	1090	33%
1997	557	1871	23%	364	176	67%	26	51	947	31%
1998	619	1946	24%	366	219	63%	15	9	1000	31%
1999	592	1961	23%	348	215	62%	11	9	951	30%
2000	486	1955	20%	293	249	54%	12	19	791	26%
2001	542	1741	24%	338	180	65%	13	25	893	31%
2002	563	1762	24%	319	226	59%	14	14	896	31%
2003	595	1702	26%	360	195	65%	4	20	959	33%
2004	582	1693	26%	363	150	71%	19	38	964	34%
2005	540	1554	26%	372	182	67%	9	8	921	35%
2006	486	1649	23%	339	219	61%	11	14	836	31%
2007	514	1769	23%	403	197	67%	20	24	937	32%
2008	480	1644	23%	308	181	63%	55	76	843	31%
2009	459	1553	23%	336	174	66%	20	25	815	32%
2010	447	1492	23%	295	160	65%	6	24	748	31%
2011	458	1358	25%	334	124	73%	28	58	820	35%
2012	403	1302	24%	268	159	63%	58	178	729	31%
2013	425	1413	23%	266	152	64%	11	20	702	31%
2014	414	1416	23%	264	175	60%	5	8	683	30%
2015	389	1219	24%	264	197	57%	7	5	670	32%

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**³ ADF&G Interim Reports GS000 Sheep by subunit 2010-2014
20A**

Interim Reports GS000 Sheep - Year 2010 Unit 20A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	45	29.4% <i>29.4% of all overlays</i>	108	70.6% <i>70.6% of all overlays</i>	0	0%	153	100%
Non Res	67	77.9% <i>77.9% of all overlays</i>	19	22.1% <i>22.1% of all overlays</i>	0	0%	86	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	112	46.9%	127	53.1%	0	0%	239	100%

Total Juveniles:	3
Animals Harvested:	112

Total Resident Hunters = 153 (64%)

Total Nonresident Hunters = (36%)

Nonresident Harvest = 67 of 112 (60%)

Interim Reports GS000 Sheep - Year 2011 Unit 20A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	41	24.8% <i>24.8% of all overlays</i>	124	75.2% <i>75.2% of all overlays</i>	0	0%	165	100%
Non Res	62	71.3% <i>71.3% of all overlays</i>	25	28.7% <i>28.7% of all overlays</i>	0	0%	87	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	1	100% <i>100% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	1	100%
Total	104	41.1%	149	58.9%	0	0%	253	100%

Total Juveniles:	3
Animals Harvested:	104

Total Resident Hunters = 165 (65%)

Total Nonresident Hunters = 87 (35%)

Nonresident Harvest = 62 of 103 (60%)

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Interim Reports GS000 Sheep - Year 2012 Unit 20A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	47	28.7% <i>28.7% of all overlays</i>	117	71.3% <i>71.3% of all overlays</i>	0	0%	164	100%
Non Res	46	64.8% <i>64.8% of all overlays</i>	25	35.2% <i>35.2% of all overlays</i>	0	0%	71	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	1	50% <i>50% of all tickets</i>	1	50% <i>50% of all tickets</i>	0	0%	2	100%
Total	94	39.7%	143	60.3%	0	0%	237	100%

Total Juveniles:	3
Total Seniors:	1
Animals Harvested:	94

Total Resident Hunters = 164 (70%)
 Total Nonresident Hunters = 71(30%)

Nonresident Harvest = 46 of 93 (49%)

Interim Reports GS000 Sheep - Year 2013 Unit 20A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	46	25.4% <i>25.4% of all overlays</i>	135	74.6% <i>74.6% of all overlays</i>	0	0%	181	100%
Non Res	49	66.2% <i>66.2% of all overlays</i>	25	33.8% <i>33.8% of all overlays</i>	0	0%	74	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	1	100% <i>100% of all tickets</i>	0	0%	1	100%
Total	95	37.1%	161	62.9%	0	0%	256	100%

Total Juveniles:	2
Animals Harvested:	95

Total Resident Hunters = 181 (71%)
 Total Nonresident Hunters = 74 (29%)

Nonresident Harvest = 49 of 95 (52%)

Resident Hunters of Alaska – Alaska Board of Game 2016 Statewide Comments

Interim Reports GS000 Sheep - Year 2014 Unit 20A

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	50	24% <i>24% of all overlays</i>	158	76% <i>76% of all overlays</i>	0	0%	208	100%
Non Res	61	71.8% <i>71.8% of all overlays</i>	24	28.2% <i>28.2% of all overlays</i>	0	0%	85	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	2	66.7% <i>66.7% of all tickets</i>	1	33.3% <i>33.3% of all tickets</i>	0	0%	3	100%
Total	113	38.2%	183	61.8%	0	0%	296	100%

Total Juveniles:	2
Animals Harvested:	113

Total Resident Hunters = 208 (71%)
 Total Nonresident Hunters = 85 (29%)

Nonresident Harvest = 61 of 111 (55%)

2015 Preliminary Data from ADFG 20A

Total Resident Hunters = 165 (71%)
 Total Nonresident Hunters = 66 (29%)

Nonresident Harvest = 40 of 72 (56%)

19C

Interim Reports GS000 Sheep - Year 2010 Unit 19C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	19	29.7% <i>29.7% of all overlays</i>	45	70.3% <i>70.3% of all overlays</i>	0	0%	64	100%
Non Res	49	67.1% <i>67.1% of all overlays</i>	24	32.9% <i>32.9% of all overlays</i>	0	0%	73	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	2	100% <i>100% of all tickets</i>	0	0%	2	100%
Total	68	48.9%	71	51.1%	0	0%	139	100%

Total Juveniles:	1
Animals Harvested:	68

Resident Hunters of Alaska – Alaska Board of Game 2016 Statewide Comments

Total Resident Hunters = 64 (47%)
 Total Nonresident Hunters = 73 (53%)

Nonresident Harvest = 49 of 68 (72%)

Interim Reports GS000 Sheep - Year 2011 Unit 19C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	11	18% <i>18% of all overlays</i>	50	82% <i>82% of all overlays</i>	0	0%	61	100%
Non Res	67	82.7% <i>82.7% of all overlays</i>	14	17.3% <i>17.3% of all overlays</i>	0	0%	81	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	3	100% <i>100% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	3	100%
Total	81	55.9%	64	44.1%	0	0%	145	100%

Total Juveniles:	1
Animals Harvested:	81

Total Resident Hunters = 61 (43%)
 Total Nonresident Hunters = 81 (57%)

Nonresident Harvest = 67 of 78 (86%)

Interim Reports GS000 Sheep - Year 2012 Unit 19C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	24	38.7% <i>38.7% of all overlays</i>	38	61.3% <i>61.3% of all overlays</i>	0	0%	62	100%
Non Res	60	77.9% <i>77.9% of all overlays</i>	17	22.1% <i>22.1% of all overlays</i>	0	0%	77	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	1	100% <i>100% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	1	100%
Total	85	60.7%	55	39.3%	0	0%	140	100%

Total Juveniles:	1
Animals Harvested:	85

Total Resident Hunters = 62 (45%)
 Total Nonresident Hunters = 77 (55%)

Nonresident Harvest = 60 of 84 (71%)

Resident Hunters of Alaska – Alaska Board of Game 2016 Statewide Comments

Interim Reports GS000 Sheep - Year 2013 Unit 19C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	27	39.1% <i>39.1% of all overlays</i>	42	60.9% <i>60.9% of all overlays</i>	0	0%	69	100%
Non Res	52	61.9% <i>61.9% of all overlays</i>	32	38.1% <i>38.1% of all overlays</i>	0	0%	84	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	3	60% <i>60% of all tickets</i>	2	40% <i>40% of all tickets</i>	0	0%	5	100%
Total	82	51.9%	76	48.1%	0	0%	158	100%

Total Juveniles:	1
Animals Harvested:	82

Total Resident Hunters = 69 (45%)
 Total Nonresident Hunters = 84(55%)

Nonresident Harvest = 52 of 79 (66%)

Interim Reports GS000 Sheep - Year 2014 Unit 19C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	29	36.7% <i>36.7% of all overlays</i>	50	63.3% <i>63.3% of all overlays</i>	0	0%	79	100%
Non Res	51	56.7% <i>56.7% of all overlays</i>	39	43.3% <i>43.3% of all overlays</i>	0	0%	90	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	3	75% <i>75% of all tickets</i>	1	25% <i>25% of all tickets</i>	0	0%	4	100%
Total	83	48%	90	52%	0	0%	173	100%

Total Juveniles:	3
Animals Harvested:	83

Total Resident Hunters = 79 (47%)
 Total Nonresident Hunters = 90 (53%)

Nonresident Harvest = 51 of 80 (64%)

Resident Hunters of Alaska – Alaska Board of Game 2016 Statewide Comments

26B

Interim Reports GS000 Sheep - Year 2010 Unit 26B

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	46	29.5% <i>29.5% of all overlays</i>	110	70.5% <i>70.5% of all overlays</i>	0	0%	156	100%
Non Res	17	56.7% <i>56.7% of all overlays</i>	13	43.3% <i>43.3% of all overlays</i>	0	0%	30	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	63	33.9%	123	66.1%	0	0%	186	100%

Total Juveniles:	2
Animals Harvested:	63

Total Resident Hunters = 156 (84%)
 Total Nonresident Hunters = 30 (16%)

Nonresident Harvest = 17 of 63 (27%)

Interim Reports GS000 Sheep - Year 2011 Unit 26B

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	38	24.7% <i>24.7% of all overlays</i>	116	75.3% <i>75.3% of all overlays</i>	0	0%	154	100%
Non Res	17	60.7% <i>60.7% of all overlays</i>	11	39.3% <i>39.3% of all overlays</i>	0	0%	28	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	1	100% <i>100% of all tickets</i>	0	0%	1	100%
Total	55	30.1%	128	69.9%	0	0%	183	100%

Total Juveniles:	1
Animals Harvested:	55

Total Resident Hunters = 154 (85%)
 Total Nonresident Hunters = 28 (15%)

Nonresident Harvest = 17 of 55 (31%)

Resident Hunters of Alaska – Alaska Board of Game 2016 Statewide Comments

Interim Reports GS000 Sheep - Year 2012 Unit 26B

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	48	29.1% <i>29.1% of all overlays</i>	117	70.9% <i>70.9% of all overlays</i>	0	0%	165	100%
Non Res	16	59.3% <i>59.3% of all overlays</i>	11	40.7% <i>40.7% of all overlays</i>	0	0%	27	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	64	33.3%	128	66.7%	0	0%	192	100%

Total Juveniles:	1
Animals Harvested:	64

Total Resident Hunters = 165 (86%)
 Total Nonresident Hunters = 27 (14%)

Nonresident Harvest = 16 of 64 (25%)

Interim Reports GS000 Sheep - Year 2013 Unit 26B

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	26	17% <i>17% of all overlays</i>	127	83% <i>83% of all overlays</i>	0	0%	153	100%
Non Res	9	39.1% <i>39.1% of all overlays</i>	14	60.9% <i>60.9% of all overlays</i>	0	0%	23	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	35	19.9%	141	80.1%	0	0%	176	100%

Total Seniors:	1
Animals Harvested:	35

Total Resident Hunters = 153 (87%)
 Total Nonresident Hunters = 23 (13%)

Nonresident Harvest = 9 of 35 (26%)

Resident Hunters of Alaska – Alaska Board of Game 2016 Statewide Comments

Interim Reports GS000 Sheep - Year 2014 Unit 26B

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	21	17.6% <i>17.6% of all overlays</i>	98	82.4% <i>82.4% of all overlays</i>	0	0%	119	100%
Non Res	10	50% <i>50% of all overlays</i>	10	50% <i>50% of all overlays</i>	0	0%	20	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	1	100% <i>100% of all tickets</i>	0	0%	1	100%
Total	31	22.1%	109	77.9%	0	0%	140	100%

Total Juveniles:	1
Animals Harvested:	31

Total Resident Hunters = 119 (83%)
 Total Nonresident Hunters = 20 (17%)

Nonresident Harvest = 10 of 31 (32%)

26C

Interim Reports GS000 Sheep - Year 2010 Unit 26C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	42	47.7% <i>47.7% of all overlays</i>	46	52.3% <i>52.3% of all overlays</i>	0	0%	88	100%
Non Res	24	88.9% <i>88.9% of all overlays</i>	3	11.1% <i>11.1% of all overlays</i>	0	0%	27	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	1	100% <i>100% of all tickets</i>	0	0%	1	100%
Total	66	56.9%	50	43.1%	0	0%	116	100%

Animals Harvested:	66
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Total Resident Hunters = 88 (77%)
 Total Nonresident Hunters = 27 (23%)

Nonresident Harvest = 24 of 66 (36%)

Resident Hunters of Alaska – Alaska Board of Game 2016 Statewide Comments

Interim Reports GS000 Sheep - Year 2011 Unit 26C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	62	52.1% <i>52.1% of all overlays</i>	57	47.9% <i>47.9% of all overlays</i>	0	0%	119	100%
Non Res	22	81.5% <i>81.5% of all overlays</i>	5	18.5% <i>18.5% of all overlays</i>	0	0%	27	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	0	0% <i>0% of all tickets</i>	0	0%	0	100%
Total	84	57.5%	62	42.5%	0	0%	146	100%

Total Juveniles:	3
Animals Harvested:	84

Total Resident Hunters = 119 (82%)
 Total Nonresident Hunters = 27 (18%)

Nonresident Harvest = 22 of 84 (26%)

Interim Reports GS000 Sheep - Year 2012 Unit 26C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	45	45% <i>45% of all overlays</i>	55	55% <i>55% of all overlays</i>	0	0%	100	100%
Non Res	25	64.1% <i>64.1% of all overlays</i>	14	35.9% <i>35.9% of all overlays</i>	0	0%	39	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	1	100% <i>100% of all tickets</i>	0	0%	1	100%
Total	70	50%	70	50%	0	0%	140	100%

Total Juveniles:	1
Animals Harvested:	70

Total Resident Hunters = 100 (72%)
 Total Nonresident Hunters = 39 (28%)

Nonresident Harvest = 25 of 70 (36%)

Resident Hunters of Alaska – Alaska Board of Game 2016 Statewide Comments

Interim Reports GS000 Sheep - Year 2013 Unit 26C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	51	41.8% <i>41.8% of all overlays</i>	71	58.2% <i>58.2% of all overlays</i>	0	0%	122	100%
Non Res	26	81.3% <i>81.3% of all overlays</i>	6	18.8% <i>18.8% of all overlays</i>	0	0%	32	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	1	100% <i>100% of all tickets</i>	0	0%	1	100%
Total	77	49.7%	78	50.3%	0	0%	155	100%

Total Juveniles:	1
Animals Harvested:	77

Total Resident Hunters = 122 (79%)
 Total Nonresident Hunters = 32 (21%)

Nonresident Harvest = 26 of 77 (34%)

Interim Reports GS000 Sheep - Year 2014 Unit 26C

Current File Statistics (110)

	Successful		Unsuccessful		Did Not Hunt		Total Hunters	
	Number	Pct	Number	Pct	Number	Pct	Number	Pct
Residents	43	43.4% <i>43.4% of all overlays</i>	56	56.6% <i>56.6% of all overlays</i>	0	0%	99	100%
Non Res	22	62.9% <i>62.9% of all overlays</i>	13	37.1% <i>37.1% of all overlays</i>	0	0%	35	100%
Unspecified	0	0% <i>0% of all overlays</i>	0	0% <i>0% of all overlays</i>	0	0%	0	100%
No Overlay	0	0% <i>0% of all tickets</i>	2	100% <i>100% of all tickets</i>	0	0%	2	100%
Total	65	47.8%	71	52.2%	0	0%	136	100%

Total Juveniles:	1
Animals Harvested:	65

Total Resident Hunters = 99 (74%)
 Total Nonresident Hunters = 35 (26%)

Nonresident Harvest = 22 of 65 (34%)

Resident Hunters of Alaska – Alaska Board of Game 2016 Statewide Comments

⁴ House Resources Committee testimony, March 11, 2013

Complete Testimony of BOG Chairman Ted Spraker
House Resources Committee Hearing
HB 158 – DNR Guide Concession Program
March 11, 2013

“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

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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

Resident Hunters of Alaska – Alaska Board of Game 2016 Statewide Comments

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.”

Resident Hunters of Alaska – Alaska Board of Game 2016 Statewide Comments

⁵ Joint Boards Criteria for Development of Board-Generated Proposals

2013-34-JB

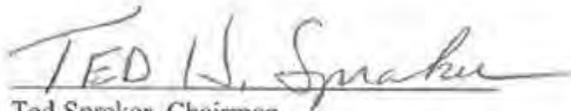
ALASKA JOINT BOARDS OF FISHERIES AND GAME

CRITERIA FOR DEVELOPMENT OF BOARD-GENERATED PROPOSAL

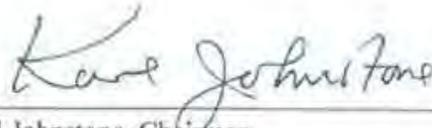
It has been suggested that criteria need to be established to guide the Alaska Joint Boards of Fisheries and Game, Board of Fisheries, and Board of Game (boards) members when deliberating on whether or not to develop a board-generated proposal. The boards will consider the following criteria when deliberating the proposed development and scheduling of a board-generated proposal:

1. Is it in the public's best interest (e.g., access to resource, consistent intent, public process)?
2. Is there urgency in considering the issue (e.g., potential for fish and wildlife objectives not being met or sustainability in question)?
3. Are current processes insufficient to bring the subject to the board's attention (e.g., reconsideration policy, normal cycle proposal submittal, ACRs, petitions)?
4. Will there be reasonable and adequate opportunity for public comment (e.g., how far do affected users have to travel to participate, amount of time for affected users to respond)?

Findings adopted this 16th day of October 2013.



Ted Spraker, Chairman
Alaska Board of Game
Vote: 6-0



Karl Johnstone, Chairman
Alaska Board of Fisheries
Vote: 7-0

Submitted By
Rich & Ellen Bove
Submitted On
3/1/2016 5:43:48 AM
Affiliation

The members of this household who frequent your fair state regularly are *vehemently opposed to Proposal 78*. This is a blatant attempt to let trappers remain anonymous while taking a resource from public or private property for their benefit. "Alaska Trappers Association" clearly wishes to pre-empt any additional trap-id requirements which would effectively end any accountability for where they place their traps or any incidental catch of wildlife pets or people.

The members of this household who frequent your fair state regularly are *strongly supportive of Proposal 79*. This proposal would mandate that traps be checked at intervals of no more than 24 hours. Currently there is no required schedule to check traps in Alaska, except for a small area in Southeast where there is a 72-hour trap-check rule.

The members of this household who frequent your fair state regularly are *strongly supportive of Proposal 80*. This proposal would, within cities of 1,000 or more population, prohibit trapping within one-quarter mile of a publicly maintained road, within 200 feet of a publicly maintained trail & within one mile of a home, school or recreational facility (such as a boat launch or campground).

Kindly take into consideration the public's wishes regarding the protection Alaska's wildlife.

Thank you, ~Rich & Ellen Bove~

Submitted By
Rich & Ellen Bove
Submitted On
3/3/2016 5:14:29 AM
Affiliation

The members of this household who frequent your fair state regularly are stringly support Proposal 141. This ruling would end the wolf hunting season in the western portion of Stampede Corridor on April 15 (instead of May 31) to coincide with the opening of the bear baiting season. This would prevent the killing of wolves attracted to the baiting stations.

Proposal 141 should be approved with the following modifications: immediate implementation in the 2015-16 regulatory year; expansion to include the entire Stampede Corridor area; closure of the hunting season earlier, on Mar 15 or April 1st; and closure of both the hunting and trapping seasons on April 15.

Kindly take into consideration the public's wishes regarding the protection of Alaska's wildlife.

Thank you, ~Rich & Ellen Bove~

Submitted By
Robert Cassell
Submitted On
3/3/2016 7:36:13 AM
Affiliation

Proposal 5 - Oppose

Current regulations are adequate for salvage of edible MEAT of game birds. Current regulations MEET my customary and traditional use of game birds.

Proposal 21,22 - Oppose

The regulation is unenforceable per the Wildlife Troopers and effectively makes any sheep seen while flying during the hunting season illegal to hunt thru the end of the season. It adversely affected my sheep hunting last year so much that I turned in my harvest ticket prior to the season closing. This regulation gave 5% more of the sheep harvest to non-resident hunters.

Proposal 23,24,25,26 - Approve

The BOG subverted the public process when enacting Proposition 207 by ignoring the AC objections, not responding in writing to the ACs why it did not respect their recommendations, refusing to correct its error when the issue was brought in front of it again last summer. This onerous regulation gave 5% more of the sheep harvest to non-resident hunters, is unenforceable per the Alaska Wildlife Troopers and effectively makes any sheep seen while flying illegal to hunt for the rest of the season as interpreted to me by an Alaska Wildlife Trooper.

Proposal- 41,43,44,45 - Approve

A 90/10% allocation for resident/non-resident hunters for sheep and should be for any drawing permits hunts and would give the residents of Alaska priority. This is consistent with other states.

Proposal - 42 modify

The percent allocation should be 90/10 for resident/nonresident hunters.

Proposal - 69 Oppose

Domestic dogs have been in Alaska for over 150 years, helped develop the state and have caused few problems with introduced disease. Their use for hunting to help find and recover shot game for human consumption is invaluable.

Proposal - 70 Oppose

PLEASE NO MORE BOLD MOVES. See my comment for proposals 23,24,25,26

Is this the guy that called Chairman Spraker 10 times at home and said Prop 207 was a good idea?

Proposition – 90 Approve

Domestic sheep and goats have been documented to transmit disease with high mortality rates to North American wild sheep. Contact with domestic sheep and goats is the most serious threat to wild sheep in Alaska from human interactions.

Proposition - 98 Approve

This would randomly spread the limited drawing permits out to more hunters.

Proposal -101,107 Approve

Non-resident hunter should be limited to 10% or less when any restrictions are placed on a hunt by drawing permit.

Submitted By
Robert Jahnke
Submitted On
2/21/2016 5:37:17 AM
Affiliation
Trapline Supplies

proposal ,78 ,yes This requirement only burdens lawful trappers and the potential of abuse by the anti-trap zealots is very probable.
proposal 79,no. Once again, if the intent is to kill trappers or at the very least put them in harms way then by all means pass this proposal.
Please do not pass or amend 79. Proposal 80, no, Please do not pass or amend. Proposal 112, I proposed this unit division to provide a
dialog on an on going concern by hunter/trappers in unit 2 pertaining to what some are still calling poor science in relation to increased
wolf number sightings in areas outside of ADF&Gs study areas in unit 2. This is based on many conversations with folks visiting my
business who hunt and trap unit 2 and my own limited experience of trapping wolves in unit 2 in the past.

Submitted By
Terry Morache
Submitted On
3/4/2016 5:26:16 PM
Affiliation
Small farmer and musher

Phone
907-982-1248
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Address
PO box 723
Willow, Alaska 99688

now there's

Since there has never been a documented case of wild animals contracting a disease from a domestic animal I would ask Board of Game, Fish and Game, and Lisa Murkowski to investigate Alaska Chapter of Wild Sheep Foundation to scrutinize the logic behind this proposed regulation.

It is my understanding that the proposal is aimed at conservation, but has harvesting limits been set to mitigate that? Are the numbers of sheep dwindling? Has any wild sheep been affected in any way by domestic sheep in Alaska? Has ACWSF taken steps to implement WSF's management policies concerning protecting wild sheep from disease from other wild sheep?

If the answer is NO to any of these questions then I would conclude that ACWSF is simply trying to follow the Wild Sheep Foundation's policy lead but in a heavy-handed, excessive manner that tramples on the rights of citizens to raise sheep and goats. Nowhere in WSF's policy is it advocated to stamp out the citizen's right to own livestock. This policy can be read online at: http://www.adfg.alaska.gov/static-f/regulations/regprocess/gameboard/pdfs/2015-2016/statewide/dept_90.pdf "DEPARTMENT COMMENTS: The department's recommendation is to TAKE NO ACTION on this proposal because the board's statutory authority is limited to game and feral animals. It does not have the authority to regulate domestic animals. [s://www.wildsheepfoundation.org/pdf/documents/1page.pdf](http://www.wildsheepfoundation.org/pdf/documents/1page.pdf) Nowhere in this policy is it stated that domestic livestock actually infected wild sheep, only that it could be a possibility.

I would ask that the determining factor be the rights of the general population over the misplaced desire of ACWSF to mislead the Board of Game into an embarrassing regulation that will surely be challenged in the courts.

Now there's prop 69 as well!!! What are these damn fools from outside doing!!! I'll tell you ruining Alaska!!! What next ban the state sport!!! Be real HOW many DOCCUMENTED cases from the state vet are there about dogs giving ticks to wildlife??? Especially since ticks are very rare in Alaska

Submitted By
Tom Meacham
Submitted On
3/4/2016 3:51:20 PM
Affiliation
self

Phone
907-346-1077
Email
tmeacham@gci.net
Address
9500 Prospect Drive
Anchorage, Alaska 99507

I have been a resident of Alaska since 1967, and am former member of the Board of Game. I wish to go on record as supporting or opposing the following proposals before the Board of Game.

Proposal 78: I OPPOSE this proposal. The repeal of any minimal requirement for trap IDs is contrary to the public interest. In fact, the opposite should pertain: a requirement for a metal tag identifying the owner of any trap set on public land should be a state-wide requirement. Further, I OPPOSE any adoption by the Board of any "statement of legislative intent" by the Board regarding not dealing further with the issue of mandatory identification of traps' owners. First, the Board is not a "legislature." Second, the adoption of any such "intent" cannot bind either this Board or a future Board in any way, if a proposal for mandatory trap IDs is properly presented to the Board for its consideration.

Proposal 79: I SUPPORT this proposal. There should be a mandatory period required of trappers to check their traps. Good trappers do it anyway; poor trappers give trapping a bad name, and their neglect can only harm their legitimacy in the eyes of the public.

Proposal 80: I SUPPORT this proposal. It will set common-sense distances between trapping activity and concentrations of human population, public trails and facilities, homes, etc. This is only common sense, and if it had been in place, much of the recent negative publicity regarding the effects of unregulated trapping on pets, birds, and public enjoyment of public areas could have been avoided.

Proposal 141: I SUPPORT this proposal. The National Park Service has recognized that the introduction of bear-baiting in the area covered by this proposal has had the unintended consequence of increasing the wolf take in the same area, due to the length of the wolf season and the wolves' attraction to bait stations.

I urge that Proposal 141 be revised so that it will cover the remaining wolf hunting season in spring of 2016, rather than waiting until the next regulatory year begins on July 1, 2016. Further, the area covered by Proposal 141 should be enlarged to cover the entire Stampede Corridor to the Parks Highway.

I also support the other two changes to Proposal 141 that have been advanced by the Alaska Wildlife Alliance and the Denali Citizens Council, which have been attempting for years to obtain some protection for the wolves that are seasonally in the Wolf Townships adjacent to Denali National Park.

Thank you for the opportunity to comment on the above regulatory proposals.

/s/ Thomas E. Meacham



IN REPLY REFER TO:

United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road M/S 121
Anchorage, Alaska 99503-6199



FWS/OSM 16006 PM

FEB 25 2016

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

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet March 18-28, 2016 to deliberate proposals to change regulations governing hunting and trapping of wildlife for the Statewide Regulations, Cycle A and B Schedules. We have reviewed the 138 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

2

**cc: Tim Towarak, Chair, Federal Subsistence Board
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Chris McKee, Wildlife Division Chief, Office of Subsistence Management
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,
Alaska Department of Fish and Game
Bruce Dale, Wildlife Division Director, Alaska Department of Fish and Game
Drew Crawford, Federal Subsistence Liaison, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record**



RECOMMENDATIONS
ALASKA BOARD OF GAME PROPOSALS

Statewide

March 18-28, 2016

Fairbanks, Alaska

U.S. Fish and Wildlife Service

Office of Subsistence Management (OSM)

PROPOSAL 5 – 5 AAC 92.990(a)(26). Definitions. Modify the definition of edible meat for all game birds.

Current Federal Regulation:

§ 100.25(a) Definitions

Edible meat means the breast meat of ptarmigan and grouse and those parts of caribou, deer, elk, mountain goat, moose, musk oxen, and Dall sheep that are typically used for human consumption, which are: The meat of the ribs, neck, brisket, front quarters as far as the distal (bottom) joint of the radius-ulna (knee), hindquarters as far as the distal joint (bottom) of the tibia-fibula (hock) and that portion of the animal between the front and hindquarters; however, edible meat of species listed in this definition does not include: Meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, and incidental meat reasonably lost as a result of boning or close trimming of the bones, or viscera. For black bear, brown and grizzly bear, "edible meat" means the meat of the front quarter and hindquarters and meat along the backbone (backstrap).

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal Subsistence users/wildlife: Adoption of this proposal will result in misalignment of State and Federal regulations, which may increase regulatory complexity, user confusion, and law enforcement concerns. Processing time for game birds would increase and the weight and space capacity hunters need to transport ptarmigan and grouse from the field may also increase. There are no biological concerns for this proposal. It should also be noted that the Federal Subsistence Board only regulated grouse and ptarmigan, while the subsistence harvest of migratory birds is managed by the U.S. Fish and Wildlife Service.

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

Rationale: This proposal would increase regulatory complexity and place additional burden on Federally qualified subsistence users who hunt under both State and Federal regulations.

PROPOSAL 6 – 5 AAC 92.990(a)(46) Modify the definition of a spike-fork moose antler:

"spike-fork antler" means an antler of a bull moose with only one or two tines on at least one antler; **antler projections originating within two inches of the base of the antler and less than three inches in length will not be counted as a tine;** male calves are not spike-fork bulls

Current Federal Regulation:

§100.25(a) Definitions

The definition under the Federal regulations is the same as the State definition: Spike-fork moose means a bull moose with only one or two tines on either antler; male calves are not spike-fork bulls.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: If adopted, this proposal will result in misalignment between State and Federal regulations and add regulatory complexity for subsistence users.

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

Rationale: This regulation would be burdensome to Federally qualified subsistence users who hunt under both State and Federal hunting regulations and would lead to increased regulatory complexity. If this proposal is adopted, the Federal Subsistence Board would need to take parallel action to address Federal spike-fork definitions in order for this regulatory change to be fully effective.

PROPOSAL 7 - 5 AAC 92.990(a)(61). Definitions. Clarify the definition of antler point.

Current Federal Regulation:

§100.25(a) Definitions

Tine or antler point refers to any point on an antler, the length of which is greater than its width and is at least 1 inch.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal would decrease regulatory complexity for Federally qualified subsistence users who also hunt under State regulations. It is not expected to impact ungulate populations.

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

Rationale: The proposed change would result in a simplified and more concise definition, but would not result in a functional change in what constitutes a point. If a hunter cannot clearly tell that a point is longer than it is wide, it should not be considered legal. The current definition contains language that does not provide additional clarity. The proposed definition would be simpler and more consistent with the current Federal subsistence definition, which would reduce regulatory complexity and eliminate a potential source of confusion for users who hunt under both State and Federal subsistence regulations.

PROPOSAL 50 – 5 AAC 92.150. Remove the requirement for evidence of sex for hunts with bag limits on one sex.

Current Federal Regulation:

§100.26 Subsistence taking of wildlife.

(g) Evidence of sex and identity.

(1) If subsistence take of Dall sheep is restricted to a ram, you may not possess or transport a harvested sheep unless both horns accompany the animal.

(2) If the subsistence taking of an ungulate, except sheep, is restricted to one sex in the local area, you may not possess or transport the carcass of an animal taken in that area unless sufficient portions of the external sex organs remain attached to indicate conclusively the sex of the animal, except that in Units 1-5 antlers are also considered proof of sex for deer if the antlers are naturally attached to an entire carcass, with or without the viscera; and except in Units 11, 13, 19, 21, and 24, where you may possess either sufficient portions of the external sex organs (still attached to a portion of the carcass) or the head (with or without antlers attached; however, the antler stumps must remain attached) to indicate the sex of the harvested moose; however, this paragraph (g)(2) does not apply to the carcass of an ungulate that has been butchered and placed in storage or otherwise prepared for consumption upon arrival at the location where it is to be consumed.

(3) If a moose harvest limit requires an antlered bull, an antler size, or configuration restriction, you may not possess or transport the moose carcass or its parts unless both antlers accompany the carcass or its parts. If you possess a set of antlers with less than the required number of brow tines on one antler, you must leave the antlers naturally attached to the unbroken, uncut skull plate; however, this paragraph (g)(3) does not apply to a moose carcass or its parts that have been butchered and placed in storage or otherwise prepared for consumption after arrival at the place where it is to be stored or consumed.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Eliminating the need to provide evidence of sex would make it less burdensome for Federally qualified subsistence hunters. However, the elimination of the evidence of sex requirement could result in the increased harvest of protected sex classes, which may negatively affect the sustainability of harvested populations under current regulations. Females of many game species are protected due to their higher reproductive value to populations. Without an evidence of sex requirement, enforcement of sex-restricted regulations are difficult to enforce.

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

Rationale: The regulation to require users to keep the evidence of sex on harvested animals is an important tool to enforce harvest regulations, especially when certain sex classes are protected to maintain or increase harvested populations. The proponent's suggestion of using DNA analysis to determine the sex of harvested individuals is impractical due to the cost of processing tissue samples and the increased time associated with determining the sex of an animal.

PROPOSAL 57 – 5 AAC 92.200(b). Purchase and sale of game. Allow the sale of brown bear hides and/or skulls by resident hunters as follows:

Statewide: allow resident Alaskan hunters to sell the hides with claws attached and/or skulls of legally taken brown bears harvested in units where the bag limit is two or more bears per season.

Current Federal Regulation:

§ 100.25(j). Utilization of fish, wildlife, or shellfish

(7) If you are a Federally qualified subsistence user, you may sell handicraft articles made from the skin, hide, pelt, or fur, including claws, of a brown bear taken from Units 1-5, 9A-C, 9E, 12, 17, 20, 22, 23, 24B (only that portion within Gates of the Arctic National Park), 25, or 26.

(i) In Units 1, 2, 3, 4, and 5, you may sell handicraft articles made from the skin, hide, pelt, fur, claws, bones, teeth, sinew, or skulls of a brown bear taken from Units 1, 4, or 5.

(ii) Prior to selling a handicraft incorporating a brown bear claw(s), the hide or claw(s) not attached to a hide must be sealed by an authorized Alaska Department of Fish and Game representative. Old claws may be sealed if an affidavit is signed indicating that the claws came from a brown bear harvested on Federal public lands by a Federally qualified user. A copy of the Alaska Department of Fish and Game sealing certificate must accompany the handicraft when sold.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal Subsistence users/wildlife: This proposal would increase opportunity for Federally qualified subsistence users in units with a bag limit of 2 brown bears/year (Units 16B, 17, 19A, 19D, 20E, 22A, and 25D) by providing an additional avenue of cash income. Harvest would likely increase as a result of such a regulation in the affected units. In addition, the status of brown bear populations in many of the units is poorly understood and harvest conditions (i.e. methods and means, season length, access, etc.) vary substantially from unit to unit as well. There are also potential law enforcement concerns associated with tracking bear hides and skulls to ensure animals were taken in the specified units.

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

Rationale: Allowing the sale of brown bear hides and skulls could lead to higher levels of harvest and increased harvest pressure in the affected units as well as adjacent units. Given the lack of objective brown bear population data in many of the affected units, further increase in harvest is not warranted at this time.

PROPOSAL 59 - 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures; and 92.990. Definitions. Clarify and restrict the use of liquids at bear bait stations.

Current Federal Regulation:

§100.25(a) Definitions

Bait means any material excluding a scent lure that is placed to attract an animal by its sense of smell or taste; however, those parts of legally taken animals that are not required to be salvaged and which are left at the kill site are not considered bait.

§100.26(b)(14)

(i) Before establishing a bear bait station, you must register the site with ADF&G;

(iii) You may use only biodegradable materials for bait; you may use only the head, bones, viscera, or skin of legally harvested fish and wildlife for bait;

(vi) When using bait, you must remove litter and equipment from the bait station when done hunting;

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users are required to secure an ADF&G permit for all bear baiting stations. This permit requires that contaminated soil be removed from bait sites. If this proposal is adopted, soil contamination would be minimized, easing the burden of clean up for Federally qualified subsistence users hunting under State regulations.

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

Rationale: Under the conditions of ADF&G bear baiting permits, all contaminated soil must be removed from idle bait stations. Requiring that liquids be used in conjunction with absorbent bait and contained within a receptacle will minimize soil contamination and facilitate bait site cleanup. It will also result in increased public safety, as it will minimize attractants at idle, unmarked bait sites.

PROPOSAL 62 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.
Remove the requirement to remove all contaminated soil from bear bait stations.

Current Federal Regulation:

§100.26 Subsistence taking of wildlife

(b)(14)

(i) *Before establishing a bear bait station, you must register the site with ADF&G*

(vi) *When using bait, you must remove litter and equipment from the bait station site when done hunting*

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal Subsistence users/wildlife: Bears will likely become habituated to baited areas and continue to frequent those areas during closed seasons.

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

Rationale: Failure to remove all attractants is a public safety issue, as the stations will continue to attract bears during closed seasons when bait stations are not marked.

PROPOSAL 66 -5 AAC 92.080 (16). Unlawful taking of game; exceptions. Allow the use of felt soles as follows:

People hunting in Alaska can legally wear whatever they want while pursuing game, including their choice of foot wear and/or any other personal protective equipment that they deem will make their hunt safer.

Current Federal Regulations: Currently there are no Federal hunting regulations restricting the use of felt-soled wading boots.

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal Subsistence users/wildlife: The prohibition of felt-soled wading boots could impact subsistence users by requiring them to purchase new gear; however, the use of felt-soled wading boots has been associated with the introduction of invasive species, such as didymo (*Didymosphenia geminata*), mycospores of the parasite that causes whirling disease (*Myxobolus cerebralis*), and New Zealand mudsnails into aquatic environments. Introductions of invasive species could result in significant impacts to habitats and subsistence resources in Alaska.

Federal Position/Recommended Action: OSM is **neutral** on the proposal as it addresses a social issue.

Rationale: OSM recognizes the importance of protecting Alaskan environments and important subsistence species from the effects of invasive species; however, this issue has not been assessed through the Federal regulation process. It is recognized that field gear is one potential pathway for transmitting invasive species, and therefore, OSM supports educating hunters who spend time in aquatic environments about the risk of spreading invasive organisms and effective disinfection procedures.

PROPOSAL 78 - 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. Remove all requirements for identification tags on traps and snares.

Current Federal Regulations:

§100.26(n)(1)(vii)(D), §100.26(n)(2)(i)(D), §100.26(n)(3)(iii)(D), §100.26(n)(4)(iii)(D), §100.26(n)(5)(iii)(E)

Trappers are prohibited from using a trap or snare unless the trap or snare has been individually marked with a permanent metal tag upon which is stamped or permanently etched the trapper's name and address, or the trapper's permanent identification number, or is set within 50 yards of a sign that lists the trapper's name and address, or the trapper's permanent identification number. The trapper must use the trapper's Alaska driver's license number or State identification card number as the required permanent identification number. If a trapper chooses to place a sign at a snaring site rather than tagging individual snares, the sign must be at least 3 inches by 5 inches in size, be clearly visible, and have numbers and letters that are at least one-half inch high and one-eighth inch wide in a color that contrasts with the color of the sign.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users trapping under State regulation in Units 1 – 5, 12 and 20E would no longer be required to mark traps and snares with their identification information.

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

Rationale: Trap identification facilitates enforcement and is currently required only in specific areas with documented issues. Additionally, in Units 1 – 5, trap identification is required under both State and Federal trapping regulations. Maintaining the current regulation will result in reduced regulatory complexity, easing compliance for users who trap under both State and Federal regulations.

PROPOSAL 79 – 5 AAC 92.095(a). Unlawful methods of taking furbearers; exceptions. Require traps to be checked every 24 hours.

Current Federal Regulation: None.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: Adoption of this proposal will decrease trapping opportunity for Federally qualified subsistence users. Some users run multiple, long trap lines and checking them every 24 hours would be difficult if not impossible. If trappers are unable to maintain as many traps as they had in the past (due to the 24 - hour checking requirement), trapping effort and

animals trapped on non-Federal lands would decrease, adversely affect Federally qualified subsistence users trapping on these lands. Requiring documentation to be submitted if traps are not checked every 24 hours would require additional time and place additional administrative burdens on Federally qualified subsistence users.

Adoption of this proposal will also result in misalignment of State and Federal regulations, which will increase regulatory complexity, user confusion, and law enforcement concerns.

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

Rationale: Adoption of this proposal will increase regulatory complexity and burden Federally qualified subsistence users. This proposal applies to all types of traps. While implementing some time requirement for checking snare or foothold traps may reduce incidental take, requiring drowning sets to be checked within a set time period would have no effect other than burdening trappers.

PROPOSAL 85 – 5 AAC 92.010(g). Harvest tickets and reports. Remove the exception for harvest tickets and reports for caribou as follows:

Delete the exception in 5 AAC 92.010(g) that allows the harvest of caribou without requiring a harvest ticket or harvest report for residents residing north of the Yukon River. All persons hunting caribou north of the Yukon River must have a harvest ticket in possession and have obtained a harvest report.

Current Federal Regulation:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports

(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Requiring Federally qualified subsistence users residing north of the Yukon River to obtain a harvest ticket and submit reports when hunting caribou could be burdensome especially for those residents living in very remote areas. Obtaining accurate harvest information using harvest tickets would provide useful information for Federal and State agencies responsible for managing caribou populations.

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

Rationale: The data gathered from harvest ticket reports are important as they provide State and Federal wildlife managers with valuable information to aid caribou population management decisions. Declines of approximately 50% in the Western Arctic Caribou and Teshekpuk Caribou herds have resulted in recent changes to State caribou regulations for the 2015/2016 regulatory year and proposed changes in the Federal Subsistence regulations for 2016-2018. One of the objectives is to reduce the hunting pressure on caribou in these herds by reducing harvest limits. Thus accurate harvest information is needed to monitor the effects of hunting pressure. If this proposal is adopted, OSM recommends outreach to the affected communities prior to the caribou hunting season to explain the justification and need for harvest tickets.

PROPOSAL 90 - 5 AAC 92.029. Permit for possessing live game. Eliminate domestic sheep (*Ovis aries*) and goats (*Capra hircus*) from the “Clean List” and require a permit for possession with stipulations if located within 15 air miles of all sheep habitat

Current Federal Regulation: None.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: The safeguards intended by this proposal may be influential in the long-term viability of Alaska’s sheep populations, which would ultimately benefit users of this subsistence resource. Federally qualified subsistence users who also engage in small-scale agriculture would be impacted by permitting requirements and conditions associated with adoption of this proposal.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale: Spatial and temporal correlations between wild sheep die-offs and the arrival of domestic sheep stocks have led to the hypothesis that disease transfer from domestic to wild stocks are a threat to wild sheep populations. Experimental data have corroborated this hypothesis, demonstrating that wild sheep are susceptible to respiratory disease caused by pathogens that are largely harmless to domestic sheep. The long-term viability of sheep populations is an important issue for subsistence users, and maintaining distance between wild and domestic stocks is logical.

These considerations notwithstanding, there are several uncertainties associated with this proposal that should be considered before it is adopted. While issuing and securing permits may be facilitated by online systems, the real burden lies in complying with the conditions of the permit, which are not well defined.

PROPOSAL 113 – 5 AAC 85.045(a)(1). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 1C.

Current Federal Regulation:

Unit 1C – Moose

Unit 1C—that portion south of Point Hobart including all Port Houghton drainages—1 antlered bull with spike-fork or 50-inch antlers or 3 or more brow tines on one side, or antlers with 2 brow tines on both sides, by State registration permit only *Sept. 15-Oct. 15.*

Unit 1C—remainder, excluding drainages of Berners Bay—1 antlered bull by State registration permit only *Sept. 15-Oct. 15.*

Unit 1C, Berners Bay *No open season.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: This proposal will increase harvest opportunity for Federally qualified subsistence users.

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

Rationale: This proposal would allow additional opportunity for Federally qualified subsistence users to harvest moose in this unit and provide management flexibility.

PROPOSAL 114 – 5 AAC 85.045(a)(3). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 5A, Nunatak Bench.

Current Federal Regulation:

Unit 5A – Moose

Unit 5A—Nunatak Bench—1 moose by State registration permit only. The season will be closed when 5 moose have been taken from the Nunatak Bench *Nov. 15-Feb. 15.*

See comments for Proposal 113.

PROPOSAL 115 – 5 AAC 85.045(a)(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 Sept. 1-Oct. 31.
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.

See comments for Proposal 113.

PROPOSAL 116 – 5 AAC 85.045(a)(5). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 7.

Current Federal Regulation:

Unit 7 – Moose

Unit 7—that portion draining into Kings Bay—Federal public lands are No open season.
closed to the taking of moose except by residents of Chenega Bay and
Tatitlek

Unit 7, remainder--1 antlered bull with spike-fork or 50-inch antlers or with Aug. 10-Sept. 20.
3 or more brow tines on either antler, by Federal registration permit only

See comments for Proposal 113.

PROPOSAL 118 – 5 AAC 85.045(a)(13). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 15C.

Current Federal Regulation:

Unit 15C – Moose

Unit 15C—1 cow by Federal registration permit only

Aug. 10-Sept. 20.

See comments for Proposal 113.

PROPOSAL 119 – 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 13C.

Current Federal Regulation:

Unit 13C – Moose

Unit 13-remainder—1 antlered bull moose by Federal registration permit only

Aug. 1-Sept. 20.

See comments for Proposal 113.

PROPOSAL 121 – 5 AAC 85.045(a)(14). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 16B.

Current Federal Regulation:

Unit 16B – Moose

Unit 16B—Redoubt Bay Drainages south and west of, and including the Kustatan River drainage—1 bull

Sept. 1-15.

Unit 16B--Denali National Preserve only—1 bull by Federal registration permit. One Federal registration permit for moose issued per household

Sept. 1-30.

Dec. 1-Feb. 28.

Unit 16B, remainder—1 bull

Sept. 1-30.

Dec. 1-Feb. 28.

See comments for Proposal 113.

PROPOSAL 122 – 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 17A.

Current Federal Regulation:

Unit 17A – Moose

Unit 17A—1 bull by State registration permit

Aug. 25-Sept. 20.

Unit 17A—up to 2 moose by State registration permit

*Up to a 31-day
season may be
announced
between Dec. 1-
Jan. 31.*

See comments for Proposal 113.

PROPOSAL 123 – 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 20A.

Current Federal Regulation:**Unit 20A – Moose**

Unit 20A—1 antlered bull

Sept. 1-20.

See comments for Proposal 113.

PROPOSAL 124 – 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 20B.

Current Federal Regulation:**Unit 20B – Moose**

*Unit 20B—that portion within the Minto Flats Management Area—1 bull by
Federal registration permit only*

Sept. 1-20.

Jan. 10-Feb. 28.

Unit 20B, remainder—1 antlered bull

Sept. 1-20.

See comments for Proposal 113.

PROPOSAL 125 – 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 20D.

Current Federal Regulation: There are no Federal regulations for moose in Unit 20D.

See comments for Proposal 113.

PROPOSAL 126 – 5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 18.

Current Federal Regulation:

Unit 18 – Moose

Unit 18—that portion east of a line running from the mouth of the Ishkowitz River to the closest point of Dall Lake, then to the east bank of the Johnson River at its entrance into Nunavakanukakslak Lake (N 60°59.41' Latitude; W162°22.14' Longitude), continuing upriver along a line 1/2 mile south and east of, and paralleling a line along the southerly bank of the Johnson River to the confluence of the east bank of Crooked Creek, then continuing upriver to the outlet at Arhymot Lake, then following the south bank east of the Unit 18 border and then north of and including the Eek River drainage—1 antlered bull by State registration permit; quotas will be announced annually by the Yukon Delta National Wildlife Refuge Manager *Sept. 1-30.*

Federal public lands are closed to the taking of moose except by residents of Tuntutuliak, Eek, Napakiak, Napaskiak, Kasigluk, Nunapitchuk, Atmautlauk, Oscarville, Bethel, Kwethluk, Akiachak, Akiak, Tuluksak, Lower Kalskag, and Kalskag

Unit 18—south of and including the Kanektok River drainages to the Goodnews River drainage. Federal public lands are closed to the taking of moose by all users *No open season.*

Unit 18--Goodnews River drainage and south to the Unit 18 boundary--1 antlered bull by State registration permit. Any needed closures will be announced by the Togiak National Wildlife Refuge Manager after consultation with BLM, ADF&G, and the Chair of the Yukon-Kuskokwim Delta Subsistence Regional Advisory Council *Sept. 1-30.*

Unit 18, remainder—2 moose, only one of which may be antlered. Antlered bulls may not be harvested from Oct. 1 through Nov. 30 *Aug 1-Mar. 31.*

See comments for Proposal 113.

PROPOSAL 127 – 5 AAC 85.045(a)(21). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 23.

Current Federal Regulation:

Unit 23 – Moose

Unit 23—that portion north and west of and including the Singoalik River drainage, and all lands draining into the Kukpuk and Ipevik Rivers—1 moose; no person may take a calf or a cow accompanied by a calf July 1-Mar. 31.

Unit 23—that portion lying within the Noatak River drainage—1 moose; however, antlerless moose may be taken only from Nov. 1-Mar. 31; no person may take a calf or a cow accompanied by a calf Aug. 1-Mar. 31.

Unit 23, remainder—1 moose; no person may take a calf or a cow accompanied by a calf Aug. 1-Mar. 31.

See comments for Proposal 113.

PROPOSAL 128 – 5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 26A.

Current Federal Regulation:

Unit 26A – Moose

Unit 26A—that portion of the Colville River drainage upstream from and including the Anaktuvuk River drainage—1 bull Aug. 1-Sept. 14.

Unit 26A—that portion of the Colville River drainage upstream from and including the Anaktuvuk River drainage—1 moose; however, you may not take a calf or a cow accompanied by a calf Feb. 15-Apr. 15.

Unit 26A—that portion west of 156°00' W. longitude excluding the Colville River drainage—1 moose, however, you may not take a calf or a cow accompanied by a calf July 1-Sept. 14.

Unit 26A, remainder—1 bull Aug. 1-Sept. 14.

See comments for Proposal 113.

PROPOSAL 129 – 5 AAC 92.015. Brown bear tag fee exemptions. Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.

Current Federal Regulations:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports

(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: There would be no impact on brown bears if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

Rationale: There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted it would continue the tag fee exemption, which eliminates the requirement that Federally qualified subsistence users must purchase a \$25 tag before hunting brown bears in these units. Retaining this tag fee exemption is particularly important in areas where there are few vendors and local economies are in a depressed state.

PROPOSAL 130 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions. Reauthorize resident grizzly bear tag fee exemptions throughout Interior and Eastern Arctic Alaska.

See comments for Proposal 129.

PROPOSAL 131 – 5 AAC 92.015. Brown bear tag fee exemptions. Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23, and 26A.

See comments for Proposal 129.

PROPOSAL 134 - 5 AAC 85.025(15). Hunting seasons and bag limits for caribou. Increase the bag limits for Mulchatna caribou in Units 17, 18, 19A & 19B, and 9A & 9C

Current Federal Regulation

Unit 9—Caribou

Unit 9A—2 caribou by State registration permit; no more than 1 Aug. 1-Mar. 15.

caribou may be a bull, and no more than 1 caribou may be taken Aug. 1-Jan. 31.

Unit 9B— 2 caribou by State registration permit; no more than 1 caribou may be a bull, and no more than 1 caribou may be taken Aug. 1-Jan. 31. Aug. 1-Mar. 15

Unit 9C, that portion within the Alagnak River drainage—2 caribou by State registration permit; no more than 1 caribou may be a bull, and no more than 1 caribou may be taken Aug. 1-Jan. 31 Aug. 1-Mar. 15

Unit 9C, remainder—Federal public lands are closed to the taking of caribou No open season

Unit 17—Caribou

Unit 17A—all drainages west of Right Hand Point—2 caribou by State registration permit; no more than 1 caribou may be a bull, and no more than 1 caribou may be taken Aug. 1-Jan. 31. The season may be closed and harvest limit reduced for the drainages between the Togiak River and Right Hand Point by announcement of the Togiak National Wildlife Refuge Manager Aug. 1-Mar. 15

Units 17A and 17C—that portion of 17A and 17C consisting of the Nushagak Peninsula south of the Igushik River, Tuklung River and Tuklung Hills, west to Tvativak Bay—up to 2 caribou by Federal registration permit. Public lands are closed to the taking of caribou except by residents of Togiak, Twin Hills, Manokotak, Aleknagik, Dillingham, Clark's Point, and Ekuk hunting under these regulations. The harvest quota, harvest limit, and the number of permits available will be announced by the Togiak National Wildlife Refuge Manager after consultation with the Alaska Department of Fish and Game and the Nushagak Peninsula Caribou Planning Committee. Successful hunters must report their harvest to the Togiak National Wildlife Refuge within 24 hours after returning from the field. The season may be closed by announcement of the Togiak National Wildlife Refuge Manager Aug. 1-Sept. 30
Dec. 1-Mar. 31

Units 17A remainder and 17C remainder—selected drainages; a harvest limit of up to 2 caribou by State registration permit will be determined at the time the season is announced. Season, harvest limit, and hunt area to be announced by the Togiak National Wildlife Refuge Manager Season may be announced between Aug. 1-Mar. 15

Units 17B and 17C—that portion of 17C east of the Wood River and Aug. 1-Mar. 15

Wood River Lakes—2 caribou by State registration permit; no more than 1 caribou may be a bull, and no more than 1 caribou from Aug. 1-Jan 31

Unit 18—Caribou

Unit 18—that portion to the east and south of the Kuskokwim River—2 caribou by State registration permit Aug. 1-Mar. 15

Unit 18 remainder—2 caribou by State registration permit Aug. 1-Mar. 15

Unit 19—Caribou

Unit 19A—north of Kuskokwim River—2 caribou by State registration permit, no more than 1 caribou may be a bull; no more than 1 caribou may be taken from Aug. 1-Jan. 31 Aug. 1-Mar. 15

Unit 19A—south of the Kuskokwim River and Unit 19B (excluding rural Alaska residents of Lime Village)—2 caribou by State registration permit; no more than 1 caribou may be a bull; no more than 1 caribou may be taken Aug. 1-Jan. 31 Aug. 1-Mar. 15

Is a similar issue being addressed by the Federal Subsistence Board? Yes. The Federal Subsistence Board will be considering Proposal WP16-29/30 at its April 2016 meeting. If adopted, this proposal would extend the caribou season in Units 9B and 17, excluding the Nushagak Peninsula, from Aug. 1 – Mar. 15 to Aug. 1 – Mar 31. These changes would result in alignment of Federal regulations with the current State regulations throughout the Mulchatna caribou herd range.

Impact to Federal subsistence users/wildlife: Eliminating harvest restrictions would provide Federally qualified subsistence users additional opportunity to harvest Mulchatna caribou, since Federal harvest of Mulchatna caribou occurs by State registration permit. It may result in an increase in bull harvest and total harvest, which could result in unfavorable changes in population parameters.

Federal Position/Recommended Action: OSM is **neutral** on this proposal.

Rationale for comment: This proposal would result in additional opportunities for Federally qualified subsistence users to harvest caribou from the Mulchatna herd. In particular, eliminating harvest restrictions would increase the chance that users could fill their harvest limit in a single trip. This is an important consideration given the changing distribution of Mulchatna caribou, poor weather and travel conditions in recent years, and the high price of fuel. However, this proposal may result in increased harvest, which could stymie recent population growth and have a negative effect on bull:cow ratios. While the population and the bull:cow ratios have become more favorable in recent years, both remain at the minimum population objective. Allowing the herd to continue to recover before liberalizing harvest could have long term benefits for subsistence users.



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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Togiak National Wildlife Refuge
P.O. Box 270
Dillingham, Alaska 99576
Phone 907-842-1063
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March 1, 2016

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

Dear Members of the Board of Game:

The Togiak National Wildlife Refuge appreciates the opportunity to comment on proposals to be considered by the Alaska Board of Game at its March 18-28, 2016 meeting addressing statewide regulations. We reviewed the proposals that could potentially affect resources on the Togiak National Wildlife Refuge and offer the following comments for Proposals 55, 57, 66, 72-74, 122, and 134.

Proposal #55 – Support for the Unit 17 portions of Togiak Refuge.

Rationale: Currently, the bag limit for brown bears in GMU 17 is 2 brown bear/regulatory year. The reported harvest of brown bears on Togiak Refuge (which is located in both GMU 17 and 18) has increased since 2002 (Fig. 1), averaging 40.1 since 2005. A population estimate of brown bears on Togiak Refuge in 2003-2004 estimated approximately 27 independent brown bears/1000 km² (95% c.i.: 21-34). At this population level, harvest rate ranges from 5.5-9.0% of the population annually, an unsustainable rate. During the years 2011-2013, 30 GMU 17 hunters (including 8 hunters on Togiak Refuge) harvested two brown bears. Reducing the bag limit from 2 to 1 would decrease the harvest to a more sustainable level.

Proposal #57 – Oppose

Rationale: Brown bear harvests in GMU 17 have steadily increased over the last 30 years due to liberalized seasons, harvest limits, and tag fee exemptions. If passed, GMU 17 would be one of the few areas in the state where brown bear hides and skulls could be sold. This would increase the harvest of brown bears not only in GMU 17, but also in adjacent GMUs 9 and 18 as well.

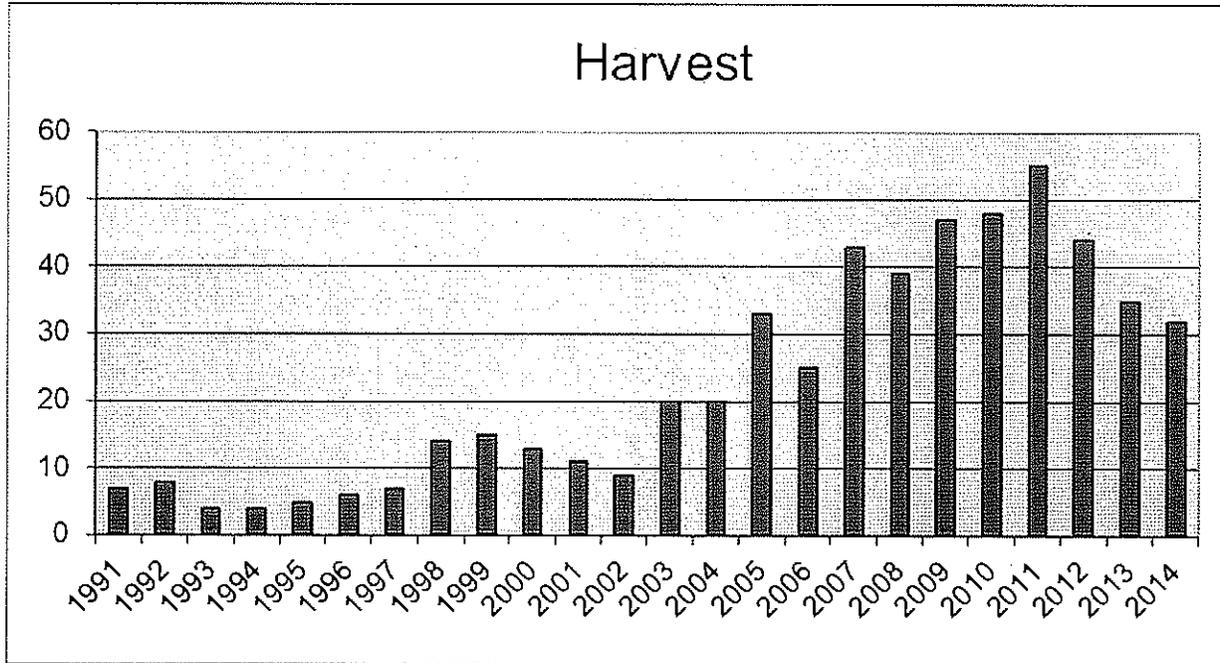


Figure 1. Brown bear harvest on Togiak Refuge, including portions of GMUs 17 and 18, regulatory years 1991-2014.

Proposal #66 – Oppose

Rationale: Prohibiting footwear with felt soles helps to reduce the potential for the introduction and spread of invasive organisms.

Proposals #72, #73, #74 – Support

Rationale: Concur with rationale provided in the proposals.

Proposal #122 – Support

Rationale: Concur with rationale provided in the proposal.

Proposals #134 – Support

Rationale: Concur with rationale provided in the proposal.

Thank you for your time to review our comments on these proposals. If you have any questions, please contact Supervisory Wildlife Biologist Patrick Walsh at (907) 842-1063.

Sincerely,

Susanna Henry
Refuge Manager, Togiak National Wildlife Refuge



Submitted By
Wayne E Kubat
Submitted On
3/4/2016 4:19:52 PM
Affiliation
self / Alaska Remote Guide Service

Proposal 26: I support the various points in this proposal. I think the current wording of proposal 207 is much too restrictive. Many areas of Alaska are totally inaccessible except by air, and banning hunting of any ram spotted during the entire hunting season in some of these remote areas, essentially turns those areas into National monuments where no hunting is allowed. It's pretty hard to fly with your eyes shut and the logic that intentional spotting in areas accessible only by air, is unethical but incidental spotting is ethical, doesn't make much sense.

The language I would suggest to replace the current 207 language and to address aggressive spotting during sheep season would be: **To avoid altering the hunting experience of others, multiple, consecutive approaches in any mechanical powered equipment, near sheep during any open sheep season is prohibited.**

Proposal #35: The ADF&G state in their comments concerning all sheep proposals, that there is no conservation concern. I think the big problem is crowding, especially with residents, since 80 % of all hunters are residents, and much or most of the effort occurs during the first 10 days. I think this proposal would be a big step in the right direction and is all that is needed for now. It may be a hassle to book clients with names starting with the right letter, and family members or buddies might never be able to hunt the first 10 days of season together, but I feel this is far preferential to drawing permits, and still allows everyone a lot of hunting opportunity.

Proposals 36 - 39: I oppose all resident head start seasons. I think a lot more sheep will be harvested to the point, that we could have a conservation concern down the road a few years. A lot of guides who would otherwise be working, may hunt for themselves. Outfitters who are also transporters, will transport hunters at that time instead of being tied up with their guided clients. I think crowding amongst residents during the head start portion will be worse than ever, resulting in even greater dissatisfaction than there is now.

Proposals 40 - 45: These proposals are all excessively restrictive to NR allocation who pay the bulk of our management bill. 89% of all contracting guides are Alaska residents too, and most of the money their clients bring to Alaska, stays here. Many of us were here long before many of Alaska's current residents. I think the general model of 15-20% NR effort paying for 70-80% of our management, has worked well for years and is good for Alaska's economy, hunters, and wildlife.

Before we go down the path of statewide resident head start, I would much prefer NR draws on state and BLM land modeled after proposal #138, but with 20% Guided NR allocation GUA by GUA of the current 5 year average. While this is higher than most residents will agree with, it is much lower than is occurring in several areas on State and BLM land. I think it is these areas that are fueling the contempt between hunters state wide. I think this level would go a long ways towards healing some of that, and help the sheep populations recover by reducing hunting pressure, without greatly reducing wildlife management funding during this time of severe budget shortages in Alaska.

Proposal 70: Oppose - Many areas of Alaska are totally inaccessible except by air, and banning hunting of any animal spotted during the entire hunting season in some of these remote areas, essentially turns those areas into National monuments where no hunting is allowed.

Proposal 136: Oppose especially in 16 B North, and Middle as well. 16B North is only at the 81 percentile of the population objective mid point. Considering that the Bull / Cow ratio is 60 per hundred, that puts the population of breeding cows well below the minimum objective. The same goes for 16B middle but to a lesser extent. Being at 103% of the mid point population objective with a bull / cow ratio of 46 per hundred, puts the breeding cow population pretty close to minimum objective. Though we have a lot of surplus bulls, I don't feel it's worth stressing breeding cows with a winter hunt. Hunters on snow machines often get close to antlerless moose to determine sex, and the potential for extra stress on pregnant cows, is not unfounded.

Additionally, 16B from Skwentna west, is getting one of the heaviest snow falls in years. After years of intensive management, moose populations have just recently started to improve. Now is not the time to be liberalizing harvest opportunity. If any liberalization is done, it should be with more drawing permits in the fall and completely avoid winter registration hunts. There are some major winter trails that go in to some areas that could make access extremely easy, and allow overharvest in localized areas.

ADF&G mentions a concern for habitat in their reasoning for increasing harvest. I feel the habitat has and can hold a lot more moose than are there, and would prefer raising the population objective to 10,000, and putting an effort at better utilizing the habitat with more moose, and more opportunity as a result, than being concerned about harvest objective at this point. I have concern that there are not as many moose in some areas as what the numbers show.

Proposal 138: I think this proposal is excessively restrictive to NR allocation and unnecessary at this time, when the Department is saying in their comments that there is no conservation concern. I think some form of spreading out effort similar to proposal # 35, is all that is



needed.

I would prefer this proposal over any state wide resident head start, if it were amended to 20% Guidede NR allocation on all state and BLM land. While 20%Guided NR/ 80 % resident is higher than most residents will agree with, it is much lower than is occurring in several areas on State and BLM land. I think it is these areas that are fueling the contempt between hunters state wide. I think this level would go a long ways towards healing some of that, and help the sheep populations recover by reducing hunting pressure, without greatly decreasing wildlife management funding, during this time of severe budget shortages in Alaska.

Submitted By

Wayne E Kubat

Submitted On

3/4/2016 7:52:38 PM

Affiliation

self / Alaska Remote Guide Service

Additional Comments

Proposal 65 - I support. At the very least it should be amended to mirror black bear regualations which only require salvage from Jan. 1st to May 31st.

Submitted By
Todd Fritze
Submitted On
1/12/2016 9:59:37 AM
Affiliation
none

I oppose both proposal #72 and #73 with requirements that moose and caribou be harvested with a 243 or larger. Owner of a smaller caliber that carry them daily should not be penalized by being required to carry another gun with them. Being able to use the smaller caliber allows individuals to be opportunistic in hunts and take a moose or caribou and still have a gun that wont destroy the hides of fur bearers without trying to figure out how to carry an additional gun. With proper shot placement both moose and caribou can be sucesfully harvested with smaller caliburs. Also many individuals have only one rifle for them that is smaller than a 243 this would cause a burden on them to try and fund a rifle in the legal caliber range suggested. This for many is an expensse that is huge.

I support proposal #78 tags on traps can often make trappers criminals when animals in traps chew and destroy tags. Or if someone opposed to trapping removes the tag from the trap. It also puts an extra expense on trappers by requireing them to tag their traps. It also can cause for confrontation that should be turned over to the state troopers if a private individual thinks a law maybe being broke and takes the information from the tag and contacts the trap owner directly. It alos would allow anti trappers to collect information on trappers for use in negative way by reading a tag on a trap.

I oppose proposal #79 requireing a 24 hour check time on trappers would put many of them out of business. Being able to travel the distances that many do to enjoy trapping does not make it feasible to to check them daily if one works a regular job. Furthermore even if one were to check every 24 hours the additional cost of fuel would make it no longer cost effective to trap. Many trappers in the state still use trapping as a primary sorce of income and if they can't make money at it they may no longer participate. This in effect can cause populations rises of furbearers that would lead to many other problems in the future. This proposal is nothing more than an attempt to put an end to trapping in Alaska.

I oppose proposal #80 having trapped various parts of Alaska for over 30 years some of my most enjoyable times have been with my children and now my grand children on short sections of line run from roads. The population of my communitiy is approximatley 2200 we have fox running through town on a regular basis and rabbis is a large proplem in Western AK. By not allowing us to trap these animals near the road we can potentially create a safety risk to our children and other communitiy members. We also have beaver that create problems on an annual basis with culverts along the roads though special permits can be given to harvest these animals it makes much more sense to allow trappers to do it under regular conditions and they can take the fur and expect some income from it. These are the kinds of places I like to trap with my grand children of young ages it makes it much more enjoyable for them and makes them want to keep going when they aren't getting exhausted from a 1/4 mile walk at every stop just to get to the first trap. Disallowing traps within a mile of a dwelling when many remote cabins are not even used in the winter is a bit combersome. In addition one may not know his line passes within a mile of a dwelling causing him to unknowingly break the law. This proposal would make a good share of the lower Nushagak River and many sections of the Mulchatna river in Western Alaska illegal to trap due to the large number of summer cabins along the waterways. The way the proposal is written it is not clear where this one mile and quarter mile area begins and ends it does not specifically state within the city limits so in may ways it could be read as all encompassing of the entire state disallowing trapping in large sections in remote areas of the state. This proposal is nothing more than an attempt to stop trapping in Alaska