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2/17/2019 1:43:33 PM  
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I oppose proposal 81.

I have never been to Kalgin Island and am not aware of the specific situation there, but in general I would prefer that Fish and Game stay focused on managing natural resources rather than get distracted by taking on a public safety mission. If you choose to go there, please resort to regulations only after advocacy and education have failed. Hunting is an activity that inherently involves risk. Managing those risks is a matter of personal responsibility.

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2/13/2019 10:09:39 PM  
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I oppose proposal 91. Discharge of firearm in a reckless manner is already classified as a felony offense under AS 11.61.195. This is a serious issue, but it can and should be handled by personal responsibility, education and enforcement of existing laws not by burdening hunters with extra regulations. Also, many popular centerfire rifle cartridges are capable of traveling 2 miles or more. An arbitrary 1/4 or 1/2 mile limitation is not a cure all solution.



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This comment is to SUPPORT proposal 55 written by Robert Stone.

I would like the board of game to truly consider this regulation and all that it entails. I am a commercial pilot and also a sheep hunter.

This year as this proposal states I had to fly in less than ideal conditions as August 10th approached. I tried to make use of the last few weekends in July but the heavy winds/turbulence of sheep country kept me out. I was constrained to push past my personal minimums knowing that once midnight August 10th came I would no longer be safe to fly in the mountains for fear of breaking this law.

This law of not flying and looking for sheep is vague and not enforceable. It puts unneeded stressors on pilots and in the back of their mind they are always wondering if someone is watching? Am I not allowed to fly over there because there may be sheep? Why can I fly and scout for caribou, bear, moose or goats all while having a sheep harvest ticket in my pocket? If I see a band of rams from a distance while flying looking for caribou then I land and shoot a legal ram a week later in that drainage is that illegal? There are so many unknowns to this law it should be rescinded.

The biggest problem I have with this issue is the mental fatigue it puts on a pilot trying to sheep hunt. Here is a prime example of a foreseeable problem. I do all my preseason scouting in mid to late July. I find a drainage with 3 big mature rams that look legal. I've pioneered a runway in my super cub and landed here multiple times and deem it adequate to operate out of for a sheep hunt.

August 8th rolls around and I have 10 days off work. We have a big low pressure sitting on top of us and it's forecasted to blow 60+knots. Nobody in their right mind is flying. Finally the weather breaks on Aug 10th and I'm a few days behind schedule and I fly to my sheep area. Before I land at my strip I find it wise to do a high circle to not spook the 3 big rams, but to see if any other bright colored tents or airplanes are in this area.

Just by flying over my area at a high altitude to look for other hunters to stay away from, have I now violated a law?

What about if I go into my sheep camp during the middle of the season and my strip I have been using during scouting has become flooded? That happens all the time and I've personally had rivers rise on me overnight and take away an airstrip in hours.

So now I need to find a new place to land. When you hunt and pioneer new landing places that no plane has likely ever landed it takes time and EXTREME amounts of concentration. When I am landing places where I have never had the ability to walk and inspect from the ground, all of my information will come from my observations while sitting in the cockpit.

Sometimes I will do 15-20 passes over an area before finally commuting to a full stop landing. This consists of high passes, low passes, passes parallel to the strip to time it for length, circles above the strip to determine wind speed and direction and also multiple passes where I will drag my tires along the strip to gauge how rough it is. This is a long, time consuming process that should not be rushed to be executed effectively. When pilots have stress factors that rush them, that is when pilot errors occur more frequently and accidents are more likely to take place.



Having to worry if someone is sitting on a nearby ridge with a video camera while you are doing these maneuvers is not right. What if there are a few sheep nearby while I'm doing all of my off airport evaluation and they misconstrue the situation for what it actually is? To a person who is ignorant to the off airport flying practice this MAY look like I was circling looking for sheep, when I am just trying to safely find a place to land, set up a camp, and enjoy a good sheep hunt.

The Federal Aviation Administration should be the one who regulates flying, not the board of game. This law is not easily enforced, but leads with fear in law abiding hunters.

The following is the Alaskan State Troopers comments on this proposal.

"The Alaska Wildlife Troopers are the primary enforcement agency for this regulation. Since this regulation was enacted, the Alaska Wildlife Troopers have received reports of aircraft and sheep hunters violating this regulation across the state. Investigation of this crime takes considerable time and effort for Wildlife Troopers to look into these types of violations. To date, there has been no successful prosecution of a hunter for a violation of this regulation. This proposal seeks to remove the restriction in GMU's 7 and 14 only. For enforceability, if the board chooses to consider removal for GMU 7 and 14, consideration should be given to removing this requirement statewide."

There have been reports of pilots breaking this law but NOT ONE successful prosecution. As they state, these types of investigations take significant amount of time and money. To be searching for a needle in a haystack that cannot be enforced is pointless. The skills and resources our conservation officers have should be put to better use and actually used towards prosecution of the real criminals, not resident pilots trying to hunt sheep.

Thank you.



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This comment is to SUPPORT proposal 99 written by Robert Cassell.

Alaska is by far the most prestigious and majestic place I've ever had the privilege to hunt. A few years ago, I decided I would make a commitment and move here, primarily to continually be able to hunt all that Alaska has to offer as a resident. By doing so I knew I would have an extreme advantage to draw hunting permits because states give extreme priority to their residents.

Soon after moving here I realized that Alaska does things different on draw allocation than most all other western states I apply to for hunting permits. Most states limit the number of non resident tags to a limited number up to and not to exceed 10% of permits. Why does Alaska vary so greatly from the norm? I would assume the profit of a non resident bear hunter. This is a must-be guided species and the price tag on a Kodiak brown bear guided hunt is extremely expensive.

I'm all for non resident hunting opportunity and think everyone should be allowed to hunt in Alaska. However, when highly coveted permits are to be drawn, residents should be allotted at LEAST 90% of the permits. This tag allocation would fall in line with most other western states but most importantly Article 8 of the Alaskan Constitution.

With non residents being allocated 40% of the permits, the state of Alaska allowance is over four times higher than what most states allocate to a non resident. As a resident who lives here, works here, pays taxes here and manages long hard winters here, this is astronomical. I truly do hope the Board of Game will prioritize the residents of this state and seek to limit the number of non residents by accepting and passing this proposal into regulation.

Thank you.



Submitted By  
Steven Shannon  
Submitted On  
3/1/2019 1:38:00 PM

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Alaska Chapter of Backcountry Hunters & Anglers

*"The sportsmen's voice for our wild public lands, waters and wildlife"*

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March 14-19, 2019

Alaska Board of Game

Comments on Proposal #128

Board of Game Members,

The Alaska Chapter of Backcountry Hunters and Anglers appreciates the opportunity to comment on Proposal 128 regarding the amendment to modify the Clearwater Creek Controlled Use Area (CCCUA). Part of our mission statement is to promote ethical and informed land use. It has become apparent that motorized users have been accessing portions of the nonmotorized Clearwater Creek Controlled Use Area and the Tangle Lakes Archeological District (TLAD) via the new trail between the Sevenmile Lake Trail and the Maclaren Summit Trail in order to hunt. This is a violation of motorized restrictions. The Alaska Chapter of BHA opposes any modification to the Clearwater Creek CUA that would allow motorized access within the CUA boundary. A better solution would be to increase awareness of the current regulations through signage, education, and literature in the Fish and Game regulations.

BHA's mission is to defend backcountry opportunities to hunt, fish and explore in primitive settings. As developments occur in Alaska and escalating improvements are made to mechanized conveyances, quality primitive opportunities will continue to diminish. The high country around MacLaren Summit is just part of the area included in the Clearwater Creek Controlled Use Area that would qualify as primitive settings. The hunting opportunities in Unit 13 for moose and caribou are notoriously crowded along the road and trail system. The CCCUA was established in 1971 to ease the pressure on the animals, and it has allowed nonmotorized users to access quality habitat. Since the animals tend to concentrate here to avoid motorized pressure, this part of Unit 13 is known for good caribou hunting. Over the last decade, hunter activity in this area has increased as more hunters have a reasonable chance at success without the competition, noise, impact, and crowds that come with motorized access.

The CCCUA contains only 50 miles of usable trail area reserved for non-motorized users versus the nearly 2,000 miles of motorized trails throughout the rest of Unit 13. Allowing motorized use along the nine miles of the Maclaren Summit Trail will not solve crowding issues throughout Unit 13, but will completely change the opportunity that exists for nonmotorized hunters. According to ADF&G, in 2016 and 2017 caribou harvest in this area made up nearly 13% of the total harvest. While nonmotorized hunters can use motorized areas, the harvest statistics for nonmotorized users in motorized areas versus within the CCCUA are much less.

There are places where motorized access makes sense and is necessary. The CCCUA is a rare part of Unit 13 where caribou and moose can be pursued by walking in from the road without motorized competition. Not all hunters have or want motorized access into the backcountry. Changing the boundaries will greatly affect our hunting opportunities. Two years ago, I drew the DC485 permit. I looked specifically at the nonmotorized parts of the unit. As a result, I had a quality experience with my brother that he and I won't forget. Our cost of successfully harvesting our caribou was just boot leather and a pack raft.

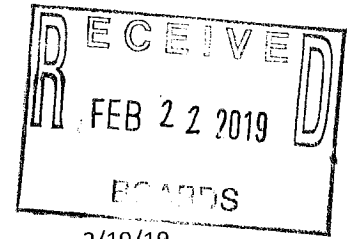
Thank you for your consideration,

Steve Shannon

Chair, Alaska Chapter of Backcountry Hunters and Anglers



***Alaska Trappers Association  
PO Box 82177  
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Alaska Department of Fish & Game  
Boards Support Section  
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Dear Chairman and Members of the Board

On behalf of the nearly 1000 members of the Alaska trapper's Association, and of Alaska trappers in general, we wish to share our opinions on several proposals which you will be considering during your upcoming meeting to discuss regulations for the south-central region of the state.

We SUPPORT Proposal #88. The north bank of the Kenai River is a logical boundary for the Skilak Loop Wildlife Management Area.

We OPPOSE Proposal #89. While it would be good to have beaver in the South Fork of the Anchor River, there is no need to create a miniature management area. Beaver populations are very dynamic and mobile and their management in larger land units is generally effective.

We OPPOSE Proposal #91. Existing law should be adequate to address this situation. If it is not, new regulation would probably have little effect. Regulation of the discharge of any weapon on this geographic scale would set a bad precedent, and would be difficult to administer, especially on public land.

We OPPOSE Proposal #109. This issue is more complicated than would be indicated by this proposal. Any regulation requiring a snare break away mechanism should be formulated and based on empirical information, and should probably not be implemented on an area described by a "road system". We suggest that, before the concept is considered, it be studied to the extent that it can be done right in the first place in order to be feasible and effective. Education would likely be an important part of its formulation. ATA stands ready to participate in such an educational effort.

We SUPPORT Proposal #124. It would increase the beaver trapping opportunity in an area that could support such an increase. It would also be a move toward standardization of the beaver season in Unit 14C with that in adjacent units.

We SUPPORT Proposal #129. It offers an appropriate clarification of existing regulation. We don't believe that the hunting and transportation restrictions on the Dalton Highway Corridor Management Unit were, or should have been, intended to apply to trapping.

We appreciate the opportunity to participate in the regulatory process.

Sincerely,

Randall L. Zarnke, president



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Alaska Wildlife Alliance supports proposal 74.

We feel that this proposal would add an outstanding hunting opportunity on the Kenai Peninsula for local hunters. Too often the hunting on the Kenai Peninsula is overcrowded and is statistically very unlikely to be successful. Therefore peninsula hunters frequently have to travel long distances, often at great expense and effort to find some place where they can get a quality hunting experience. Providing a draw season for local hunters would be of tremendous value to those who live on the Kenai Peninsula.

We feel this is biologically sound in that the moose population is currently above the objectives yet the harvest numbers are below objectives. This would obviously solve both of those problems.

We are worried that if the moose population continues to exceed the carrying capacity, habitat damage could cause long-term detriment to the moose population. This very sound proposal for reducing the moose overpopulation and increasing harvest makes very good sense.



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The Alaska Wildlife Association supports proposal 75.

We are in favor of carefully controlled, soundly managed draw hunts that would increase hunting opportunity and address the problem of the overpopulation of moose in area 15 C. This proposal would provide local hunters with a quality hunt that meets management objectives





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The Alaska Wildlife Alliance would like to express its support for proposal number 89.

Homer locals have stated that there appears to be almost complete extirpation of beavers in the upper Anchor River drainage. It would make sense therefore to limit further trapping of these animals until their population can rebound. Robbing an ecosystem of its natural diversity is almost universally detrimental to all species in the ecosystem. Beavers play an important role in the health and vitality of the Upper Anchor River ecosystem.

Beaver dams and the associated ponds can provide nurseries for salmon and trout. An early indication of this was seen following the 1818 agreement between the British government of Canada and the government of America allowing Americans access to the Columbia watershed. The Hudson's Bay Company, in a fit of pique, instructed its trappers to extirpate the fur-bearing animals in the area. The beaver was the first to be made locally extinct. Salmon runs fell precipitously in the following years, even though none of the factors associated with the decline of salmon runs were extant at that time.

There are several reasons why beaver dams increase salmon runs. They produce ponds that are deep enough for juvenile salmon to hide from predatory wading birds. They trap nutrients in their ecology and notably the huge nutrient pulse represented by the migration of the adult salmon upstream. These nutrients help feed the juveniles after the yolk sac has been digested. The dams provide calm water which means that the young salmon can use energy for growth rather than for fighting currents; larger smolts with a food reserve have a better rate of survival when they reach the sea. Finally, beaver dams keep the water clear which favors all salmonids.

We also note that beavers occur in the lower Anchor River system and on many of the other small rivers on the Kenai Peninsula that have sustainable salmon runs.

We believe that good scientific management of wildlife consists of restricting or ending a season when numbers of that species becomes too low. This seems to be the case with the upper Anchor River beavers.



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Alaska Wildlife Alliance is opposed to proposal 92.

There is certainly not an overabundance of Tundra Swans in the Kenai Peninsula. In fact, it would be very rare to see one at all. Their migratory patterns take them much more Inland than their Coastal relatives, the Trumpeter Swans.

#### Tundra and Trumpeter Swan Ranges

Red is breeding range

Gray is migration route

Blue is wintering range

Source: Audubon Field Guide

Tundra Swan                      Trumpeter Swan

It is very difficult to tell the difference between a Trumpeter Swan and a Tundra Swan with a casual observation. In fact, many birders express difficulty telling the two species apart.

It makes no sense to open a season on a species of bird that is rarely on the Kenai Peninsula. it would be even worse to open a season that would almost guarantee that the wrong species of swans were taken by people hunting. The most likely result of this proposal being passed would be that an inordinate number of protected Trumpeter Swans would be taken.



## The Alaskan Bowhunters Association

### Board of Game Comments

### Southcentral March 2019

ADF&G Boards Support Section  
ATTN: Board of Game Comments  
Fax 907-465-6094

The Alaskan Bowhunters Association is a non profit membership organization representing both resident and non-resident hunters who choose to accept the challenge of using conventional archery gear to hunt for Alaskan Game. We wish to comment on a number of the proposals to be considered at the Southcentral Region Board of Game meetings to be held in Anchorage, March 15-19, 2019.

**Proposal 54 – Support with Caution.** This proposal requests allowing use of crossbows in certain specific areas of the Southcentral region where the current law allows hunting with shotguns, muzzleloaders, bow and arrows. The ABA does not object to allowing crossbows in these special areas. However we wish to make it very clear that this does NOT allow use of crossbows in special areas that are designated for archery gear only (example Eklutna Lake) and does NOT allow use of crossbows in specially designated archery only hunts (example Dall sheep hunt 140 in October in Unit 14C).

**Proposal 75 – Support.** This proposal would establish an archery / muzzleloader drawing hunt for a moose (except cows with calf). It does not specify dates. The ABA generally supports any new archery hunts when they are helpful in achieving harvest objectives and increasing hunter opportunity and participation. It seems apparent from reading proposals 74 through 78 that there is a higher than desired bull to cow ratio in Subunit 15C and there is a need to harvest more bulls than is being provided by the Spike/fork/50"/4 brow tines. Allowing archery or muzzleloader harvest of nearly any moose should help to reduce the abnormally high bull cow ratio and provide additional opportunity for hunters with minimal risk of overharvesting the resource.

**Proposal 80 – Support.** This proposal would establish an archery only hunt permit area for moose in the Hope/ Palmer Creek Valley. This would be appropriate if there are significant safety concerns based on large numbers of firearms hunters in what is apparently a moderately developed and road accessible area.



## The Alaskan Bowhunters page 2

**Proposal 84 – Support.** This proposal requests an archery hunt for sheep in unit 15 which is in advance of the regular firearms season. This would NOT be a drawing hunt but would provide opportunity to hunt with a low chance of success for those hunters wishing to challenge themselves by hunting Dall sheep with archery gear. The Alaskan Bowhunters Association has made multiple prior requests for a similar type of archery season prior to the regular firearms season. The person making this proposal did not specify dates but we would suggest August 1-9 as dates for an archery sheep season. There would be no drawing requirement. It could be a registration hunt to enable ADF&G to measure and monitor participation but anyone with a harvest ticket could participate. Over 30 years of data from Archery only hunts in Unit 14C and Eklutna has shown that there is a very low bowhunter success rate on mature full curl rams. So over harvest should not be a concern. This would provide increased opportunity with no risk to the resource and anyone who wished to accept the challenge could participate. In the past the ABA has made similar proposals for an early archery season for sheep in any area open to harvest ticket sheep hunting. We have been routinely denied this extra opportunity on the ground of being a “special interest group”. We believe that archery hunting is a limited means of take and therefore allows more participation with less impact on the resource. This would be an excellent chance for the Board of Game to institute this hunt in a small area with fairly good access on a test basis to see how it would work.

**Proposal 110 – Support.** This proposal would simply shift the Non-resident archery only goat hunt in the remainder of 14C from a drawing to a registration hunt. This would be expected to increase opportunity for non-resident archery hunters to hunt goats. Non-resident hunters would still be required to either have a guide or hunt with a second degree next of kin. The change would only affect the August 16-31 Archery hunt. This is an example of a hunt that should continue to be limited to only conventional archery gear. The nonresident any weapon goat hunt would still be a drawing hunt.

Thank you for your consideration of the Alaskan Bowhunters Association comments regarding these few proposals.

Respectfully Submitted,

  
John D Frost

Legislative vice president of The Alaskan Bowhunters Association



Submitted By  
Barbara Pape  
Submitted On  
3/1/2019 10:13:13 AM  
Affiliation

I am a long-time Girdwood property owner. I hear that proposal 121 will allow for a bear hunting/bear-baiting season located close to populated and popular trail areas of the Girdwood valley. It is unclear to me from the map how close these areas proposed to be open - are to public use areas. I am against bear baiting. Girdwood has a trash and bear attractant issue - that is not being resolved and at critical capacity. Adding bear baiting may create more bear-human interaction potential and safety issues to those that access the woods around the Girdwood valley. Please keep the regulation to allow hunting, but without use of bear bait (ref unit 14C remainder)<http://www.adfg.alaska.gov/static/hunting/maps/gmumaps/pdfs/14c.pdf>



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Proposal 128 should not be corrected to open Maclaren Summit trail to motorized use. As a hiker and avid human powered recreation advocate, I see the need to keep this trail for non-motorized use in all seasons. Too any foot trails have been ruined by motorized use and attendant noise.



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Proposal 98 - I strongly support the change to have bear season in Kodiak open on October 10. This will allow hunters more access as many lakes start to freeze by October 25.

Proposal 108 - I also support this proposal, as allowing 4 stroke motors on the Ayakulik river would benefit all users and the environment.

Thank you



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To the Alaska Board of Game,

Thank you for reading these comments. I do currently serve on the Matanuska Valley AC but am here writing my personal comments today.

Prop 55 This proposal and its predecessors have been beat to death. The original was Board generated, which I am not a fan of. We had a sheep working group that came to nothing but the obvious that there are many different groups that can't come to a consensus on this issue. I do not think it is fair to pick on one species and one user group. Either do this for all species and all forms of transportation or do it for none. Therefore I fully Support this proposal.

Prop 56 If an area is under intensive management then the moose or caribou population is depressed. If the moose or caribou population is depressed then residents should have first chance at these species. I fully Support this proposal.

Prop 84 I know that harvest would be minimal. I do foresee a lot of archers out there making this a very crowded hunt. Archers can still apply for the limited number of drawing tags available for this area. I am not a fan of weapons specific hunts unless there are mitigating circumstances (Pipeline, population etc) I am Opposed to this proposal.

Prop 99 Why does Kodiak get such special treatment? I know a lot of time was spent in the past on the Brown bear management strategies for this unit. I know there are Federal concessions. A lot of this could be solved I feel with a State concession program, but that is another argument for another day. ADF&G I feel can manage this hunt and keep the trophy status with the allocation change. A 60/40 resident/nonresident split is unacceptable. Why should an Alaska resident have to move out of State, change residency to be able to get a decent chance at one of these bears? Why can't an Alaska resident purchase one of the guided tags and go with a guide? If a guide offers a quality service at a quality price a resident would choose to go with a guide for one of these rare resident tags. And actually the nonresident permit percentage is higher than 40%. The nonresidents currently get some of the resident tags for the 2nd degree of kindred. I fully Support this proposal.

Proposal 100 A nonresident is a nonresident. There should not be a separate pool for second degree of kindred. The Department of Fish and Game does not need to be spending precious resources managing and running separate draws for second degree of kindred in any unit or hunt. Kodiak should not get special treatment for this. I adamantly Oppose this proposal.

Prop 101 While I am not thrilled about this proposal I feel it is a step in the right direction. More opportunity for residents. I Support this proposal.

Prop 104 On the surface I like this proposal. Yet if permits are returned before the season, ADF&G will end up issuing less permits in total. I do not like basing the one every four year rule on opportunity and not harvest. Things happen. I had a Kodiak Brown bear tag for last Spring. I was unable to use it because life got in the way and other opportunities came up. So for me to be penalized because I am unable to go on a hunt in my mind is unfair. Plus again ADF&G does not need to spend precious resources managing a separate list. I Oppose this proposal.

Prop 106 One of the reasons to keep things special on Kodiak has always been the facts that nonresident Guided hunters harvest bigger boars and less sows. These nonresidents are guided by professional hunters. Most resident hunters are not professional hunters. Most do not have the sufficient time to try and harvest a bigger boar. A trophy bear is what someone is happy with. Everyone's idea of a trophy can be different. I do feel that more information can always be helpful and the penalties are not too severe in this proposal. I Support this proposal.

Prop 114 The BOG can't rescind the shared bag limit as proposed in this proposal as stated in the proposal book. Besides that I do not feel adding more permits to this already depleted area is warranted. There is opportunity through the regular draw. I am Opposed to this proposal

Prop 115 Again a nonresident is a nonresident. We do not need to be adding any special draws for second degree of kindred. We do not need to be adding more permits to this area. I could support it if these three tags were taken from the nonresident pool, but I do not feel that is a step in the right direction. A hunting license is either resident or nonresident. There is not a separate license category and therefore I do not feel there should be a separate drawing category. I am Opposed to this proposal.





Prop 130 A nonresident is a nonresident. Currently this would only affect Kodiak Brown bear. Again there is not a separate license

category for a second degree of kindred. The second degree of kindred is a special provision that makes Alaska unique. To be

share Alaska with a close relative on their hunt of one of these three species is what hunting is about. These are the memories that last a lifetime. Alaska's must be guided laws force nonresidents to be guided and pay heavily for those three species. It is a wonderful opportunity to have a second degree of kindred to go on these special hunts with if you are so lucky. I Support this proposal.

146 AF&G's population objective is too low. I was born in 1971 in Anchorage. I have hunted or been on a mosse hunt just about every year that it was allowed in this unit. My father started guiding in this area in the late 1960's. I have seen the ups and downs of the moose population in this unit. If ADF&G feels that they want to follow thru with these hunts (Antlerless and a Tier II any moose) then to allow for greater success they should allow the permits to start at the normal August 20th and continue through to the end of the Tier II season on March 31st for both. (August 20th-March 31st)

Thank you for your precious time.

Birch Yuknis



Submitted By  
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I support proposal number 99 by Bob Cassell



Submitted By  
Brian Ohlen  
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3/1/2019 4:05:48 PM  
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Board of Game Members,

I am writing to voice strong opposition to any amendment that would allow motorized access within the Clearwater Creek CUA (Proposal 128). Area 13 is known to offer ample opportunities for motorized hunters along the Denali Highway. The CCCUA provides areas where animals aren't pressured by motorized travelers and provides a different type of hunting experience. If motorized access was allowed within CCCUA, I would likely give up caribou hunting in that area. Furthermore, since area 13 offers the most reliable chance of a tag close to Anchorage, I would probably no longer hunt caribou at all.

Last year I had 2 friends that were interested in trying out hunting for the first time. They both applied for the Tier 1 permit. They are both avid outdoorsman but had little to no experience hunting. They voiced interest in a backcountry style hunt and wanted to get away from crowds. Together, we decided to go into the Clearwater Creek CUA. We had an amazing experience and were successful. It was one most memorable experiences of my life. The biggest factor in our success and enjoyment was being able to get away from the motorized crowds. Both of these new hunters are now planning trips back into the CCCUA this year. If motorized access is allowed, I am sure these two new hunters will not go hunting again.

Please don't allow motorized access within this special area.



Submitted By  
Brian Okonek  
Submitted On  
2/25/2019 12:05:39 PM  
Affiliation  
none

Dear Board of Game,

I am writing in support of Proposal 128, 5 AAC 92.540 (3)(c)(i), Controlled Use Arreas. The Maclaren Summit Trail off the Denali Highway should remain in the Clearwater Creek Controlled Use Area. It is important that there are non motorized areas accessible from a road for people to hunt in that either do not have an ATV or desire to hunt on foot, with horses or by paddle boats. I object to the "correction" to this proposal.

Sincerely,

Brian Okonek



RECEIVED

DEC 08 2018

BOARDS  
ANCHORAGE

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

Comments to 2018/2019 Proposed Changes

From Brian West  
1000 Oceanview Drive  
Anchorage, Alaska 99515

Southcentral Region.

Proposal 54. OPPOSE. Weapons restricted hunts were created to give these individuals an advantage over people using rifles. The primary, I would say only, purpose of hunting is to put food on the table. At one time there were few people using primitive weapons, however, as the state population has grown so has the number of people using primitive weapons. These people are given an advantage by being able to hunt before the general season. Adding another weapon to the list of approved weapons increases the numbers of people hunting in the special season. There is nothing that prohibits an individual from hunting with a cross bow in the general season, why do they need a special season? There are too many special interest groups.

Proposal 63. OPPOSE. Proposal 74 offers a better solution.

Proposal 70. OPPOSE. The proposer states that moose numbers in the area are low, opening the are to a general hunt is inappropriate.

Proposal 71. OPPOSE. If moose numbers are low than a general hunt is inappropriate. Increasing hunter opportunity in an area with a low moose population does not seem wise.

Proposal 72. OPPOSE. Registration hunts routinely result in over harvest. Just look at the data from the zone 1 Fortymile caribou herd for 2018. Over harvest of sub-legal bulls in an enforcement issue and is not a valid reason to liberalize the hunt conditions. If an any bull season is adopted, I would believe that the number of hunters would increase substantially. Many hunters who are frustrated with antler restrictions in other areas would go here.

Proposal 73. OPPOSE. High probability of over harvest.

Proposal 74. SUPPORT. This is the most reasonable approach of all the proposals dealing with this issue.

Proposal 75. OPPOSE. No permits should be given to non-residents. Creates another special interest hunt. Additionally, why should the special hunt be less restrictive than the other hunts?

Proposal 79. OPPOSE. These classes are truly a waste of time. The age group being targeted will consider them a waste of time. If someone does not currently hunt in a save manner no amount of training will change that.



Proposal 80. OPPOSE. If this person is worried about safety changing to a archery only hunt will not improve things. There used to be an archery only hunt in Anchorage that was closed because of the high number of incidents of unsafe hunting practices and slob hunters.

Proposal 81. OPPOSE. The color of clothing has nothing to do with the problem. The problem is hunters who do not take the time to identify their target. Furthermore, nothing prohibits an individual from wearing bright orange if they think it necessary for their own safety.

Proposal 84. OPPOSE. Everyone wants their own special season and it is always geared for their maximum benefit to the detriment of all others. Why not a special season after the general hunt? Because that does not provide him with an advantage. And again, nothing prohibits the use of a bow during the general hunt. If it is not as successful to use a bow then it does not matter when they hunt as it will not affect the rate of success.

Proposal 90. OPPOSE. Too restrictive? Hunt somewhere else. The purpose of the youth hunt program is to allow a reasonable hunting opportunity while being accompanied by a mentor who is supposed to be passing on hunting knowledge, making the requested change will put the youth firearms hunters in direct conflict with those using primitive weapons.

Proposal 96. OPPOSE. The proposal is not clear.

Proposal 99. SUPPORT. I support this, however, I would eliminate all permits for non-residents, unless the hunt is under subscribed by residents. Rules and regulations should not provide clients to guides.

Proposal 100. OPPOSE. A non-resident is a non-resident. Where non-residents are required to obtain a permit, they should all be treated the same, with the same chance to draw a permit.

Proposal 102. SUPPORT. The game of this sate is to be managed for the use of the residents of this state, not non-residents and guides, many of whom are themselves non-residents. There are currently not enough permits given out to satisfy demand by residents why does the Board continue to provide a priority to non-resident hunters? At what point do Alaskan hunters vent their frustration with the Board through ballot initiatives?

Proposal 103. SUPPORT. Proposals that put more permits in the hands of residents should be supported. That being said, any hunt managed through permits should place all permits into the hands of residents. Non-residents should not even be considered unless residents do not apply for all the permits.

Proposal 105. SUPPORT. Well reasoned proposal.

Proposal 106. OPPOSE.

Proposal 108. OPPOSE. Four stroke motors are expensive, why should someone have to change engines just to access this river? What data does the proposer have to prove that four stroke engines are quieter than two stroke? This would only affect hunters what about other users?



Proposal 111. OPOSE. JBERs ability to test and provide orientation to hunters is not a valid reason for changes to hunts dates. Besides, the current black bear season runs from April 15 through June 15 it is over by the time the moose season starts.

Proposal 114. OPPOSE. This proposal is especially offensive. The stated goal of youth hunts is to give them an opportunity to hunt before all other hunters so that traditions and knowledge can be passed down from one generation to the next. It is not to allow for the adult mentors to gain a leg up on all other hunter who are already negatively impacted by youth hunts. Therefor, the requirement for counting any kill of the youth against the adult is not onerous. If the adult also wants to hunt then they should hunt during the general season. I also find the statement "leaving legal rams on the mountain" to be misguided. Shooting all the legal rams in an area would be detrimental to the population.

Proposal 115. OPPOSE. A non-resident is a non-resident. There should not be separate classes of non-residents. If non-residents are hunting by permit, they should all be in the same pool with an equal chance of drawing a permit. Whether or not they have a relative who they can hunt with instead of a guide should in no way be a consideration.

Proposal 120. OPPOSE. There are many established trails in the area and regulations allow for bait stations within one quarter mile of such trails this will lead to conflicts between hunters and other users. The first time a person is harmed because they were attacked by a bear drawn to a bait station near a trail will be the beginning of the end for bear baiting.

Proposal 127. OPPOSE. You cannot effectively eliminate all but local residents form a hunt.

Proposal 128. OPPOSE. Extremely confusing. The trail runs north and south. The highway is the southern boundary. The wording makes no sense. The issue description says that the intent is to remove the trail from the controlled use area but this does not accomplish that. What this wording does is include all the trail and the land 100 feet east of it. The wording should be left alone. What is need is explicit language that the Maclaren river is closed to the use of motorized vehicles. There should also be signs. There is already problems with motorized use on the Maclaren River.

Proposal 130. SUPPORT. This treats all non-residents the same, as they should be. And in no case should a resident be forced to give up a hunting opportunity in order to hunt with a non-resident relative. Regulations and permits should not be governed by how they affect the guide industry.



Submitted By  
Brooks Bradley Horan  
Submitted On  
3/1/2019 7:31:24 AM  
Affiliation

I support proposal 128. Modifying the CUA is the wrong move. Clarifying the boundaries in the regs book, making sure signage is clear and properly placed are important steps. However, changing the laws about motorized access is the wrong move. Allowing ATVs along the nine miles of trail this would open up does nothing to alleviate crowding on the 1900+ miles of motorized trails in Unit 13, but would drastically affect the walk in opportunities for non motorized hunters. Please keep the McLaren Summit trail non motorized





Submitted By  
Carolyn Brodin  
Submitted On  
3/1/2019 11:46:01 PM  
Affiliation

I am writing in objection Board of Game Proposal 121, initiated by the Resident Hunters of Alaska. Due to the high potential for user conflict, I especially object to the use of bear baiting in the Girdwood Watershed within 14C. The community of Girdwood hosts millions of visitors annually. Those visitors and residents, and often their pets, recreate in the designated, undesignated, and primitive trail systems in the valley. Many people recreate in the more remote areas of 14C remainder. To come across a bear bait station while enjoying the wilderness is a horrible thing, for a bait station to be near a trail is dangerous.

I object to the statements of the representative from Resident Hunters of Alaska at public meetings in Girdwood. He stated that this increase in bear baiting would reduce the bear population and therefore reduce our "bear problem". Girdwood does not have a bear problem, it has a garbage problem which attracts a few bears. Girdwood is working on a solution.

I am also writing in objection to Board of Game proposal 116 initiated by the Resident Hunters of Alaska, to increase the limit of brown bears killed from 1 every 4 years to 1 every year. The reason that the brown bear population is thought to be "healthy" in 14C remainder is not justification for increasing the number of bears killed this drastically! In a short time the population will be "unhealthy". Brown bears are a rare and special thing to see in this area by both residents and visitors. Please do not allow this unnecessary depletion of this animal. We do not need more brown bears killed to reduce conflicts in Girdwood.

Thank you



Submitted By  
Christian Hicks  
Submitted On  
2/28/2019 5:12:54 PM  
Affiliation

I am an avid hunter on Kodiak and completely support proposal 109. I am concerned with wildlife that I hunt being caught in traps and wasted unnecessarily. We have had bear and deer killed due to these traps without the mechanisms, resulting in fewer animals that might otherwise be harvested by hunters. When I duck hunt, I do not want to worry about my dog being caught in a trap, which could result in harm or death to my retriever. This seems like a no brainer to me, as it would not impact the targeted species by trappers. Thank you for your consideration.



Submitted By  
Christina Hendrickson  
Submitted On  
3/1/2019 12:31:21 PM  
Affiliation

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Email  
[christina.cope@gmail.com](mailto:christina.cope@gmail.com)  
Address  
PO Box 978  
Girdwood, Alaska 99587

I am writing in objection Board of Game Proposal 121, initiated by the Resident Hunters of Alaska. Due to the high potential for user conflict, specifically, I object to the use of bear baiting in the Girdwood Watershed within 14C. The community of Girdwood hosts millions of visitors annually. Those visitors and residents, and often their pets, recreate in the designated, undesignated, and primitive trail systems in the valley.

In the remainder of 14C Resident Hunters of Alaska proposes baiting in the Girdwood Watershed April 15 – June 30 and allow brown bear baiting from April 15 – May 31.

Alyeska Ski Resort's last day of skiing is typically after 15 April. Many SouthCentral residents and visitors ski the Girdwood Watershed's back country slopes through June, depending on the weather and snow pack. Visitors arriving via scheduled tours visit and stay in the Girdwood Watershed in early May when Seward welcomes the first series of cruise ships.

On 11 February 2019 at the Girdwood Land Use Committee meeting, Resident Hunters of Alaska representative, Brian Watkins, stated that the *"Hunting and baiting are not allowed within 1 mile o dwellings, cabins, not within and ¼ mile o [publicly unded] [sic] trails/roads/railroad, which makes most o Section 14C Remainder challenging terrain or hunters to access."*

With challenging terrain and pack out requirements, I am concerned that potential hunters may utilize our trail system, which includes publicly funded, private, and primitive social trails, to access easier terrain in the Girdwood watershed, which is accessible via vehicle and parking lots at trail heads. Our community boasts unparalleled recreational opportunities for visitors and residents. This allure and management of our trail systems is the economic engine of our community.

I ask that AD&F exclude the Girdwood Watershed from 14C to avoid potential user conflict within our established recreational community that drives our dependent local economy.



Submitted By  
Christopher Gates  
Submitted On  
2/28/2019 10:44:58 PM  
Affiliation

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Proposal 99. Support. Alaskans enjoy protections under the constitution that includes common use of our wild game resources. Alaskan residents should have an overwhelming preference for hunting opportunity. This proposal addresses that correctly. Proposal 55. Support. The Board unilaterally restricted an entire swath of resident DIY hunters instead of reducing non-resident participation in an overcrowded hunting situation. This misguided decision has led to a regulation that is equal parts unenforceable for troopers and uncomfortable for ethical pilots who are now exposed to false accusations. The first step for reducing over harvest or over crowding should be the thoughtful reduction of non resident participation. Residents should be the last group asked to bear restrictions.



# Chugach Regional Resources Commission

February 1, 2019

Chenega Bay

Eyak

Nanwalek

Port Graham

Qutekcaq  
Native Tribe

Tatitlek

Valdez Native  
Tribe

Doug Vincent-Lang, Commissioner  
Ted Spraker, Alaska Board of Game, Chair  
Members of the Alaska Board of Game  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, Alaska 99811-5526

Dear Commissioner Vincent-Lang, Chairman Spraker, and Alaska Board of Game members:

The Chugach Regional Resource Commission (CRRC) requests that prior to deliberations on ADF&G's Proposal 76 to establish an "any bull" drawing hunt in Unit 15C, the Alaska Board of Game fulfill the requirement of the Alaska subsistence law by making a customary and traditional use determination for the area between TM549 and the Nonsubsistence Area boundary pursuant to AS 16.05.258(a) and 5 AAC 96.615(a)(1).

It is our understanding that ADF&G submitted Proposal 76 to establish "any bull" moose drawing hunts in Unit 15C in order to increase moose harvests and increase the likelihood that moose harvest levels may better reach Intensive Management harvest objectives for the Unit 15C moose population. Reportedly, the February 2017 GSPE 15C moose population point estimate of 3,529 moose exceeds the Intensive Management population objective of 2,500 – 3,500 moose (5 AAC 92.108). This proposal includes the moose hunt area located between the existing TM549 hunt area and the boundary of the Anchorage Nonsubsistence Area identified in figure below.



The TM549 Tier II moose hunt is associated with a harvest quota of only 4 bull moose. All 4 permits were issued to a single community for the 2018 season. Tier II management implies that there is insufficient harvestable surplus of moose to provide for all subsistence uses, even though the Unit 15C moose population exceeds the Intensive Management population objective.

The Alaska Board of Game has not yet determined if the portion of the Unit 15C moose population located between the TM549 hunt area and the boundary of the Anchorage Non-Subsistence Area are positively associated with customary and traditional (C&T) subsistence uses.

Prior to opening this area for drawing permit moose hunts, which would not provide reasonable opportunity for subsistence uses, CRRC encourages the Alaska Board of Game to fulfill its statutory obligation to determine whether this portion of the Unit 15C moose population is associated with C&T uses.

Other Unit 15C moose proposals submitted this cycle by members of the public and the Homer AC indicate the importance of moose hunting in Unit 15C for meat and subsistence, including proposals 72 – 74. The TM549 moose hunt area boundary appears to not reflect an actual moose population boundary and according to information provided us by the divisions of Wildlife Conservation and Subsistence likely results from (1) an oversight by the Alaska Board of Game at the Subsistence Consistency Review meetings held following the McDowell decision and the loss of rural priority allocation of fish and wildlife by the State of Alaska and (2) changes in the Anchorage Mat-Su Kenai Peninsula Nonsubsistence Area boundaries some decades ago.

CRRC recommends the Alaska Board of Game amended the existing C&T finding for moose in Unit 15C (5 AAC 99.025(a)(8)) to include all portions of Unit 15C outside the Anchorage Nonsubsistence Area and determine the amount of moose reasonably necessary for subsistence uses (ANS) for this new, larger area.



With the high numbers of moose in Unit 15C, CRRC hopes that the Board's consideration of this requested amendment may lead to greater numbers of TM549 permits being issued or perhaps even a sufficient moose harvestable surplus to provide for Tier I moose hunting opportunities or perhaps even more liberal unrestricted moose hunting opportunities throughout the subsistence portion of Unit 15C.

Thank you for your consideration of this request on behalf.

Sincerely,

A handwritten signature in black ink that reads "Patty Schwalenberg". The signature is fluid and cursive, with a long, sweeping line extending from the end of the name.

Patty Schwalenberg

Executive Director

Chugach Regional Resources Commission



# CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

18620 Seward Hwy, Anchorage, AK 99516 Phone: 907-345-5014 Fax: 907-345-6982

February 13, 2019

ADF&G Boards Support Section  
Attn: Board of Game Comments  
P.O. Box 115526  
Juneau, Alaska 99811-5526

**Subject: 2018/2019 Board of Game Proposals**

I am writing on behalf of the Chugach State Park Citizens Advisory Board regarding regulatory proposals that will affect Chugach State Park. Please consider these comments during the upcoming Board of Game meeting.

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

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

The 15 member advisory board is comprised of park users representing various interests ranging from backcountry skiers, hikers, hunters, bikers, horseback riding enthusiasts, as well as, ATV and snowmachine users. At approximately 495,000 acres, Chugach State Park comprises nearly half of the Alaska Game Management Unit (GMU) 14C. With over 1.3 million visits to the park annually, we have an interest in Board of Game regulation changes that may affect park resources and visitors.

We have carefully reviewed the 2018/2019 Board of Game regulatory proposals that will affect the park's wildlife and users. Our recommendations and proposed amendments are included below. These proposals were discussed at length during our December 10<sup>th</sup>, 2018 and January 14<sup>th</sup>, 2019 meetings. The board voted and made the following findings at our February 11<sup>th</sup>, 2019 meeting. Board members proposed amendments to proposals 118 and 119. These amendments are included below for the Board of Game to review and consider. Ten members of the board were present, with five members being excused.

**PROPOSAL 112**      REAUTHORIZE THE ANTLERLESS MOOSE SEASONS IN UNIT 14C AS PROPOSED BY THE ALASKA DEPARTMENT OF FISH AND GAME.

**Amendment(s) Discussed:** None

**Recommendation:** Support. (10 Yes, 0 No)





**Findings:** This hunt has proven to be an effective tool at managing the moose population within Unit 14C for a number of years. This proposal comes directly from the state's authority on wildlife management, the Alaska Department of Fish and Game. Requiring annual renewal of this hunt allows the Department of Fish and Game to closely regulate antlerless moose harvest quotas to keep the moose population within a sustainable number. Keeping the moose population at or near the goal of between 1,500-1,800 moose within the subunit helps to avoid over-browsing of winter habitat and the resulting die-offs from starvation.

**PROPOSAL 118** OPEN A BLACK BEAR REGISTRATION HUNT IN EXISTING DM666 MCHUGH CREEK HUNT AREA. PROPOSAL IS FOR A WEEKDAY HUNT WITH SEASON DATES OF SEPTEMBER 5 THROUGH MAY 31. SHOTGUN OR MUZZLELOADER ONLY.

**Amendment(s) Discussed:** Open a black bear [REGISTRATION] **draw** hunt in existing DM666 McHugh Creek hunt area. Proposal for a weekday hunt with season dates September 5 through May 31. [SHOTGUN OR MUZZLELOADER ONLY.]

**Reason for Amendment(s):** Amending this hunt to be via draw permit will allow ADF&G to issue a finite number of permits for this hunt, rather than allowing any qualified hunter to participate. Limiting the number of hunters in this area will help reduce potential conflicts between user groups and fellow hunters given the relatively small area the McHugh Creek Valley encompasses. In addition, eliminating the prohibition on the use of centerfire rifles was discussed. Limiting this hunt to shotgun or muzzleloader only may result in a higher wounding ratio of bears within an area that sees heavy recreational use all year. Many states across the country have eliminated "shotgun only" hunts because they have proven to only provide the illusion of safety. Data compiled from various wildlife management agencies nationwide show that the ratio of animals wounded, as well as, accidents involving firearms is no greater or less in a "shotgun only" area when compared to that of a centerfire area.

**Recommendation:** Oppose. (3 Yes, 6 No, 1 Abstain)

**Findings:** Although black bear hunting is not currently be allowed in this area, there are numerous opportunities for black bear hunting in other parts of the park. Sufficient evidence to support claims that this hunt would help reduce human/bear conflicts in the park could not be provided to the board. The McHugh Creek and Turnagain Arm Trail see heavy use by hikers during the fall months. The proposed hunt may increase the potential for conflicts between user groups given the valley's available legal hunt area and regulatory constraints of the park.

**PROPOSAL 119** OPEN A BLACK BEAR REGISTRATION HUNT IN EXISTING DM666 UPPER CAMPBELL CREEK HUNT AREA. PROPOSAL IS FOR A



WEEKDAY HUNT WITH SEASON DATES OF SEPTEMBER 5 THROUGH MAY 31. SHOTGUN OR MUZZLELOADER ONLY.

**Amendment(s) Discussed:** Open a black bear [REGISTRATION] draw hunt in existing DM666 Upper Campbell Creek hunt area. Proposal is for a weekday hunt with season dates of September 5 through May 31. [SHOTGUN OR MUZZLELOADER ONLY.]

**Reason for Amendment(s):** Amending this hunt to be via draw permit will allow ADF&G to issue a finite number of permits for this hunt, rather than allowing any qualified hunter to participate. Limiting the number of qualified hunters in this area will help reduce potential conflicts between user groups and fellow hunters given the relatively small area Upper Campbell Creek encompasses. In addition, eliminating the prohibition on the use of centerfire rifles was discussed. Limiting this hunt to shotgun or muzzleloader only may result in a higher wounding ratio of bears within an area that sees heavy recreational use during the fall months. Many states across the country have eliminated “shotgun only” hunts because they have proven to only provide the illusion of safety. Data compiled from various wildlife management agencies nationwide show that the ratio of animals wounded, as well as, accidents involving firearms is no greater or less in a “shotgun only” area when compared to that of a centerfire area.

**Recommendation:** Oppose. (2 Yes, 8 No)

**Findings:** The reasoning behind the board’s opposition to this proposal echoes many of the concerns expressed for proposal 118. Sufficient evidence to support claims that this hunt would help reduce human/bear conflicts in the park could not be provided to the board. The numerous trails of the Upper Campbell Creek area see heavy use by hikers, backpackers, and bikers during the fall months. During the winter months, this area is home to some of the best alpine skiing and fat tire biking in the state. The proposed hunt may increase the potential for conflicts between users groups given the area’s available legal hunt area and regulatory constraints of the park.

**PROPOSAL 120** OPEN A BLACK BEAR BAITING REGISTRATION HUNT FOR SHOTGUN OR MUZZLELOADER ONLY WITHIN THE ANCHORAGE MANAGEMENT AREA.

**Amendment(s) Discussed:** None

**Recommendation:** Oppose. (0 Yes, 10 No)

**Findings:** This proposal is likely to increase the number of human/bear conflicts due to the high park use observed within the Anchorage Management Area. Feeding wildlife within the park will encourage frequent patterned visitation of black and brown bears to areas within close proximity of residential neighborhoods. Bears will become accustomed to food



sources outside of their normal food supply, and will begin to search for human food scraps and garbage within the developed areas of the Municipality of Anchorage. This proposal is also likely to increase the number of "social trails" throughout the park. Hunters will be developing their own "social trails" to frequent bait stations, only to be followed by curious hikers who may not be aware where they are heading. The practice of bear baiting has its merits and responsible methods, however, the board does not find this proposal to be in the best interest of Chugach State Park, its various user groups, or the peripheral residents of the Anchorage Bowl who border the park.

We greatly appreciate the opportunity to review and submit comments on these proposals. Please let me know if you have any questions regarding these recommendations. Thank you for your consideration.

Sincerely, \_\_\_\_\_

A handwritten signature in cursive script that reads "Rosa H Meehan".

Rosa H Meehan  
Chair

cc: Dave Battle, ADF&G



Dear Board of Game,

I support Proposal 128, and oppose the "correction." I find ADF&G's very detailed description of the proposal extremely persuasive and hereby adopt those arguments as my own. Allowing motorized hunting on the Maclaren Summit Trail would negatively affect populations of both caribou and moose, and would substantially degrade a rare and presently high-quality hunting experience for not only non-motorized hunters but for motorized hunters as well. Additionally, non-hunters, both Alaskans and visitors, treasure this trail, which is infrequently used by motorized recreationists (or at least was before the trail extension), in an area where non-motorized opportunities are so rare that they sometimes seem to be nonexistent.

[Your website just submitted the above before I was finished. If I had been able to send an email, this wouldn't have happened; I will try to finish and see if your website will accept my completed comment; do you realize that you are discouraging comments by requiring that electronic ones be submitted on your website and not by email?

To continue (and I've just contacted Kristy, who is very kindly helping me; I really appreciate that)—but I still want all that I'm writing, including these bracketed paragraphs, to be included as part of my comments; not everyone would know, as I didn't, but my wife fortuitously did, that someone like Kristy would be available and able to be so helpful]:

That this extension is potentially creating the problems described by ADF&G is especially disturbing since DNR failed to consult with ADF&G before reaching its decision to extend the trail (see p. 36 of booklet).

ADF&G notes that non-motorized hunters have a lower impact than motorized ones. Surely a reasonable number of areas should be managed for low rather than high impact hunting (p. 33).

Many long-time hunters of the Denali Highway area bemoan how crowded it now is and how the quality of the hunt is significantly lower than it was historically. The regulation making MST non-motorized for hunting helps maintain at least some of this historic quality. The so-called "correction" would have exactly the opposite unfortunate effect.

I'm also disturbed by one of two DNR rationales for extending the trail: "users were already extending the Maclaren Summit Trail despite TLAD restrictions" (p. 36). Instead of enforcing a very reasonable and important regulation, DNR chose to effectively reward those who chose to ignore the regulation.

Finally, and again, I would like to adopt ADF&G's excellent argument in their entirety.

Thank you for this chance, as frustrating as it was ,to comment in support of Proposal 128 and against any "correction."

Sincerely,

Cliff Eames



Submitted By  
Cole Styron  
Submitted On  
3/1/2019 8:28:44 AM  
Affiliation

Re: Proposal 128

The Clearwater Creek CUA is a unique opportunity within Unit 13 to hunt without competition from motorized hunters, while still having walk-in access from a nearby road. The wild, scenic and reliable hunting in the Sevenmile Lake area would be decimated by the ATV/ORV traffic if this proposal were to be adopted. Alaskan hunting has always favored those with means, and opportunities for motorized hunters abound in this state. On the other hand, there are too few opportunities for walk-in access where competition with ATV and Supercub hunters is limited, especially in Southcentral. We should be expanding these areas, not reducing them. I am firmly against Proposal 128.

Cole Styron



Submitted By  
Colt Foster  
Submitted On  
2/28/2019 6:41:18 PM  
Affiliation

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[Flashfoster@hotmail.com](mailto:Flashfoster@hotmail.com)  
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20633 Philadelphia Way  
Eagle River, Alaska 99577

I would like to support proposal #55 in regards to removing the restriction of "spotting sheep" from an airplane during sheep season. Even though I opposed the original prop 207 that brought about this rule, I was hopeful that the result would be a positive somehow. It has been undeniably negative in my personal experience as a resident sheep hunter and private pilot. The amount of air traffic condensed into the days before sheep season when "spotting" is legal has become almost dangerous. Both the guides and residents have been forced to do all their scouting together and then try to hunt the very beginning of season. Previously this air traffic was spread out and many hunters chose to wait until later season to scout with less pressure in the mountains. This law has increased not only the pressure on sheep but also hunter conflicts in the field. As a resident I often only have a long weekend to hunt due to work commitments. Without the ability to scout ahead of time has resulted in many unsuccessful hunts as long hikes have turned up no rams or other hunters already in the area. These frustrating situations can be better avoided if we could scout, but most of us pilots are worried about being falsely accused of "spotting sheep" even if we are looking for other camps. This has also caused me personally to avoid flying in the mountains even for flight seeing tours with non-hunting friends. This is particularly frustrating with my love for mountain flying. For a law designed to make better hunting experiences, it has actually made many aspects worst. This "sheep spotting ban" is a failed experiment. It needs to be overturned.

Sincerely, Colt Foster

Submitted By  
Colt Foster  
Submitted On  
2/28/2019 5:27:39 PM  
Affiliation

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20633 Philadelphia Way  
Eagle River, Alaska 99577

I would like to voice my support for proposal #99 concerning Kodiak brown bear drawing permits. I agree that these drawing permits (along with all others in the state) should be limited to no more than 10% non-residents. Most other western states including MT, CO, WY, ID, NV, UT, NM have placed a 10% cap on the amount of non-resident tags allowed for limited draw animals. This includes bighorn sheep, moose, goat and premiere elk, mule deer or pronghorn tags. Alaska should place the same resident preference on our limited draw hunting tags.

Sincerely, Colt Foster



**Customary & Traditional Use Committee  
February 15, 2019**

**Comments:**

We oppose Proposal 54 to allow the use of crossbows in restricted-weapons hunt. Crossbow hunting could be dangerous in the field with all other hunters out hunting for moose and other wildlife. Special hunts shouldn't be created, there is more than enough hunting opportunities to hunt and take wildlife.

**Comments:**

We oppose Proposal 128 to modify Clearwater Creek Controlled Use Area description. Motorized vehicles should not be used in these areas, it is a prime area for hunters who prefer to walk out to hunt. It is a good areas to hunt for those hunters who do not have or cannot afford ATVs. There are so many other areas in GMU 13 that hunters who use ATVs to hunt with can go to hunt for wild game.

The Board should keep areas for those who walk out to hunt and keep those areas open for them to hunt in. Some hunters may actually like to walk out to hunt for wildlife, without the invasion and noise from AVs.

Hunters who use ATVs have so many advantages over those who do not have ATVs, and they have excessive amounts of land areas to hunt in GMU 13. Hunters who hunt with ATVs really do not need to have this area to hunt, leave it as it is, for hunters who walk in to hunt.

**Comments:**

We oppose Proposal 131 to re-authorize an antlerless moose season in GMU 13. Cows may be inadvertently killed leaving behind a helpless calf or calves. Calf or calves will not survive, predators will kill them. Two or more moose may be killed as a result of cow moose being accidentally killed.

Furthermore, we oppose antlerless moose being harvested during the rutting season – during the month of October. Moose meat would have a bad taste, most people would not eat moose meat that is harvested during rutting season. A moose would be wasted, moose meat would have to be thrown away.

**Comments:**

We oppose Proposal 135, see comments under Proposal 131.

**Comments:**

We support Proposal 140 to re-authorize resident brown bear tag fee exemption in the Central/Southwest Region. Brown bears are thought to be at a healthy population, there isn't a conservation concern for brown bears in these areas.

Resident hunters will be more likely to hunt for brown bears, if they do not have to purchase a \$25 tag fee to kill a brown bear in Central/Southwest Region. More brown bears should be harvested to protect calves of moose and caribou.

Submitted by:

*Glenn Stecker*  
*for*  
*Link Pet*  
CT Committee Chair

Date: February 14, 2019



Submitted By  
Dan Montgomery  
Submitted On  
3/1/2019 11:59:11 PM  
Affiliation

My name is Dan Montgomery and I've been a resident of Alaska for 37 years. I'm a big game master guide and have made my living guiding since 1993. Thank you for this opportunity to comment on the Southcentral Region proposals.

I support the following proposals:

Prop. 55-Support- The aircraft restriction should be lifted in areas 14C and 14A and only applied to hunters during the open hunt periods that their permits are for. These areas have multiple seasons with different opening and closing dates. With this change the permit holders would have the same restrictions as the general season.

Prop. 104- Support- I don't think a little extra harvest by residents will have any negative impact on the bear population. It is managed very conservatively now.

Prop. 110-Support ?I don't support this proposal if the Dept. will close the draw permit hunt by emergency order if the harvest goal for non-residents is met with additional harvest from this hunt. I've been told by area biologist Dave Battle that they will not apply any harvest to either residents or non-residents from this archery hunt but this proposal says they will. The dept. expects there will be little to no harvest on this hunt as in the past and that is why they will not apply any harvest to the quota. I guide in this area and it has a very healthy goat population.

Prop. 115-Support- I guide in this area also. I was the author of the proposal that put restrictions on the number of permits for non-residents in this area. We are currently allotted 13.5% of the overall amount. The board policy of going back the last 10 years for the average number of permits issued to non-residents was not applied in this area because at the time (2007) that number was around 25% so the board went back 20 years to get 13.5%. By adding these 3 permits you are not going to increase the percentage to non-residents by much. By adding these 3 permits you will not increase the harvest because most years there will not be any harvest for these permits. 2DK have the same low harvest rates as residents because they are poor sheep hunters. I would guess that over half won't even hunt. If you do approve this proposal I would make the dates the same as the middle hunt in these areas, Aug. 23 to Sept. 4 and not the entire length of all 3 seasons as written. I would even support taking the same non-resident permits in these time slots currently allotted to any non-resident and make them only available to just 2DK hunters.

Props. 116,117,118,119,120 and121. Support- Any added bear hunting opportunity in these areas is welcomed. Having hunters harvest them instead of the Dept. putting them down when they move into Anchorage is a good thing.

I OPPOSE the following proposals.

Prop. 56 Oppose- not needed and non-residents harvest predators.

Prop. OPPOSE- 99, 100, 101, 102,103- The current draw allocation system has been in place since 1977 and works very well and should not be changed. The guiding of non-residents for brown bear on Kodiak is vital to the economy of Kodiak and Alaska and brings in millions of dollars to our state.

Prop. 114 OPPOSE- The youth can already apply for permits and adding more pressure to these areas by issuing more permits would have a negative impact on the population.

Prop. 130 Oppose. Not needed.

Prop. 146 Oppose- there should be no tier II hunt in this area.

Thank you

Dan Montgomery





Submitted By  
Dan Huttunen  
Submitted On  
2/6/2019 10:21:31 AM  
Affiliation  
Alaska Resident

As a 65-year Alaska resident, I strongly support and urge the Alaska Board of Game (Board) to adopt Proposal 99 by Robert Cassell. In my opinion, there is **NO** situation where it is proper to deny Alaskan Residents the opportunity to compete on an equal basis for permits to hunt wildlife where scarcity of that resource requires limited take. There should be NO such case where ANY permit is granted to a non-resident to the exclusion of Alaska Residents as long as there are Alaska residents who are applying for those permits.

The issue before the Board in this proposal is not one of sustained yield or orderly harvest. It is solely one of allocation. And the contested allocation is **away** from Alaska Residents and **to** non-residents. The utterly transparent issue before the Board here is MONEY. Non-residents must be guided - though there is **NO** requirement for the guide to be an Alaska Resident.

Clearly Alaska receives a larger tag fee from non-residents than from residents but the tag fee is small compared to the (tens of thousands of dollar) fees charged by guides. The current allocation simply guarantees that a significant portion of a scarce wildlife resource will be used to generate large sums of money for a very limited number of people - some of whom don't even live in Alaska.

In my opinion, the current allocative strategy to non-residents is wrong. Scarce permits should not be available to non-residents as long as there is a pool of resident hunters who desire them.

Dan Huttunen



Submitted By  
Daniel Elliott  
Submitted On  
2/27/2019 3:32:53 PM  
Affiliation

Phone  
907 376-5196

Email  
[dmelliott@mtaonline.net](mailto:dmelliott@mtaonline.net)

Address  
950 E. Fairview Loop, Wasilla, AK 99654  
Wasilla, Alaska 99654

Proposal 99 Kodiak bear permits.

I support proposal 99 . Despite the fact that ADFG likes the money non residents

bring to the state, the drawing system unfairly treats the Alaskan hunter. There are too many permits going to non residents.



2/25/19

Daniel Elliott

950 E. Fairview Loop Rd

Wasilla, AK 99654

tel: 907-376-5196

ADFG Board Support  
Board of Game

I support Proposal 128 concerning the  
Maclaren Summit Trail being non-motorized  
and included in the Clearwater Controlled Use Area.

I do not support the proposed correction to allow  
motorized use.

The 4-wheelers tend to disturb + drive the animals  
further from the road. The non-motorized hunter  
is more limited in the distance he can carry  
a caribou. Alaska is seemingly being over-run  
with 4-wheelers. The non-motorized hunter  
needs restricted areas where everyone can hunt,  
just not using a vehicle.

Dan Elliott

Submitted By  
David Heuman  
Submitted On  
3/1/2019 3:56:45 PM  
Affiliation



PC029  
1 of 1

my comments re: proposal109 unlawful methods of taking furbearres; exceptions... 'My concern is the unintended 'bycatch' of non-targeted species. Over the years I have had 3 dogs impacted by snares, 2 died, one merely degloved its foreleg, what a mess. I don't know if the breakaway will do the job but I think it makes sense to address the issue,and it sounds like it wouldnt be a financial burden on the trapper.



Submitted By  
Diane Wilson  
Submitted On  
2/28/2019 2:27:51 PM  
Affiliation

Phone  
907-746-3070

Email  
[ramblingjw@yahoo.com](mailto:ramblingjw@yahoo.com)

Address  
17450 Rambling Road  
Palmer, Alaska 99645

Proposal 128 Please help keep this area restriction to closed motorized vehicle for hunting.



Submitted By  
Doug Blossom  
Submitted On  
3/1/2019 12:13:23 AM  
Affiliation

Alaska Board of Game  
Southcentral Region Meeting

Chairman Spraker and Members of the Board,

The following are my comments on proposals submitted for the southcentral region Board of Game meeting, focused on Kenai Peninsula area moose proposals. Moose hunting, primarily on the Kenai Peninsula, is an important tradition for my family and myself. Every fall my sons and I go looking for moose. Based on our hunting style we get up close and personal with moose for approximately two weeks or longer every fall.

### **Proposal 63 and 64 – Oppose**

Adding fork bulls back into the harvest regulations would put too much pressure on the bull population. Spike, fork, 50-inch, and 3 brow tine regulations caused bull to cow ratios to get down to 9:100 in 15C in 2010 and forced regulation changes at the 2011 Board of Game meeting. The S/F, 50, and 3 brow tine regulations allow for too many bulls to be available as legal and when combined with illegal bulls misjudged as legal bulls, high hunting pressure, and plentiful motorized access opportunity places more pressure on the bull population than it can sustain. It took a few years of very limited bull harvest from 2011 through 2013 to get a good distribution of bulls across age classes and antler sizes. I don't want to see 15C go back to the same conditions and I'm afraid S/F, 50-inch, and 3 brow tine would take us back to 2010. 15A and 15B bull populations fare a little better than 15C because motorized access is limited in large portions of these subunits.

I also oppose closing the Lower Kenai Peninsula Control Use Area regulations. I believe this provides opportunity for hunters that prefer to hunt by means other than a motorized land vehicle.

### **Proposal 65 - Support**

Recent fall composition counts in all subunits of unit 15 show high bull to cow ratios and indicate the bull numbers can sustain some more harvest. This will provide some additional opportunity to harvest some bulls that are less than 50-inch but will not put the pressure on the bull numbers the same way adding fork back into harvest regulations would.

### **Proposals 69, 70, and 71 – Support**

I reluctantly support allowing more opportunity in the unit 15B draw area. Allowing more hunters into the area could increase bear and wolf harvest which is needed for this area. It bums me out that this used to be a quality moose area and is reduced to an area hardly anyone wants to hunt because of low moose numbers. We will see if the 2014 Funny River fire and a handful of other smaller fires in the 15B area will bring the moose population back. I walked through one of the smaller burned areas by Indian Creek in 2016 and while the post-fire browse looked very good, moose sign was scarce.

### **Proposals 72 and 73 – Oppose**

These proposals were proposed by some members of the Central Peninsula Advisory Committee and were debated at the meetings I attended. I believe the quality of moose hunting in 15C with a registration any bull hunt easily accessible from the road system would be horrible. 15C would potentially see worse crowds than the Denali Highway in September because Unit 13 is a huge area, 15C is not. The any bull season would likely be a couple days in duration, it would lead to high hunter conflict, and potentially unsafe conditions with thousands of people trying to get a bull within the first few days of season.

### **Proposals 74 and 76 – Support based on a smaller permit quota (Up to 50)**

With the likelihood of passing proposal 65 or 66 to add 3 brow tine back into legal harvest criteria, I can't support issuing up to 200 any bull permits. I would recommend a resident any bull draw of 50 permits or less. I don't feel the moose population is as strong as ADF&G believes and I would like to see us liberalize with caution. 2010 to 2013 still lingers in my memory and I don't want to see hunting in 15C go back to that period. Bull to cow ratios support liberalizing bull harvest, but I support a modest increase and we can always liberalize further in 3 years if bull to cow ratios are still good and healthy.

### **Proposal 77 – Oppose**

I disagree with ADF&G on this proposal. I do not observe the moose numbers and densities that ADF&G produces from their census counts. ADF&G census counts in 2010, 2013, and 2017 show an increasing moose population in 15C. I personally have seen a decreasing moose population over the same time period. Based on reports I hear from my son's fall scouting flies and what I see out hunting in some of the best moose habitat in subunit 15C, I just don't see an increase. I see a decrease especially in the mature cow population. I've gone from commonly seeing 20 to 30 cow moose in a single day to seeing 20 cows total during a whole season of hunting. Big groups of moose, 10 to 20 animals in size, used to be common in September as well and for the last couple seasons the largest



groups found are maybe three to four moose in size. These small groups of moose aren't numerous enough to replace the numbers seen

when the larger groups congregated.

Respectfully,

Doug Blossom

Ninilchik, AK



Submitted By  
Douglas A Stephens  
Submitted On  
2/28/2019 3:04:14 PM  
Affiliation  
Mr.

Regarding Proposal 128, to revise the boundaries of the Clearwater Creek Controlled Use Area to exclude the Maclaren Summit Road.

Please, do not do this. There are few enough areas and trails reserved for non-motorized use as it is. I hunt exclusively by fatbike and have biked in the Maclaren Summit Road to hunt. There are few areas where I can escape the sound, fumes, and general intrusion that motorized vehicle foist on the wilds.

Please leave the Maclaren Summit Road within the Controlled Use Area.





Submitted By  
Edward Soto  
Submitted On  
2/3/2019 8:55:42 PM  
Affiliation

Dear Board;

I am writing in support of Proposal 55. Specifically, I agree with the safety issues and the pressures put on pilots, in particular private pilots because of prop 207. During the Dall Sheep working group meetings, I had discussions with BOG members that introduced and supported prop 207 and they told me it was all about generating a quality experience by removing the close in fly-by's that often disturb sheep during a stalk. I can sympathize with that, however I also believe there is a law that prohibits harassment of wildlife. Why generate regulation when there already is one that does the same? The problem with prop 207 and why I support proposal 55 is that 207 is redundant, unsafe, creates ambiguity in the field and discriminates against a user group. If we discriminate against aviators, then why not ATV or other user groups?

Thank you for the opportunity to comment. Respectfully, Ed Soto

Submitted By  
Edward Soto  
Submitted On  
2/3/2019 8:34:20 PM  
Affiliation

Dear Board;

I am writing in support of proposal #99 which proposes to allocate 90% of brown bear harvest on Kodiak to residents. I concur with the proposal's reasoning and would add that under current regulations, residents are penalized twice. The categories under the 2018-19 allocation is "Alaska Residents or Nonresidents Hunting with Resident Relatives" and "Nonresidents and Nonresident Aliens Hunting with an Alaska-licensed Guide". In essence, the current regulations allow for exclusive non-resident allocations of almost 40% and allow for additional nonresidents to compete for the remaining permits with residents thereby reducing resident use even further. The allocation then becomes one given to commercially guided and those not requiring commercial guide services. At minimum residents should never need to compete for their base allocation and nonresidents can compete for the remainder. Guiding shouldn't be a factor as their business is regulated by a different Board. 90% resident allocation is reasonable and common throughout the western states with Alaska being the exception. If resident permit allocations remain unused after the draw, it would then be reasonable to offer them first come-first serve to all. Thank you the opportunity to comment.

Very Respectfully, Ed Soto



Ethan Williams  
ethanw@mtaonline.net

Concerning Proposal 99, I completely agree with the content and idea of this proposal allocating tags and harvest to residents of Alaska. With the increasing people and limited resource available in all species of Alaskan game, allocation has come to the forefront and needs to be implemented. The Constitution of Alaska clearly states under Article 8 that ALL its resources are “for the maximum benefit of its people” and “reserved to the people for common use” and to be “maintained on the sustained yield principle”. I feel that all the wildlife harvests should be allocated such that a minimum of 90% of each species shall be available to residents of Alaska. Please make this well written and founded proposal as part of the new Alaska Fish and Game Regulations. Thank you for your time and consideration. Ethan Williams



Submitted By  
Frank Bishop  
Submitted On  
2/26/2019 9:43:31 AM  
Affiliation  
Alaska Wildlife Adventures

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9074862716  
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[frankabishopawa@yahoo.com](mailto:frankabishopawa@yahoo.com)  
Address  
PO Box 2491  
PO Box 2491  
Kodiak, Alaska 99615

### **Proposal 98**

#### **5AAC85.20 Hunting Seasons and Bag Limits for Brown Bear**

My Name is Frank Bishop, Master Guide number 191. I am in opposition to this proposal.

If it were to pass, it would put hunters in the field at a time when sow bear activity would be at its highest in the salmon streams. This would lead to more DLPs of sows with cubs. In turn causing a long term depletion of these animals.

### **Proposal 99**

#### **5 AAC 92.061. Special provisions for brown bear drawing permit hunts**

My Name is Frank Bishop, Master Guide number 191. I am in opposition to this proposal.

The revenue that nonresidents bring to our state is a major source of income which benefits local businesses, helps fund Fish and Game, and allows all Alaskan residents to obtain harvest tickets at no cost. Without the nonresident income, the harvest tickets would no longer be free to Alaskan residents, the local businesses would suffer as well as the Fish and Game funding. The current system provides an equal opportunity for all Alaskan residents to share in the benefits of nonresident hunter permits and tags.

Alaska's permitting system works equally well for all the residents of Alaska. There is no need to bring in how other states do their systems to further an agenda of a select few.

### **Proposal 102**

#### **5 AAC 85.020. Hunting seasons and bag limits for brown bear**

My Name is Frank Bishop, Master Guide number 191. I am in opposition to this proposal.

It is not that residents are not getting an equal opportunity to harvest bears on the road system.

For example in the fall of 2017 there were 17 nonresident permits issued and 136 resident permits issued. Nonresidents took 6 bears out of 17 permits. Residents took 10 out of 136 permits issued. Of the 153 permits issued approximately 11.8% went to nonresidents. This does not indicate that residents are not getting an equally opportunity to hunt on the road system. (Referenced from Registration Hunt Data from ADF&G)

The success for nonresidents is due to the professional guides they are required to have and the amount of time spent in the field actually hunting. Nonresidents are clearly not in competition with the resident hunters. The resident hunters are in competition with themselves and the amount of time they put in the field.

I disagree with the proposal claiming that residents are not getting an opportunity to hunt, the data clearly shows that they are. The data is being cherry picked to try and show support for an egregious proposal. Review all the historical data and apply it accurately.

The Kodiak Road System registration hunt is the only place on Kodiak where a nonresident and a resident can hunt without a drawing permit. The Kodiak Road System also allows an easier access to hunting for our resident and nonresident disabled veterans. Many of them are unable to hunt in other areas on the island due to their disabilities. We should not take this opportunity away from our nonresident disabled veterans.

#### **Personal impact of Proposal 102**

My name is Frank Bishop, a Master Guide and co-owner of the bison herd on Narrow Cape on Kodiak. I am also a resident hunter but I am not affiliated with the Resident Hunters of Alaska organization.



Proposal 102 affects me very personally as well as my family and the other ranchers in the Pasagshak area.

If this proposal were to pass, (which I am opposed to) it would stop me from earning a living as a master guide and it would also stop others from becoming guides in the future. Which in turn affects the economies of the individuals and the state.

When the number of bears harvested is reduced as it would be with only resident hunters, not because of the lack of opportunity to hunt but due to their less successful hunts, this will cause an increase in the bear population and an increase in the bear predation on the bison herd and the other cattle ranches in the area.

Taking this into consideration I will suffer loss of income on two fronts. It seems to me to be an attempt to appease a few selfish hunters at the expense of an entire industry.

Thank you for your consideration



Submitted By

Frank E. Baker

Submitted On

11/14/2018 10:22:59 AM

Affiliation

Board member - Chugach State Park Citizens Advisory Board

I oppose the proposed bear hunts (Proposal 118, 119, 120 ) in Chugach State Park because they are inconsistent with the objectives of the park, with its increasing number of users. I'm especially against the bear hunt (Proposal in DM666 (Upper Huffman to Powerline Pass) because bears aren't as predictable as moose and they aren't as easy to kill. Nobody wants wounded bears in the most heavily used portion of the park, just minutes from neighborhoods. And because they are bears, some hunters tend to be a little excitable (not good when they're supposed to be worried about what's downrange when they pull the trigger). Muzzleloaders are also one-shot tools and that isn't the best thing for bears, as Lewis and Clark found to their chagrin. I'm especially against baiting bears, as it teaches bad behavior and habituates them to human food. I think a solid proposal to diminish bear-human interactions is to recommend to the Municipality of Anchorage that they require residents to use bear-proof garbage containers.



Submitted By  
Frank S Noska IV  
Submitted On  
2/22/2019 8:41:33 AM  
Affiliation

Phone  
907-841-7372

Email  
[franknoska67@gmail.com](mailto:franknoska67@gmail.com)

Address  
PO BOX 872025  
WASILLA, Alaska 996872025

I am commenting on Proposal 99.

In alligning with the majority of other western states and MORE IMPORTANTLY, the Alaska Constitution, I support this proposal. Alaska residents are not receiveing their constitutional fair share of these permits. Alaska residents are not currently represented by the constitution that mandates that wildlife be reserved for Alaskans. Non residents are currently allicated a 40% of the Brown Bear tags in Unit 8. This percentage is clearly not fair or constitutionally correct, in representing the Alaska resident. By adopting the proposal that would "issue a minimum of 90% of the drawing permits to residents, with the remaining drawing permits available to both residents and nonresidents on the same terms", the allocation in Unit 8, between residents and nonresidents, would be corrected and in line with the meaning of State of Alaska Constitution. Thank you. Frank Noska



Submitted By  
G Origer  
Submitted On  
2/27/2019 12:26:01 PM  
Affiliation

Phone  
495.5105

Email  
[herk-em@hotmail.com](mailto:herk-em@hotmail.com)

Address  
turning piont  
Willow, Alaska 99688

I am writing this opinion in support of proposal 99 submitted by Robert Cassel.

You and your predecessors have decided to allocate 40% of a precious resource to guides/non-residents over the people who make Alaska their home. We live here, we work here, we play here, and we hunt bears here, but not as much as nonresidents.

I did some quick research into other states policies regarding big game hunts. In most limited opportunity hunts, allocation for non-residents is less than 10%. In no case was there such a gross mismatch in hunting opportunities as the Kodiak Brown Bear hunts in Alaska.

There were 31 total hunts for the fall 2017 Kodiak Brown Bear, here are rough numbers pertaining to these hunts.

	Resident	Guide/Non-Resident
# of applicants all permits	over 6000	73
# of permits	116	64
% of permit > 100% success	0%	84%
% of permit < 5% success	87%	0%
ratio of permits to applications	< 2%	> 87%

This resource is for the benefit of residents, not the guiding industry or their clients. The numbers are astounding in the guide/non-resident advantage. I don't have resources for extravagant hunting trips, I am a resident and hunt in Alaska. Please give residents the consideration they deserve for living, working, and raising their families here. Consider how much effort it take to live here full time. Adopt this proposal and give residents a reasonable chance to experience a quality hunt in Alaska.

Respectfully,

G. Origer



Submitted By  
Garry Barnett  
Submitted On  
2/17/2019 3:08:44 PM  
Affiliation

I fully support Bob Cassell and proposal 99,  
( 5 AAC 92.061. Special provisions for brown bear drawing permit hunts.) Further, this should be the regulation on all permit / draw hunts  
in Alaska.





Submitted By  
George Matz  
Submitted On  
2/18/2019 3:30:23 PM  
Affiliation  
Mr.

Phone  
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Email  
[geomatz41@gmail.com](mailto:geomatz41@gmail.com)  
Address  
PO Box 15182  
Fritz Creek, Alaska 99603

Dear BOG Members;

My purpose in writing is to urge you to reject Proposal #128 which changes the boundary of the Clearwater Creek Controlled Use Area in order to allow motorized access by hunters on the Maclaren Summit Trail in Unit 13B.

I realize that this is a board generated proposal, but I think your reasons for the proposal are faulty and do not take into consideration all users of this trail (including nonhunters) and the unique advantage the trail offers those who prefer to hunt without motorized vehicles. In essence, the board proposal demonstrates special favoritism to a user group (those who use motorized vehicles) that already have more than adequate opportunity to hunt in other parts of 13B.

I would like to note that restricting hunters on motorized vehicles from using this trail does not deprive any hunter of access. They still have access, but without dependence on a vehicle to do the work for them. Restricting modes of access does not equate to not having access. Access rights are given to people, not machines. Unrestricted access for all modes of transportation often leads to conflict between user groups and invariably, less opportunity for one or more user groups. Not good management.

There are good reasons for not allowing motorized vehicles in the same area that on-foot hunters depend on for good hunting opportunity, such as the Clearwater Controlled Use Area. As any on-foot hunter has observed, the presence of motorized vehicles can have a disturbing effect on caribou. The motorized vehicle congestion that typically occurs along the Denali Highway during the hunting season causes caribou to seek relief by going further from the road. This results in greater disadvantage (and loss of opportunity) to the on-foot hunter than it does to hunters using motorized vehicles.

I have hunted the Maclaren Summit area the past couple of years and think that the trail offers the on-foot caribou hunter an opportunity to reach high country away from the road without having to hike several miles across the tundra. Having just turned 77, I can no longer expect to make that trek and haul out any carcass. If I am not given the opportunity to hunt caribou in the Maclaren Summit area without having to put up with the disturbance created by motorized vehicles, I will have lost hunting opportunity.

I would also like to mention that it behooves the BOG to recognize that there are many other users of the Maclaren Trail. During the first Tier I caribou season there are still a number of tourists in the area. I have often seen about as many tourists hiking the trail as there are hunters. Most are not aware that hunting season has just started. While, on-foot, I have a chance to briefly talk to them to explain the situation. On the other hand, four-wheelers usually just buzz by, forcing hikers off the narrow trail. I don't think that most four-wheelers give these other trail users a good impression of hunting. Given the presence of hikers on the trail, the BOG needs to consider, for the consideration of others, limiting rather than expanding use of the trail by hunters.

Thank you for reconsidering Proposal #128.

George Matz

Fritz Creek, AK.



Submitted By  
Greg Acord  
Submitted On  
3/1/2019 10:40:37 PM  
Affiliation

My name is Greg Acord, Thank you board of game for your effort and for taking the time to consider my comments. I have been guiding hunters on Kodiak Island every year since 1988. All of my time on Kodiak has been on the South west end of the Island in the areas surrounding Olga Bay and in the Halibut Bay Area. I have also applied for and received 3 resident draw Kodiak bear permits.

Proposal 98

I wrote and support proposal 98.

Starting the fall bear season earlier will give hunters more daylight to be in the field, milder weather in an extreme weather environment, less conflict with late season deer hunters and an all around less harsh conditions for hunters with disabilities. Typically, the conditions in October on Kodiak can be tolerable or even pleasant. But November is typically dark, cold, unpleasant and potentially dangerous for the inexperienced or less physically capable hunter. Starting the season earlier, also allows access to many lakes that typically freeze up later in the season, this helps spread the hunting pressure out and gives more options for access.

This proposal benefits all bear hunters.

Proposals 99,101,102

I do not support proposal 99,101,102

Thanks to the great work accomplished over several decades by the knowledgeable biologists and land managers in the Kodiak Department of Fish and Game and Kodiak National Wildlife Refuge. We have today a Bear population management plan that is working to sustain a healthy thriving population of Kodiak Brown Bears. It would be difficult or impossible to find an example of a game population that is managed as well.

With no consideration for the management plan or the impacts on the state and local economies. This proposal is asking to reallocate nonresident bear permits and give them to resident hunters. The management plan is working in part because of the non-resident guided hunters. A large percentage of the bears harvested by non- resident guided hunters are mature male bears. Harvesting some mature males equates to more bears in the overall population. Using harvest statistics, resident hunters harvest a greater number of female bears than non-resident guided hunters. The non-resident guided hunters are contributing more money per permit into the state and local economies than the resident permit holders. This proposal does not consider the fact that Kodiak National Wildlife Refuge does not belong to the state of Alaska. The refuge encompasses a large percent of land in unit 8 and many of the permits in question are on the refuge. These proposals do not benefit the bears, the hunters or the state of Alaska.

Proposal 103,104

I do not support Proposals 103,104

The department of fish and game has developed a management plan that is working; I believe we should trust them to continue to implement this plan. I also believe that if every permit is used in every hunt this will change the successful formula of the existing management plan. Resident hunters harvest a higher percentage of female bears than the non-resident guided hunters do. If resident hunters end up with every available unused permit, it could result in more female bears harvested, that will result in fewer bears.

Proposal 106

I support proposal 106

Hunter education that will result in fewer female bears harvested is a good idea. There are information videos already available; the department could require hunters to watch the videos before picking up their bear permits.

Proposal 108

I wrote and support proposal 108

Creating a controlled use area and restricting the outboard motors within the controlled use area to 4 stroke only is an easy step in protecting the fish and wildlife on the Ayakulik river. If this proposal is implemented the noise and water pollution can be eliminated with no impact on any refuge users. All wildlife and all refuge users will benefit from this proposal.



Submitted By  
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Submitted On  
2/26/2019 9:41:26 PM  
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None

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Wasilla , Alaska 99687

Please consider my support of Proposal #99 re: the allocation of brown bear permits for unit 8. Support for this proposal is tendered because it seeks to correct an allocation issue which is in direct conflict with Article VIII, Sections 1,2, & 3 of the Alaska State Constitution. Residents of Alaska are being cheated of their opportunity to maximize their harvest of a state/public resource by nonresident hunters. Obviously, issuing 40 percent of available permits to nonresident hunters benefits only them and a small cadre of guides who will accompany them in the pursuit of the said resource. This does not pass the "red face test" in our State of Alaska environment of 2019 when our constitution decrees the we will have " them available for maximum use consistent with the public interest " (Art. 8, Sec.1), " for maximum benefit of its people " ( sec. 2 ), and " wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use." (Art. 8' Sec. 3). This is not what is happening under current law. I would encourage the BOG to enact this proposal in order to support maximum resident hunting opportunities.

Submitted By  
Hans Nordstrom  
Submitted On  
2/27/2019 2:29:41 PM  
Affiliation



PC043  
1 of 1

I am writing the board to discuss allocation of fish and game in Alaska, and at the same time voicing support for Prop 99. I was born and raised in Montana, where I took part in hunting and fishing. I moved to Alaska in 2004 and have made this my home. I was shocked to see the way that the resources of this state are allotted. In Montana there is a large preference to resident status. Living here it seems that the preference people should receive from being a resident of the state is not there. It appears that the almighty dollar is more important than the well being of the people that inhabit the state's communities. Many of us rely on fish and game to fill our freezers. I realize that prop 99 is about brown bears on Kodiak, but it is a microcosim of the way the state treats it's residents.



Submitted By  
Hugh Wisner  
Submitted On  
3/1/2019 1:12:50 PM  
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Proposal 107. Prohibit shooting from a boat in Ugak bay I believe this problem is settled when you take Hunter safety. I grew up in Wisconsin deer hunting where there's farms, Towns, and houses and it doesn't seem to be a problem back there. I don't think it's necessary to put another law on the books for maybe 10 cabins in the bay.



Submitted By  
Ian Zwink  
Submitted On  
2/28/2019 10:27:01 PM  
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Regarding proposal 98

The ultimate goal of any hunt should be to return home safely. Giving hunters optimal conditions by allowing hunting for brown bears to start on October 10th, not only protects hunters but keeps people tasked with rescuing hunters out of potentially dangerous and life-threatening conditions. Spacing out brown bear and deer hunters in the area by beginning brown bear hunting on October 10th would also make the area as a whole safer for hunters. There is no reason why brown bear hunters and deer hunters should have conflicts when this practical solution of moving the brown bear hunting start date up fifteen days would be one that provides various protections for hunters and reduces conflicts between them. There would be no drawback to this proposal with the benefits being a safer and more enjoyable hunting season for those in the area.

Submitted By  
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2/28/2019 10:19:43 PM  
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Regarding proposal 108.

To get the most significant return on our resources, we must take the appropriate measures to maintain them so that they can thrive. Limiting the use of motors on the Ayakulic river to four-stroke motors would solve both noise and river pollution problems. These are issues that we can all agree are important and deserve to be addressed, by allowing four-stroke motors access to this river the matters raised in the proposal will be solved without limiting or interfering access to the river. Two-stroke motors no longer have a place on this river when there is the quieter, cleaner, four-stroke option available. This is a simple and practical solution that if implemented now will prevent a much greater pollution problem in the future.



Submitted By  
Janelle Eklund  
Submitted On  
2/23/2019 1:44:37 PM  
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Ms.

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I am writing in support of proposal 128. I object to the correction. The Maclaren Summit Trail at about mile 37 of the Denal Hwy needs to stay in the Clear Water Creek Controlled Use Area like it has been for many many years. I have hunted this area on foot and by canoe and others have used horses. There needs to be at least one place hunters can go free of the sight, sound and competition of motorized hunters. Non-motorized hunters deserves some space too. Please keep the Maclaren Summit Trail in the Clear Water Creek Controlled Use Area.



Submitted By  
Jenya Aleksandrushkin  
Submitted On  
2/28/2019 9:57:01 PM  
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Concerning Proposal 98: Beginning the Fall hunting season on October 10th. If the season were to begin on the planned October 25th, the weather conditions will have become harsh and possibly compromise the safety of hunters. If lakes freeze in this time period, Hunters may become grounded. The colder temperature also poses a higher risk for injury among hunters.

During late October, deer season is also open, causing an influx of sportsmen in the area. This congestion creates more disruption to wildlife. By spacing the hunting times, this could be avoided. The decision to open hunting season on October 10th will not only ensure hunter safety, but also reduce the amount of hunters at one time, minimizing the strain on wildlife.

Submitted By  
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2/28/2019 9:33:06 PM  
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I am writing in regards to Proposal 108, concerning the restriction of motor types used on the Ayakulic River. Currently, two- stroke motors are permitted. This is concerning for several reasons. In two-stroke motors, the engine lubricating oil must be mixed with the fuel, releasing toxic levels hydrocarbons, carbon monoxide, and smoke as a by-product. This pollutes not only the air, but creates a caustic environment in the waters that host many types of salmon and trout. In addition, the loud noise emission from two-stroke motors disturbs wildlife, from waterfowl to brown bear. This disruption is unnecessary when options such as a four-stroke motors are available. This is in the best interest of sustaining the wildlife surrounding the Ayakulic River.



Submitted By  
Jodi Estrada  
Submitted On  
2/17/2019 4:11:15 PM  
Affiliation



PC048  
1 of 1

**PROPOSAL 109**

**5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.**

**Require all snares on the Kodiak road system to have a breakaway mechanism as follows:**

I support proposal 109 in regards to requiring snares on the Kodiak road system to have breakaway mechanisms. I know of several dogs that have been trapped in snares and have seen many snares and leg hold traps along commonly used recreational trails. A release mechanism could allow these animals to escape with lesser injury or death.



# Katmai Guide Service

JOE KLUTSCH, MASTER GUIDE

February 27, 2019

Alaska Board of Game  
P.O. Box 115526  
Juneau, Alaska 99811-5526  
www.boardofgame.adfg.alaska.gov

Dear Members of the Alaska Board of Game:

I am submitting this letter to address the following proposals along with my personal recommendation for action on each as listed. My recommendations reflect those of the Kodiak AC which invested extensive time and efforts in responding to these proposals. As many of you know, I have served over 40 years on the Naknek/Kvichak Advisory and have been responsible for crafting AC comments particularly for sport fishing and hunting regulations for the Bristol Bay and Alaska Peninsula region. This experience has taught me to recognize good AC work when I see it. The Kodiak AC's work in this regard is as good as I have ever seen and it is based on extensive public input.

I am not trying to avoid extra work on my part by not restating the rationale for the recommendations on these proposals but rather, avoid redundancy. I could not restate the AC's any better than they did.

PROPOSAL #	RECOMMENDATION
93	oppose
94	support
95	support as ammended
96	oppose
97	support as ammended
98	oppose
99	oppose
100	support as ammended
101	oppose
102	oppose
103	oppose
104	oppose
105	oppose
106	oppose
107	oppose
109	support

Conclusion: It is interesting to note that a number of the proposals made by a few individuals and an organization





claim to be in the interest of promoting resident hunting opportunities however many of these same people have gone on record before the Alaska State Legislature opposing re-authorization of the Big Game Commercial Services Board. This Board is an essential element in regulating the guiding and transporting industries which benefits all resident hunters. This inconsistency puts into question the real motivation for a number of the proposals you will be considering.

Thank You for all your hard work and dedication.

Respectfully,

Joe Klutsch

A handwritten signature in cursive script that reads "Joe Klutsch".



Submitted By  
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3/1/2019 12:01:13 PM  
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I support Proposal 128 and object to the "correction." It would open the Maclaren Summit Trail, affectively the only non-motorized trail in the area to motorized use. I don't think the proposed correction to the language is a good idea or fair to all users.



Submitted By  
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Submitted On  
1/26/2019 11:41:40 AM  
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Hello there. My name is Jon Essert and I reside in Soldotna. I'm primarily writing concerning moose hunting in 15c. A little background about myself, I am a former ADF&G employee, college graduate with environmental studies and biology degrees, and I very much enjoy feeding my family with moose I harvest myself. I have recently stumbled across the ALCES scientific journal so that has been occupying my evenings always learning more about moose.

My family has a cabin in the caribou hills and that's where I do most of my moose hunting. The last few seasons I have been fortunate enough to harvest bulls during the motor closure and I very much support that regulation. We hunt opening weekend on side by sides and that's a circus. During the motor closure, it's "real" hunting, and we enjoy walking in peace and quiet. If I could make a suggestion on that note, it would be to somehow disallow all use of motorized vehicles during the moose season rather than just disallowing moose hunters from using motorized vehicles because it's a much harder regulation to enforce the way it is now and people are abusing the grey areas around this regulation.

I understand the bull:cow ratio is about double what the ideal management objectives would like to see for 15c (51:100 rather than 25:100). Rather than default to the obvious response of "we need to kill more bulls", I would like to see some more discussion on increasing the cow numbers to offset that bull:cow ratio in the direction we need. I understand there are some predator hunting methods available in 15c that are currently not being utilized for wolves. Myself and a hunting partner had a very close encounter with several wolves while we were walking down the middle of a very busy trail in the caribou hills. They snuck up behind us to within 5 yards before noticed. There are a lot of wolves in 15c. In addition to wolves, I've recently learned black bear harvest is down substantially as well, which is not a good sign with the black bears being as hard on moose calves as they are. Not sure how we can get that harvest back up but one idea might be to increase public education on the impact bears have on moose populations.

During the past few seasons hunting 15c, we have seen many many bulls in the "hard to decide" category, as I'm sure you're aware and I'm sure we aren't alone in those observations. Given the current 50" four brow regulation I think this is just part of hunting we have to get used to. Myself and my hunting partner watched the 54" bull we harvested this year for nearly TWO HOURS before we decided he was good to harvest. This was after 6 days hunting on foot, walking over 100 miles, and passing on roughly a dozen sub legal bulls. I wish more people just had patience to hunt harder and find more bulls until you get a legal animal, rather than take the easy route and shoot at any horns they see that might be close. I also believe this regulation is the reason we are seeing 20-25% sub legal harvest. I understand we killed about 175 bulls in 15c during 2018 even including the sub legal, which is still below the low end harvest objective of 200 animals so I don't see this as being a huge issue for long term herd conservation.

Below I will list my comments for each individual proposal I am concerned about and I very much appreciate this opportunity to comment in a process that seems to work very well.

Proposal 63: I strongly disagree with doing away with the motor closure. I feel it limits the lazy hunters who make impaired decisions. I don't own horses and I do own side by sides and 4 wheelers so I'm probably in the minority here but I really think the motor closure is good. It limits access to a very accessible area and there would just be too many people hunting 15c if this regulation was lifted. Access is primarily in the caribou hills and the current trails infrastructure just can't support increased interest. In regard to the habitat not supporting an increased number of animals, myself and anyone I know within my group of friends who spend a great deal of time in the caribou hills are not seeing starving moose to the degree noted here. The habitat is great following the fire and can seemingly hold more moose as indicated by high twinning rates and relatively fast population growth following the last management regulation change. In addition, I think liberalizing the current regulation back to allowing fork moose harvest is a waste of the resource. If we all want to put more meat in the freezer, harvesting young moose rather than old mature bulls is a waste. Let them grow and harvest them when they are larger, resulting in more meat.

Proposal 64: As previously stated, I think harvesting young bulls is not responsible if we are simply looking to put more meat in the freezer.

Proposal 65: if a change in current regulations is indeed necessary, this would be the change I would like to support as a local hunter. More mature bulls being harvested and also less work load for enforcement agencies because less sub legal bulls will be killed. My concern here being that in a matter of years we will put ourselves back in the situation we had prior to 2010 (10:100 bull cow ratio) resulting in poor hunting and harvesting.

Proposal 66: Same comment apply as listed for proposal 65.

Proposal 72: Of all proposals listed for 15c, I disagree with this one the most and would strongly discourage this approach be

implemented. Given the easy road access to unit 15c, the registration structure simply wouldn't work. This structure works well in areas off the road system where other hunters don't have an easy car ride to go pick up a permit. There will be hundreds if not thousands of people waiting in line to get this any bull permit in an area that they can simply drive to and harvest a bull. As previously stated, this area is already very very busy because of its easy access via motorized access and I feel this hunt structure would make an overcrowding issue much worse than it currently is. I would like to see the board look at other methods at increasing bull harvest for the people of the Kenai rather than creating the most sought after tag in the state for non-local hunters. Simply remove the 4brow tine reg back to the 3brow reg and you will get more harvest. We don't need more hunters in this area plain and simple.

Proposal 73: Same comments as for proposal 72 apply here. I STRONGLY disagree with making a registration hunt in 15c to increase harvest. There are already hunters in the woods looking for moose to harvest, we just need to give them more legal bulls to kill by reducing the brow tine requirement.

Proposal 74: On a similar note to previous proposals, I would hate to see any more crowing than is already present in 15c. This proposed drawing permit would surely be very sought after because it would be the most affordable "any bull" tag in the state to hunt. I know that's a huge consideration when I'm applying for tags so I'm sure I'm not alone there. Look at DM210 and DM211 permits as an example of what I'm predicting would occur. Authors of the proposal fail to acknowledge it won't be local people getting the increased harvest opportunity, it will be anchorage folks. I feel we are realitvly close to our harvest objectives and while a need for increased harvest is warranted, I strongly feel it can be accomplished by those of us already out hunting these woods. Just go back to 3brow tine.

Proposal 75: We already have an archery only season, I don't see a need to make more seasons which are an increase work load for our already a teaser enforcement agencies.

Proposal 76: Again, I STRONGLY discourage putting more hunters in the woods. It's sinoly going to amplify the problems we already see with sublegal harvest and overcrowding. There are enough hunters living in the local community looking for harvest opportunity to accomplish your Intensive Managment objective of 200-350 bulls. We are at 175 in 2018, that's only 25 away and one could easily speculate with "unreported" kills not being accounted for that we are currently in the low end of the harvest objective. I really don't want to see a situation develop where myself and my family are no longer able to hunt in the Caribou hills, where my In-laws have been hunting for 4 generations. I very much want to continue this legacy and allow my future children to participate in hunting the caribou hills where we have for so many years.

Proposal 78: AGAIN, I strongly disagree with this approach. You already have people willing to accomplish your objectives. Don't increase the work load of the state by implementing new unnecessary permits and also don't increase the work load of the troopers by creating a situation where you have both general season harvest ticket hunters targeting 50" 4brow bulls as well a permit hunter looking for "any bull". That's a tough situation that we don't need to create.

Proposal 79: Strongly agree. I feel every resident of Alaska wishing to participate in a hunt regardless of location or the hunters age should have to pass hunters education. Can't hurt anything.

Proposal 85: I completely disagree with this proposal. According to ADF&G, black bear harvest is down, not up, and we need to try to increase harvest of black bears in an effort to reduce conflict between bear and moose.

Proposal 91: Given the number of recreational cabins in the caribou hills, I feel that limiting firearm discharge in this manor would negatively effect many people ability to hunt around our cabins, the way we have done for decades. I completely understand the safety aspect of this proposal and agree that bear populated areas such as Homer, firearm discharge should be regulated however not in the rural areas. As somewhat discussed in proposal 79, perhaps everyone should just take hunter education.

Thanks again for taking the time to review my comments. See you in Anchorage!



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3/1/2019 11:47:44 AM  
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Please approve proposal 128, in a form that does not allow motorized hunting on the Maclaren Summit Trail. I have been hunting almost annually on the Denali highway for nearly a decade. I have hunted both moose and caribou, and I have used motorized transport some years and non-motorized transport others. The CCCUA is a valuable system element that benefits all hunters on the highway. Please do not erode this important area by allowing motorized hunting on the MST. Thank you, Jonathan



Submitted By

julian

Submitted On

2/28/2019 9:17:52 PM

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Kodiak resident big game guide

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Regarded proposal 99:.. I do not support it. Guiding a huge source of income for the state and kodiak island. and 102 guiding on Kodiak road system. Im born and raised on kodiak. I've been assistant guiding the last 5 years I plan on getting my registered guide license and guiding on the road system to make money and keep it in my town and my state.





Dear Board;

I am writing to support proposal 99 put forth by Robert Cassell. The proposed allocation that 90% of drawing permits be issued to Alaskan residents is a fair and reasonable allocation. A 40% allocation of permits to nonresidents doesn't fall in line with the Alaskan constitution mandates. A resource as precious as a Kodiak Brown Bear Hunt should never see a comparable or at times higher nonresident harvest than resident harvest. That fact alone shows an uneven distribution of the natural resource. Knowing the financial benefit of a Kodiak Brown Bear harvest ticket to a nonresident it's no coincidence this is our most egregious example of nonresident permit allocation. Now is the time the board realizes this error and updates our resident permit allocation percentage and does what is constitutionally demanded of them, and give the residents back this precious and scarce resource.

Respectfully

Justin Coffman



Submitted By  
Kalie Harrison  
Submitted On  
3/1/2019 3:05:20 PM  
Affiliation

Proposal 121 and 116 are unacceptably close to trails and living space in the Girdwood valley. While the allowable area is large, it's obvious that the ease of use on our trail systems will mean that hunters will be walking in just steps off Winner Creek Trail, or even the CPG cat trail. Girdwood's primary business is tourism and this will endanger both residents and scores of tourist each year.



Submitted By  
Karen Yashin  
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3/1/2019 4:13:02 PM  
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(I apologize if you recieved this already but I am not sure that my comment came throught the first time as I received no email to verify)

I have lived in Kodiak since 1978 both in the villages and in Bells Flats and have witnessed and heard of a number of unfortunate instances when a companion dog was trapped close to its owner and just off a road or trail in a rural neighborhood. Having taken a class in releasing traps, it is obvious that as the traps are now it would be very hard to release the mechanizm in time to save a pets (or other animal unintended to be caught) life as it would struggle making it harder. Also, a normal tool like a leatherman will NOT cut the snare line if that is the trap used. I am in favor of the break-away or some quick release form of trap as being discussed in proposal 109. Thank you for this opportunity.



Submitted By  
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2/17/2019 6:02:05 PM  
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Hello,

I am commenting about PROPOSAL 109 5 AAC 92.095 (Unlawful methods of taking furbearers; exceptions). I support having a regulation that includes a breakway mechanism for all snares on the Kodiak Road System. Last year, I attended a workshop for pet owners where residents learned how to safely remove a dog from the three major trap categories. The room was packed with community members who are concerned about trapping and their dogs getting into snares. This regulation will reduce capture of non-target species, such as dogs and bears. Please vote for Proposal 109. Thank you for the opportunity to comment.

Kelly Krueger



Submitted By  
Ken Wilkinson  
Submitted On  
3/1/2019 9:23:26 AM  
Affiliation

Gentlemen and Ladies,

I strongly disagree with proposals 116 and 121. Area is known as Remainder of 14C. Bear baiting in this area is in too close a proximity to the town of Girdwood and the 1000's of recreational users on the Winner and Glacier Creek drainages. Not only do residents and Alaskans use this area, thousands of visitors from out of state/country frequent these areas. Bear/human conflict will increase and feeding bears habituates the animals to non-natural food sources, possibly attracting them into town. Although the area may seem "remote" it is not the case, as this area is planning recreational upgrades to trails, as well this area is used by gold miners and panners. Although ethics is supposed to guide the actions of hunters and trappers, traps have been found too close to trails, even within the municipality, and bait stations have been abandoned, causing impacts to bears and other animals habituated to the location. Either of these situations occurring close to Girdwood, disproportionately negatively affects visitors and residents in these areas. Any wounded animals could end up in the town of Girdwood,...not a good situation, especially in the case of Brown bears, where the hunters would not have the opportunity of a bait station "shot". This area is too heavily used and bear hunting would be conflicting and only cause problems in town. Please reject proposals 116 and 121. Safety and proximity preclude any advantage of additional harvest opportunities.



Submitted By  
Kevin laemmrich  
Submitted On  
2/28/2019 3:51:27 PM  
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No on proposal 116 and 121 not bear hunting or baiting in remainder 14c.

This area has heavy hiking traffic that includes dogs and berry pickers. To close to town for attracting more bears and adding traps.



# United States Department of the Interior

FISH AND WILDLIFE SERVICE  
Kodiak National Wildlife Refuge  
1390 Buskin River Road  
Kodiak, Alaska 99615  
(907) 487-2600



PC060  
1 of 1

February 19, 2019

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

Dear Members of the Board of Game:

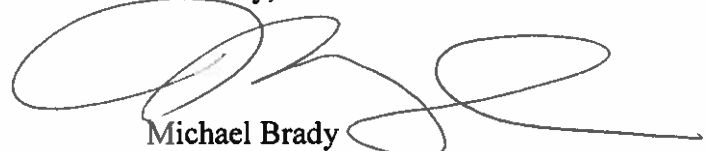
I appreciate the opportunity to comment on Southcentral Region proposals to be considered by the Alaska Board of Game during its March 15-19, 2019 meetings. I offer the following comments regarding Proposal 99 pertaining to Game Management Unit 8 (GMU 8).

The Fish and Wildlife Service has a long history of provision of hunting opportunity to the American public on National Wildlife Refuges. On federal refuge lands we are required to ensure that the allocation of hunting opportunity is fairly balanced between State-resident and non-resident hunters. On Kodiak Refuge, which comprise 52% of the land area of GMU 8, this fair balance has been struck with the long-standing standard of allocation of drawing permits for recreational sport hunting of brown bear. Specifically, this standard has provided 60% of drawing permits to Alaska resident hunters and 40% of drawing permits to non-resident hunters.

This permit allocation standard has been highly successful—both by providing balanced opportunity to American hunters, and by ensuring a productive bear population that includes adequate representation of trophy-class males. Review of bear harvest data for Kodiak Refuge indicates a long-term trend of increased ratio of males including trophy-class males.

I oppose Proposal 99 and further recommend no change to the current resident and non-resident allocation standard for drawing permits for recreational sport hunting of brown bear in GMU 8.

Sincerely,



Michael Brady  
Refuge Manager

Cc: Nathan Svoboda, Alaska Department of Fish and Game



Submitted By  
Kurt Whitehead  
Submitted On  
3/1/2019 9:52:48 PM  
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Mr. Chairman and members of the Board of Game,

I'm opposed to all of the anti-guide proposals before you and wanted to comment specifically on the most detrimental one which is proposal 99. I am strongly opposed to this one.

My name is Kurt Whitehead. My wife Trina Nation and I are year-round, residents of Klawock, AK on Prince of Wales Island and we are NOT members of Resident Hunters of Alaska.

Most of the proposals in front of you at this meeting do not directly impact us but many of them could potentially end my fellow guides small businesses or at the least, severely impact/hamstring them.

Proposal 99 has the potential to not only end many small local businesses on Kodiak Island but it would also have a major negative ripple effect on the economy of Kodiak and the management of Kodiak island's wildly successful brown bear program.

The majority of Kodiak Island's brown bear guides are residents. These hard working guides pump millions of dollars into Alaska's LOCAL economy. These ethical guides keep bear hunting clients safe. These honest guides do their utmost to harvest only mature male brown bears. Most of these tenured guides have families to support. Most of these professional guides you haven't heard of because they are busy working, raising families, keeping their clients safe, paying taxes, voting and NOT making the headlines. Many of these active, involved guides are busy contributing to society and their communities and have found a small niche to earn income and distribute it to other local businesses. Let's review some facts regarding this anti-guide proposal:

-The vast majority of Alaska's guides are RESIDENTS.

-The current Kodiak brown bear management program WORKS VERY WELL.

-Kodiak guides are 97% Alaska residents and contribute an incredible amount of money to the LOCAL economy.

-Very few, if any, guided hunts end in disaster and/or need to be rescued by the Coast Guard/troopers.

-Most guide operations utilize the local air taxis, hotels, restaurants, grocery stores, fuel docks, airlines, shipping operators, sporting goods shops, etc. etc.

-Most unguided, resident hunters (I know, I'm one of them) are mainly interested in conserving their money, they bring as much food as possible from Anchorage, they don't buy much of anything from the gift shops or sporting good shops and they certainly don't create the trickle down effect that guides have on the local economy.

-Alaskan resident hunters spend \$25 with the State per brown bear tag, while the non-resident clients that most of us guides take spends \$1000.

-Most of us local guides pay local sales taxes for our clients.

-All resident hunters are able to hunt brown bears in units 1, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25 and 26. So, in EVERY GMU that has brown bears, a resident can hunt them WITHOUT drawing a tag and they can even harvest TWO bears in many of those GMU's and they can hunt YEAR ROUND in many of those GMU's and they only need to pay a \$25 tag fee. The only GMU in the state that is predominately a draw hunt for brown bear is unit 8 but it is also an amazing conservation and economic success story. And yes, it is the unit under attack in this proposal!?

-Alaska resident hunting guides and their clients routinely harvest mature male brown bears with a much lower sow and adolescent harvest rate than resident hunters.





I could go on and on about the truly adverse effects this proposal will have on every Kodiak guide but the reasons given above should be deserving enough for you to dismiss this proposal.

Thank you!

-



Submitted By  
larry carroll  
Submitted On  
2/27/2019 8:39:41 AM  
Affiliation  
kodiak adventures lodge

**Prop 98.**

2 main concerns are: There are many years where there are still Salmon (coho) in many streams that early in Oct. when they have a late run. This gives hunters a huge advantage hunting early and bears at a huge disadvantage as they are traveling primarily along the river banks looking for the last remaining fish. Many hunters drawing fall tags for Kodiak want to book opening season in the mistaken premise that there are salmon in the streams and want that advantage. We have to inform them otherwise as we almost never see salmon still in the streams by Oct. 25th. I am not stating that I want it harder for hunters to find bears. Hunters in our area already have approx. 75% success.

Second issue is that these hunts are mainly a trophy hunt and bears being valued for their hide, the difference between the quality of the hide from Oct. 10th to the 25th is huge. 15 days can be a big deal in the fur growth of fur bearers. All other fur trapping is in Nov. on Kodiak just for this reason.

The premise that weather is drastically worse 15 days later is really not fact as on Kodiak the temps do not vary that much in that short of time and historically we see major winds in Mid Oct. every year.

Thank you for giving us a chance to voice our concern and for your service as a board members.

**Prop. 105:** First I would like to state my opposition to this has nothing personally against MR. Zweng as he is a great guy but I see this a move to benefit him personally.

Changing boundary in this area is really damaging to resident hunters (a majority of hunters for this area) drawing tag db234 and db204. The prop. never addresses resident hunters. Most of these hunters hunt both sides of Kiliuda bay during their hunt and are then not hunting on top of each other especially in the fall hunt when almost everyone shows up opening day.

Making Db204 and Db234 part of Ugak bay is foolish because then you really end up with 3 very small areas for hunters to use as no resident hunter is going to travel across the pass (almost impossible for most) into the other part of the hunt area to Ugak bay or vice versa. So then you have 4-5 resident hunters hunting on top of each other as there is then not enough room to spread out and this does not take into account the 3 tags for non residents making 7-8 hunters in a very small area. There are already small conflicts with guides and the resident hunters in this area due to the small area for non residents because the federal area is off limits for guides other than Mr Zweng.

Yes this makes the federal area smaller also but: I see this as only benefiting the stake holder of the exclusive area of federal lands (southern shore of Kiliuda bay) in this area. Effectively making him (Mr Zweng) sole guide of the new area and only his non resident clients could apply for those non resident tags in the new federal area making this really no longer a draw for non residents. Both non resident and residents lose in this proposal.

Thank you for giving us a chance to voice our concern and for your service as a board members.



Submitted By  
lawrence  
Submitted On  
2/26/2019 7:11:49 PM  
Affiliation

Prop 93.

I disagree that the limit needs to be changed. 3 deer per person is more than enough for all goals of both the trophy and meat hunter. The average deer yields 30lbs -50 lbs of meat. (3 deer average is approx. 90 -150 lbs) Plenty of meat for the average family ( other family members may hunt also and many do if extra meat is needed) This is currently plenty of opportunity for not only residents of Kodiak but all of Alaska and Non residents also if trophy hunting is their goal. Most non residents do not take all of the meat from the 1-2 deer they shoot. Very few non residents ever buy a 3rd tag as for most 2 deer is plenty even for the trophy hunter. Raising it to 5 will not bring more money to the state in tag sales either as tags are free for residents.

If locals feel they need more meat so they can feed elderly or those that can not hunt they can proxy. I think limits of over 3 just encourages the harvest of younger smaller deer as hunters then know they can shoot more if there was not enough meat on a fawn or yearling.

We have lived on Kodiak for 11 years and hunted there more than that and have never felt the need to harvest more than 1 per family member and we live on wild game meat all year. (family of 4).

In regards to population fluctuations this is mostly weather related in the remote parts of Kodiak and can be very different from area to area even on Kodiak. Making the whole Island higher limits when some areas may have been hit with harder winters than other areas does not allow for deer to come back unless the whole Island then drops back down to 3 or lower since the island is not broken into separate management areas. Many areas have more pressure also. Ugak bay, Anton Larsen and Port Lions are reachable by boat and have much more pressure on them. ADFG does not do deer counts and do not track populations other than by harvest surveys (which by the time they get them and evaluate it would be late for them to change things) . The only other way populations are evaluated to my knowledge is by local observation and contact thru fish and game officers and can be very subjective based on who you talk to.

Prop 99.

I agree with this simply because it follows what our state constitution mandate dictates. The resources are to be managed for Alaskan residents first and foremost. Having only 60% of tags go for Alaskans is just plain wrong and the guide association has had too much influence with the Board of Game in years past. Please make this right.

Thanks for your time serving the board and giving me a voice.



March 1, 2019

**To:** Alaska Department of Fish & Game; Board of Game

**RE:** Proposal 109; 5AAC 92.095. Unlawful methods of taking furbearers: exceptions.

I am writing you in support of the proposal to require that all snares used on the Kodiak Island Road system have a breakaway mechanism. I am concerned, just as others are, that snares have caught bears which resulted in significant injuries. I am also a dog owner and very concerned that he be caught in a snare and unable to breakaway.

These snares are intended to catch smaller furbearing animals and the fact that they have caught bears, deer, and larger dogs indicate that a locking snare should be prohibited. Other states have instituted restrictions on locking snares because of concerns of capturing non-targeted species. I encourage the Board of Game to institute the same in order to avoid these serious and unnecessary trappings.

Thank you for your consideration.

Linda Lance  
1338 Mountain View Drive  
Kodiak, AK 99615

Submitted By  
Lindsey Cassidy  
Submitted On  
3/1/2019 10:00:58 AM  
Affiliation



PC065  
1 of 1

I oppose opening the only non-motorized trail to motorized use. Please keep it non-motorized. I object to the "correction" being proposed in proposal 128.



Submitted By  
Michael Edgington  
Submitted On  
2/28/2019 2:28:08 PM  
Affiliation

Phone  
907-231-6819  
Email  
[mike.edgington@gmail.com](mailto:mike.edgington@gmail.com)  
Address  
PO Box 514  
Girdwood, Alaska 99587

### **Comment in opposition to Proposal 121**

*[Affiliation note: I serve as an elected member of the Girdwood Board of Supervisors, but this comment is in my capacity as a private citizen]*

Proposal 121 seeks to establish black bear baiting within the "Remainder of 14C" area.

In its response to proposal 121, ADF&G states "Access to the Remainder of 14(C) is difficult". While that is true for the bulk of the area, "Remainder of 14C" includes the town and resort community of Girdwood. Girdwood lies on the road and rail system less than 40 miles from Anchorage.

Due to the expense and difficulty of travel to most of Remainder of 14C, it is a reasonable assumption that a significant amount of bear baiting activity would be close to the easily accessible trail system within the Girdwood Valley.

Girdwood is a world-renowned travel destination, with several hundred thousand visitors annually. They are attracted to the scenic valley and use Girdwood both as a base for regional recreation and to recreate within the Girdwood Valley itself.

Girdwood's Winner Creek trail, managed by Chugach National Forest, is frequently highlighted as one of the top destination trails in Alaska. Proposal 121 would allow baiting stations to be set within a few hundred yards of the most popular sections of the Winner Creek Trail.

Other popular trails within the Girdwood Valley are maintained by private organizations, so would not even be subject to the 400yd setback requirement for publicly maintained trails. Proposal 121 would permit baiting stations to be set immediately adjacent to (or even on) those trails where they cross state land.

The setting of bear baiting stations is incompatible with the existing economic use of land within the Girdwood Valley. It will lead to significant conflicts with existing user groups. Therefore, I oppose proposal 121 as written.

Whilst I strongly oppose bear baiting stations within Girdwood Valley (the drainage of Glacier Creek, Virgin Creek & Tidewater Slough and their tributaries) I do not object to bear baiting being permitted in the more remote parts of Remainder of 14C, including the Twenty Mile drainage and Lake George areas.

If proposal 121 were modified to apply only to Remainder of 14C \*excluding\* Girdwood Valley, then I would have a neutral opinion.



Submitted By  
Michael R. Bryan  
Submitted On  
3/1/2019 12:52:12 PM  
Affiliation  
Fairbanks AC

Phone  
907-451-6365

Email  
[fbksfishng58@yahoo.com](mailto:fbksfishng58@yahoo.com)

Address  
378 Shannon Drive  
Fairbanks, , Alaska 99701

As a resident of Alaska and long time (30 years) hunter, I strongly encourage you to consider and vote in favor of Proposal 102 (Allow residents only to hunt the RB230 and RB260 along the road system of Kodiak Island) and Proposal 103 (Allow the transfer of undersubscribed non resident tags to the resident pool) and proposal 116 (Change the bag limit to allow a harvest of one brown bear per year to one, up from one every four regulatory years) and proposal 121 (Allow black bear baiting along the Twenty Mile River -Unit 14C Remainder). Your consideration and your service on the Board is appreciated. M Bryan, Fairbanks



Submitted By  
Michael Zweng  
Submitted On  
2/26/2019 2:14:07 PM  
Affiliation

Name: Michael Zweng

Support for Proposal # 105

I would like to thank the ADF&G for their comments on this proposal and the concise synopsis regarding the effect. I would also like to thank the Board of Game for their time in reviewing this proposal.

As ADF&G noted, this proposal would make unit 04 entirely federal land and allow the current Wildlife Refuge special permit holder the exclusive privilege to hunt this area. This is similar to the majority of the brown bear drawing hunt borders on Kodiak (21 of the 31 guide use areas). The KNWR accounts for approximately 2/3 of the land on Kodiak Island and a special use permit is required to perform guided hunts on the KNWR.

This proposal is a benefit and more evenly distributes the harvest in unit 4. There have been consecutive years in the past where the special use permit holder has not drawn any bear hunters because other guided hunters in unit 4 have drawn all the permits allocated. When this happens they are all forced to hunt on the smaller portion of state land that is in the current boundaries of unit 4 since they do not hold a Wildlife Refuge special use permit. This means that no guided hunt harvest had taken place on the KNWR portion of unit 4, and a concentrated harvest of all guided hunts has taken place on the state land portion only of unit 4. Since all guided hunts in unit 4 had to take place on the state land portion, guided hunter congestion is a concern because access is limited to only a portion of the northern shore of Kiliuda Bay.

Should this proposal be adopted, although the brown bear drawing hunt borders will change, the amount of land that guides can hunt will not change since guides that do not hold the Federal Wildlife refuge permit are unable to hunt the Wildlife refuge portion of unit 04. In fact, this will be a benefit to the guides that do not hold a Wildlife Refuge permit because now they would only have to register one guide use area (Unit 2) to hunt the same land that they previously had to register 2 guide use areas. This would allow them to register another guide use area and not exceed the maximum number of 3.

As noted by ADF&G, this proposal would require the adjustment of the number of permits allocated in both areas. This should be fairly straight forward since approximately 2/3 of the land in unit 4 would remain in unit 4. Therefore, it would seem reasonable that 2/3 of the number of permits would also remain with unit 4 and 1/3 would transfer with the land to unit 2.

The Kodiak bear hunt drawing areas currently match the state Guide Use Areas. Therefore, an associated change to the state Guide Use Area borders of Kodiak areas 8-02 (Ugak Bay) and 8 04 (Kiliuda Bay) (such that 8-04 matches the KNWR Guide Use Area KOD-18) will be sought from the Big Game Commercial Services Board (BGCSB) upon the acceptance of this proposal by the Board of Game (board). This two-step approval is required since the board controls the brown bear drawing hunt area borders, and the BGCSB controls the state Guide Use Area borders under 12 AAC 75.265.





Submitted By  
mike mccrary  
Submitted On  
2/5/2019 4:33:28 PM  
Affiliation  
70 North LLC

Proposal 99 challenges the "Findings of the Alaska Board of Game 2017-222-BOG Alaska Board of Game Nonresident Hunter Allocation Policy" and highlights BOG's predisposition to grant special privilege to non resident hunters.

Adopted as written, Proposal 99 marks the beginning of the end to BOG's decades long demonstrated practice of a misguided non resident allocation policy of Alaskans wildlife; regardless of species.

Proposal 99 as written does not prohibit guided hunting and the numbers of eligible guided hunters is not changing.

I support adoption of Proposal 99 as written.



Submitted By  
Mike Munsey  
Submitted On  
2/24/2019 9:55:40 AM  
Affiliation  
Munsey's Bear Camp

Phone  
9072025619

Email  
[munseymike12@gmail.com](mailto:munseymike12@gmail.com)

Address  
P.O. Box AOS  
P.O. Box AOS  
Kodiak, Alaska 99697

I was born and raised on Kodiak Island and have lived my entire life here, and I am strongly opposed to Proposal 99. Nonresident hunters provide a huge source of revenue to the State of Alaska through licenses and tag fees. They also contribute more to the local economy than resident hunters. Nonresident hunters statistically spend more money in local sporting goods stores, hotels, restaurants and tourist shops than resident hunters. Passage of this proposal would be a huge financial blow to not just the guides who operate on Kodiak, but also to the local economy in general, and to the ADF&G budget.



Submitted By  
Nat Nichols  
Submitted On  
3/1/2019 3:54:44 PM  
Affiliation  
none

Dear Members of the Alaska Board of Game,

I support Proposal 109's requirement for the use of breakaway mechanisms on all snares set along the Kodiak road system and I applaud the Kodiak Advisory Committee's effort to promote responsible, ethical trapping by submitting it. Proposal 109 will benefit all users of Kodiak's wildlife resources by reducing the number of non-target species (e.g., bears, deer, dogs etc.) that are being injured or killed by snares. I thank the Board of Game for their careful consideration of this matter and hope that this proposal will be adopted.

Sincerely,

Nat Nichols

Kodiak, Alaska



## United States Department of the Interior

NATIONAL PARK SERVICE

Alaska Region

240 West 5<sup>th</sup> Avenue, Room 114

Anchorage, Alaska 99501

IN REPLY REFER TO:  
10.D. (AKRO-RD) 20190206

FEB 14 2019

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

Dear Chairman Spraker:

The National Park Service appreciates the opportunity to comment on the 88 proposals currently under consideration by the Alaska Board of Game for the Southcentral Region. After reviewing the proposals, we do not have any comments.

Should you or your staff have any questions, please feel free to contact Mary Hake, Wildlife Biologist and liaison to the Board of Game, at 907-644-3576 or me.

Sincerely,

Debora Cooper  
Associate Regional Director  
National Park Service

cc:

Doug Vincent-Lang, Acting Commissioner, ADF&G  
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G  
Chief, Division of Wildlife, ADF&G  
Steve Wackowski, Special Assistant to the Secretary for Alaska  
Herbert Frost, Regional Director, NPS  
Greg Siekaniec, Regional Director, USFWS  
Tom Doolittle, Deputy Assistant Regional Director, USFWS-Office of Subsistence Management  
Ben Bobowski, Superintendent, Wrangell-St. Elias National Park and Preserve  
Jason Taylor, Regional Chief of Natural Resources, NPS-Alaska Regional Office  
Andee Sears, Regional Law Enforcement Specialist, NPS-Alaska Regional Office  
Ken Adkisson, Natural and Cultural Resources Program Manager, Bering Land Bridge National Preserve



Submitted By  
Natura Richardson  
Submitted On  
2/28/2019 2:43:58 PM  
Affiliation

As a Kodiak resident, I support Proposal 109.



IN REPLY REFER TO:

## United States Department of the Interior

Office of Subsistence Management  
1011 East Tudor Road MS 121  
Anchorage, Alaska 99503-6199

OSM 19007.PM

**FEB 28 2019**

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 15-19, 2019 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Southcentral Region. We have reviewed the 88 proposals the Board will be considering at this meeting.

The 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 recommendations 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,

Thomas Doolittle,  
Acting Assistant Regional Director

Enclosure



**Chairman Spraker**

**2**

**cc: Federal Subsistence Board  
Thomas Doolittle, Acting Assistant Regional Director,  
Office of Subsistence Management  
Jennifer Hardin, PhD, Subsistence Policy Coordinator,  
Office of Subsistence Management  
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management  
George Pappas, State Subsistence Liaison, Office of Subsistence Management  
Katya Wessels, Acting Council Coordination Division Supervisor,  
Office of Subsistence Management  
Richard Encelewski, Chair, Southcentral Alaska Subsistence Regional Advisory Council  
Robbin La Vine, Acting Anthropology Division Supervisor,  
Office of Subsistence Management  
DeAnna Perry, Council Coordinator, Office of Subsistence Management  
Kristy Tibbles, Executive Director Board of Game, Board Support Section,  
Alaska Department of Fish and Game  
Edward Grasser, Director Wildlife Division, Alaska Department of Fish and Game  
Ben Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record**



## **RECOMMENDATIONS**

### **ALASKA BOARD OF GAME PROPOSALS**

**Southcentral Region**

**March 15-19, 2019**

**Anchorage, Alaska**

**Office of Subsistence Management (OSM)**





**PROPOSAL 58 – 5 AAC 85.045(4). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose seasons in Unit 6C.

### Current Federal Regulations

#### Unit 6C – Moose

*Unit 6C–1 antlerless moose by Federal drawing permit only* Sep. 1-Oct. 31

*Unit 6C–1 bull by Federal drawing permit only* Sep. 1-Dec. 31

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal Subsistence users/wildlife:** This proposal will increase harvest opportunity for Federally qualified subsistence users. In Unit 6C, all antlerless moose permits are allocated to residents of Unit 6C.

According to the Alaska Department of Fish and Game (ADF&G) Species Management Report for moose in Unit 6 (Westing 2018), the most recent moose population survey (2013) produced a population estimate of 609 moose, which is within the current management objectives of maintaining a post hunting population of 600-800 moose. Calf survival in Unit 6C was estimated at 20% of observed moose. At the time of this survey, the moose population in Unit 6C appeared to be healthy and above management goals for the unit.

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

**Rationale:** Moose populations appear to be doing well in the unit and 100% of the antlerless moose permits are distributed to residents of Unit 6C. This proposal would allow additional opportunity for Federally qualified subsistence users to harvest moose in this unit and provide management flexibility.

**PROPOSAL 59 – 5 AAC 85.025(1). Hunting seasons and bag limits for caribou.** Shorten the hunting season for Kenai Mountain caribou (DC001) in Unit 7.

### Current Federal Regulations

#### Unit 7—Caribou

*Unit 7, north of the Sterling Highway and west of the Seward Highway—1 caribou by Federal registration permit only.* Aug. 10-Dec. 31.

*The Seward District Ranger will close the Federal season when 5 caribou are harvested by Federal registration permit*



**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal Subsistence users/wildlife:** If Proposal 59 is adopted, Federally qualified subsistence users will continue to hunt caribou from Aug. 10-Dec. 31 under Federal subsistence regulations, providing a rural subsistence priority and a hunt without any competition from non-Federally qualified users. Adopting this proposal would increase regulatory complexity and user confusion by misaligning State and Federal caribou seasons in Unit 7.

Given the small number of caribou harvested under State regulations, adopting Proposal 59 would have minimal direct effect on the caribou population. However, the population has been below State management objectives since 2011. Additionally, the caribou population may experience indirect benefits if caribou are collared in the fall rather than the spring when they are in prime rather than poor condition, respectively.

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

**Rationale:** Conservation concerns for the Kenai Mountain caribou herd necessitates shorter seasons and harvest reductions. Federally qualified subsistence users will still be able to hunt from Aug. 10-Dec. 31 under Federal regulations.

**PROPOSAL 63 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the resident bag limit for moose in Unit 15 and remove the road closure criteria in Unit 15C.

### **Current Federal Regulations**

#### **Unit 15C – Moose**

*Unit 15A remainder, 15B, and 15C—1 antlered bull with spike-fork or 50- inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. Aug. 10 – Sep.20*

*Unit 15B and 15C—1 antlered bull with spike-fork or 50 inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai Refuge Manager is authorized to close the October-November season based on conservation concerns, in consultation with ADF&G and the Chair of the Southcentral Subsistence Regional Advisory Council. Oct. 20 – Nov.10*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting



proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** If adopted, the addition of spike-fork bulls into the harvest would provide more opportunity for Federally qualified subsistence users hunting moose under State regulations.

Moose populations in Units 15A, 15B, and 15C need to be considered separately because the population dynamics differ between the units. Based on the current status of the moose populations in Units 15A, and 15B (see below), increasing the bull harvest through more liberal hunting regulations would likely have negative population consequences. However, the moose population in Unit 15C has been stable to slightly increasing since 2013 and thus may be able to sustain an increase in the bull harvest.

#### Unit 15A

In 2013, the Unit 15A moose population was 1,269–1,843, which is well below the State population objective of 3,000-4,000 moose for this Unit. The bull:cow ratio in recent years has remained within or above the State's management objectives of 20-25 bulls:100 cows.

#### Unit 15B

The moose population in Unit 15B is still considered to be low based on a census conducted in 2017, which estimated the population at 837 moose. Prior to 2017, the last population census was done in 2001. The bull:cow ratios declined from 49 bulls:100 cows in 1994 to 33:bulls:100 cows in 2010. No surveys were conducted in 2014 due to inadequate snow cover. The current harvest levels in both East and West sections of Unit 15B are thought to be within acceptable guidelines to maintain the minimum bull:cow ratio of 40 bulls:100 cows.

#### Unit 15C

In 2017, the Unit 15C moose population was within the State's management objective of 2,500-3,500 moose and the bull:cow ratio was within the State management objectives of 20-25 bulls:100 cows. Since 2013, the moose population in Unit 15C has been stable to slightly increasing and both bull numbers and bull:cow ratios have been increasing.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** this proposal for Unit 15C and **oppose** this proposal for Units 15A and 15B. OSM has no comment on the road closure.

**Rationale:** The moose population in Unit 15C is considered stable. However, the loss of high quality moose habitat due to development, potential of high mortality during years with heavy snowfall, along with a lack of knowledge on the migratory patterns of moose on the Lower Peninsula, suggests caution and the importance of monitoring the population, composition, and harvest on a regular basis.

**PROPOSAL 64 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the resident bag limit for moose in Unit 15 to include spike-fork bulls.



See comments for Proposal 63.

**PROPOSAL 65 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the bag limit for moose in Units 7 and 15 from four to three brow tines.

### Current Federal Regulations

#### Unit 7 – Moose

*Unit 7—that portion draining into Kings Bay—Federal public lands are closed to the taking of moose except by residents of Chenega Bay and Tatitlek.* No open season

*Unit 7, remainder—1antlered bull with spike-fork or 50 inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only.* Aug.10 –Sep.20

#### Unit 15C – Moose

*Unit 15A remainder, 15B, and 15C—1antlered bull with spike-fork or 50 inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only.* Aug. 10 – Sep.20

*Unit 15B and 15C—1antlered bull with spike-fork or 50 inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai Refuge Manager is authorized to close the October-November season based on conservation concerns, in consultation with ADF&G and the Chair of the Southcentral Subsistence Regional Advisory Council.* Oct. 20 – Nov.10

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** If adopted, the addition of bulls with three brow tines as proposed would potentially provide more opportunity for Federally qualified subsistence users hunting moose under State regulations. Liberalizing the antler restrictions would potentially increase the number moose that could be harvested under these regulations.

Moose populations in Units 15A, 15B, and 15C need to be considered separately because the population dynamics differ between the units. Based on the current status of the moose populations in Units 15A, and 15B (see below), increasing the bull harvest through more liberal hunting regulations would likely have negative population consequences.



However, the moose population in Unit 15C has been stable to slightly increasing since 2013 and thus could sustain an increase in the bull hunt.

#### Unit 7

Moose numbers in Unit 7 are chronically low and in decline. The moose population is unlikely to increase unless there are significant improvements to the moose habitat due to large natural fires or large-scale habitat manipulation.

#### Unit 15

In 2013, the Unit 15A moose population was 1,269–1,843, which is well below the State population objective of 3,000–4,000 moose for this Unit. The bull:cow ratio in recent years has remained within or above the State's management objectives of 20–25 bulls:100 cows.

The moose population in Unit 15B is still low based on a census conducted in 2017 that estimated the population at 837 moose. Prior to 2017, the last population census was done in 2001. The bull:cow ratio declined from 49 bulls:100 cows in 1994 to 33:bulls:100 cows in 2010. No surveys were conducted in 2014 due to inadequate snow cover. The current harvest levels in both East and West sections of Unit 15B are thought to be within acceptable levels to maintain the minimum bull:cow ratio of 40 bulls:100 cows.

In 2017, the Unit 15C moose population was within the State's management objective of 2,500–3,500 moose and the bull:cow ratio was within the State management objective of 20–25 bulls:100 cows. Since 2013, the moose population in Unit 15C has been stable to slightly increasing and both bull numbers and bull:cow ratios have been increasing.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** this proposal for Units 7, 15A, and 15B and **support** for Unit 15C.

#### **Rationale:**

#### Unit 7

Chronically low moose populations in Unit 7 suggest that liberalizing the bull moose hunt is not recommended at this time.

#### Unit 15

Low moose population numbers in Unit 15A and Unit 15B, liberalizing the hunt in these units is not recommended.

The moose population in Unit 15C is currently considered stable under the current State and Federal hunting regulations. However, the loss of high quality moose habitat due to development, the potential for high mortality during years with heavy snowfall, and lack of understanding of the migratory patterns of moose on the Lower Peninsula, suggests caution in liberalizing the hunting regulations through



reducing the antler restriction from four to three brow tines on at least one side into the harvest. Continued monitoring will be necessary to monitor the population and prevent overharvest.

**PROPOSAL 66 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the resident bag limit for moose in Unit 15 from four to three brow tines.

See comments for Unit 15 in Proposal 65.

**PROPOSAL 67 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the resident bag limit for moose in Units 15A and 15B from spike-fork to four points on one palm or three brow tines.

### **Current Federal Regulations**

#### **Unit 15C – Moose**

*Unit 15A remainder, 15B, and 15C—1antlered bull with spike-fork or 50 inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. Aug. 10 – Sep.20*

*Unit 15B and 15C—1antlered bull with spike-fork or 50 inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai Refuge Manager is authorized to close the October-November season based on conservation concerns, in consultation with ADF&G and the Chair of the Southcentral Subsistence Regional Advisory Council. Oct. 20 – Nov.10*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** If supported, this proposal would reduce the number of moose available for Federally qualified users hunting moose under State regulations in Units 15A and 15B, and thus reduce harvest opportunity.

Based on low moose population numbers in Unit 15A and lack of recent population surveys in Unit 15B, removing the take of spike-fork and limiting the hunt to large bulls with 50 inch antlers with either 3 or 4 brow tines could result in recruitment of more bulls into the population.

**Federal Position/Recommended Action:** The OSM recommendation is **neutral** this proposal.



**Rationale:** Federally qualified subsistence users would still be able to harvest a bull moose with a spike-fork or 50-inch antlers with 3 or more brow tines on either antler under Federal regulations on Federal public lands in Units 15A and 15B. Limiting the moose harvest to just large bulls may allow for more recruitment of younger age bulls into the population, thus increasing the population.

**PROPOSAL 68 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Change the resident bag limit for moose in Units 15A and 15B from spike-fork to five points on one palm and shorten the season.

See comments for Proposal 67.

**PROPOSAL 78 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Establish resident drawing hunts for “any bull” moose in Units 15 and 7.

### Current Federal Regulations

#### Unit 7 – Moose

*Unit 7—that portion draining into Kings Bay—Federal public lands are closed to the taking of moose except by residents of Chenega Bay and Tatitlek. No open season*

*Unit 7, remainder—1antlered bull with spike-fork or 50 inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. Aug.10 –Sep.20*

#### Unit 15C – Moose

*Unit 15A remainder, 15B, and 15C—1antlered bull with spike-fork or 50 inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. Aug. 10 – Sep.20*

*Unit 15B and 15C—1antlered bull with spike-fork or 50 inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai Refuge Manager is authorized to close the October-November season based on conservation concerns, in consultation with ADF&G and the Chair of the Southcentral Subsistence Regional Advisory Council. Oct. 20 – Nov.10*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.



**Impact to Federal subsistence users/wildlife:** Establishing a drawing permit for any bull by Alaska residents only would provide additional opportunity for Federally qualified subsistence users to hunt bull moose without antler restrictions under State regulations in Units 7, 15A and 15B. All Alaska residents, including Federally qualified subsistence users, would have an equal chance of obtaining a drawing permit.

The current bull:cow ratios in Units 7, 15A, 15B, and 15C are within acceptable guidelines under current State regulations so there is no need to establish a resident only hunt for any bull moose in these units. Thus, there is no benefit to the moose populations in these units if this proposal is adopted.

#### Unit 7

Moose numbers in Unit 7 are chronically low and are in decline. The moose population is unlikely to increase unless there are significant improvements to the moose habitat as a result of large fires or large-scale habitat manipulation.

#### Unit 15

In 2013, the Unit 15A moose population was 1,269–1,843, which is well below the State population objective of 3,000-4,000 moose for this Unit. The bull:cow ratio in recent years has remained within or above the State's management objectives of 20-25 bulls:100 cows.

The moose population in Unit 15B is still considered to be low based on a census conducted in 2017, which estimated the population at 837 moose. Prior to 2017, the last population census was done in 2001. Bull:cow ratios declined from 49 bulls:100 cows in 1994 to 33:bulls:100 cows in 2010 and no surveys were conducted in 2014 due to inadequate snow cover. The current harvest levels in both East and West sections of Unit 15B are thought to be within acceptable guidelines to maintain the minimum bull:cow ratio of 40 bulls:100 cows.

In 2017, the Unit 15C moose population was within the State's management objective of 2,500-3,500 moose and the bull:cow ratio was within the State management objectives of 20-25 bulls:100 cows. Since 2013, the moose population in Unit 15C has been stable to slightly increasing and both bull numbers and bull:cow ratios are within state management guidelines.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** this proposal for Units 7, 15A, and 15B but **support** for Unit 15C.

#### **Rationale:**

#### Unit 7

Chronically low moose populations in Unit 7 suggest that establishing an additional resident drawing hunt for any bull is not recommended at this time. In addition, there is no need to establish a resident-only drawing hunt for any bull moose to attain healthy bull:cow ratios given the stable bull:cow ratios and low moose population in Unit 7 .





## Unit 15

Establishing a resident-only drawing hunt for any bull moose in Units 15A and 15B is not recommended because of the low moose population numbers in these subunits.

Under the current regulations, bull:cow ratios are currently healthy in Unit 15C. Establishing a resident-only drawing hunt s for any bull moose in Unit 15C would provide additional hunting opportunities for Federally qualified subsistence users. In addition, the State can adjust the number of drawing permits issued based on the moose population and thus it is unlikely the addition of this drawing hunt would result in a conservation concern.

**PROPOSAL 83** – 5 AAC 85.045(13) **Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose seasons in Unit 15C.

### **Current Federal Regulation:**

#### **Unit 15C – Moose**

*Unit 15C—1 cow by Federal registration permit only.*

*Aug. 10 – Sep. 20*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** Reauthorizing the antlerless moose season in Unit 15C would have a minimal impact on Federally qualified subsistence users, as they can already harvest antlerless moose with a Federal subsistence drawing permit on Federal public lands in the unit. Moose harvest is limited by annual quotas and reauthorizing an antlerless season should not impact the moose population.

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

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

**PROPOSAL 86** – 5 AAC 85.065. **Hunting seasons and bag limits for small game.** Reduce the bag limit for spruce grouse in Units 7 and 15.

### **Current Federal Regulations**

#### **Unit 7 – Grouse (Spruce)**



*10 per day, 20 in possession*

*Aug. 10-Mar. 31*

**Unit 15 – Grouse (Spruce)**

*15 per day, 30 in possession*

*Aug. 10-Mar. 31*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**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. Furthermore, this proposal would limit opportunity for Federally qualified subsistence users to harvest grouse on non-Federal lands in Units 7 and 15.

Reducing the harvest limit may benefit Grouse populations. Currently, there are no grouse population surveys being conducted in Units 7 and 15, but grouse wing collection numbers from hunters showed a significantly lower proportion of juveniles in 2017 than in 2016. According to the 2018 Alaska Small Game Summary, spruce grouse populations on the Kenai Peninsula appear to be lower than average for the area. This may be due to lower than average reproduction in recent years. A recent spruce bark beetle outbreak on the Kenai Peninsula could also have had a detrimental impact on the spruce grouse population in the area.

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

**Rationale:** Although Proposal 86 would limit opportunity for Federally qualified subsistence users on non-Federal lands in Units 7 and 15, the proposal could help the grouse population rebound from lower than average production and lower than average populations. This proposal may help ensure spruce grouse harvest opportunity into the future in an area where hunting pressure may be high due to increased access from the road system.

**PROPOSAL 87 – 5 AAC 85.065(a)(3). Hunting seasons and bag limits for small game.** Close the ptarmigan season in Unit 15C.

**Current Federal Regulations**

**Unit 15 – Ptarmigan (Rock, Willow, and White-tailed)**

*Unit 15C–20 per day, 40 in possession*

*Aug. 10-Dec. 31*

*Unit 15C–5 per day, 10 in possession*

*Jan. 1-Mar. 31*



**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal will result in decreased opportunity for Federally qualified subsistence users to harvest ptarmigan on non-Federal lands in Unit 15C.

According to the 2018 Alaska Small Game Summary, ptarmigan populations on the Kenai Peninsula appear to be stable.

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

**Rationale:** This proposal would decrease opportunity for Federally qualified subsistence users to harvest ptarmigan in this unit when current data shows that, although ptarmigan populations may be declining in other areas throughout the state, they appear to be stable in this area.

**PROPOSAL 93 – 5 AAC 85.030. Hunting seasons and bag limits for deer.** Increase the bag limit for deer in Unit 8.

### **Current Federal Regulations**

#### **Unit 8—Deer**

*Unit 8—all lands within the Kodiak Archipelago within the Kodiak National Wildlife Refuge, including lands on Kodiak, Ban, Uganik, and Afognak Islands—3 deer; however, antlerless deer may be taken only from Oct. 1-Jan. 31*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** As no objective or comparable population estimates exist for deer in Unit 8, determining the conservation impact of this proposal is difficult. However, several factors suggest increasing harvest limits would not create conservation concerns for deer. First, since Unit 8 deer are mostly limited by winter severity, human harvest is presumed to be compensatory mortality. Additionally, between 2002 and 2013, total harvest estimates (including illegal harvest and wounding loss) were well below State management objectives. Between 2002 and 2010, only 36% of hunters harvested their entire limit (e.g. three deer) on average; 25% harvested two deer; and 40% only harvested one deer (Svoboda and Crye 2015). Finally, in-season management provides flexibility to decrease harvest limits if needed during the hunting season.

Additionally, a conservation concern for brown bears and an increased safety concern for hunters could result if this regulation is adopted without modifying the deer possession limit. Brown bear DLP issues have increased when hunters are unable to effectively and efficiently process harvested deer, especially if hunting prior to bears denning or when other bear food resources are in short supply (Smith et al., 1989).



Adopting this proposal would also increase regulatory complexity and user confusion by misaligning State and Federal harvest limits. It would also preclude a subsistence priority by resulting in State harvest limits becoming more liberal than Federal harvest limits. However, opportunity for Federally qualified subsistence users would increase as they would be able to harvest five deer under State regulations.

**Federal Position/Recommended Action:** OSM is **neutral** on this proposal.

**Rationale:** Impacts to the deer population are uncertain but seem nominal. While adopting this proposal would preclude a rural subsistence priority, it would increase opportunity for Federally qualified subsistence users hunting under State regulations. Adoption of Proposal 93 would also misalign Federal and State harvest limits.

Smith, R.B., V.C. Barnes, Jr., and L.J. Van Daele. 1989. Brown Bear-human conflicts in the Kodiak Archipelago, Alaska. Pages 111-119 in M. Bromley, editor. Proceedings of an International Symposium on Bear-people Conflicts, Northwest Territ., Can. Gov. of Northwest Territories Dept. of Renew. Res.

Svoboda, N. J., and J. R. Crye. 2015. Unit 8 deer management report. Pages 9-1 through 9-16 in P. Harper and L. A. McCarthy, editors. Deer management report of survey and inventory activities 1 July 2012–30 June 2014. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2015-3, Juneau.

**PROPOSAL 108 – 5 AAC 92.540. Controlled use areas.** Create a controlled use area on the Ayakulic River in Unit 8.

**Current Federal Regulations:** None

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** As no controlled use area exists under Federal regulations, Federally qualified subsistence users would still be able to use two-stroke motors under Federal regulations. This may lead to user confusion and law enforcement concerns. A similar Federal proposal would need to be submitted for consideration by the Federal Subsistence Board to create a controlled use area under Federal regulations.

However, this proposal may also create hardship for Federally qualified subsistence users hunting under State regulations if they need to purchase another motor.

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

**Rationale:** This proposal may lead to user confusion, law enforcement concerns, and hardship for Federally qualified subsistence users hunting under State regulations. In order to be effective, a Federal proposal would need to be submitted to the Federal Subsistence Board to create a controlled use area under Federal regulations.



**PROPOSAL 113 - 5 AAC 85.045(5). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C.

### Current Federal Regulations

#### Unit 7—Moose

*Unit 7, remainder—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only* Aug. 10 – Sep. 20

#### Unit 14—Moose

*No Federal open season*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose under State regulation. It is not expected to have a detrimental effect on the Twentymile/Portage/Placer moose population.

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

**Rationale:** The moose population in the Twentymile/Portage/Placer drainages is characterized by large population fluctuations associated with winter severity. As a result, the option to administer antlerless hunts is an important tool for managing population size within the appropriate range. Because the number of antlerless permits issued for the Twentymile/Portage/Placer hunt is adjusted annually, accounting for current population metrics, there is little threat to the conservation status of this moose population. Reauthorizing the antlerless season also provides additional harvest opportunities to Federally qualified subsistence users.

**PROPOSAL 127 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Open a registration hunt for moose in Unit 19A.

### Current Federal Regulations

#### Unit 19A—Moose

*Unit 19A-North of the Kuskokwim River, upstream from but excluding the George River drainage, and south of the Kuskokwim River upstream from and including the Downey Creek drainage, not including the Lime Village* No Open Season.



*Management Area. Federal public lands are closed to the taking of moose.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** Moose hunting in the eastern portion of Unit 19A was closed under State and Federal regulations in 2006 because of conservation concerns. Conservation concerns included low productivity, low bull:cow ratios, and low density combined with historically high hunting pressure. While bull:cow ratios have exceeded management objectives (20-30 bulls:100 cows) since 2007 and calf:cow ratios have exceeded management objectives (30-40 calves:100 cows) since 2011, the overall moose population in eastern Unit 19A has not significantly changed since the closure was enacted in 2006 (ADF&G 2004, ADF&G 2018, Seavoy 2014, Peirce 2018).

The proposal also stipulates that anyone acquiring a Tier I permit for moose in Unit 19A could not have any other hunting permits in the Kuskokwim drainage and that permits would only be available in Sleetmute. Federally qualified subsistence users would have additional opportunity, but may not be able to realize this increased opportunity if they are unable to obtain permits.

Adoption of this proposal would also increase regulatory complexity and user confusion by misaligning State and Federal regulations. Currently moose hunting on Federal lands in the eastern portion of Unit 19A is closed to all users, therefore Federal public lands in this area would not be directly impacted by this proposal.

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

**Rationale:** There are conservation concerns for this proposal. Moose abundance in eastern Unit 19A has not significantly changed since the hunt area closed in 2006. Additionally, this proposal burdens Federally qualified subsistence users and misaligns State and Federal regulations.

ADF&G. 2018. Annual report to the Alaska board of game on intensive management for moose with wolf, black bear, brown bear predation control in game management unit 19A. Alaska Department of Fish and Game, Division of Wildlife Conservation.

[http://www.adfg.alaska.gov/static/research/programs/intensivemanagement/pdfs/2018\\_gmu\\_19a\\_intensive\\_management\\_annual\\_report.pdf](http://www.adfg.alaska.gov/static/research/programs/intensivemanagement/pdfs/2018_gmu_19a_intensive_management_annual_report.pdf). Accessed August 2, 2018.

ADF&G. 2004. Central Kuskokwim Moose Management Plan. Alaska Department of Fish and Game, Division of Wildlife Conservation. Central Kuskokwim Moose Management Planning Committee.

[https://www.adfg.alaska.gov/static/research/plans/pdfs/final\\_ckmmp.pdf](https://www.adfg.alaska.gov/static/research/plans/pdfs/final_ckmmp.pdf). Accessed May 3, 2018.

Peirce, J. M. 2018. Moose management report and plan, Game Management Unit 19: Report period 1 July 2010–30 June 2015, and plan period 1 July 2015–30 June 2020. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018-22, Juneau.



Seavoy, R.J. 2014. Units 19A, 19B, 19C, and 19D moose. Chapter 21, pages 21-1 through 21-34 [In] P. Harper and L.A. McCarthy, editors. Moose management report of survey and inventory activities 1 July 2011-30 June 2013. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR-2014-6, Juneau, AK.

**PROPOSAL 131 - 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose seasons in Unit 13.

### Current Federal Regulations

#### Unit 13—Moose

*Unit 13E—1 antlered bull moose by Federal registration permit      Aug. 1 – Sep. 20.  
only; only 1 permit will be issued per household*

*Unit 13, remainder—1 antlered bull moose by Federal                      Aug. 1 – Sep. 20.  
registration permit only*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose. It is not expected to have a detrimental effect on the Unit 13 moose population.

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

**Rationale:** The Unit 13 moose population currently meets the State’s objective for population size. Because the number of antlerless moose permits issued in Unit 13 is adjusted annually, accounting for current population metrics, reauthorizing antlerless hunt poses little threat to the conservation status of this moose population, yet provides an important management tool to local managers. It also provides additional harvest opportunities to Federally qualified subsistence users.

**PROPOSAL 133 - 5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose seasons in Unit 18.

### Current Federal Regulations



**Unit 18—Moose**

<i>Unit 18—Goodnews River drainage and south to the Unit 18 boundary—1 antlered bull by State registration permit; or</i>	<i>Sep. 1 – 30</i>
<i>1 moose by State registration permit</i>	<i>A season may be announced between Dec. 1 and the last day of Feb.</i>
<i>Unit 18, remainder—2 moose, only one of which may be antlered. Antlered bulls may not be harvested from Oct. 1 through Nov. 30</i>	<i>Aug. 1 – Apr. 30.</i>

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose. It is not expected to have a detrimental effect on the Unit 18 moose populations.

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

**Rationale:** Providing antlerless moose hunting opportunities is an important aspect of moose management in much of Unit 18. In Unit 18 remainder, where the population is large and growing, antlerless hunts provide additional harvest opportunity for Federally qualified subsistence users, while providing a mechanism to check the rapid growth of this population. Within the Goodnews drainage, the flexibility for local managers to announce an antlerless season provides additional opportunity for Federally qualified subsistence users and allows local managers to be responsive to changing population and harvest dynamics. This is an important consideration in areas like the Goodnews drainage that are experiencing rapid population growth. For both of these populations, managing population size at a sustainable level is in the long-term interests of Federally qualified subsistence users. Antlerless hunts are an important management tool for achieving that.

**PROPOSAL 134 - 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose season in Unit 17A.

**Current Federal Regulations**

**Unit 17— Moose**

<i>Unit 17A—1 bull by State registration permit</i>	<i>Aug. 25 – Sep. 20</i>
<i>Unit 17A—up to 2 moose; one antlered bull by State registration</i>	<i>Up to a 31 – day season</i>





*permit, one antlerless moose by State registration permit*

*may be announced between  
Dec. 1 – last day of Feb.*

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose. It is not expected to have a detrimental effect on the Unit 17A moose population.

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

**Rationale:** This proposal is consistent with the Unit 17A moose management plan, which calls for a limited antlerless harvest when the moose population exceeds 600 animals. The current population estimate is in excess of that threshold, and this proposal provides management flexibility. It also provides additional harvest opportunity to Federally qualified subsistence users without risking the long-term viability of the population.

**PROPOSAL 138 – 5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose season in the western portion of Unit 26A.

### **Current Federal Regulations**

#### **Unit 26A—Moose**

*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-Sep. 14.

**Is a similar issue being addressed by the Federal Subsistence Board?** No. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** This proposal will increase harvest opportunity for Federally qualified subsistence users. While moose are sparse in this hunt area, harvest is very low and not likely to significantly affect the Unit 26A moose population. Proposal 138 also maintains alignment of State and Federal regulations, decreasing user confusion and regulatory complexity, while also providing management flexibility.

**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 hunt area and not affect the Unit 26A moose population.

**PROPOSAL 139 – 5 AAC 92.015. Brown bear tag fee exemptions.** Reauthorize the brown bear tag fee exemptions in Units 18, 22, 23, and 26A.

### **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. Currently, there are no wildlife proposals being addressed by the Federal Subsistence Board. The Board will be accepting proposals to change Federal subsistence hunting and trapping regulations from January to March 2019.

**Impact to Federal subsistence users/wildlife:** It is unlikely there would be any impact on the brown bear population 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 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 140 – 5 AAC 92.015. Brown bear tag fee exemptions.** Reauthorize the resident brown bear tag fee exemptions for the Central/Southwest Region.

[See comments for Proposal 139.](#)

**PROPOSAL 141 – 5 AAC 92.015. Brown bear tag fee exemptions.** Reauthorize resident grizzly bear tag fee exemptions throughout Interior and Eastern Arctic Alaska.

[See comments for Proposal 139.](#)

March 1, 2019

Alaska Board of Game  
PO Box 115526  
Juneau, Alaska 99811-5526

Via Email: [dfg.bog.comments@alaska.gov](mailto:dfg.bog.comments@alaska.gov)

Re: Proposal 99

Dear Board of Game Members,

Old Harbor is a coastal community located at the Southeast Coast of Kodiak Island, 70 air miles southwest of the City of Kodiak and 322 air miles southwest of Anchorage, Alaska. Our mission statement is, “*To preserve and protect the culture, values and traditions of its community, shareholders and descendants; and to work together to create economic and educational opportunities while promoting self-determination and pride.*” The Alutiiq Tribe of Old Harbor, Old Harbor Native Corporation and the City of Old Harbor all work together to build the economy in our community.

We are the primary owner of Sitkalidak Island, the island adjacent to the village of Old Harbor. Sitkalidak Island is part of the Game Management Unit 8 and the Brown Bear Hunt Area 105/135.

**We strongly oppose Proposal 99 to allocate at least 90% of the Unit 8 Brown Bear drawing permits to residents of Alaska.**

We oppose proposal 99 because it will greatly reduce the economic opportunity that bear hunts with non-residents can provide to our Shareholder, Descendants and their spouses who are registered guides or assistant guides. Additionally, we are concerned that if this proposal were approved that the number of successful bear hunts could be reduced and many residents in our community are worried about the increased bear population and the nuisances they have caused.

Please contact Cynthia Berns at 907.351.8890 or [cberns@oldharbor.org](mailto:cberns@oldharbor.org) if you have any questions regarding our comments. We greatly appreciate your consideration of our comments regarding Proposal 99.

Sincerely,

OLD HARBOR NATIVE CORPORATION



Carl H. Marrs  
Chief Executive Officer

CC: OHNC Board of Directors



Submitted By  
Patricia Picha  
Submitted On  
3/1/2019 1:31:23 PM  
Affiliation

Dear Board Members,

Thank you for the opportunity to comment on Proposal 128, the suggested modifications of Clearwater Creek Controlled Use Area (CCCUA). I am one who strongly favors keeping as much of Alaska as wild as possible. Hunting, fishing and exploring on foot are, in my mind, the best way to learn the country and become a more skilled outdoors person.

Nonmotorized users have been accessing parts of the CCCUA. The trailheads at Sevenmile Lake and MacLaren Summit need to be clearly marked indicating the nonmotorized areas. Motorized users have abundant areas in which to hunt. I am not in favor of "modifications".

Please keep the the CCCUA as it was intended, to keep pressure off animals in an otherwise heavily hunted area and to provide opportunities to hunt quietly.

Thank you for your consideration.

Patti Picha



**Alaska Board of Game  
South Central Region Meeting  
March 15-19, 2019**

My name is Paul Chervenak and I am a 39-year resident of Kodiak Alaska. I have been in the guide/outfitting business for 33 years. During this time, I have actively participated with the ADF&G, USF&WS and local native association resource managers and biologists. I participated in the development of the 2002 Kodiak Brown Bear Management Plan and then helped form, and have been chairman of, the Kodiak Unified Bear Subcommittee (KUBS) which oversees this plan and deals with bear issues on Kodiak. I am the State trustee, and chairman of, the Kodiak Brown Bear Trust. I have been on the Kodiak Advisory committee for over 20 years.

I am **opposed** to proposals 98 (changing season dates) and proposals 99,101,102,103,104 and 130 that deal with changing brown bear permit allocation on Kodiak. These will all result in a change in the current harvest rate of bears on Kodiak.

In recent years, there has been a push to change the resident/non-resident allocation for bear permits on Kodiak, increasing permits to residents. These ideas range from changing the distribution from the current 60/40 split (residents/non-residents-which currently is actually 66/34) to a 90/10 or greater, giving non-resident permits to residents and/or establishing a resident waiting list for under subscribed permits.

The first question that should be asked is: **What is good for the bears?**

The current management system is working beautifully. Changes, if any, should be slight and closely monitored.

Bear Management on Kodiak Island is one of the major successes in wildlife conservation. The current population is at an all-time high with a large percentage of the harvest being mature males, showing the health of the population. ADF&G consistently hits the annual target harvest of 6% (~180 animals). It a unique, interdependent and complex system developed over time and we are now at the micro management level. We need to be extremely careful, just slight changes could have potentially multiple and lasting consequences.

The second question that should be asked is: **What will be gained?**

The tables 1&2 in the Kodiak AC minutes show an example of what would happen if you gave the residents 90% of the current permits issued on Kodiak. The tables show: the existing # of non-resident permits, resident permits and total permits by hunt area. The fourth column shows the current resident draw success percentages with the existing resident # of permits (taken from the 2018 ADF&G hunt supplement). The 5<sup>th</sup> column shows the new draw success percentages for residents given the same # of applicants given 90% of the current # of permits issued. Draw percentages go up minimally.



Giving the “under subscribed” non-resident permits to residents and/or establishing a waitlist for non-used resident permits will negate the variable used by ADF&G in establishing permit numbers. They figure in some resident and non-resident permits being unused, thus issuing a higher number of permits than harvest would allow. These options will probably lead to an actual reduction in permits issued, making the drawing odds even greater.

With the current # of resident applicants, even giving them 90% of the current permits available, drawing odds only increase slightly. Only giving them a few more permits as some of the proposals would do, basically doesn't change their odds of drawing a permit. There is practically nothing gained.

Naturally the next question is: **What will be the cost?**

There will be definite major economical ramifications for the small businesses (guides), Kodiak and the state of Alaska. The change in allocation will most likely have major biological ramifications. Some unknowns probably will be: a decrease in resident permits, depending on harvest, and the loss of the long standing and traditional bear guide industry on Kodiak.

Economically: there will be a major loss of revenue for the small business owners, the guides, and the Kodiak economy.

It's hard to calculate the exact figures, but you would first look at the money generated from the hunts. The Kodiak AC minutes reflect some very minimal figures with just the hunt costs listed, 4.1 million dollars. It is hard to estimate the additional income these nonresidents bring to the economy. They, and often accompanying non-hunters they bring, have the added expenditures of non-resident accommodations, food and drink, equipment, gifts and other tourism related expenditures. Then there is the additional revenue that is gained by many of these hunters returning to Kodiak, often with their families, for other types of trips once they've gotten to know the Island.

Additionally, there is the loss of the guides higher per hunt expenditures of employees, air transportation, food, fuel, equipment, permitting, advertising, etc. These nonresident permits being given to residents will not generate anything even close to the same dollar figures.

Following the 10% allocation of some states in the lower 48 (which some proposers like to use in requesting this allotment) there would only be one non-resident permit available if the prescribed hunt had at least 10 permits available. Using the current # of permits issued, this would reduce the non-resident allotment to a maximum of 15 spring and 3 fall permits. Possibly 18 total permits, down from 170. (see the last column in Kodiak AC's minutes, figures 1&2) Even taking a straight 10%, or 50 of the current 500 drawing permits, would reduce it to less than 1 permit for each of the 62 possible prescribed hunts. This would put most of the bear guiding operations and their employees out of business.



These economic impacts carry over to the state level. These non-resident hunters often have additional tourism related expenditures throughout other parts of Alaska as they travel to Kodiak and then in return trips. It's well documented that non-resident hunters pay for most of the operating costs of the ADF&G (78%). Loss of license and tag revenue from Kodiak nonresident bear hunters alone would be close to one million dollars, if you gave the residents the current nonresident tags. (using the figures in Kodiak AC minutes-Proposal 99)

185 non-res licenses/tags @ \$1160=\$214,600. PR fund match \$643,800 Total \$858,400  
120 non-res deer tags @ \$300=\$36,000. PR fund match \$108,000 Total \$144,000  
Total lic/tag expenditures \$1,002,400  
Comparison-160 res lic/tag @\$70=\$11,200 PR Fund match \$33,600 Total \$44,800

I believe the Kodiak AC's comparison numbers would actually be much lower, if you account for resident show participation rates and the likely probability that they would all already have their hunting licenses. So, 160 res tags@25=\$4000 and with PR funds would total \$16,000.

Biologically: there will be biological ramifications with the change in permit allocation. I disagree with the ADF&G being "political" and saying this is an allocation issue when it is also a biological issue. There will be an increase in sow harvest and a decrease in adult boar harvest. Both leading to lower cub production and lower sow/cub survivability. The resident hunters have a higher percentage of sow harvest. The targeted harvest of adult boars has helped increase sow/cub survivability which has led to a higher bear population. Harvest of adult males needs to continue to maintain the population as is or it will decrease. The guided non-resident hunters account for the majority of the harvest of adult males. (See the Kodiak AC'S Table 3- numbers taken from ADF&G harvest data over the last 8 years: whether looking at 28+", 27+" or 26+" skull sizes defining large boars). These percentages go up if you factor in the resident harvest by guides who drew a resident permit, and the residents who had help from a guide. Guides are primarily responsible for the harvest of large adult boars. Their predictable participation and anticipated harvest rates are very important for the continued health of Kodiak bear management.

Brown bears are not like ungulates, you cannot stockpile them. If you fail to harvest moose in an area, the majority will be there the following year, they do not kill each other. You cannot stockpile bears, you have to keep the harvest of adult boars ongoing.

I'm not trying to be mean, but it's a fact, the resident hunters will not be able to harvest the adult boars anywhere near the guides rate of success, or they already would. The majority of them do not know how to hunt brown bears, even if they were to put in the effort and time the guides do. They do not have the experience or knowledge to do so effectively. Brown bears are too smart, too wary and have too big of home ranges.

I started as a resident rookie brown bear hunter and have now been hunting them extensively in each of the last 35 years. I have a lot of experience, but am not even close to, or will ever, know too much. I have also watched and talked with many resident hunters, often helping



them, and see them repeatedly make the same mistakes I did early on, especially on scent control.

Non-experienced brown bear hunters have no idea on how careful you have to be with scent control. They often; take the easy route into an area, camp close to or in bear concentration areas often having fires, hike around looking for bears, try low odds of success stalks and often try to outdo other hunters in the area. This lack of scent control instantly drives the adult boars miles and miles away, leaving the sows and sub adult boars (both with smaller home ranges) as the bears available for harvest.

Guides are also better at spreading out use over time and the hunt area, giving everyone a higher quality and more successful hunt opportunity. They often coordinate with some of the resident hunters and have better knowledge of the hunt area and means of moving and/or accommodating other hunters. Resident hunters often concentrate in the May time period and lack the ability to coordinate with other residents, often ending up on top of each other, creating a less successful hunt and quality of experience. Putting more resident hunters into these hunts, by changing allocation, will worsen this problem.

Board of Game authority, mandates and their Nonresident Hunter Allocation Policy (NHAP)

The BOG by the Alaska constitution has general authority to provide for the utilization, development and conservation of all natural resources... "for the maximum benefit of the people." The BOG is required to look at the Common Use Policy ..." where the resources are reserved to the people for common use" and they are mandated to make sure the resources are maintained on the sustained yield principle. Additionally, by Alaska Statute, the commissioner of ADF&G is required to manage the resources of the state in the interest of the economy and general well-being of the state.

Maximum benefit of the people-The Kodiak bear is a unique situation in that it is not a "meat" animal, thus isn't managed to maximize it as a food source for the people of Alaska. So, that leaves it for its intrinsic and economic value. The intrinsic value is for all to see and enjoy, photograph. The primary value of the brown bear is to the economic value of the state and local economy. "For the maximum benefit of the people" should thus involve a high percentage of nonresident guided hunters which clearly maximizes the economic value of the Kodiak bear.

Common Use-The common use clause in the constitution makes no differentiation between personal and commercial use. The legal discussion of this is pointed out in the Kodiak AC minutes. Thus, unless conservation demands it, no preference is given to one or the other, residents or resident guides. The vast majority, 97%, of the guides registered in Unit 8 (Kodiak) are Alaskan residents. The times when a preference can be given is when there is a conservation concern. So, in fact, looking at "conservation", it might demand that guides be given preference with their lower sow, and much higher adult boar, harvest rates.





The BOG NHAP also acknowledges that “60% of state remains in Federal ownership and is managed for the benefit of all residents of all U.S. citizens equally”. Approximately 2/3’s of Kodiak Island is in Federal ownership. The USF&WS service wants access to the Kodiak National Wildlife Refuge open to all U.S. citizens equally. In fact, in 1976 when they came up with the current allocation, the USFWS wanted a 50/50 allocation, but compromised on the current allocation.

I think it is very clear that in the **best interest of the bears**, operating on the sustained yield principle, maximizing the benefit to the people and holding to the common use clause, the BOG should maintain the status quo on permit allocation.

Thank you for the opportunity to submit comments and feel free to contact me should you desire any additional information or clarification.

Sincerely,

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Submitted By  
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Support of Proposal #99: change allocation of Kodiak Brown Bear drawing permits for Alaskan residents. Preferential allocation for residents drawing permits for big game hunting in most Western states is the standard. Generally, no more than 10-15% of the permits are awarded to out of state residents. I know this first hand, as I apply for big game permits every year in such states (Montana, Utah, Colorado, New Mexico, Arizona, Idaho and Wyoming). Why is this? Because State Constitutions mandate state resources for the benefit of the state residents preferentially. I am not a bear hunter. But I strongly support this proposal and others that justly advocate for the preferential allocation of hunting permits for Alaskan residents. This is the norm in our country, except here in the state of Alaska.  
Sincerely, Paul Ferucci Anchorage, AK



unapologetically **FOR ALASKAN RESIDENTS**

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Comments to Alaska Board of Game  
Region II Southcentral Meeting – Anchorage  
March 14 - 19, 2019

Proposals we support: 55, 56, 61, 74, 75, 76, 99, 130, 102,103,104,116,121,126 as amended

Proposals we oppose: 115

Proposal 55 – 5AAC 92.085(8) Unlawful methods of taking big game; exceptions

SUPPORT

Alaska's same-day-airborne (SDA) law addresses the issue of fair-chase and spotting game from the air by requiring anyone who has been airborne to wait until 3am the next day before hunting. The board-generated "proposal 207" that created this new restriction on spotting Dall sheep from the air during sheep season was never the right approach to further impose fair-chase ethics among sheep hunters, guides, and pilots, beyond our SDA law.

As wildlife troopers have stated, this regulation is unenforceable. It is also hypocritical of this board to **say on the one hand in regulation that it's** okay in Unit 22 to spot caribou from an aircraft, and even land and shoot same day (as this board allowed for the Mulchatna herd at one time), **yet it's not fair-chase** when sheep are spotted from the air, even if you have to wait until 3am the next day to hunt.

The board also created a new youth sheep hunt from August 1 – 5 and declined to include the restriction of spotting sheep from the air **during that time period. So it's okay on a youth hunt to spot sheep from the air during the hunt and wait til 3am the next day to hunt, but for adult sheep hunters during the general season it's a no-no?**

There is no subjective evidence this restriction has changed behavior. Our SDA law still applies. The board should be consistent in applying fair-chase standards across the state.

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Proposal 56 – 5AAC 92.106 Intensive management of identified by game prey populations

SUPPORT

This is a RHAK proposal the board has seen before, and we will keep submitting it until the board eventually approves, because it is consistent with the intent of IM Law and consistent with the board's past opinions.



Case in point: the board last year addressed nonresident hunting of the Nelchina caribou herd, which is an IM listed population, and stated that nonresident hunting will only be allowed when the herd is within IM objectives.

This is the very same thinking **as this proposal which we'd like to apply to Region II at this time, and statewide at a later date.**

We want to reiterate that this proposal only applies to areas where there are *active* IM predator control programs in Region II, and only applies if *both* the harvest and population objectives are not met.

Currently there are no active IM programs in Region II.

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#### Proposal 74 – 5AAC 85.045 Hunting seasons and bag limits for moose

##### SUPPORT

This is a well-written proposal with data that shows more opportunity for residents can be given for an any-bull moose hunt via a new draw permit structure with limited permits.

The Department as well says the population is at or near carrying capacity, the bull:cow ratio is double the management goals, and has a very similar proposal (#76) before the board, which we also support.

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#### Proposal 99 – 5AAC 92.061 Special provisions for brown bear drawing permit hunts

##### SUPPORT

We have always supported the intent and language of Article 8 of our state constitution that speaks to common use of our wildlife resources by Alaskans in conjunction with a maximum benefit to Alaskans. All wildlife is reserved to the people of Alaska for common use.

The framers of our state constitution did not say that the majestic brown bears of Kodiak were somehow different than the majestic moose of the interior; neither did those framers differentiate between Dall sheep and caribou.

The board continues to posit that species like brown bears and Dall sheep and mountain **goats are a "trophy" species**, and thus not a food animal, and so Alaskans should not be given the same priority to hunt those species as with moose and caribou and deer. Again, this is not what our state constitution intended.

**The board's new nonresident allocation policy as well directly contradicts the intent of our state constitution when it comes to – and no surprise – the "must be guided" species within Alaska's must-be-guided law, and puts residents and nonresidents on an equal allocation footing with those "trophy" species.**

Many Alaskans live here because we love to hunt and experience the vast outdoors Alaska offers. We expect wildlife allocations to adhere to our state constitutional mandates.

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Proposal 130 – 5AAC 92.061 Special provisions for Unit 8 Brown bear permit hunts

SUPPORT

This is a RHAK proposal deferred from the 2017 Statewide meeting, and for Region II Southcentral it only applies to Unit 8 brown bear permit hunts, specifically the 8 permits allocated to nonresident 2<sup>nd</sup>-degree-of-kindred (2DK) hunters that are currently in the resident pool of available tags.

We posit in our proposal that there should never be an instance where any nonresident permit, regardless if it is to a guided nonresident hunter or a 2DK nonresident hunter who will be guided by his or her resident relative under AS 16.05.407, is placed within the resident pool of available permits.

After seeing our proposal, the Kodiak F&G Advisory Committee put in proposal 100 to create a separate drawing for 2DK brown bear permits in Unit 8, but to lower the number of permits from 8 to 6. Where that separate draw would come from is unclear.

As there are currently 8 2DK permits within the resident pool of tags, we view that as 8 permits that should remain in the resident pool and be allocated to residents. If the board creates a new nonresident 2DK pool of permits, those permits must either come out of the nonresident pool or be added to the nonresident pool, and the current 8 permits within the resident pool (wrongly) dedicated to nonresident 2DK hunters remain available for resident hunters.

92.061(a)(2) would have to be amended to remove the provision allowing nonresident 2DK permits within the resident pool.

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Proposal 100 – 5AAC 92.061 Special provisions for Unit 8 brown bear permit hunts

SUPPORT as Amended

We do support removing the 8 permits currently in the resident pool of tags allocated to nonresident 2DK hunters, but should those permits be removed from the resident pool of tags, we want those 8 permits placed back in the resident pool of tags allocated to residents.

Those permits should never have been in the resident pool of tags to begin with, but since they were the Department obviously has no issues allocating them to residents and having those harvests attributed to residents. The board should not take away the resident opportunity that should have been there in the first place.

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Proposal 101 – 5AAC 92.061 Special provisions for brown bear drawing permits

**Support the Concept, but out of the Board of Game's authority**

Often, the board will speak to the value of nonresident hunter dollars to the state in terms of license and tag fees and matching federal Pittman-Robertson funds that go to the Division of Wildlife Conservation, as a way of defending the 40% allocation of Kodiak brown bear permits to nonresident guided hunters.



The proponent of this proposal is simply trying to point out that perhaps there are some residents willing to pony up the same nonresident tag fees in order to have the same equal opportunity as a nonresident to draw a Kodiak tag.

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Proposal 102 – 5AAC 85.020 Hunting seasons and bag limits for brown bear

SUPPORT

This is a RHAK proposal based on the extremely limited general brown bear hunting opportunity resident hunters have on Kodiak island, which is mostly federal refuge lands. The spring and fall RB 260 and RB 230 registration hunts are really the only brown bear hunts **on Kodiak that aren't under a draw permit system**. But because they allow both resident and nonresident opportunity, guides have taken increasing advantage of this lucrative hunt outside federal concession areas and we have seen increases in nonresident guided hunters and nonresident harvests.

**We'd like to see residents have at least one place on Kodiak where they do have general brown bear hunting opportunity and don't have to compete with so many guides.**

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Proposal 103 – 5AAC 92.061 Special provisions for brown bear drawing permits

SUPPORT

This is a RHAK proposal which has brought out a lot of discussion with the Department and guides. As our proposal states, we first came up with the idea to re-allocate unused nonresident guided permits for Kodiak brown bear by looking at the permit hunt supplement that comes out every year showing the number of permits available and those that were allocated.

We contacted the area biologist on Kodiak and he informed us that actually, most of those **permits were used, they just didn't show up because they didn't go through the draw permit process, rather through the over-the-counter permits available under the "alternate list" caveat within 92.061 (a)(4)(D) that reads:** *"if a guided nonresident drawing permit is available, but the alternate list is exhausted, the permit becomes available, by registration at the Kodiak ADF&G office, to the first applicant furnishing proof that the applicant will be accompanied by a guide."*

It turns out that many guides are not even going through the draw permit process because the exclusive hunting concessions on Kodiak National Refuge lands in conjunction with **permits allocated to those specific concessions means they don't have to the way the regulation now reads. There really is no "alternate list" as the regulation states. These** permits are essentially given to the guides with exclusive guide use areas and guides can pick and choose which clients they want, or whether they want to hunt all of the allocated permits (some guides said they purposely do not utilize all the permits available to them). There is absolutely no reason for a nonresident to put in for a draw permit when he or she



can contact the guide with exclusive privileges to work out an arrangement and show up in Kodiak for the OTC permit.

This is not how we believe the system is supposed to work. The regulation needs to be re-written so that it does not allow for this to happen. We suggest the following changes:

“92.061(a)

(4) the following provisions apply to a guided nonresident drawing under this section:

(A) an applicant for a guided nonresident drawing permit must apply through the draw permit process in order to be eligible to receive a permit, and may apply for only one such permit **per application period;**”

The alternate list provision would still apply and then be used as intended. A nonresident would still have to have a handshake agreement with the guide prior to applying for the permit for that guide’s area.

As far as the original intent of the proposal to reallocate any unused nonresident permits to the resident pool, we recognize that many resident permits are also not utilized after someone draws a tag, and that the Department allocates the number of permits based on that historical data. According to information from the Kodiak area biologist, there still are quite a number of un-utilized nonresident guided permits and we still believe those permits should be reallocated to the resident pool of tags.

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Proposal 115 – 5AAC 85.055 Hunting seasons and bag limits for Dall sheep

OPPOSE

It is unclear if this proposal seeks to add additional draw permits for 2DK nonresident hunters to the current nonresident pool of permits, or take from the current nonresident pool of permits that are also available to 2DK nonresidents.

We oppose adding any additional nonresident permits, whether they are allocated to guided only nonresidents or to 2DK nonresidents. Any additional permits should be allocated to residents.

We would also add that the “requirement that the relative accompany the 2DK nonresident in the field” the proponent lists as an issue he’d like the board to address is in statute under AS 16.05.407 and not under the board’s authority to change.

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Proposal 116 – 5AAC 85.020 Hunting seasons and bag limits for brown bear;  
5AAC 92.132 Bag limits for brown bears

SUPPORT

This is a RHAK proposal asking to conform Unit 14C remainder regulations with the adjacent subunits 14C and 7 that allow one bear every regulatory year. We see no reason why 14C Remainder, with similar bear population numbers, should be one bear every four years

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Proposal 121 – 5AAC 92.044 Permit for hunting bear with the use of bait or scent lures

SUPPORT

This is a RHAK proposal asking to allow black bear baiting in Unit 14C remainder and also asking to include grizzly bears in the opportunity over bait.

Currently black or brown bear baiting is not allowed in Unit 14C Remainder even though the bag limit in adjacent units is one bear every regulatory year.

Much of Unit 14C Remainder is remote, and access is via the Twentymile River. Black bear baiting is allowed in adjacent Unit 7 within the Chugach National Forest and we see no reason not to also allow black bear (and brown bear) baiting in Unit 14C Remainder where bears are abundant.

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Proposal 126 – 5AAC 85.045 Hunting seasons and bag limits of moose

SUPPORT as amended – add resident any bull hunt only

*(Note: there is a printing error in the proposal book for this proposal. It shows the nonresident moose open season in Unit 16A for "1 bull with spike fork antlers or 50-inch antler or 3 or more brow tines one one side" is Aug. 10 – Sep. 25. The actual nonresident season is Aug. 20 – Sep. 25)*

We support additional resident moose hunting opportunities when populations exceed the population objectives and are necessary to continue to meet harvest objectives and reduce the population.

We support the addition of resident any-bull draw permits, leaving the number of permits to the discretion of the Department.

Since antlerless hunts must be authorized by the Advisory Committees within that jurisdiction, and we are not sure whether or not they authorized an antlerless hunt, we cannot support the addition of antlerless hunts. Should the prevailing ACs vote in favor of an antlerless hunt, we would support that as well as the any-bull additional draw hunts for residents.

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Thank you to Board of Game members for your service, and Board Support and Agency staff!

Resident Hunters of Alaska (RHAK)  
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info@residenthuntersofalaska.org





ADF&G Boards Support Section  
ATTN: Board of Game Comments  
Fax 907-465-6094  
March 1, 2019

Dear Chairman Spraker and Members of the BOG,

My name is Richard (Dick) Rohrer, I first came to Alaska in 1965 and I have lived the past 50 years in Kodiak Alaska. I am licensed Master Guide #69 and I've been actively involved in the development of the State of Alaska Kodiak Brown Bear Permit system since its beginning in 1976/77. I was the sole Guide representative on the Citizens Advisory Committee during 2000-2002 that developed the Kodiak Archipelago Bear Conservation and Management Plan. I'm still active in the Guiding business here in Kodiak.

Please consider my comments on the following Proposals:

Proposal #99:

I oppose this proposal and request the board reject any change in the allocation of Kodiak Brown Bear Permits between Resident and Non-resident hunters. I refer you to the points made by the Kodiak Advisory Committee and their very thorough explanation of the economic impacts this change would have on Kodiak. If you pass this proposal it will be the end of the guiding industry for Big Game in Kodiak which has been a part of our local economy for the past 95-100 years.

The management of Kodiak Brown Bear is a well-known success story and in my 54 years in Alaska there is no better time to harvest a large trophy male with a 28" or larger skull than right now. Consider the following harvest data in Attachment 3 of the Kodiak Advisory Board Minutes and the comparison to the harvest data from 1971-1978.

Average number of Male Bears with 28" and larger skulls harvested **per year** 2011-2018 is 19!!

Average number of Male Bears with 28" and larger skull harvested **per year** 1971-1978 is 3.4!!

Proposal #130:

I encourage the Board to reject this proposal and consider my comments relating to 2DK in Proposal #100.

Proposal #100:

The regulation to include Non-Resident second degree of kindred applications in the Resident pool of Permits was implemented by the BOG in 1983/84. The reason for this was so that 2DK



non-residents could apply on a party application with their resident relative so if drawn both could hunt. Many of the current 2DK non-resident applications for the Kodiak Bear Permits are in fact Party applications. My preference is to keep the current system as is in Kodiak however I recognize there is interest in implementing a system for 2DK non-residents that could be consistent throughout the State.

The Kodiak advisory board has proposed a separate drawing for a very limited number of 2DK permits in this proposal so if the BOG is inclined to believe a change in the Kodiak system is necessary than I support proposal #100 and reject proposal #130.

Proposal #103:

I oppose this proposal. It is critical to keep the Resident and Non-Resident Drawing Permits in separate systems. The current permit policy takes into account the fact that a number of permits are never used, both non-resident and resident. Any change to the current allocation system that will insure all available Kodiak Brown Bear Permits are utilized will require a substantial reduction in the total number of permits offered. Currently there are approximately 500 permits per year offered and the total desired harvest of approximately 200 animals. Thus utilizing all available permits while keeping the desired harvest to about 200 animals could mean a possible reduction to some 300-350 total permits offered instead of the current 500.

Proposal #104:

I oppose this proposal. See my comments on Proposal # 103. Please note that there would be substantial cost to the Kodiak Department in staff time and Dollars to implement this change.

Proposal #106:

It is apparent the proposer is unfamiliar with Kodiak. The ADFG provides a substantial amount of educational information to successful applicants that draw Bear permits and have done so for many years.

Regarding the suggested penalty for Sow harvest: Kodiak has implemented the "Want Minimums" regulation in the past with success. If in the future it becomes necessary to reduce mature sow harvest this is the recommended procedure in the Management Plan.

I'm prepared to explain the specifics of the "Want Minimums" if the Board desires.

I oppose this proposal as unnecessary!

Thanks for the opportunity to comment, Richard Rohrer

A handwritten signature in black ink, appearing to read "Dick", written in a cursive style.



Submitted By  
Rick Metzger  
Submitted On  
2/9/2019 7:05:14 AM  
Affiliation  
self

Dear Alaska BOG Board Members,

Please consider my comments on proposals 95, 96, 97 as they apply to goat harvest of goats in area DG 480. I am a long time on again off again resident of Kodiak Island with ownership of properties located within boundaries of DG 480. Over the years I have been an avid hunter and observer of goat and deer populations and the statutes that apply to the taking of these animals.

There are many many people like me within the DG 480 area who exercise our hunting rights and know the terrain as well as any Kodiak full time resident and there are many many more nonresident hunters who spend thousands of dollars to hunt only Kodiak deer.

According to the proposals goats are over populated in area DG 480 and more resident opportunity is needed to control the population. In my opinion low harvest is due more to lack off effort than to lack of opportunity.

A kodiak goat hunt for an experienced Kodiak hunter is no more difficult than a trophy black tail hunt. They share the same habitat. You go high and they go higher but the mountains are short with no place to go.

The quick simple solution to increase effort could be to eliminated the "must be guided" stipulation for nanny goats on non resident hunters in area DG480.

Thank you for you consideration,

Rick Metzger

Custer Wa. and USS 1857 Deadman Bay Kodiak Is.



Submitted By  
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I am a hunter and an Alaskan, and I support Proposal 128. I believe it is imperative to include the Maclaren Summit Trail in the Clearwater Controlled Use Area. Those of use that recreate along the Denali Highway have precious few areas to enjoy our preferred, nonmotorized methods of travel away from use of all terrain vehicles. This is an important hunting area for nonmotorized hunters. With recent hunts being closed early due to low herd numbers, every acre closed to the wide range of motorized vehicle is important to nonmotorized hunters. On foot, horse, or canoe, the time commitment and cost to travel further afield can be significant; we simply cannot throw another gas can in the back of our packs and travel another 10 or 20 miles. The caribou harvested from CCUA feeds my family. Please protect this wild and bountiful place for my generation and the generations to come, whatever technology may bring our way.



Submitted By  
Robert Mattson  
Submitted On  
1/29/2019 10:14:37 AM  
Affiliation

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Address  
P O Box 772  
Cordova, Alaska 99574

#### Board Members

I submitted a proposal for moose hunting in 6B, Propoal #57. I would like to strike the word Hunters from my Proposal. I spoke with the Cordova Advisory Board on 1-23-19, They also concured with me on it. Last year before the proposals where due we had 3 meetings with all user groups in the hunting area. We worked hard to come up with a proposal we could agree on. That was to change the Date. I am Not trying to due away with the walk in hunt. Nor am I trying to change the Non-Motorized portion of the regulation. What the motor/Power group would would like to see is to be able to hunt bears and sport fish September 1st-4th. We would like to leave our gear in the feild from Bear hunting and fishing, Come out of the feild and back to the road. Then head back out to Moose hunt. Over the past few years the Copper River has changed course and picked up speed and volume making it more more dangerous to cross loaded with all the gear just to turn around and head right back out to change from Bear hunting and fishing to Moose hunting.By leaving our gear in the feild it would make this crossing safer for all the hunters involved.

Thank you for your consideration

Robert Mattson



Submitted By  
robert tracey  
Submitted On  
3/1/2019 8:39:23 AM  
Affiliation

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907-294-2228

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[chudabob@yahoo.com](mailto:chudabob@yahoo.com)

Address  
p.o.box 76  
nondalton, Alaska 99640

i am in full support of proposal 147, 148 changing the brown bear season back to sept. 20 to oct. 21 in fall and may 10 to may 31 in spring odd years for the fall even years for the spring. having a bear season open oct. 7 would dramatically decrease opportunity to harvest a bear because salmon are gone from the streams and are moving higher. this would have a major impact on guided trophy hunts where some guides have already booked for a couple fall seasons out going by the ealier fall opening sept. 20. unit 17b which shares a long border with 9b has a 2 bear season every year aug. 20 to may 31 for residents and nonresidents same bears



Submitted By  
Ruth  
Submitted On  
3/1/2019 7:49:18 AM  
Affiliation  
Copper Country Alliance

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907-822-3644  
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[cca@coppervalleyak.net](mailto:cca@coppervalleyak.net)  
Address  
HC60 Box 306T  
Copper Center, Alaska 99573

Dear Board of Game Members,

I SUPPORT proposal 128 as submitted by ADF&G staff, and OPPOSE the "Correction" to Proposal 128, for the following reasons:

### **Honor the CUA**

The "Correction" totally reverses the original proposal and goes against the reason the Clearwater Creek Controlled Use Area was created to accomplish in 1971, and what it does accomplish, year by year: protecting wildlife resources from overhunting.

### **CUA More Important Now Than Ever**

Motorized hunting is much more common now than in 1971, before 4-wheelers were invented, so being in an area of light impact is especially important for local caribou and moose populations.

### **Non-Motorized Hunting is Special**

My late husband hunted on foot, and I sometimes went along to help pack. Hunting on foot was a special experience: Moving quietly, being aware of all the sounds around you, the good way you feel when you finally put down the last load at the highway. It is a wonderful thing that the Clearwater Creek Controlled Use Area exists for this sort of experience. It would be quite different if the "Correction" opened the Maclaren Summit Trail to motorized hunting.

### **The Fallacy of Shared Trails**

The argument that the trail could be shared ignores the fact that a quiet experience is important to non-motorized hunters. They would also have a disadvantage in trying to find game when ATVs are there.

### **Fairness**

There is an issue of fairness here. Motorized users have five designated trails in the Tangle Lakes Archaeological District (TLAD), and all of them are open to motorized hunting. To the East and West of the TLAD, riders are not required to stick to designated trails. The situation already strongly favors motorized users; taking away the Maclaren Summit Trail—the one CUA trail that starts in high country—from non-motorized hunters would be an act of disrespect for those who do not use ATVs, whether they do so by choice or necessity.

### **Some ATV Users Leave Designated Trails**

Out of sight of the highway, some ATV users branch off the trails, such that the backcountry is webbed with illegal trails. If you open the Maclaren Summit Trail to motorized hunting, you can be sure that hunters will drive off it, further violating the intent of the Clearwater Creek Controlled Use Area.

Sincerely,

Ruth McHenry

# From the desk of

Sam Rohrer  
P.O. Box 1388  
Kodiak, AK 99615



PC086  
1 of 2

February 28, 2019

Kristy Tibbles  
Executive Director, AK BOG  
P.O. Box 115526  
Juneau, AK 99811-5526

RE. 2019 Southcentral Region Comments

Chairman Spraker and BOG Members,

Thank you for serving our state and its wildlife resources and thank you for taking the time to read my comments on Southcentral Region proposals.

I will be brief in my comments, but I do encourage you to look closely at the Kodiak Advisory Council comments and meeting minutes, as they accurately reflect the views of our Kodiak community. Our community put a tremendous amount of time and effort into AC meetings to thoughtfully consider all the Kodiak proposals. This was an effort to protect and maintain a system of Brown Bear Management that has taken over 40 years to perfect.

Kodiak's Brown Bear Management Strategy is regarded as one of the most successful systems in wildlife conservation. As you know, Kodiak is world famous for its large bears and record book skull sizes. The facts are clear, there has never been a better time to hunt Kodiak in terms of chances of success on large record book skulled bears. But this has not happened by accident. It is the result of years of careful management and developing a plan that works. I ask that the BOG be very careful in how it changes this enormously successful program.

## **Proposal – 99    OPPOSE**

I ask that you oppose proposal 99. This proposal would single handedly upset the management structure on Kodiak that has been in place for over 40 years. It would also have devastating financial affects on local small business and our community at large. The Alaska Constitution mandates that wildlife be managed “for the maximum benefit of its people”. But this benefit it not just reserved for the person who actually pulls the trigger and harvests the bear. This benefit is for ALL Alaskans, that includes the financial benefit to the local community.

This proposal would also very likely increase sow harvest, which would ultimately result in fewer tags being issued. Even if 100% of available tags were offered to resident hunters, resident hunters would still not have substantially higher draw odds, especially for the most popular hunts. It is important to remember, that the Kodiak Road System area offers over the counter tags and continues to produce some of the largest skulled bears taken in all of Alaska.

Resident hunters have numerous opportunities to harvest bears via over the counter tags both on Kodiak and the entire Alaska Peninsula. There is no reasonable purpose to change the current set allocation.

## **Proposal – 100    Support**

I ask that you support proposal 100. The Board of Game has long asked for the public to bring a proposal that could be applied statewide for management of 2DK permits. The Kodiak AC has proposed this separate drawing hunt with a separate 2DK allocation. For the guiding industry in Alaska to have long term viability it needs stability. A separate 2DK drawing and allocation provides this stability. I believe this proposal could be duplicated in other areas of the state, which would help bring stability to all non-resident drawings.

907-486-4074  
907-539-1828  
sam@kodiakbearcamp.com





### **Proposal – 101 Oppose**

I ask that you oppose proposal 101. First, this proposal is outside of the purview of the Board of Game, however, even if this was not the case, the Board should still oppose it. This proposal would create 2 classes of Alaskan resident hunters, those who can afford high license and tag fees and those who cannot afford them. This is not equal access, this is “special access” for those who are rich. This also ignores the additional economic benefit that nonresident hunters bring to rural Alaska, besides their license and tag fees.

### **Proposal – 102 Oppose**

I ask that you oppose proposal 102. It is telling that the entire community of Kodiak, through the local AC, unanimously opposed this proposal. Currently, most locals would encourage a higher harvest in the “Road System Area”. If conflicts were happening on the “Road System Area” the BOG could rest assure, that the local AC would bring a proposal forward to address it. This is a proposal that is offering a “solution” where a problem does not exist.

### **Proposal – 103 Oppose**

I ask that you oppose proposal 103. Again, the Kodiak AC unanimously opposed this proposal. It is important to remember that Managers consider unused permits by both resident and nonresidents when establishing permit numbers. If all unused permits were used, it would require fewer permits be issued in the first place. On average only 8 permits go unused by nonresident hunters each year.

### **Proposal – 104 Oppose**

I ask that you oppose proposal 104. The argument against this proposal is very similar to the argument in opposition to proposal 103. Re-issuing the high number of permits drawn but not used would result in higher participation and harvest. Currently Kodiak is hitting its harvest goals, if participation and harvest increase, then the number of permits originally offered would have to significantly decrease to keep Kodiak within its harvest objectives. This proposal would ultimately *decrease* the opportunity of Resident hunters to obtain a drawing permit.

### **Proposal – 106 Take No Action**

I ask that you take no action on proposal 106. The first part of the proposal recommends that the Department develop educational material to encourage the harvest of mature boars. This is such a good idea, that the Department already did this many years ago. Currently the department offers an information letter, a website, a video, an in-person presentation at time of tag pick-up, and a booklet all aimed at educating the public about Brown Bears. The second part of the proposal asks for a penalty if sows are harvested. Currently, female harvest is within the Department’s objectives, however if the female harvest climbs above objectives, the current bear management plan for Kodiak recommends that sow skull size minimums be initiated. This strategy has been used successfully in the past on Kodiak, however it is not currently needed.

### **Proposal – 130 Oppose or Take No Action**

I ask that you either oppose or take no action on proposal 130. The issue that this proposal seeks to address, will already be addressed by Proposal 100.

Thank you for taking the time to thoughtfully read my comments. I appreciate all that you do for Alaska!

Respectfully,

Sam Rohrer  
Kodiak, AK



Submitted By  
scott mileur  
Submitted On  
2/26/2019 6:22:51 PM  
Affiliation

Dear Board of Game,

I am totally against proposals 99, 101, and 103.

Thank you for your time.

Sincerely,

Scott Mileur Registered Guide 527



Submitted By  
Shannon OBrien  
Submitted On  
2/28/2019 9:31:53 PM  
Affiliation

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Address  
PO Box 1385  
Girdwood, Alaska 99587

I Implore you to vote no on proposal 121 which would allow black bear baiting stations in and close to the Girdwood Valley. This would include state or federal land, e.g. near parts of the Winner Creek Trail & all of Upper Winner Creek Trail.

We have lived in this valley for 18 years and recreated daily in and around Girdwood. Girdwood is a recreation community with tourists coming from all over the world to take advantage of our surroundings. I have skiied, hiked, snowshoed or biked in all of the proposed areas. Many residence and visitors I know use these areas for recreation. It seems that it would be unsafe and irresponsible to have bear bating stations so close to a recreation community.

Thank you. Shannon O'Brien



# SLEETMUTE TRADITIONAL COUNCIL

P.O. Box 109 Sleetmute, Alaska 99668



PC089  
1 of 1

To the Board of Game

February 26, 2019

RE: Proposal 127

The Sleetmute Traditional Council, (STC), **Supports** this proposal only with the Stony Holitna Advisory Committee, (SHAC), amendments.

STC and the other three village councils in the area made resolutions of support for the closure when it began in 2006, and sent these to the Board of Game, (BOG).

The people of these villages have continued to support this closure and the ongoing predator control programs that the ADF&G have operated in the area. We have started to see a moderate increase in moose, especially these last few years. Current moose numbers don't come close to the numbers those that existed here through the 80s and 90s, but there may exist the possibility of having a very limited hunt, which will still allow for herd growth.

SHAC has labeled this prospective hunt an "experimental" one, and STC encourages the board to treat it as one. That is why our council believes the amendments SHAC has put forward are so critically important.

Thank you for your time and attention,

Evan Matthew Andrianoff, President  
Sleetmute Traditional Council



Submitted By  
Steve MacLean  
Submitted On  
3/1/2019 2:08:58 PM  
Affiliation

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10111 Eshamy Bay Dr  
Anchorage, Alaska 99515

1 March, 2019

Alaska Board of Game

Comments on Proposal #128

Dear Alaska Board of Game Members,

My name is Steve A. MacLean. I am an Alaskan resident, and have been since I was born in Barrow, AK in 1970. I have been hunting and fishing in Alaska since I was taught by my uncles, as is the Inupiaq way. I feel uniquely privileged to hunt in Alaska as an Alaska resident, and cherish the opportunities it presents. With this background, I respectfully submit my comment on Proposal #128 to modify the description of the Clearwater Creek Controlled Use Area (CCCUA).

The CCCUA provides a unique, rare opportunity for those hunters who choose to hunt without motorized equipment to access quality hunting habitat without competition or disturbance from motorized vehicles. As the roadway along the Denali Highway becomes more and more crowded with motorized hunters, the opportunities for non-motorized access are more and more important. The CCCUA was established in 1971 to ease pressure on animals accessed via the Denali Highway system. Because of the reduced pressure, the CCCUA provides unequalled access to quality hunting areas for those who choose to make the hunt harder than it has to be by relying on their own legs and back to get in. The CCCUA contains only 50 miles of usable trail, compared to nearly 2000 miles of motorized trails in the rest of the Unit. Allowing motorized use of the 9 miles of trail on the MacLaren Summit Trail will irreparably, and permanently damage the opportunities that exist for non-motorized hunters, while having insignificant impact on the access for motorized hunters. There are many areas where motorized access is necessary and makes good sense for hunter safety. We are fortunate that the CCCUA is not one of those places.

I encourage the Board of Game to clearly identify the boundaries of the CCCUA, and unequivocally identify areas where motorized access is permitted. I submit to the Board of Game that modifying the boundaries of the CCCUA is not necessary, would irreparably harm the hunting opportunities for those who choose non-motorized access, and have insignificant impacts on access for motorized hunters. In conclusion, I encourage the Board to keep the MacLaren Summit Trail as one of the few access points for non-motorized hunters.

Respectfully,

Steve A. MacLean



Submitted By  
Steven Shannon  
Submitted On  
3/1/2019 3:55:40 PM  
Affiliation

Comments on Proposal 128

To the Board of Game,

My name is Steve Shannon and I am a resident of Alaska. I live in Fairbanks and I am a teacher in our community here. Thank you for the chance to have my voice heard on this important proposal as you consider it.

Two years ago, I drew the DC485 tag to hunt caribou in GMU 13. I had heard about the Nelchina herd and how crazy the Denali Highway can get during hunting season. Knowing that things can get crowded and competitive, I chose to look specifically at nonmotorized areas in the unit. My brother flew up from Florida to have his first backcountry experience in Alaska and to act as my Sherpa on an adventure we'd never forget. Suffice it to say that after just a half day of work, we had gotten away from the crowds and had three days of hunting and packing out without even seeing another person.

The nonmotorized areas within Unit 13 make a DIY backcountry hunt for caribou an achievable goal for regular Alaskans. The access to walk-in areas off the Denali Highway make the peace and restoration of wild places available to those who are willing to do the work. Motorized access is important in many areas of the unit, but changing the Clearwater Creek Controlled Use Area (CCCUA) would be a mistake. The CCCUA was created specifically to reduce the harvest of moose and caribou in GMU 13. In doing so, it created a fantastic opportunity for hunters that are willing to hike, bike or pull a cart into the high country in search of a trophy adventure without competition from hunters on motorized vehicles.

Over 95% of the area where caribou hunters access GMU 13 is motorized. Nearly 2,000 miles of trails are motorized. In the CUA, there are just 50 miles of trail dedicated to nonmotorized users. Opening up the proposed area would not change the crowded conditions faced by many of those hunters. It would however have a significant impact on those hunters resolved to walk or bike in. Many hunters from around the state come to hunt the migrating Nelchina herd in the fall, and all of the have seen the conditions along the Denali Highway at that time of year. The CCCUA and Tangle Lakes Archeological District allow those willing and able to get away from the crowd and go as far as their own power can take them.

I understand that the new trail that connects Sevenmile Lake and MacLaren Summit Trail (MST) has caused some confusion and I submit that the descriptions of the CCCUA and TLAD be clarified in the regulations book so there is no mistaking that the MST is a nonmotorized trail as it lies within the boundaries of the CCCUA.

Thank you for your time and consideration,

Steve Shannon

Fairbanks, Alaska



## Regarding proposal 99 for Unit 8 Kodiak Island

My name is Stig Yngve I am proud to be a resident hunter and a hunting guide. 90/10 is ludicrous. The odds of drawing a Karluk lake bear tag are less than 2%, but so is a Chugach sheep tag. Many areas of Kodiak have been as high as 20% odds of drawing for a resident. A resident claim of never drawing a tag here is statistically untrue. Nonresidents harvest more bears here because they have a guide, plain and simple. We know bear hunting, that's what we do for a living. They also harvest way less sows than resident bear hunters.

With that in mind an amendment should be made to the 60/40 allocation such that guides can take their 40% of tags and put in either residents or nonresidents for drawing hunts. Then everyone is equal.

Alaskans' sense of entitlement is incredibly selfish at times, echoed greatly by Resident Hunters of Alaska and Robert Cassell. Our state economy is hugely dependent on nonresident tourism of which hunting is a major driving force. And guides facilitate that. 90/10 would put us out of business. Alaskans hunt elsewhere too and aren't condemned as nonresidents.

Why should that be the case here?

I guide for Kodiak Brown Bear, it's a huge part of my livelihood. That money stays here and circulates here in our local economy year' round. This is a direct assault on guides and guiding.

I also hunt as much or more for my self as a resident for brown bear and other animals on Kodiak Island. Every year. I have never had a problem with opportunity to draw bear tags and go bear hunting.

Guess what we'd be doing if we weren't guiding?

We'd be GAINFULLY UNEMPLOYED resident hunters UNLEASHED! We would slay critters in a more brutally efficient manner and on a more astronomical level than ever before. Nobody wins with 90/10.

## Regarding proposal 102 for Unit 8 Kodiak Island

The Kodiak road system is currently the only opportunity for a guide, resident or nonresident to have a guaranteed chance to hunt Kodiak Brown Bear. 70% of recent bear harvest has been attributed to guided nonresident harvest. This is not because of an increase in guide pressure overall, rather the results of one very efficient and effective guide. Most are bumbling buffoons that disappear as quick as they appeared guiding on the road system.

Many residents buy a bear tag and hunt every year, but hold out for as many years as it takes to find a desirable trophy bear to harvest, not overly concerned with killing a bear Right Now! Its not for lack of opportunity on a legal bear. I personally harvested a bear as a resident unguided on this hunt and it was a high quality experience and a big bear harvested. So harvest statistics are completely null and void here.



The road system is also the only area where a registered guide, especially one that lives and works on Kodiak Island, like myself, can get their start with very low startup costs. It has always been this way.

As guides we generally harvest mature boars. This means less infanticide. As a result bear populations and the uniformity of the different age classes on the road system is extremely healthy now. Lots of young bears and sows with cubs and big mature boars.

Also, because the northeast end of Kodiak and the road system is a human population center, the COMBINED guided nonresident and resident hunting pressure is a highly effective tool for combating potential negative bear/human interactions on the road system.

Clearly we are catalysts of that and it is quite evident our road system bear management plan is self-regulating and working just fine. DO NOT CATER TO 100% RESIDENT OPPORTUNITY!





Submitted By  
Stig Yngve  
Submitted On  
2/10/2019 10:38:30 AM  
Affiliation

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Address  
1657 Three Sisters Way  
Kodiak, Alaska 99615

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Clearly we are catalysts of that and it is quite evident our road system bear management plan is self-regulating and working just fine. DO NOT CATER TO 100% RESIDENT OPPORTUNITY!



Submitted By  
Stig Yngve  
Submitted On  
2/10/2019 10:35:20 AM  
Affiliation

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Address  
1657 Three Sisters way  
Kodiak, Alaska 99615

Regarding proposal 99 for Unit 8 Kodiak Island

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With that in mind an amendment should be made to the 60/40 allocation such that guides can take their 40% of tags and put in either residents or nonresidents for drawing hunts. Then everyone is equal.

Alaskans' sense of entitlement is incredibly selfish at times, . Our state economy is hugely dependent on nonresident tourism of which hunting is a major driving force. And guides facilitate that. 90/10 would put us out of business. Alaskans hunt elsewhere too and aren't condemned as nonresidents.

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I also hunt as much or more for my self as a resident for brown bear and other animals on Kodiak Island. Every year. I have never had a problem with opportunity to draw bear tags and go bear hunting.

Guess what we'd be doing if we weren't guiding?

We'd be GAINFULLY UNEMPLOYED resident hunters UNLEASHED! We would slay critters in a more brutally efficient manner and on a more astronomical level than ever before. Nobody wins with 90/10.



## Minto-Nenana Fish and Game Advisory Committee

Authorized by 5 AAC 96.021

March 1, 2019

Ted Spraker, Alaska Board of Game, Chair  
Doug Vincent-Lang, Commissioner  
Alaska Department of Fish and Game  
PO Box 115526  
Juneau, Alaska 99811-5526

Dear Commissioner Vincent-Lang and Chairman Spraker:

The Minto-Nenana fish and game advisory committee opposes the reauthorization of antlerless moose hunts in the Minto Flats Management Area of Unit 20B in Proposal 136 given the decision to prohibit the take and use of cow moose for constitutionally-protected religious funerary and memorial ceremonies.

While we recognize that discontinuing the antlerless moose hunts may limit the ability of people to put moose meat in their freezers for customary and traditional uses in the Minto Flats Management Area, we feel strongly that the constitutional exemption from seasons and bag limits for Alaska Native religious practice for funerals and memorial ceremonies is of greater priority under the law than subsistence harvests and especially general hunting opportunities.

We feel strongly that the department's statement in the 2018 moose management report and plan justifying their decision without any tribal consultation or public involvement of this reallocation decision by the Division of Wildlife Conservation is highly problematic:

"With the actual harvest unknown and the population estimate of moose in Unit 20B falling within the IM population objective, the number of female moose harvested with these permits may begin to cause a reduction in permits available for drawing permits to the general public. A better system for tracking the harvest of moose from these permits is needed for the department to provide maximum hunting opportunity for hunters"  
(Hollis 2018:25).

The Minto-Nenana AC disagrees with the department's reallocation of cow moose from constitutionally-protected religious hunts to general drawing hunts for antlerless moose violates the 1979 Frank Decision by the Alaska Supreme Court and the subsistence priority law.

Until the moose population is recovered to be able to provide for ceremonial uses of cow moose in the Minto Flats Management Area, we oppose any other take or uses of cow moose for subsistence or general hunting.

Sincerely,

A handwritten signature in blue ink that reads "Tim McManus" followed by a flourish.

Tim McManus, Co-Chair



Submitted By  
Todd  
Submitted On  
2/14/2019 4:24:45 PM  
Affiliation

Phone  
Bowey

Email  
[Akboweys@gmail.com](mailto:Akboweys@gmail.com)

Address  
PO Box 671089  
Chugiak , Alaska 99567

I support proposal #99 to argue the case for resident priority to brown bears on Kodiak and by linking later to Alaska's game animals. For too long the priority over our resources have gone out of state. These resources belong to Alaskans first.



Submitted By  
Tom Lessard  
Submitted On  
2/28/2019 5:54:52 PM  
Affiliation  
Personal

Proposal 124 Extend 14C Beaver Season: Support but Amend as follows:

- 1) Align seasons of GMU's 6, 7 & 15, 8, 14C to Nov 10 - April 30 ( This would lengthen season in areas open to beaver trapping in 14C and shorten beaver season in 7 & 15).
- 2) Reduce limits in 14C, 7 & 15 from 20 beaver to 10.

I spent considerable time relative to this proposal talking with trappers, the proposal author, dog owners and the Kenai Area Biologist. Aligning the seasons will help simplify the regulations and reduce confusion, mistakes and conflict among not only trappers but also other users, managers and enforcement.

The BOG only just changed the Kenai beaver opener from Nov 10 to Oct 15 a few years ago. I greatly appreciate your willingness to accommodate the trappers. Most years allow some open water beaver trapping opportunity even with a Nov 10 season opener.

At least some of the public, esp dog owners, factor trapping seasons into their dog activities. Having consistent opening dates (not just beaver season but all seasons) will help reduce conflict with the general public. Additionally, by-catch of out of season furbearers (e.g. otters) would be reduced.

GMU 14C is the Anchorage unit but includes mainly wild lands much of which is Chugach State Park where beaver trapping is not allowed. However, like the Kenai Peninsula, there is not an abundance of prime beaver habitat. Meanwhile I share concerns similar to those expressed in Proposal 89, the Anchor River Closure Proposal. Over the years, seemingly concurrent with extension of beaver seasons, active beaver colonies have been steadily disappearing along the road system in Unit 14C and Unit 7. Now, apparently like the Upper Anchor River, areas with previously active colonies in prime beaver habitat are devoid of beaver, for example the extensive willow areas around Upper and Lower Summit Lakes, Turnagain Pass and freshwater ponds adjacent to Turnagain Arm. One can still see old dams and houses, but no active colonies. This has been building and increasing in scope for years. As a trapper I would like to have more beaver around.

Thank You,

Tom Lessard

Cooper Landing



Submitted By  
Tom Van Every  
Submitted On  
2/28/2019 7:17:58 AM  
Affiliation  
hunter

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PO Box 90458  
Burton, Michigan 48509

Proposal 108

I would support a proposal to create a controlled use area on the Ayakulik river to make it a 4 stroke motor only.

October 25th opening day found us at day break glassing the Ayakulik river valley and surrounding mountains.

Low and behold here comes a 2 stroke GO Devil motor and boat with deer hunters.

In fact we never saw a bear in that area until 3 days after they left

My son killed an 8' beginning the 2nd week of the hunt. (Me , never chambered a round.)

Keep Area quiet as the bears don't react the same way with a 4 stroke, that's what I experienced. ( my son killed his 30 min after we left Greg Acord's Zodiac, with a 4 stroke)

Submitted By  
Tom Van Every  
Submitted On  
2/28/2019 5:53:04 AM  
Affiliation

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Proposal 98

I support the change to have the Fall Brown Bear Season begin on October 10th.

As a non-resident hunter in Fall 2016 it would have been better to have had our hunt start earlier.

I did not see the bear I was willing to wait for.



Submitted By  
Tony Jacobson  
Submitted On  
2/27/2019 11:51:59 AM  
Affiliation

Prop. 99, I agree and encourage the board to accept this proposal. Kodiak bear permits are highly prized and should have Preference to Alaska residents. Tony Jacobson 49 year Alaska resident.



Submitted By  
Tony Russ  
Submitted On  
2/10/2019 4:41:00 PM  
Affiliation  
none

I would like to support Proposal 99, which proposes changing resident/nonresident allocation of brown bear drawing permits in Unit 8. We, the people of Alaska, should receive 90% of the permits, and should also take a great majority of the bears, which by law belong to us. Statistically, (approx.) 9700 residents and 300 nonresidents applied for Unit 8 bear permits for the 2018 drawings. So only 3% of the applicants were nonresidents, yet they received 40% of the permits. It is not fair to residents, nor in line with our State Constitution that a nonresident had/has a 32 times better chance of getting a permit than a resident for a sport animal. Nor is it right that nonresidents often take more Unit 8 bears than residents in any given year. This proposal is simply common sense, given our State Constitution and the reality of Unit 8 bear drawing and success numbers.





Submitted By  
Will Elliott  
Submitted On  
2/28/2019 11:15:43 AM  
Affiliation  
resident, hunter

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Dear Board of Game,

I would like to offer comments on Proposal 128, and the correction that would open the Maclaren Summit Trail to motorized use.

I've hunted in that area for decades, on foot, snowmachine, and 4 wheel drive, and I do not believe opening that area to motorized use is a good idea or fair to all users. That trail is effectively the only trail option for non-motorized users in the area. If I want to drive off-road, I have plenty of options in every direction, whereas someone who wants a non-motorized experience does not. Put simply, opening up the trail takes away non-motorized users' rights, whereas leaving it as it is doesn't harm anyone. I don't think that's fair, and would urge you to keep that trail as a non-motorized option.

The trail remains a valuable resource even for motorized users who want to take a break from hunting the other side of the highway, which is becoming increasingly crowded, and enjoy the country on foot.

Thank you for hearing my comments,

Will Elliott



Submitted By  
Will Taygan  
Submitted On  
3/1/2019 11:14:06 AM  
Affiliation

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Amended (Corrected) Proposal 128 IS TERRIBLE! After surveying/mapping work was done on the Maclaren Summit Trail, \*most\* of the trail was found to be in the nonmotorized CCUA. Original proposal 128 would have made the entire trail nonmotorized, basically continuing the status quo. The "correction" completely flips the proposal so the amended proposal would **MOTORIZED** the whole trail, and reduce the size of the CCUA. This is where I hunt, and it's already crowded with non-motorized hunters. We can not afford to lose any hike-in/bike-in hunt opportunities! Please **DO NOT REDUCE THE BOUNDARIES OF THE CLEARWATER CONTROLLED USE AREA**. Please designate the Maclaren Summit Trail as **NONMOTORIZED**. Nonmotorized hunt areas are few and far between, offering a unique and traditional hunting experience. Furthermore, the original purpose of the CCUA was to protect the herd from overhunting, as access to the area is quite easy, motorized vehicles are not necessary. Windy and Alpine Creeks are becoming very popular with bike-hunting and it is important to preserve all of our nonmotorized hunting trails, to relieve pressure on the Clearwater Mountains, as this is a growing segment of our hunting and fishing community.



Submitted By  
william barnett  
Submitted On  
2/17/2019 2:04:20 PM  
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I support proposal # 99 by Robert Cassell.