



Submitted By
Jake Abbott
Submitted On
12/28/2018 12:34:07 PM
Affiliation

~~Members of the board,

I am writing in support of proposal 23 and 28.

I am the author of both of these proposals, and will outline my reasons for submitting them below.

Proposal 23 seeks to expand the RG014 archery only registration hunt area near Juneau. The current boundaries include all drainages south of Little Sheep Creek draining into Gastineau Channel and Taku Inlet, as well as the south side of the Blackerby Ridge area above the 1,000 foot elevation.

This current boundary area is at times confusing, and eliminates a significant amount of area that could be expanded and included in this hunt.

This hunt is already a self-limiting hunt since goats may be only taken with bow and arrow, and thus a bow hunter certification is required. This eliminates a large portion of hunters, and will lead to a hunt that is not heavily pressured.

The Alaska Department of Fish & Game (ADF&G) readily admits that there is a surplus of goats in this expanded area, specifically the Mount Juneau area. I sat through the Juneau-Douglas Advisory Committee meeting and listened to ADF&G's reasoning for opposing this proposal. One of their reasons for opposing it was they were concerned that if this area was opened to hunting, it would adversely affect the goat population in that area and they would possibly not rebound. I found this confusing since they also readily admit that there was a surplus of goats in that area. It has been my experience that ADF&G's point based system of managing goat populations has been extremely successful, and I find it discerning that in this instance, ADF&G seems to be arguing against their own ability to effectively manage an expanded hunt area with that system. Also, ADF&G would still retain the ability to close down by emergency order, specific zones within this expanded hunt area if specific groups of goats were to become adversely affected.

When I read between the lines here, my perception is that the opposition to opening this area comes from the fear that doing so would adversely affect other non-consumptive user groups, and their viewing ability for these goats. I find this argument invalid, since this proposal does not seek to harvest every single goat in the expanded area, rather, just an allowable percentage. After all, isn't the mandate maximum sustainable yield?

I believe that expanding this area will allow for more harvest opportunity, and provide access to a valuable resource that we are lucky to have around the Juneau area. This hunt would literally be out our back door and provide an excellent opportunity to those hunters who do not wish to venture out in their boats during what can be weather-wise on the water, one of the most difficult time periods of the year.

Proposal 28 seeks to clarify, or allow black bear baiting in GMU 1C, the area surrounding Juneau. I am in support of this proposal and would like to see black bear baiting allowed in GMU 1C.

Under current regulations, **5AAC92.044** allows the use of bait to take black bears statewide under the authority of a permit issued by ADF&G. **5AAC92.044(b)(5)** restricts the proximity to certain, roads, residences, campsites, recreation areas, and trails, in which bait stations may be placed.

Under the current regulatory scheme, bear baiting is "technically" legal in GMU 1C, but a hunter cannot legally do so since ADF&G refuses to issue a permit for this area. This decision seems to be arbitrary, and I question whether ADF&G has the authority to just not issue a permit absent an emergency order.

This creates a sort of legal black hole for myself when it comes to this proposal, as what I am seeking to legalize is technically legal, ADF&G just will not issue the permit.

I am seeking an amendment to **5AAC92.044** which will require ADF&G issue a permit to hunters in GMU 1C to take black bears over bait, or to have the board direct ADF&G to issue these permits.

When considering this proposal, I think it is important for the board to consider that this permit is not a "permit hunt," such as a registration hunt permit, but rather, it is a permit to use a certain method & mean. ADF&G not issuing this permit to hunters is akin to the department saying that hunters may not use rifles in a general season deer hunt, as both rifles and baiting are considered methods & means under Alaska regulations, and not hunts.

I also think it is relevant for the board to consider whether or not ADF&G has the authority to limit methods & means used in hunts absent a regulation adopted by the Board of Game, or promulgated under the Administrative Procedure Act (APA). I believe the Alaska Supreme Court ruling in **Estrada v. State** further supports this argument. In this ruling, the Alaska Supreme Court ruled that the administrative creation of a harvest limit on a subsistence permit by ADF&G without going through the APA was unlawful. Similarly to this, the Board of Game under **AS16.05.255(2,3)** has the authority to adopt in compliance with the APA, regulations establishing open and closed seasons,



and methods and means. I believe that ADF&G not issuing a permit under **5AAC92.044** is effectively creating a regulation without taking the appropriate steps required by the APA. A similar case to this related to Board of Game regulations is ***State v. Tanana Valley Sportsmen's Association***.

In speaking with ADF&G, I have found that the number one concern with issuing bear baiting permits in GMU 1C is public safety, and whether or not allowing this activity to occur will further aggravate the trash bear issue that exists in Juneau. I believe that by the requirements for placement of a bear bait station in **5AAC92.044(b)(5)** this problem will be almost completely alleviated as there are strict requirements for the proximity of bait stations to residences, recreation areas, roadways, and trails. When these requirements are taken into consideration; it becomes clear that the majority of the core Juneau area will be closed to baiting by those requirements alone, further alleviating concerns that this will aggravate bear issues. I also believe that there is no historical, or anecdotal evidence to show that bear baiting will further aggravate the trash bear problem that exists in Juneau. Currently, bear baiting is allowed on the Kenai Peninsula, the Mat-Su valley, and the Fairbanks areas. These areas are also heavily populated, and bear baiting seems to work there. I also think it is worth noting that Juneau is not the only town in Alaska that has issues with trash bears.

Bear hunting in southeast Alaska traditionally occurs in the spring, and is boat based with hunters targeting bears feeding on beaches and estuaries. Bear baiting is already currently allowed in the majority of southeast Alaska, and seems to occur with little to no issues. Allowing this to occur in GMU 1C will provide a method by which archery hunters, and hunters without boats, can selectively and, successfully harvest quality animals. I also believe that allowing this to occur may have an un-intended side effect of actually pulling bears away from the Juneau area by providing a food source outside of the core town.

I also think that it is worth noting that during the Juneau-Douglas Advisory Committee (JDAC) meeting, the JDAC overwhelmingly voted in favor of this proposal with 11 members voting in favor, 1 voting against, and 2 abstaining.

I understand at times that the subject of bear baiting can be a contentious one among user groups. I am just struggling to see why the Juneau area has to be so different from the majority of the state in regards to the legality of this activity. Especially absent any hard evidence to show that bear baiting will create anymore, or any less unintended bear-human interactions.



Submitted By
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Submitted On
12/28/2018 9:45:57 AM
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December 28th, 2018

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the January meeting in Petersburg. APHA members rely on fair and predictable allocation to non-resident hunters based on defensible biological parameters that are in line with the principles of sustained yield and result in a maximum benefit to ALL users. The APHA maintains its support of the Board's current allocative policies and believes that the well defined, species specific, resident preferences are in the best interests of all Alaskans.

Guided Hunt Allocation Benefits Resident Hunters, Visiting Hunters, Guides & Non-hunters

APHA commissioned its first socioeconomic report with the McDowell Group in 2014, titled *"Economic Impacts of Guided Hunting in Alaska."* More recently (2017), APHA partnered with SCI to add to and update McDowell's 2014 seminal work. *"The Economic Importance of Hunters Visiting Alaska; Alaska's Guided Hunting Industry 2015"* provides new information on funding for conservation that our visiting clients contribute to wildlife management. Guiding hunters is primarily an activity that occurs in rural areas of Alaska.

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| <ul style="list-style-type: none">• 87.2 Million total economic output (2015) | <ul style="list-style-type: none">• 52.5 Million new dollars to Alaska (2015) |
| <ul style="list-style-type: none">• More than 50% economic benefits occur in rural areas (2012, 2015) | <ul style="list-style-type: none">• 1,550 people directly employed, total employment with multipliers; 2,120 (2015) |
| <ul style="list-style-type: none">• 89% Active Guides are AK Residents (2012) | <ul style="list-style-type: none">• Visiting hunters (guided & non-guided) purchase 13% of total Alaska hunting licenses (2015) |
| <ul style="list-style-type: none">• Guided hunters are approx. 3% of total hunters in the field (2015) | <ul style="list-style-type: none">• Visiting hunters (guided & non-guided) contribute 72% of total revenue to the ADFG wildlife conservation fund (2015) |

Significance to Alaskans & Meat Sharing



Guiding hunters in Alaska has its origins in Territorial days. Because of our rich history, guides have deep roots in communities across Alaska, with many guides living in remote communities or "Bush Alaska." APHA worked with McDowell to quantify what some of the benefits Alaskans reap from Guided Hunting. In 2015 30 million new dollars went to Alaska business that were directly attributed to Guided Hunting. This generated another 20 million in economic activity in the support sector. Hunting guides do what they can to share the harvest; 230,000 lbs of well cared for, high quality game meat was shared with their fellow Alaskans in 2015.

Individual Proposal Comments

Below you will find our comments on individual proposals under your consideration for Region I regulatory change. Leading up to the drafting of these comments the APHA held multiple teleconferences and invited all of its members to participate in the drafting of these comments. Our teleconferences were well attended with good representation from guides who conduct hunts in every Region in the state. You will find that there are some proposals that we don't have comments listed for. These were proposals that we felt did not directly impact guides or were outside of the group's purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations. While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. Because the APHA takes a statewide perspective when approaching Board proposals, we urge you to consider regional expertise from our members even when their position is different from that of the APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or regional basis. Given the opportunity, Alaska's hunting guides will continue to bring a wealth of wildlife and hunting knowledge to the table.

Proposal 3- OPPOSE

Conservation Concerns:

Guides in Region I expressed a variety of conservation concerns in opposition to proposal #3. Our members were unanimous that shooting from a boat will result in additional big game animals that are struck and run into the thick forest but are never followed up and recovered by the shooter. After all, nearly all of the hunting areas accessed by boat in Region I are influenced by extreme tidal fluctuations and medium to high energy ocean wave action. Proposal #3 does not require that a hunter, after shooting at an animal, make land fall to determine if they hit the animal or not. We envision a variety of scenarios where hunters will get excited and choose to shoot from a vessel but will not make landfall to follow the animal up. It is also important to consider that Region I offers vessel based hunting opportunities for iconic and valuable species such as brown bear, coastal black bear, moose and mountain goats. APHA is concerned that proposal #3 will unnecessarily increase human caused mortality that will not be accounted for in harvest records. APHA is opposed to proposal #3 based on conservation concerns related to unreported and wasteful human cause mortality.

Proposal 4- Oppose

APHA opposes the wasteful take of wildlife. Our membership felt strongly that deer should not be treated differently than any other wild animal important to subsistence in Alaska. Each year guides carefully handle and preserve hundreds of thousands of pounds of valuable wild meat in Alaska. In a recent report, APHA document that in 2015 alone hunting guides shared 240,000 lbs of meat with their fellow Alaskans. As guides we appreciate and respect the value of wild game. Edible deer meat should be salvaged, well cared for and eaten or shared with the less fortunate.

Proposal 7- OPPOSE

Conservation Concerns:

APHA opposes proposal #7 based on conservation and management concerns. Bear sealing data in most of Region I represents the best available data for managers to base their management decisions on. See department comments on proposals 49 & 50. Last year significant changes were made to Unit 9 brown bear seasons based on sealing and other harvest data. APHA oppose proposal #7



because skull sealing data is the most cost effective and realistic method to estimate harvestable surplus for bears in Region I at this time.

Proposal 8- Take No Action- (reference other comments)

Recommended Action:

APHA recommends tabling and taking no action on *proposal #8* because the proposal is seeking relief from a condition that does not exist. There is no current requirement for non-resident black bear hunters to hunt with a guide in Region I.

Background & Nonresident Black Bear Hunting Options:

During the 2010 Region I Board of Game meeting in Ketchikan the board adopted *proposal #37 "require(ing) a drawing permit for non-resident black bear hunters who did not enlist the services of a registered hunting guide."* (2011, ADFG; Board of Game Direction on Black Bear Guide Allocations and Harvests in South East Alaska, pg. 1)

The resulting hunt structures created multiple avenues for non-residents to hunt black bears in the same units:

1. retain the services of a registered hunting guide and hunt under harvest tag (GMUs 1,2, 3 & 5)
2. apply for a drawing open to all non-residents not hunting with a registered guide (GMUs 1,2 & 3)
3. secure a registration permit in areas managed by draw where hunts are "under subscribed" (GMUs 1,2 & 3)
4. hunt in portions of Region I managed by harvest ticket either with or without a registered guide (GMU 5)

Prop. #8 Would Unfairly Benefit Nonresidents:

Proposal #8 seeks to "equally limit(ing) all nonresident black bear hunters because of conservation concerns." If the board or the legislature were required to adopt regulations that equally restricted all classes of non-resident hunters they would be conferring an advantage not currently enjoyed by resident hunters. Resident hunters are currently managed through a variety of allocation schemes to include but not limited to: archery only hunts, non-motorized hunts, youth hunts, early and late season hunts for the same species in the same management area, antler or horn restrictions vs. any animal of a given sex. In fact these various allocations are necessary as the Board of Game works towards maximizing the benefit of the resource for the "state and its people." Proposal #8 seeks to equally limit non-residents and thus imbue a privilege not currently enjoyed by resident hunters.

Prop. #8 Would Degrade the Value of a Limited Black Bear Resource:

Proposal #8 seeks to unwind a well-reasoned decision to allocate between guided and non-guided nonresident hunters. During testimony in Ketchikan during the 2010 Board of Game meeting a strong record was built that guided nonresident black bear hunters had lower rates of conflict in the field, the guide businesses were locally owned and that hunting guides are able to add more value to a black bear hunt than a non-guided commercial service. During that time it was also clear that resident hunters enjoy hunting black bear in Region I. Proposal #37 was passed to ensure that the limited number of guided black bear hunts available to the highly regulated guide industry would remain available in a way allowing for the maximum return for the publicly owned resource. Prop. #8 would undo the good work of the board and degrade the overall value of the guided black bear opportunities in Region I by causing guides to lower their prices to ensure drawing hunt participation. If passed, proposal #8 will have the effect of reducing the total value of black bear hunts in Region I while doing nothing to add value back to the resource or local economies.

AS 16.05.256. Nonresident and Nonresident Alien Permits-



"Whenever it is necessary to restrict the taking of big game so that the opportunity for state residents to take big game can be reasonably satisfied in accordance with sustained yield principles, the Board of Game may, through a permit system, limit the taking of big game by nonresidents and nonresident aliens to accomplish that purpose."

When the board passed Prop. #37 in 2010 it acted within the broad statutory authority conveyed by AS 16.05.256. The board was clear, the new hunt structure was designed to limit nonresidents and nonresident aliens to benefit resident hunters. As a result, resident hunters still enjoy a "2 bear" annual limit in all of Region I, while nonresidents and nonresident aliens enjoy various restrictions.

Proposal 9- Support with Recommendations

Overview:

APHA supports repealing the requirement for nonresidents not hunting with a guide to draw a tag in the portions of GMU 1 covered in proposal #9. APHA recommends that the department carefully monitor these hunt areas for increased transporter or outfitted nonresident black bear hunting. Hunting guides utilizing 1B, 1C & 1D are strictly limited in the number of black bear hunts they may take by the US Forest Service. If conservation concerns develop from an increase in non-guided commercial hunting, sustainable hunting guide businesses will needlessly suffer as conservation concerns are necessarily addressed.

Conservation:

APHA defers to the department; black bear populations are sustainably harvest in GMU 1B, 1C & 1D. Proposal #9 seems well thought out and unlikely to cause conservation concerns in the near term.

Recommendation:

APHA would like to recommend that a mechanism be put in place to track big game commercial service use in GMU 1B, 1C & 1D and that managers be given the discretion reinstate the current drawing hunt for nonresidents not using a hunting guide in the units. APHA requests that a report on the status of big game commercial services in GMUs 1B, 1C & 1D offering black bear hunts be given to the board during the next Region I meeting in 2021.

Proposal 35- Support

APHA support the additional opportunity provided by proposal #35.

Proposal 42- see comments on proposal #43

Proposal 43- SUPPORT

Conservation:



APHA supports wise use and conservation of our wildlife resources. Proposal #43 represents a necessary update to wolf management and wildlife conservation in unit 2. APHA strongly supports this update to scientific wolf management.

Proposal 49 & 50- Support with Amendment

Suggested Amendments:

- APHA recommends the current “up to” number of nonresident tags not using a guide remain unchanged
- APHA recommends nonresidents within the second degree of kindred, who are hunting with a resident relative, be able to receive an over the counter-harvest-ticket with a one bear baglimit
- APHA commits to working with guides, landowners and the department to make additional harvest opportunity available for “guided nonresidents” as long as the additional harvest meets conservation objectives

Overview:

APHA appreciates and supports past board actions to ensure sustainable harvest of the large coastal black bears in GMUs 2 & 3. APHA is especially appreciative of the collaboration between the board, department, industry and the US Forest Service to achieve the maximum benefit to the public from nonresident black bear hunting as hunting opportunities were necessarily restricted to achieve conservation goals. As an industry, we are proud of our partnership and the area’s guide’s willingness to hold their harvest down on what amounts to a “hand shake” agreement with the board. Proposals 49 & 50 really embody the spirit of stewardship and the long-term successes that are enjoyed from restricting harvest in the short-term.

Conservation:

APHA facilitated multiple teleconferences and discussions with members and non-members who guide in GMUs 2 & 3. While there was some disagreement about whether or not it was the reduction in harvest in 2012 or ongoing intensive management ultimately led to improved numbers of black bear, there was unanimous agreement that bear numbers have improved since 2012. APHA supports increasing harvest in GMUs 2 & 3 based on an improved population of black bears in GMUs 2 & 3.

Allocation:

Hunting guides in SE Alaska are overwhelmingly local, small businesses. Virtually 100% of the registered guides permitted in GMUs 2 & 3 are Alaska residents. According to McDowell, each guided hunt in Alaska brings \$27,000 of economic activity to our economy. However, guides are just one of the commercial uses. Non-guided nonresidents often patronize transporters, lodges (usually licensed transporters) or outfitters. At this time it is estimated by local guides that less than 50% of the Region’s transporters and lodges are Alaskan owned. Further, there is little or no data describing the economic impacts generated by the lower priced transported or outfitted hunts. Even if transporters or lodges are receiving similar prices for their services, they have a lower rate of Alaskan ownership thus a reduced economic benefit to Alaskan communities.

Guides are Alaskan and the hunts they offer are much more valuable to the state than transported or lodge-based trips. Black bears in GMUs 2 & 3 are susceptible to over harvest.

APHA asks that the board give an allocation preference to nonresidents purchasing guided hunts because this is a better return for a finite resource.



Resident Hunters:

APHA has always recognized that resident hunters enjoy black bear hunting in southeast Alaska. We further recognize that the harvest level and conservation challenges that led to the new hunt structures put into place in 2012 were not driven by resident hunter harvest. APHA supports future hunts structures that keep resident seasons and bag limits in place.

Nonresident Relatives:

Hunt structures put into place in 2012 had the unintended consequence of restricting nonresident relatives travelling to Alaska to hunt black bears with their relatives. Nonresident relatives represent a very small segment of the hunting effort, so small that their impact on the bear population is inconsequential. APHA supports nonresidents relatives, within the second degree of kindred, being able to hunt with an over the counter harvest ticket, just like guided nonresidents.

Proposal 52- SUPPORT

APHA supports proposal 52 as a necessary update to harvest reporting requirements for black bears.



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

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

12/1/18

Dear Chairman Spraker and Members of the Board:

I'm writing on behalf of the more than 900 members of the Alaska Trappers Association, especially those who live in Southeast Alaska. We appreciate the opportunity to offer the following comments on proposals for the Southeast region, that you will be considering at your January 2018 meeting in Petersburg.

Proposal 10: With all due respect to the Upper Lynn Canal fish and Game Advisory Committee, The ATA does **not support** this proposal.

- Coyotes are a very resilient species that is difficult if not impossible to over harvest.
- They are not sealed elsewhere in the state.
- We feel the sealing process would just create work for the department and would result in file data that served no productive purpose.

Proposal 11: ATA **supports** this proposal. There is an ample beaver population with relatively low trapping pressure and a depressed market. The existing sealing program would identify any harvest level that might create a concern.

Proposal 12: This proposal addresses a complex issue with numerous tentacles. With all due respect to Southeast trappers, the ATA **defers** to the judgement of the Board.

Proposal 13: ATA is vigorously **opposed** to this proposal.

- It would be a nuisance rule that would be subject to abuse.
- It is too easy for an ill-intentioned person to mess with (ie relocate) the identification tags.
- Diligent law enforcement officers generally know who traps where. If they don't, it is not difficult to find out.
- Such a requirement would be a burden on trappers.
- This is a favorite proposal of the anti-trapping community. It is an old issue that has been debated many times. Nothing has changed.



Proposal 14: ATA is **opposed** to this proposal. ATA recommends that trappers use signs to identify the area where traps are set. However, trapline signage is, and should be, optional. Signage on each set is unnecessary. It would be a substantial burden on trappers who put out hundreds of sets, often in country that no one visits, except the trapper.

Proposal 22: ATA **supports** this well-written proposal. Douglas Island is not isolated in a manner that allows for specific management of its wolves, which can move freely to and from the island. The "management area" designation serves no real purpose.

Proposal 31: This proposal would increase local trapping opportunity without creating conflict. It shows great insight by local trappers. ATA eagerly **supports** it. We **defer** to the judgement of the Board on the definition of "submerged."

Proposal 32: ATA **opposes** this proposal. It appears simply to be a local anti-trapping measure. We are unaware of any issue it is attempting to resolve. Such a closure is unnecessary and would probably be difficult to enforce.

Proposal 38: ATA **supports** this proposal for the same reasons we support Proposal 11.

Proposal 42: ATA **supports** this proposal. The resource can support additional harvest. The current regulation is unnecessarily restrictive.

Proposal 43: ATA **supports** this proposal for the same reasons it supports proposal 42. Monitoring by the Department would identify any resource population issues in the unlikely event that such issues might arise.

Proposal 44: ATA **supports** this proposal. It would offer uniformity to the wolf trapping season and apparently the resource is capable of supporting additional harvest. We object to any efforts by federal agencies to manage natural resources which belong to the State.

Again. The Alaska Trappers Association appreciates the opportunity to participate in the regulatory process.

Sincerely,

A handwritten signature in black ink that reads "Randall L. Zarnke". The signature is written in a cursive, flowing style.

Randall L Zarnke, president



Submitted By
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Submitted On
12/26/2018 11:14:47 AM
Affiliation

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I oppose: PROPOSAL 23 5 AAC 85.040(a)(1). Hunting seasons and bag limits for goat.

The current closure of this area for goat hunting, in my opinion, has made it one of the best areas to watch goats in Alaska. The goats in this area do not seem to have the fear of humans that they normally do in areas where they are hunted. I believe that allowing this type of hunting would cause them to move away from humans and cause some of the places currently valued for goat watching to decrease considerably. In particular:

1. In the Nugget Falls area at Mendenhall Glacier goats typically move down fairly low for feeding and resting. Lots of tourists and locals visit this area to watch and photograph the goats. In general I have noted that when people bring their dogs along the goats move back up the mountain and show an obvious fear of them. In most instances the presence of humans seems to not bother them. Overall the U.S. Forest Service encourages and educates tourists about the goats and most seem to be really thrilled to see them.
2. The rock peninsula in front of the glacier is a wonderful place to get close to goats. I have often sat in different areas and had goats behaving "normally" with no obvious fear of my presence. This area can be easily accessed in winter by crossing the ice on the lake or later from a trail.
3. Mount Juneau is considered a goat watching place. An interpretive sign near the wharf in Downtown Juneau discusses this and shows where to look. This is also emphasized by Gastineau Guiding at the top of the tram. When I am hiking up there most people I see are looking over at Mount Juneau and talking about the goats. Since there is a trail to the area on Mount Juneau I suspect, if hunting is allowed, when people go up there the goats would vacate the area.
4. Along and near the Mt. Roberts Trail. When the tram first opens goats can often be seen feeding close by which seems to really thrill the tourists and locals. There is a place not far from the Tram in the "Bear Valley" area where goats bed down for the winter.

I believe allowing bow hunting would contribute to goats developing a fear of humans in these areas and decrease the wildlife viewing opportunities considerably.



December 27 Comment on ADF&G Board of Game Proposal #22 for Removal of hunting quota for Douglas Island Wolves, to be considered at the board's January 11-15, 2018 meeting in Petersburg, Alaska

I OPPOSE BOG PROPOSAL #22.

My name is Bruce H. Baker and I reside at 10738 Horizon Drive, Juneau, Alaska 99801. I live on north Douglas Island, have hunted with rifle or camera in the Juneau area for more than 40 years, and OPPOSE Proposal #22 because it would remove the annual 3-wolf harvest quota for Douglas Island. The Douglas Island Management Unit in GMU 1-C was set up years ago to restrict the number of wolves that could be killed on the island to no more than 3 per year. It became a heated public issue when a single Juneau trapper targeted an entire pack on the west side of the island and killed them all. The Game Board at the time recognized that a reasonable number of wolves had a place on the island and that other non-consumptive wildlife interests deserved to be able to appreciate them as well. The goal of the existing regulation has been to guard against an over-harvest of wolves on the island, a risk that is high, given the easy access to the island by water or road.

In making this proposal, Mr. Jesse Ross provides absolutely no definitive scientific data to support his claim that if the existing regulation remains on the books, "... wolves will continue to suppress the deer population on Douglas Island and further decrease the sport hunting and wildlife viewing opportunities." He provides no biological data that conclusively demonstrates that public opportunities to harvest or view deer or wolves on Douglas Island are significantly out of balance.

Proposal #22 is a proposed solution to a problem that hasn't been proven to exist. It's a clear case of "If it ain't broke, don't fix it."

/s/ Bruce H. Baker



December 27 Comment on ADF&G Board of Game Proposal #23 for Allowing Archery Hunting of Mountain Goats on Mt. Juneau and Nearby Areas, to be considered at the board's January 11-15, 2018 meeting in Petersburg, Alaska

I OPPOSE BOG PROPOSAL #23.

My name is Bruce H. Baker and I reside at 10738 Horizon Drive, Juneau, Alaska 99801. I have hunted mountain goats with rifle or camera in the Juneau area for more than 40 years. I OPPOSE Proposal #23 because it would open the area including Mt. Juneau, Mt. Roberts, and the entire area from the Mendenhall river/glacier to Taku river/glacier to archery goat hunting (except killing nannies with kids would be prohibited August 1 – November 30). The area is currently closed except for an area around Blackerby Ridge.

The area proposed to be opened to goat hunting is heavily used by Juneau residents and visitors for hiking and mountain goat viewing. For many folks, this is their only opportunity in a lifetime to see goats from a respectable viewing distance and to watch the animals' behavior.

By the late 1980's, mountain goats had been eliminated from Mt. Juneau and its ridges. The main cause was over-hunting. Goats were even shot on Mt. Juneau in plain sight of people in downtown Juneau who were viewing them! After that, I was proud to contribute, along with many other Juneau residents, to help fund the transplant of mountain goats from the Snettisham area to Mt. Juneau. ADF&G cooperated and assisted in this effort. In the years since the re-introduction of mountain goats, they have once again become a popular attraction to Juneau residents and out-of-town visitors, whether they are seeing them from downtown Juneau, or while hiking the extremely popular trails above tree line, one of which is even accessible by cable car. Mountain goats are more valuable as a non-consumptive wildlife resource on the ridges and mountains in the proposal area. In fact, the economic value of viewable mountain goats has increased in the area as tourism has increased.

There are other opportunities for goat hunting in northern southeast Alaska, including areas farther out the Juneau road system.

/s/ Bruce H. Baker



December 27 Comment on ADF&G Board of Game Proposal #28 for Allowing Bear Baiting in Juneau, to be considered at the board's January 11-15, 2018 meeting in Petersburg, Alaska

I OPPOSE BOG PROPOSAL #28.

My name is Bruce H. Baker and I reside at 10738 Horizon Drive, Juneau, Alaska 99801. I have hunted in the Juneau area with rifle or camera for more than 40 years. I OPPOSE Proposal #28 because it would open the Juneau area (1C) to black bear baiting. This practice of baiting has been prohibited in the Juneau sub-unit for more than two decades, as an acknowledgement of the many problems the community has had with bears that have become conditioned to human placed food. Luring bears to bait stations would exacerbate this perennial problem.

Similarly, the purposeful conditioning of bears to human placed food is likely to increase the number of human-bear encounters and result in human safety problems.

In short, bear baiting not only contradicts the principles of fair chase hunting, it is also totally inconsistent with community-wide efforts to encourage the more than 30,000 of us Juneau residents to manage our garbage in a way that does not encourage the conditioning of bears to human placed food.

/s/ Bruce H. Baker



Submitted By
Jos Bakker
Submitted On
12/26/2018 1:19:15 PM
Affiliation

Proposal 13

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

Require identification tags for traps and snares in Units 1-5 as follows:

I **strongly SUPPORT** this proposal.

1.As a non trapper I would like to see tags on traps so I can contact authorities with the info when I see a problem.

2.Troopers can deal with problems much quicker and much more effiently when information is available.

Submitted By
Jos Bakker
Submitted On
12/27/2018 3:48:03 PM
Affiliation

Proposal 22

5AAC 92.530(23). Management areas.

I **strongly oppose** this proposal 22

This regulation was set up to protect wolves on Douglas Island from overharvest after one trapper targeted and killed an entire pack of wolves. Please protect the wolves on Douglas Island.

Wolves have a very important role to play in the ecosystem. When wolves are around prey moves through nature differently. As was seen when wolves were re-introduced in Yellowstone. Deer will move around more, do not stay in open areas very long and are very wary of all creatures(humans as well). One comment on an opinion piece in the Juneau Empire says it all:" I understand the desire to kill the competition, but you should work on becoming a better hunter instead".

This proposal suggests that removal of wolves will improve hunting, which it probably does. It will make it easier again. For wildlife viewing, photography etc. it certainly is fun to see a frolicking deer. But nothing compares to seeing a wolf.

Please protect the wolves of Douglas Island.

And predator management should not be a "one fits all" strategy as suggested. Ecosystems vary widely and should be treated as a such"

I **strongly oppose** this proposal



Submitted By
Jos Bakker
Submitted On
12/27/2018 4:25:47 PM
Affiliation

Proposal 23

5 AAC 85.040(a)(1). Hunting seasons and bag limits for goats.

I **strongly oppose** this proposal 23.

After the population of mountain goats was wiped out through overhunting, it took almost 30 years to rebuild the mountain goat population, somewhat. Finally, they can be seen in several areas around Juneau.

Downtown Juneau: viewing scopes are set up for our million plus spring/summer visitors to view the mountain goats.

The Mendenhall Glacier: viewing scopes are set up to view the mountain goats.

As a former Forest Service volunteer, I had the pleasure to show many visitors the mountain goats on the mountains around the Mendenhall Glacier. Viewing of goats in de winter is a great photographic opportunity as well. Spring is magical as the nannies give birth at lower elevation and can be observed from the Mendenhall Glacier observatory. Or a short hike will bring you just a little closer.

Guided hiking trips on the many trails in Juneau have been seeing mountain goats as well.

A pair of high snow years - 2006 and 2007 – killed as much as 40 percent of the population near the Juneau road system. The population is still recovering.

I **strongly oppose** proposal 23

Submitted By
Jos Bakker
Submitted On
12/27/2018 5:33:13 PM
Affiliation

Proposal 28

5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.

I **strongly oppose** this proposal 28.

Please do not allow bear baiting in the Juneau area.

The Juneau area is a densely populated area due to its constricted geography and already has a chronic garbage bear problem. Luring bears to bait stations with human food would only increase this problem.

I **strongly oppose** this proposal 28



Gwen Baluss
10236 Heron Way
Juneau, AK 99801

December 22, 2018

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

Re: Comments on Proposal #23 for Southeast Alaska, winter 2018/2019

Dear Board of Game,

Please consider my opposition to Proposal #23 for Southeast Alaska, winter 2018/2019, 5 AAC 85.040(a)(1). Hunting seasons and bag limits for goat. It would open new areas near Juneau to mountain goat hunting.

I have lived near Juneau for over 20 years. One of my favorite things to do is hike the alpine trails. Seeing goats, sometimes at close range, is often the highlight of a summer hike. I know that many locals share this excitement at seeing goats, as do the tens of thousands of visitors that come and support our economy annually. Any activity that reduces the opportunity for wildlife viewing makes Juneau a less desirable place to live and to visit. It directly jeopardizes some my neighbor's livelihood.

ADF&G would likely set very conservative bag limits due to recent lower goat counts, so a hunt might not directly affect the population in a big way. But hunting could have a huge effect on the goat's behavior. Besides making them less watchable, it could drive them to spend more time in less desirable areas, further from recreational trails. This could hurt the goat population indirectly if the new places had less forage, or places to escape predators.

As someone who does a lot of fishing and does not have to means to get out of town in a boat or plane, I understand hunters' desire for more road-system opportunities. However, I feel that allowing this hunt would be an irresponsible way to manage our shared resources. It would hurt thousands of goat-watchers, for a small benefit of a select group of hunters.

It's important to review some of the history of the area. In the 1980's residents pushed for closing areas around Juneau to hunting because they wanted to be able to see goats near town. There was even a reintroduction effort after goats around Mount Juneau had all but disappeared. The community, I believe, still values goats as much or more as they did back then and wants the chance to see them when they hike, or even when they look up from downtown or the Mendenhall Glacier Visitor Center.

Please do not expand goat hunting near Juneau.

Sincerely,

Gwen Baluss



Submitted By
Steve Behnke
Submitted On
12/23/2018 8:02:14 PM
Affiliation

Phone
9075867890
Email
srbehnke@ak.net

Address
4545 Thane Rd.
Juneau, Alaska 99801

As a 35 year resident of Juneau, and hunter, I urge you to reject proposals 22,23, and 28. These are extreme positions which would undercut the balance between hunting and non-consumptive values that most Juneau residents value.

Proposal 22 would get rid of the Douglas Island wolf quota, which was a carefully crafted compromise between potentially wiping out wolves on the island and banning all wolf hunting there. We don't need to go back to those battles between different public interests. Please leave the compromise in place.

Proposal 23 would expand bow hunting of goats. Again the existing regulations were a hard fought compromise that provides for a balance of hunting and wildlife viewing. I enjoy the chance to see goats up close on Mt. Juneau, Mt. Roberts and other areas near our incredible trail system. These are small, easily accessed populations that provide great wildlife viewing opportunities that don't exist in very many capital cities. Please leave the existing system and compromise in place. If it is changed I expect to see efforts to reduce existing hunting opportunities.

Proposal 28, allowing bear baiting in Juneau, would exacerbate existing problems of bear management. We don't need to be feeding and habituating more bears. And its totally unneeded in a place where black bears are so abundant and easy to hunt.

Please reject these three proposals that fail to reflect community values of balancing hunting and non-consumptive uses.



Submitted By
Darren Belisle
Submitted On
11/20/2018 2:48:58 PM
Affiliation

Phone
907-612-0733
Email
darren.b@aptalaska.com
Address
POP Box 56
Skagway, Alaska 99840

We would like to remove our proposal from consideration. This is proposal 12- 5AAC 84.270

Darren Belisle and Luke Rauscher



Submitted By
Mike Bell
Submitted On
12/28/2018 10:29:14 AM
Affiliation

Phone
907-518-0296
Email
bkcbell@gmail.com

Address
PO Box 171
998 Mitkof Highway
Petersburg, Alaska 99833

I urge the Board to reject Proposals 45 & 46, I do not believe they are sustainable because the bag limit of one deer no longer means anything due to the Federal Designated Hunter Program and State Proxy tags. The Designated Hunter program has gotten way out of control, almost everybody is using it and at least doubling their limit, sometimes much, much more. Until there is a limit put on how many extra tags a hunter may fill I think it would be a very bad idea to extend the deer season into November, I believe you would see a very large harvest but only for a year or two. My family has benefitted greatly for a lot of years from this program but, again, it is being used far too heavily to extend the deer season around Petersburg into the rut when the deer are the most vulnerable and hunters can get their limit one day and be right back the next day with fresh tags. Another thing to consider is the wolf and bear population, from what we have been seeing the last couple years, both populations are on the rise on Mitkof and Kupreanof. This is also going to have an affect on our deer population. Like the folks that are for these proposals I really want to hunt those first couple weeks of November but I'm afraid it wouldn't last and in a few years we would be looking to change it back again. I do agree with Fish and Games recommendation that Proposals 45 & 46 be either rejected or approved together. This will spread out the hunting pressure and be better for all. Thank you, Mike Bell



PROPOSAL COMMENTS

Alaska Board of Game
January 11-15, 2018 Meeting

From: Joel Bennett
15255 Point Louisa Rd
Juneau, AK 99801

December 26, 2018

Dear Board members,

I am a 50-year resident of Juneau, Alaska. I have been an active licensed hunter in the state for this entire period. I am also a professional photographer and recreational user, with a wide practice of wildlife enjoyment that is separate from hunting.

I was a member of the Board of Game from 1977 to 1990, and again in 1997.

PROPOSAL #4, PERMIT TO HARVEST GAME FROM A BOAT IN UNITS 1-5

OPPOSE

I believe that authorizing shooting game from a boat is to be avoided in SE Units. There is ample opportunity for persons of compromised physical ability to shoot deer from the beach in adjacent meadows in SE Alaska. The instability of a boat's shooting surface would result in a greater incidence of wounding, with the difficulty of following up a wounded animal in a timely manner. While it may be appropriate in some parts of the state, SE marine waters have not traditionally been open to this hunting method, and the status quo should be maintained.

PROPOSAL #20, CHANGE BAG LIMIT ON DOUGLAS ISLAND FOR DEER IN UNIT 1C

SUPPORT

If there is uncertainty about deer population numbers due to hunting or other pressures, it is reasonable to either reduce the number of does that can be harvested, or reduce



the overall bag limit. I support both, but at a minimum, a reduction in the harvest of does is justified.

In general, a 4-deer limit per season for deer is an extremely liberal limit. For SE Alaska. Unless harvest reports indicate that this limit is reached by a significant number of hunters, my view is that the bag limit should be adjusted downward, and the bucks-only part of the season should be lengthened in Units that have greater hunting pressure (and other stresses) than others. Douglas Island is one of those areas, with easy access to many favored hunting areas on the road system or by boat. In many years of deer hunting, both on Douglas and Admiralty island., I believe that 2 adult deer satisfy most small family needs for the year – avoiding the problem of wasted meat from freezer burn.

PROPOSAL #22. REMOVE HUNTING QUOTA FOR DOUGLAS ISLAND WOLVES:

OPPOSE

This would eliminate the Douglas Island Management Area in GMU 1-C, removing the annual 3 wolf harvest quota for the island. This Management Area was set up years ago to restrict the number of wolves that could be killed on Douglas Island to no more than 3 a year. It became a public issue when a single Juneau trapper targeted an entire pack of wolves on the west side of the island and removed them all. The Game Board at that time recognized that wolves had a place on the island--- in reasonable numbers, and that other non-consumptive wildlife interests deserved to be able to enjoy them as well. The goal of the Management Area and its quota system was to guard against over harvest of wolves on the island, something that can occur because of easy road and boat access, while allowing continuing harvest.

At the time this Management Area was adopted, the Board felt that this policy was a balanced one, recognizing that the local deer population would fluctuate, primarily in response to the severity of the winters. If wolves became a problem (and that is not supported by the data at this time), the Department quota could be raised, but a specific control on overharvest via a special management area would still be maintained overall. This policy remains sound, given the special nature of Douglas island., and the wide diversity of wildlife users that have an interest in deer and wolves on the island.

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

OPPOSE

This would open up Mount Juneau and Mount Roberts, and the entire Juneau area from Mendenhall river/glacier to Taku river/glacier to archery-only mountain goat hunting (except killing nannies with kids would be prohibited August 1-Nov 30). The area is presently closed except for an area around Blackerby Ridge. As you all know, several



areas in close proximity to the Juneau road and trail system are used by people who enjoy seeing mountain goats in the wild. In fact, it is the only chance that many may ever have.

In the late 1980's, mountain goats were completely depleted from Mount Juneau and its ridges, including Mount Roberts. The primary cause was overhunting. As a result, the area was closed to hunting. Subsequently, a project was initiated by local resident volunteers, with ADFG cooperation and assistance, to transplant goats from the Snettisham area to Mount Juneau. This reestablished the nucleus of a small herd, the descendants of which can be seen in the area in the spring and summer months. This serves a broad public interest, with people being able to observe goats without the pressure and mortality from hunting. Mount Juneau and Mount Roberts rise above the City of Juneau, and goats are often in plain view of thousands of residents and visitors.

There are alternative hunting opportunities in the more remote parts of the Juneau area to accommodate goat hunters. The mountains and drainages northland west of Mendenhall river are open, for example, and accessible from the road system.

This closure should be maintained, particularly to include Mount Juneau and Mount Roberts and its adjacent ridges, in recognition of the recreational and tourism values that would be compromised by goat hunters.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU AREA (1-C)

OPPOSE

This would open the Juneau area (1C) to black bear baiting. Baiting black bears as a hunting method has been prohibited in the Juneau 1-C subunit for over 30 years, in recognition of the many problems caused by bears becoming accustomed to human food, as well as other conflicts. Juneau has a chronic garbage bear problem at the present time. Attracting bears to bait stations with human food will only add to this problem through food conditioning.

The problem of food conditioning bears through improper garbage handling became so acute that a special Black Bear Committee, was formed in Juneau, consisting of members from ADFG, law enforcement, the local refuse company and citizens. The committee was charged with finding ways to alleviate the problem of bears obtaining garbage and human food. Allowing bear baiting in Juneau would work against the positive measures this committee has achieved.

Given the densely populated Juneau area, with its constricted geography between ocean and mountainside, an earlier Board recognized that Juneau 1-C was not appropriate for this activity. An extensive trail system exists in the City and Borough of Juneau, along with many roads and residences throughout the area. The distance restrictions around dwellings, roads and trails that apply to bear bait stations in present



regulations are insufficient to keep food-conditioned bears from travelling into residential and high use public areas around Juneau.

A Proposal to open the Juneau area to bear baiting has not been made in the nearly 30 years since the prohibition was adopted. I believe that the reason for this is that there is insufficient justification for it.

There are many other opportunities for black bear hunting in the alpine areas surrounding Juneau. Bear baiting is fundamentally inappropriate for our area, and will result in unnecessary conflicts.

Finally, given the urban character of Juneau, and the controversial nature of the hunting method, it would be unfair to the City and its residents to adopt a regulation of this type without the Board or the Department holding a public meeting in Juneau and soliciting more widespread public comment.

Sincerely,

A handwritten signature in black ink that reads "Joel Bennett". The signature is fluid and cursive, with a large initial "J" and a long horizontal stroke at the end.

Joel Bennett



Submitted By
Kristine Benson
Submitted On
12/26/2018 11:13:52 AM
Affiliation

Phone
907-780-7811
Email
kbenson722@gci.net
Address
145 Behrends Ave
Juneau, Alaska 99801

Dear Board of Game members, Southeast Region: Please do NOT approve Proposal 23 regarding opening a large area that is currently closed to goat bow hunters. There are several concerns about this proposal that warrant you disapproving it. The areas proposed for change include several areas that are accessed by many hikers via well known and maintained trails. Also included are areas where viewing goats is one of the important interest points for people who hike the Nugget Falls trail or come to the Forest Service Visitor Center at the glacier.



Submitted By
Rachel K. Bergartt
Submitted On
12/27/2018 4:19:26 PM
Affiliation
Southeast Alaska Resident

Phone
9079575022
Email
dr.rachel.bergartt@gmail.com
Address
9315 VIEW DRIVE
JUNEAU, Alaska 99801

Dear Alaska Board of Game,

I am writing in support of Proposal 14, "Require trappers to post identification signs for traps and snares in Units 1–5."

Trapping and snaring through the use of unmarked trap lines currently presents an unnecessary risk to humans and dogs. This unnecessary risk is easily mitigated by the requirement of signage as described in Proposal 14. The proposed requirements are similar to those currently required for marking Bear Baiting Stations within Alaska and would pose no undue or unique burden on trappers.

As a user of wildlife resources, it is my firm ethical code that we must all bear responsibility for any danger that our consumptive activity places upon our shared community. Hence, trappers should bear responsibility for the danger that their activity poses to other user groups and mitigate that harm by placing signs within 50 yards of a trap set.

Placement of signs will alert other user groups to the potential danger ahead, allowing community members to choose whether to continue into an area where active traps are present. Posting signs delineating traplines will help to reduce the unintended capture of domestic pets and reduce risk to humans, as many hikers, families with children, and dog-walkers would simply choose to recreate elsewhere than along an active trapline. Additionally, posting of signs may actually increase the trapper's chance of successful harvest, as people may choose to avoid this area for recreation and it is common knowledge that target species for trapping tend to avoid areas heavily scented with humans and domestic canines.

Furthermore, placement of signs demonstrates that trappers are actively trying to reduce conflicts with other public resource users and shows the public that those trappers are engaging in ethical and lawful trapping. This action will go a long way toward building public support for trapping. Additionally, some trappers have voluntarily taken the initiative to use signs to mark trails where they are trapping, and this is a good-will gesture that is much appreciated within our community.

In conclusion, I fully support Proposal 14 and encourage you to do the same.

Respectfully,

Rachel K. Bergartt



Submitted By
Rachel K. Berngantt, D.V.M.
Submitted On
12/27/2018 4:19:35 PM
Affiliation
Southeast Alaska Resident

Phone
9079575022
Email
dr.rachel.berngantt@gmail.com
Address
9315 VIEW DRIVE
JUNEAU, Alaska 99801

Dear Alaska Board of Game,

I am writing in support of Proposal 13, "Require identification tags for traps and snares in Units 1–5."

As a 16-year resident licensed Alaskan hunter and fisher, I am required to identify all harvesting gear left unattended in the field (such as crab pots, shrimp pots, sport use ground tackle, bear baiting stations, etc.) or be personally attending the gear (such as fishing rods or hunting with rifles/shotguns). Trapping should be no exception. Reinstating the language requiring traps to be marked serves several key purposes:

- 1) Marking the traps with identification will keep trapping requirements in line with the rest of harvest activity occurring within Southeast Alaska. Marking is not unduly or uniquely burdensome to trappers, and therefore, trappers should identify their traps as required with all other harvest gear.
- 2) Marking the traps with identification will bolster community trust with trappers. When unmarked traps are encountered by a community member, questions immediately arise as to why active traps are unmarked and raise suspicion of the activity, triggering an immediate distrust. Requiring markings on traps will eliminate the mystery as to why active traps are unlabeled when all other harvesting gear in Southeast is required to be marked.
- 3) Marking traps with identification will aid law enforcement, reduce budget constraints and encourage responsible trapping practice. When a trap is found to be set illegally, currently, law enforcement must spend valuable time talking with ADFG sealing officers to try to piece together who owns the trap and who is known to trap in a particular area, if ownership can even be determined at all. In this time of state budget crisis, paying ADFG sealing officials and law enforcement for work to sleuth out ownership is particularly egregious and can be eliminated with a simple marking requirement. Additionally, people who may be otherwise inclined to trap illegally may think harder about that choice when their name is attached to the gear.

The only people that benefit from not requiring marking of traps is those who trap illegally or irresponsibly. This exemption is only protecting those who put the community at risk, all the while profiting personally from this public resource. Alaskans deserve better. Furbearers are a shared resource, and we must all be held accountable to use public resources in a conscientious manner.

Additionally, if trappers are concerned about the public perception of trapping, I would encourage the Alaska Trappers Association to engage in a concerted public outreach effort to educate the non-trapping community about the ethical standards of trappers and not hide behind the shadows of unmarked traps. Trappers alone can change their image - looser regulations for trapping activities only serve to perpetuate the notion that trappers are irresponsible and unconcerned about the communities they reside in.

In conclusion, I fully support Proposal 13 and encourage the Board of Game to do the same.

Respectfully,

Rachel K. Berngantt



Submitted By
Gretchen Bishop
Submitted On
12/23/2018 9:12:40 PM
Affiliation

Sinc Thanks Dear BOG members: I am writing to oppose BOG proposals number 22, and 28. I am concerned about overharvest of wolves if the limit is removed on Douglas Island. I enjoy deer hunting but also like to watch wolves, as do the tourists in our thriving tourism industry. Furthermore wolves keep their prey populations healthy. I am most concerned, however; about the proposal to permit baiting of black bears in the Juneau area. Juneau has made heroic and largely successful efforts to avoid creating garbage bears. This proposal would greatly hamper these efforts and create many garbage bears, resulting in their eventual demise. This would also embolden these bears and endanger the public. Thanks for the opportunity to comment and for your service on this board. Sincerely, Gretchen Bishop



Submitted By
Arthur Bloom
Submitted On
12/24/2018 4:44:48 PM
Affiliation

PROPOSAL #22 Remove hunting quota on Douglas Island

OPPOSED - Easy road and boat access make it possible to completely eliminate wolves on Douglas Island. Previously the BoG recognized the that some number of wolves have a place in the island ecosystem, and that non-consumptive values should be recognized. I agree with this viewpoint and do want to see the restrictions changed.

Submitted By
Arthur Bloom
Submitted On
12/24/2018 4:53:08 PM
Affiliation

PROPOSAL 23: Allow Archery hunting of Mountain Goats

OPPOSED: This area is better used for viewing of goats. The animals have become accustomed to people because of the many hikers and would be less wary. Archery equipment has become so high tech that archery hunting is only marginally less deadly than rifle hunting, especially with animals that are habituated to people.

Submitted By
Arthur Bloom
Submitted On
12/24/2018 4:59:38 PM
Affiliation

Proposal 28: Allow black bear baiting

OPPOSED: I do not believe this is "fair-chase" hunting.

Juneau has had a chronic black bear/garbage/human food problem and allowing bear baiting in a populated area would only add to the problems.



Submitted By
Joyanne Bloom
Submitted On
12/24/2018 8:08:38 AM
Affiliation

Phone
9077233604
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joyanneb@gmail.com
Address
883 Basin Rd
Juneau, Alaska 99801

Regarding proposal 28, I urge you not to support bear baiting in the Juneau area. Although I am opposed to baiting anywhere, I would compromise with allowing it in places over 100 miles from population areas. It doesn't belong in and around Juneau where:

we work hard to keep bears from becoming accostomed to planted food in garbage bins in front of our homes,

where we have dogs accompany us into wilderness areas and

where we value our wildlife for our own viewing and that of our visitors.

Submitted By
Joyanne Bloom
Submitted On
12/24/2018 8:15:31 AM
Affiliation
none

Phone
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Address
883 Basin Rd
Juneau, Alaska 99801

Regarding proposal 23, I, like much of Juneau live at the base of Mt. Juneau and enjoy goat sightings almost daily in the summer. I love to take visitors up Mt. Juneau and walk the ridge so they can see goats up close. There should be no hunting of any kind along those trails and ridges. It took money, effort and a lot of time to get a goat population back up there for all of us to enjoy. It's even a treat to the thousands of visitors who take the tram up Mt. Roberts to look over and spot goats on the Juneau ridge. Lets not reduce their recovering numbers by even one goat. Hunters need to find a place to go where there are not hikers. The two endeavors are not compatable.

Thank you for your consideration.



Submitted By
Catherine Botelho
Submitted On
12/18/2018 9:30:09 AM
Affiliation

I am concerned about the possible expansion of the local mountain goat bow hunting open area under **Proposal #23**. It is my understanding that all ridges between Mendenhall and Taku Rivers would be open for harvest if this regulation was adopted.

In recent years due to the excitement of ice-cave viewing, the foot and ski traffic around and across Mendenhall lake has markedly increased. In winter, it is extraordinary to view the number of people of all ages crossing the lake on foot, on sleds, and on skis watching for the appearance of mountain goats sunning themselves on the precipitous drops beyond Nugget Falls. There is no other place in Juneau that gives this kind of access to wildlife viewing of mountain goats. In the spring, hikers rise early to hit the West Glacier trail to scramble over the peninsula to get to a viewpoint to specifically find a spot to observe mountain goats before everyone else shows up. Anecdotaly, the last few spring and summers, fewer viewing opportunities have occurred for friends that have been making these treks multiple times each year for many years. (Population down, too many people?)

The popularity of hiking up Mt. Juneau is partially the draw of viewing mountain goats as well. It is a very accessible trail (as opposed to Blackerby which is much more challenging). When I entertain out-of-town guests, I always have several pairs of binoculars in my car for spotting mountain goats on Mt. Juneau or the ridge as we travel Basin Road. Alpine areas of Mount Roberts to Sheep Creek and West Peak are increasingly high use hiking trails. The great memories of these treks are the wildlife.

We need to protect these wildlife viewing opportunities for the greater number of people. **Keep the current closures. Please do not change the boundaries of the allowable hunting areas.**



Submitted By
Barry Brokken
Submitted On
10/29/2018 8:25:04 AM
Affiliation
Alaska Trappers Association, Juneau Chapter

Phone
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capitalimp@gci.net
Address
2355 O'Day Dr.
Juneau, Alaska 99801

Proposal 31:

As the author of this proposal, most of my ideas and concerns are listed in the body of proposal #31, however, I would like to provide a little in-sight. Perhaps 10 years ago, the trail restrictions listed in the trapping regulations, (1/4 mile setbacks from certain trails), had no provision for the use of elevated sets placed 50 yards or more from trails. I authored a proposal to allow such trapping, and through the BoG process and discussion with the BoG members, we crafted the current regulation.

It has been very successful in allowing younger trappers to participate in marten and ermine trapping, and has had little to no negative effects to other trail users. I would like to apply similar rules and requirements to submerged sets, to allow opportunity for water-oriented furbearers, (though a 5" jawspread might preclude the trapping of otter and beaver, which would run counter to the end-goal of this proposal).

Southeast in general, and Juneau/unit 1C in particular, has a very high population of such furbearers, (i.e. mink, otter, and beaver), but under current regulation, the resource is nearly off-limits to trappers wishing to trap along the road system.

Many of our younger trappers simply don't own or have access to watercraft to trap outlying islands or large river systems, and the current lack of opportunity to pursue the more common furbearers in this area is having a negative effect in recruiting and keeping new trappers interested in the activity.

As you know, the ATA actively tries to recruit and teach new trappers, stressing ethics, responsibility, humane practices, and public out-reach. This proposal would aid in such endeavours.

Thank you,

Sincerely, Barry Brokken.



Submitted By
Odin Brudie
Submitted On
12/27/2018 11:03:24 AM
Affiliation

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907-209-4344

Email
odin@gci.net

Address
512 6th St
Juneau, Alaska 99801

Re: SE Board of Game Meeting Jan 11-15 in Petersburg

Dear Game Board Members,

Regarding Proposal 22 - Remove (Wolf) Hunting Quotas on Douglas Island.

I OPPOSE this proposal. Like a MAJORITY of the backcountry users of Douglas Island, I primarily use the island for NON-HUNTING Recreation, mostly skiing and hiking. **I occasionally hunt on the island.** We are very happy to see and hear the return of wolves to the island. A dozen years ago, wolves had been exterminated from the island by one or two trappers. This must not happen again. Wolves are an essential part of a wild, healthy, and diverse animal population here in Juneau.

Regarding Proposal 23 - Bow Hunting quota for Mountain Goats in the Front-Country area of Juneau.

I strongly oppose the hunting of goats in this area. Mt. Juneau is among our biggest attractions for hikers, both resident and visitors. Seeing Mountain Goats are the HOLY GRAIL for a trip up the Mt. Juneau ridge. Some years, there are precious few goats, some years your chances are good of seeing them. When they are present in good numbers, hikers are in VERY CLOSE PROXIMITY to the goats. Allowing any hunting of goats on the Mt. Juneau Ridge would be irresponsible, unsafe, and a bad precedent.

Thank you for considering my perspective, which I share with many of my Juneau compatriots.

Sincerely,

Odin Brudie
512 6th St.
Juneau, AK 99801
odin@gci.net



From: Richard Caulfield
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG comment: Hunting proposal #22--Hunting wolves on Douglas Island
Date: Wednesday, December 26, 2018 10:28:38 AM

Dear Board of Game:

I've been an avid hunter for all of my 44 years in Alaska. I'm opposed to changing the regulation about hunting quotas for wolves on Douglas Island. There currently are opportunities for hunting and trapping wolves on Douglas, but there needs to be a balance that avoids over harvest. Keeping the current quotas in place is a way to do that. I oppose proposal #22 that seeks to do so, and I urge you to reject that proposal.

Thank you.

Rick Caulfield

--

Rick Caulfield
15205 Point Louisa Road
Juneau, AK 99801

caulfield99801@gmail.com



From: Richard Caulfield
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG comment: proposal #23
Date: Wednesday, December 26, 2018 10:34:59 AM

Dear Board of Game:

I've been an avid hunter in Alaska since I first came here 44 years ago--moose, caribou, deer, bear, and small game.

I oppose proposal #23 about expanded archery hunting of mountain goats near Juneau because there are already

such opportunities and there is a need to balance interests of hunters with non-consumptive uses/viewing of mountain

goats in these often-visited areas. I'm also concerned about safety for many residents and visitors hiking trails near

Juneau when often-times ill-trained bow hunters are seeking to take goats. There are other opportunities for archery

hunting that are located away from these highly-used areas. I oppose proposal #23 and ask you to reject it.

Thank you.

Rick Caulfield

--

Rick Caulfield
15205 Point Louisa Road
Juneau, AK 99801

caulfield99801@gmail.com



From: Richard Caulfield
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG comment: Bear baiting in 1-C (#28)
Date: Wednesday, December 26, 2018 10:43:09 AM

Dear Board of Game:

I've hunted every year of my 44 years in Alaska--moose, caribou, bear, deer, and small game. I've never understood why Alaskans, who have access to such amazing opportunities for fair chase hunting, have to resort to bear baiting. It may be done commonly elsewhere, but it makes no sense here--and especially in areas where we struggle to keep bears from becoming habituated to human food. I've had bears walking through my yard here in Juneau, but thankfully they didn't find food. I don't think it's smart to encourage bears to seek out bait stations when we're trying to avoid bear-human interactions in populated areas. There are plenty of other opportunities for hunters to take a bear without using this practice. I've used those opportunities, and so can they. Please reject proposal #28.

Thank you.

Rick Caulfield

--

Rick Caulfield
15205 Point Louisa Road
Juneau, AK 99801

caulfield99801@gmail.com



Submitted By
Daniel Coleman
Submitted On
12/28/2018 3:42:26 PM
Affiliation

Phone
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Address
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Juneau, Alaska 99801

Dear Board of Game,

I'm writing in opposition of PROPOSAL 19 5 AAC 92.510(6). Areas closed to hunting. Road systems that have access to hunting grounds are few and far between in our area. The public lands that Hecla is proposing to restrict access to are our lands, not mining property. It is not right for them to deny the access of myself, my family, or friends to public lands that should be safely regulated to allow harvesting of game. For years there have been few incidents and no loss of life. We need to try regulation and enforcement of safe hunting practices before limiting access to all hunters. Don't let a few rotten apples ruin the public's access to a valuable road system that puts food on the table of many families.

If Hecla is truly concerned about the safety of their employees I think they should look at incidents of mine and bear safety which have caused more fatalities than hunting.

Sincerely,

Dan Coleman



Submitted By
Brett Collins
Submitted On
12/28/2018 12:36:55 PM
Affiliation

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1024 Wee Burn Drive
Juneau, Alaska 99801

I'm a hunter, a Juneau resident who lives on North Douglas and a tour guide in the region. I strongly object to proposal's 22, 23, and 28.

Proposal 22. The reality is that little is actually known about the wolf pack on Douglas Island. Data collected is anecdotal, and often reported in by hunters and trappers. Making a decision based on anecdotal data goes against scientific reasoning. Maybe instead of blaming wolves we should look at how it's managed in terms of tags given out. Yes wolves take deer, but so do the many hunters with the easy access that the trails in Douglas provide. While I have heard wolves, and seen sign, I'm yet to see a wolf on Douglas Island. I'd be stoked to see one in the wild, as would many of my friends, both hunters and non-hunters. They also belong here, were here before humans, and what right do we have to control their population just so we can go shoot more deer?

23 The mountain goat population around Juneau is a unique feature to have here. I get to fly with tourists as part of my summer job, and it's a lot of fun pointing goats out to them. I also enjoy being able to go up to the ridges in my own time, and like the fact I may be able to see mountain goats, and get relatively close to them. If it gets opened up to hunting again, considering how easy it is to get up to the ridges in Juneau, the population will dwindle quickly (and people will most likely start blaming wolves!!), and many will miss the awesome opportunity to see these beautiful animals in the wild.

28 Bear baiting in Juneau seems like a terrible idea. We already have a problem with bears being attracted to human food, it doesn't seem prudent to let people bait traps nearer a built up population. I know it's accepted in other parts of Alaska, but perhaps that should also be looked at!

Cheers, Brett Collins



Submitted By
Judy Crondahl
Submitted On
12/23/2018 7:29:01 PM
Affiliation
Resident

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Proposal #22: I am opposed to removing limits on hunting of wolves on Douglas Island. This could decimate an entire population and harm the diversity of the island's ecosystem.

Proposal #23: I am opposed to instituting an archery hunt of mountain goats on Mt. Juneau and Mt. Roberts. I remember when the goats were brought in and since then it has provided a wonderful viewing opportunity for both residents and visitors. The telescopes on the waterfront provide a real thrill when tourists and locals can get a good view of goats.

Proposal #28: I am opposed to bear baiting. This is against everything the city has been trying to do to cut down on the garbage bear problem in the area.



Submitted By
Hanna Davos
Submitted On
12/28/2018 9:37:21 AM
Affiliation

As a lifelong resident of southeast I find it odd that proposal 19 is submitted under the Sitka region instead of Juneau. I am not in favor of Hecla Greens Creek Mine proposing shutting down 1/4 mile swaths of land to hunting. Greens Creek Mine has a safety procedure in place that has served them very well for the past 30 years, with the exception of the incident this summer they have a stellar safety record. i see no need for further encroachment on land that is being leased to them.



December 27, 2018

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

Re: Comments for the 2019 Region 1 BOG Meeting

Thank you for the opportunity to submit written comments relating to the proposals for the Petersburg Board of Game meeting, January 11-15, 2019.

My wife and I have lived in Sitka for the past 45 years. Our 3 children were born and raised in Sitka and all 3 continue to reside and work in Alaska. I have worked as a hunting guide in SE Alaska since 1985 and currently hold a Master Guide license.

Proposal 3

I am opposed to this proposal. I believe that meat salvage requirements for Sitka blacktail deer should be the same as for other big game species that are hunted for food. Although there is not a great deal of meat on the ribs, the rib meat is good quality and not difficult to salvage.

Proposal 4

I am opposed to this proposal. I believe it encourages unethical hunting practices. Allowing hunters to shoot at big game from a boat will result in unnecessary wounding of game animals for two reasons. First, a boat is not a stable shooting platform due to wave action and makes target acquisition more difficult. Second, game animals on a beach often spot the approaching boat at a distance and this, in combination with rocky underwater approaches to many beaches, results in shots being taken at excessive ranges.

The other ethical issue here is that hunters shooting from a boat may not attempt to go ashore and search for the animal if it does not show obvious signs of a hit, and runs off, particularly if the weather is poor and breaking waves on the beach. Wounded animals, even those that are mortally wounded, do not always show obvious signs of being hit before running into cover; this is particularly true of brown bears and black bears. Failing to follow up animals shot from a boat is almost certainly going to happen if this proposal is passed.



Proposal 7

I am opposed to this proposal. SE black bears are a very important and highly sought after big game resource. These bears are regarded as some of the biggest black bears in North America. Eliminating the sealing requirement for a portion of the black bears harvested will result in the loss of valuable information that is needed to make management decisions.

Proposal 8

I am opposed to this proposal. The basis for the proposal is in error. There is no guide requirement for non-resident black bear hunters in SE Alaska. The drawing requirement for unguided nonresident black bear hunters was put into place at the November 2010 Region 1 BOG meeting because prior to this time there was no way to control the unguided nonresident black bear hunting effort in SE. The guided nonresident hunting effort was found to be already effectively controlled through the Forest Service's special use permitting system. However, the 2010 BOG meeting did not establish a requirement for nonresident black bear hunters to hire a guide, nor has there ever been such a requirement.

Proposal 9

I am very cautiously in support of this proposal. The black bear drawing permit hunts in 1B, 1C, and 1D are undersubscribed each year. Also, there are no resource concerns for the black bear populations in these management areas. When the black bear drawing system was established in 2010, there was not an overharvest issue in 1B, 1C, or 1D either; but instead, a concern that if the drawing requirement was just put into place in GMU 2 and GMU3, nonresident hunting effort would move to GMU 1. Since this did not happen, it is reasonable to conclude that a drawing in these management areas is not needed.

However, the non-resident draw system for black bear in SE also resulted in a major reduction in the illegal guiding taking place on transporter vessels since these operators could no longer pre-book large numbers of non-resident hunters. A walk around any one of the hunting/fishing trade shows will confirm that this problem of illegal guiding is still common in areas like Prince William Sound and Kodiak, but is now much less common in SE Alaska. I am concerned that eliminating the draw for unguided nonresident black bear hunters in GMU 1 will allow a foothold for this practice to get reestablished in SE. If this happens, the impact will be felt not only in GMU 1 but in GMU 2&3 as well, due to their close proximity to GMU 1. If the draw will no longer apply to GMU 1, a system should be put in place to closely monitor the transporter activity in the area along with a plan to effectively respond to any significant increase in this activity.

Proposal 49/50

I am opposed to these proposals, as written. When the 2010 black bear draw was established, hunting guides entered into a handshake agreement with the Department of Fish & Game to self-limit their black bear hunting effort to maintain guided harvest at 2007-2009 levels. In general, this meant that each guide would take fewer black bear hunters than allowed by their Forest Service special use permit allocation. Guides have held to this agreement, even though in some cases this has resulted in a permanent reduction in black



bear allocation. The Forest Service “use it or lose it” policy is that if an allocation is not fully used over the course of 5 years, the allocation will be reduced to a lower number because of the non-use. This happened to me a couple of years ago and no doubt happened to other guides, as well.

If the Department feels that the resource can handle additional hunting effort, consideration should be given first to the guided nonresident component because of the reductions that occurred through the handshake agreement.

In addition, the 2010 draw did not anticipate any negative impacts on resident hunters. In fact, in discussions about the drawing system it was an important consideration that resident hunters not be negatively affected. Since that time it has become apparent that some resident black bear hunters have been adversely impacted through the second degree of kindred draw requirement. I would support eliminating the drawing requirement for second degree of kindred nonresident black bear hunters. These hunters would still be required to obtain a registration permit in order to monitor this component of the black bear hunting effort.

Proposal 51/52

I support these proposals. The shorter harvest reporting and sealing requirements for Kuiu Island were put in place years ago when the transporter activity on Kuiu was much higher than it is currently. As I mentioned earlier, the unguided nonresident draw system has significantly reduced this component of the black bear hunting effort. This change, along with a number of enforcement actions against transporters in the region, has helped control black bear harvest on Kuiu Island (and elsewhere) to a level where the shorter reporting and sealing are no longer necessary.

Thank you for the opportunity to comment on these proposals.

Sincerely,

Brad Dennison
Master Guide
Sitka



Submitted By
Chris Done
Submitted On
12/28/2018 12:25:39 PM
Affiliation

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PO Box 20624
Juneau, Alaska 99802

I strongly support both Proposal #13 and #14. Trap lines, traps, and snare need to marked / identified because trappers are not the only users of the lands where traps are set. Other users need to be aware of the trap so they can avoid them. Other consumptive user of fish and wildlife are required to identify and take ownership of their gear. Trappers should also.



Submitted By
Ritchie Dorrier
Submitted On
12/27/2018 10:50:42 AM
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Regarding Proposal #28, compelling the Department to issue black bear baiting permits, I see no sense in this proposal. While I realize this practice may be allowed in other unique areas of the state, it is my opinion the bears are already tempted by human food and waste, and bear baiting would potentially exacerbate the situation. And as a hunter, I feel baiting bears is not in alignment with the ethics of fair chase hunting. Thank you for your consideration of my opposition to Proposal #28.



Submitted By
Danielle L Duncan
Submitted On
12/24/2018 10:28:02 AM
Affiliation

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Address
3264 MENDENHALL LOOP RD #19,
19
JUNEAU, Alaska 99801

This comment is in regards to PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES: I disagree with the proposal because a three wolf harvest is plenty for Douglas Island and if we harvested more, it would not lead to having more deer, as other wolves would come into the territory. There are more than enough deer around southeast and no need to cull wolves who perform essential ecosystem duties and are just as important as deer. Thanks for your consideration.

Submitted By
Danielle L Duncan
Submitted On
12/24/2018 10:34:56 AM
Affiliation

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Address
3264 MENDENHALL LOOP RD #19,
19
JUNEAU, Alaska 99801

This is in regards to PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS. I am firmly against this proposal because there are more than enough mountain goats to be harvested outside of the greater Juneau area. The goats are more valuable for tourism than in a few people's stomachs. The idea that someone would be using a bow and arrow in an area heavily used by recreational hikers and their dogs is unreasonable and dangerous. There had been no hunting of the goats on Mt. Juneau for a long time and I'd like to keep it that way.

This area is better used for viewing and non consumptive enjoyment of goats without the pressure and mortality from hunting. There are alternative hunting opportunities in the more remote parts of the Juneau area to accommodate goat hunters— the mountains and drainages northland west of Mendenhall river are open, for example, and accessible from the road system. The value of goats for viewing for our local population and summer visitors is obvious.

Thanks for your consideration~

Submitted By
Danielle L Duncan
Submitted On
12/24/2018 11:53:02 AM
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19
JUNEAU, Alaska 99801

This comment is in regards to PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU. I am firmly against this proposal both on moral and safety grounds. Bear baiting is an unfair and inhumane hunting practice that should never be allowed in the Juneau area. It is also dangerous to attract bears when there are many people in the area hiking, etc. I find it appalling to even propose bear baiting in southeast Alaska. Thanks~



Submitted By
Luke Fanning
Submitted On
12/27/2018 8:39:10 PM
Affiliation

I am writing in SUPPORT of proposal #22, which would eliminate the Douglas Island Management Area. Effectively, this would end the 3-wolf annual limit on Douglas Island, and Douglas would be managed under the same plan as the remainder of unit 1C.

I am an avid hunter who lives on Douglas Island. I have hiked and hunted extensively for over 20 years. In recent years, the wolf population on Douglas has increased substantially, and wolf predation is adversely impacting the deer herd. In addition to wolf sightings, we're finding multiple wolf kills in the spring while grouse hunting, and there is more wolf sign on the island than I've ever seen before. In some areas of the island that typically hold large numbers of deer, deer sign has been very sparse, yet there is a high amount of wolf sign—it appears the deer are under a lot of pressure from the wolves. We are also seeing wolves on the beach while fishing during the summer, and the wolf population seems to have grown substantially. The department has already shared in their comments that they have heard numerous similar reports.

While the deer population in neighboring areas is doing very well after several successive mild winters, the Douglas Island deer are not. ADF&G is now seeking to limit the taking of does on the island, citing concern over wolf predation as a driving factor.

The bottom line is that the Douglas Island Management Area is no longer reasonable given the growth in the wolf population and the adverse impact to the deer herd. Proposal #22 should be approved so that the department can manage the Douglas Island wolves consistently with the remainder of area 1C.

Sincerely,

Luke Fanning
Douglas Island, Alaska

Submitted By
Luke Fanning
Submitted On
12/27/2018 8:58:23 PM
Affiliation

I am writing in SUPPORT of proposal #16. Prior 2008, the waterfowl season in SE Alaska ran from September 1 – December 16. This gave hunters the most opportunity to focus on migratory birds. When the season start date was delayed by two weeks in 2008, it effectively triggered a loss of opportunity in the peak season when the early migrating flocks (particularly wigeon, pintail, teal and migrating mallards) are harvested. Once those birds are gone, all opportunity to hunt them is lost.

The bottom line is that the season start date should be brought back to September 1st in order to maximize hunting opportunity during the peak season.

Sincerely,

Luke Fanning



Submitted By
Luke Fanning
Submitted On
12/27/2018 9:05:34 PM
Affiliation

I am writing to OPPOSE proposal #15, which would result in a dramatic loss of hunting opportunity during the early weeks of the waterfowl season in SE Alaska, when the migrating birds are coming through SE Alaska. The proposal seeks a later end to the season in order to increase late-season hunting days primarily for targeting of sea ducks and resident mallards. In many areas of SE Alaska, the other birds (teal, wigeon, pintails, etc) are all gone by then, so this proposal would increase opportunity for some hunters, at the expense of peak season hunting opportunity for the majority during the peak of the migration.

Please do not approve this proposal. Sincerely,

Luke Fanning



Submitted By
Laurie Ferguson Craig
Submitted On
12/27/2018 7:56:40 AM
Affiliation
none

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Address
PO Box 33306
Juneau, Alaska 99803

I oppose Proposal #22 regarding wolf trapping and hunting on Douglas Island. I am a longtime Juneau resident (49 years) and I recall the uproar over the extermination of the Douglas wolf pack by one trapper many years ago. Our wildlife approaches have changed over the years to strongly favor non-consumptive uses. We appreciate the value of predators in the balance of nature in Alaska which represents one of the few remaining American places where wildlife can be viewed in a truly natural setting. I oppose the removal of the current regulation.

Submitted By
Laurie Ferguson Craig
Submitted On
12/27/2018 8:15:54 AM
Affiliation
none

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I oppose Proposal #23 regarding opening certain areas around Juneau to archery hunting of mountain goats. Within this area are very popular mountain goat viewing sites. Mt Bullard, adjacent to Mendenhall Glacier and within sight of the visitor center and its more than half million visitors, is home to a population that are viewable year round by half a million viewers. Hunting activity is easily viewed from the center's windows and, in particular, when wildlife watchers use the spotting scopes provided by the Forest Service. As testimony to this phenomenon of easy visibility, one day from inside the visitor center we watched a mother bear kill the first baby goat born on the mountain. It was a National Geographic moment that distressed some visitors and children. I would not want to observe a hunter do the same thing in front of visitors, or carry a carcass through the parking lot. I am a retired naturalist with 14 years' experience serving guests at the Mendenhall Glacier Visitor Center. The watchable wildlife value of these animals far exceeds the value of a consumptive user who has alternative places to harvest a goat. The same appreciation of wild goat viewing applies to Mt Juneau. The opportunity to teach and learn about wild animals in their natural setting far outweighs the taking of these animals by bow or other hunters. Additionally, local hikers are using more trails with access to high country where mountain goats are commonly seen. In keeping with greater ideals of outdoor fitness and health, we would not want to endanger the public or negatively impact their hiking experiences. For these reasons I object to Proposal #23.



Submitted By
Laurie Ferguson Craig
Submitted On
12/27/2018 8:25:18 AM
Affiliation
none

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I strongly oppose Proposal #28 which would allow bear baiting. As a long time Juneau resident (since 1969) I have observed bears and the public's attitude about them shift significantly from fear to tolerance and appreciation. Allowing bait stations would undermine and contradict these new attitudes of co-existence. Baiting bears directly conflicts with public education efforts to control human food attraction for bears. One high-profile case in Juneau convicted a person for feeding bears. The bears' behavior, when the feeding was discontinued, negatively affected many other residents' potential safety when the bears sought human food on neighboring properties. Bears learn very quickly that human food sources are easy and accessible. Trash control continues to be a problem in Juneau. We want to keep people safe and bears wild, and preventing food conditioned bears is essential to that effort. Reject Proposal #28 about bear baiting, please.



Dear Ted and Nate,

During a recent HCC meeting, the SE BOG schedule and GMU 2 proposals came up. This letter is a result of that discussion from me, not the HCC. However, please note that there have been no opinions expressed from within the HCC differing from what I am about to present other than deer allocation which has not been discussed.

As you both know, the 1989 and 1991 anti-wolf harvest ballot initiatives hit our state hard relative to maintaining healthy, sustainable wildlife populations. From my world, the impact on the Upper Kuskokwim, Alaska Range as a whole, Talkeetna's, Wrangell's and the Chugach were hit hard with subsequent depressed ungulate populations, many of which have never fully recovered. For those of us who have keen observation ability and who spend significant time in the woods, this situation was emphasized by significant increases in wolf populations easily seen by actual sightings, tracks, dens and reduced rodent and ungulate populations.

Please note that this is exactly where POW is currently. Nearly every one of my employees who hunt, camp or spend regular time in the field have seen significant increase in the POW wolf population. Even to the point that many hunters are seeing wolves in packs, pairs or individuals in nearly every outing. They are not seeing deer and very few have the harvest they would like to have to provide the food they are used to for their families. This is not a Hollis local reflection. It is an Island wide reflection.

Note that I have seen as many live wolves while living here in this rain forest environment for going on two years as I have seen in the past 35 years total. Every game trail in every preferred deer habitat has something in common currently; "heavy wolf sign". Also, please note that I have not see a deer in over a month but wolf howling's and sightings are common.

One of my employees who spends as much time as possible with his wife and children out hiking, hunting, fishing, camping, wood cutting etc. had three different instances this past summer and fall where packs of wolves negatively impacted their excursions by surrounding them in the woods, howling, barking etc., in my mind to lure their dogs away from them. Each of these incidents were in differing locals. One of my geologists while doing surface recon just above the mine had wolves run up and bark at him in the forest. Calling deer here is a common hunting practice. Calling deer here now has just as much chance of luring wolves as it does deer.



The following are my reflections and suggestions for your consideration. The only reason you are receiving this letter is that there is a problem here and without affirmative action, it will not get better by itself. Please note that I am not actively hunting here on POW. Have brought my good Wildlife Technologies call down to try and harvest a wolf or two but each year the wolf season is closed by emergency order before I have a chance to get out and enjoy trying.

1. As much as I want to believe in the DNA based wolf population density/extrapolation estimates, there has to be failure in that process somewhere. There are too many wolves for it to be correct. If it were me, I would go back to the lady who developed the DNA identification process used here, confer carefully with her, and carefully review every part of the population extrapolation aspect from the beginning to learn where the failure has occurred. My personal thoughts are that the DNA work may be valid where it occurs, but using it for island wide extrapolation is not effective. I know that certain AB's would differ on this comment but I am not at all comfortable with the density estimation.
2. Here we are yet once again with hunters dividing into various user groups all competing for what is left of declining ungulates. This is a statement in itself for POW where the recent winters have been mild and the habitat is prime for ungulates, and the hunter effort is not growing.
3. The illegal harvest/unreported wolf harvest works against everyone's best interest and those involved need to be fully prosecuted. However, the citizens who resort to this activity statewide in most cases have one thing in common: "the management system is not working".
4. For the past three years, the wolf harvest objective has been met within a few weeks or even days of the season opening. This itself should shed some light on the situation.
5. There should be no doe harvest allowed until things turn around.
6. There could be a reduction in deer harvest opportunity say from four deer to three for the next BOG cycle or something similar to help support the following recommendation.
7. I would look seriously at increasing the wolf harvest objective by 2 to 3 times for the next BOG cycle. Then reconciling encouraged predator and prey science and inventory data to help



8. To the amount you feel comfortable with, consider conferring these types of actions for support from the FSB during the BOG meeting to help bring various user groups together.

9. Please consider that prior to the 1989 and 1991 ballot initiatives we had a one brown/grizzly bear harvest limit every four years nearly statewide. This was because we had healthy and, in many cases, growing numbers of ungulates. Once the result of the ballot initiatives surfaced and the ungulate populations were dropping rapidly, the level of bears became a concern on what was left of the ungulates. Thus, the need to harvest more bears.

10. The BOG actions taken over the past recent years regarding black bear conservation and harvest on POW have worked, but have probably contributed to an increased number of black bears. You should look carefully at where you can increase some additional harvest opportunity without spiraling back to where the situation was six or seven years ago.

11. There is opportunity for you to consider the above within several of the SE GMU 2 proposals, especially the ADF&G proposal #43 which I believe was well written.

Regardless of the above, wishing you both the Very Best and Thanking You for your Significant Commitments to the State and our Wildlife.

As Always,
Bobby Fithian



Submitted By
Anne Fuller
Submitted On
12/26/2018 12:02:13 PM
Affiliation

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7943 N Douglas Hwy
Juneau, Alaska 99801

I am writing in opposition to proposal 28 to Issue permits for using bait or scent lures to hunt black bear in Unit 1C
Douglas Island is a place where I walk, cycle, hike, and paddle. I use trails and I cross meadows in lots of different conditions.
Sometimes I see creatures, more often I see sign.

We don't need bait stations. Hunting can be properly regulated to be safely and efficiently conducted on the island. The prohibition of bear baiting makes sense on this island with all the houses, streets, trails, and roads. The bears should be rambling and finding food on their own.



Submitted By
Jeanette Gann
Submitted On
12/10/2018 10:57:55 AM
Affiliation

I would like to voice my support for PROPOSAL 13 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. Require identification tags for traps and snares in Units 1–5.

If it's required that all crab pots must have contact information associated with them, it stands to reason that traps on land should do the same, especially if unintended game and /or pets become ensnared in said traps, which they often do.

Thank you for the opportunity to comment.

Jeanette Gann



JOSEPH W. GELDHOF

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VIA HAND DELIVERY

December 26, 2018

Alaska Department of Fish & Game
Board Support Section
Post Office Box 115526
Juneau, Alaska 99811

Re: Alaska Board of Game Proposals # 22, 23 & 28

Members of the Game Board:

I am writing with regard to the above-referenced proposals, all of which will have an obvious impact on wildlife resources in Unit 1-C. As a resident of Juneau, I am concerned the proposals are inconsistent with balanced resource management and detached from actual biological considerations.

PROPOSAL # 22

This proposal would remove the current limit on harvesting wolves on Douglas Island by eliminating the Douglas Island Management Area in GMU 1-C. At present, the Douglas Island Management Area limits the annual wolf harvest quota for the island to three wolves. This limit was set up years ago by the Game Board based on the recognition that wolves had a place on the Douglas Island. Putting a quota on the harvest of wolves on Douglas Island makes sense in order to guard against over harvest of wolves, something that can readily occur because access to areas used by wolves on Douglas Island by road and skiff is easy.

Douglas Island should have some wolves. Not only does a wolf population afford non-consumptive users of our wildlife with an opportunity to see wolves, having at least a small population of wolves on Douglas Island probably keeps coyotes and feral dog populations in check. Remove the wolves and you risk creating a problem with coyotes and dogs running deer or otherwise stressing deer populations in an un-intended and inefficient manner.



I am also concerned the proposal here isn't really based on actual field work or some sort of biological reality. There is no obvious justification for removing the quota on wolf harvest for Douglas Island. Instead, this proposal appears to me to be sort of an *ad hoc* reaction to the fact that the wolves exist and perhaps that deer population on Douglas Island are lower. Absent genuine findings by department biologists that demonstrate the wolf population is obviously excessive and detrimentally impacting deer population and the overall biological well being of Douglas Island, the Board of Game should pass on adopting this proposal.

PROPOSAL # 23

This proposal would open up Mount Juneau and Mount Roberts, and the entire Juneau area from Mendenhall River to Taku River to archery-only mountain goat hunting with some exceptions for the taking of nannies with kids, would be prohibited August 1-Nov 30). Most of this area is presently closed to hunting except for an area around Blackerby Ridge.

I have bow hunted in New York and Michigan and have some apprehension as to the difficulty of hunting by this method. Frankly, even if one could get a clear shot on a goat in the typically rugged and steep inhabited by goats, the likelihood that the goat might run following being shot for a bit and wind up falling hundreds of yards into a remote and difficult to access place is high.

It is also worth considering that the now established resident population of goats in the Mount Juneau and Mount Roberts area was established in the 1980's. The original population of goats in close proximity to Juneau was re-established through the hard work of local residents in coordination with the Department of Fish & Game. The reintroduction of the goat population is an obvious success story and the goats are frequently viewed by Alaska residents and tourists because the goats reside in close proximity to the Juneau road and trail system. From a pure economic perspective, maintaining a viable population of goats on Mt. Juneau that are not hunted and accordingly relatively placid and viewable is smart.

It may make sense for the Game Board to open areas outside of the Mt. Juneau and Mt. Roberts area for goat hunting using bows but any move to allow hunting of goats in an area where they are obviously enjoyed by tourists and locals is exactly the kind of change in the status quo that accelerates dismay about hunting. Modify this overly broad proposal to protect all goats in the Mt. Juneau and Mt. Roberts area.



PROPOSAL # 28

This proposal would open the Juneau area (1C) to black bear baiting at bait stations. This proposal is a dumb idea and deserves to die.

Baiting black bears as a hunting method has been prohibited in the Juneau Game subunit for over 20 years, in part because baiting bears accelerates problems with bears. A baited bear easily converts to a garbage bear and increases the likelihood of a bad human/bear interaction.

I am not advocating for a restriction on hunting black bears in Juneau but the use of bait stations goes against my sense of proper hunting ethics and the historic tradition of hunting by fair chase. Alaskan is not the kind of place where hunters should or need to bait our wildlife in order to harvest a bear or any other species. Bear baiting is a despicable practice and no competent or self-respecting hunter would willingly acknowledge they harvested an animal habituated to bait. Please pass on this proposal that has no basis in biological necessity, proper game management or according to hunting ethics.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "Joe Geldhof", written over a horizontal line.

Joseph W. Geldhof



From: Catherine Goulait
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposed regulation changes Juneau area
Date: Monday, December 24, 2018 2:14:34 AM

To the Board:

My name is Catherine Goulait.

My residence is 5175 Thane Road, Juneau, Alaska, 99801.

My reason writing to you concerns Proposals #22, #23 and #28. I have lived in Juneau for thirty-four years and value the unique environment we have here. Therefore I am opposed to the aforementioned proposals which would change regulations in the Juneau area that have proved efficacious to our special circumstances and our geography. Because of this geography we live in close proximity to our wildlife areas. We have many summer visitors as well as residents who appreciate the unique opportunity of viewing wildlife in their natural habitat with ease. Our commercial establishments benefit greatly from the ability to offer this accessibility to visitors and residents alike.

As to proposal #22 which is the removal of the hunting quota of three wolves a year on Douglas Island the Game Board recognized years ago that wolves had a place on the island in reasonable numbers. The community has an interest in being able to enjoy wildlife sightings and interactions. It has been proven in the past that it is all too easy because of access and road systems on the island to over harvest. This can eliminate viewing and photography opportunities and cause disharmony in the community.

As to proposal #23 archery hunting of mountain goats, the entire area of Juneau had been over hunted and a population had to be reestablished in the early 1980's. Again, visitors to the tram, the visitor's center at Mendenhall Glacier, and the many hiking trails of Juneau enjoy the ability to view these magnificent goats in their natural habitat. As I understand there is already designated area for hunting west of the Mendenhall Glacier. Let us save the areas we live in for viewing and appreciation in non consumptive ways.

As to proposal #28 to allow bear baiting in Juneau. We already live in such close proximity to wildlife that acclimating them to human food sources could quickly become a detriment and nuisance to the citizens of this city. We are very careful with trash and it's disposal here as it is recognized that otherwise problems arise with acclimated bears. Also in the summer we have many visitors who hike the Juneau trails. If the bears come to associate humans with foodstuffs it endangers the human population. This is not even to address the issue of fair hunting practices which should be considered.

Thank you for consideration of the concerns of a long-time resident who loves her community and all the wildlife it encompasses.

Catherine Goulait



Submitted By
Susi Gregg Fowler
Submitted On
12/27/2018 10:21:51 AM
Affiliation

Dear Members of the Board of Game:

I recently heard about Proposal #23, allowing archery hunting of mountain goats on Mt. Juneau and nearby areas. I am a lifelong Juneau area resident. I grew up fishing, hiking and hunting here. And yes, I hunted on Mt. Juneau. In the early 60's it was a great spot for ptarmigan. By the time I was in college, though, I had stopped hunting on Mt. Juneau as had my dad, an avid sport hunter. But Juneau's population had grown. It was still much smaller than it is now, but the change in population seemed to warrant a change in our behavior.

Proposal #23 opens a huge area to bow hunting, and much of that area is currently extensively used for non-hunting activity—and, I believe, for uses that are not compatible with allowing archery hunting. My husband and I regularly watch the mountain goats, both from our home and from the trail. We've shared our binoculars with visitors from tour ships walking along Basin Road. They're ecstatic at the sight of these grand creatures. Our grandson frequents the Mt. Juneau trail and ridges with friends and running team. Our daughter has taken both our grandchildren camping along the ridge where they have experienced incredible, thrilling goat sightings (being mindful of the fact that these are wild creatures). Allowing bow hunting seems an unnecessary risk both in terms of public safety and the risk of losing a very special natural resource.

I ask you not to implement Proposal #23.

I don't understand the purpose of Proposal #23, bear baiting in the Juneau area. Those who have spent time in Juneau know that bears habituated to human food are an ongoing problem for us, a problem that has gotten much worse with our increased population. I can't see any positive benefit to this proposal, particularly given the population density of our community. **I hope you will not implement Proposal #28.**

Regarding Proposal #22, removing a hunting quota on Douglas Island wolves, I am aware that there have been increased wolf sightings and concerns in the Juneau area. Although I have not seen wolves myself in our frequent hikes around the island, people I know have. Some are thrilled and others are alarmed. It would seem to me a more appropriate response to concerns about human/wolf contacts due to increased wolf population would be to reexamine population numbers and determine whether there is a more appropriate number of allowable takes. If the proposal is intended to answer concerns about too many wolves, wouldn't that solution meet the management goal rather than completely removing the hunting quota? **Please do not implement Proposal #22.**

Thank you for considering my comments and for your service on the Board of Game.

Sincerely,

Susi Gregg Fowler

603 West 12th Street

Juneau, Alaska. 99801

(907) 586-3279



Submitted By
Janice Gregg Levy
Submitted On
12/25/2018 10:32:17 AM
Affiliation

Phone
907-586-1427
Email
levyjan@gmail.com
Address
534 5th Street
Juneau, Alaska 99801

I write to oppose Proposal 23, which as I understand it would expand archery hunting of mountain goats in the Juneau area. In the past few years there has been a reestablishment of the mountain goat population, the viewing of which is enjoyed by much of the population of the Juneau area. This wildlife viewing is enjoyed by people of all levels of physical ability. The goats can be seen from time to time from the JDHS parking lot and along Glacier Avenue as one looks up toward the face of Mt. Juneau; in the early spring as one walks or drives along Basin Road; and also by hikers on the Perseverance Trail, Mt. Juneau Trail, and Mt. Roberts Trail, among other mountain hikes in the area. I oppose any expansion of the allowed hunting of this species in the Juneau area. Thank you for your consideration of my comments.



From: Mary Ellen Arvold Dave Haas
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG proposed regulations #22, #23 and #28 comments
Date: Monday, December 24, 2018 3:48:43 PM

My name is Dave Haas. I live at 2590 Fritz Cove Road, Juneau, Alaska and have lived at this address continuously the past 15 years. I am writing to comment on three proposed regulations, #22, #23 and # 28 which will come before the Board of Game next month.

#22) I oppose this proposed regulation. While I am not ultimately happy with the 3 wolves per year limit on harvesting wolves on Douglas Island, I wish that it were none. However, I appreciate the current regulation as a reasonable compromise. I have hunted deer in the Juneau area almost 40 years now and always enjoy seeing or hearing a wolf in the area. I always prefer having a more natural predator/prey balance than one devoid of predators - that is for most other areas of the world, not Alaska which truly represents "wild" in the world. Please don't take the wild out of our Juneau area.

#23) I oppose this proposed regulation. Allowing bow and arrow hunting of mt. goats on Mt. Juneau and nearby areas is simply too close to our population. From where we used to live downtown for 17 years, you could see mt. goats in the Mt. Juneau alpine areas. That means you'd also be able to see bow hunters and injured mt. goats. We don't want this near or in view of from our homes.

#28) I also oppose this proposed regulation. This simply takes the skill and difficulty of taking a prized big game animal out of the hunt. You might as well just hunt from your doorway in an easy chair. These hunters or policy makers should stay on their sofas with their electronic game players and away from our backyards baiting bears into our neighborhoods. This would be a joke of a "hunt".

Please do not approve any of these three proposed regulations as they all weaken quality hunting in Juneau specifically and Alaska in general. They don't deserve to have a place in Alaska.

Dave Haas



Submitted By
Steven Haavig
Submitted On
12/28/2018 1:49:02 PM
Affiliation

PROPOSAL : #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES

Please do not remove the hunting quota on Douglas Island.

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

I view these goats when I walk the Perseverance and Sheep Creek Trails. So do lots of other users like tourists and guests.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

DO NOT ALLOW bear baiting in CBJ. My neighbor set up a baiting stand and shot a bear in his back yard 150 yards from Glacier Hwy. I heard the rifle sit from my house!



Submitted By
Gordon Harrison
Submitted On
12/26/2018 11:19:55 AM
Affiliation

I am opposed to Board of Game proposals #22, 23, and 28. With regard to #22, I believe that a viable wolf population on Douglas Island is imperative. With regard to #23, I object to the hunting of goats by archery or any other means near Juneau. These animals are a marvelous natural resource that can be seen by residents and visitors to our city. With regard to # 29, I believe that baiting bears is an unethical hunting tactic, and I especially object to it near Juneau where we have enough problems with bears being attracted to human food sources.



From: Mary Hausler
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG proposal #22 proposal to remove hunting quota on Douglas Island wolves
Date: Friday, December 28, 2018 1:00:51 PM

Dear Board of Game, I am a long time Douglas Island resident who frequently hikes, snowshoes, and skis on Douglas Island on and off trails. I am vehemently opposed to this proposal to remove the annual 3 wolf quota on Douglas Island. The current regulation was put in place after a strong public reaction when a Juneau trapper targeted and killed an entire pack on the island. It was recognized at the time that wolves are an integral part of this ecosystem. It was also evident that many Juneau residents including those who are deer hunters or who have many friends and family members who hunt on the island enjoy knowing there are wolves on the island, and seeing their scat and tracks, and occasionally being blessed with a glimpse of a wolf. We're more than willing to share the deer with the wolves who were here before us. Part of what makes this place special is their presence.

Sincerely,

Mary Hausler
3240 Nowell Ave
Juneau, AK

From: Mary Hausler
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG proposal #23 to allow archery hunting of Mt. Goats on Mt Juneau and nearby areas
Date: Friday, December 28, 2018 1:44:24 PM

Dear BOG,

I am writing to express my opposition to this proposal. As a long time Juneau resident and frequent hiker in the valleys and on the ridge tops covered by this proposal, I have often had the pleasure of seeing Mt. Goats. Sometimes they are tiny white dots off in the distance, but other times I have sat for hours observing goats at close proximity as they go about their business. In the Spring I can often see them from my living room or deck. The area covered by the proposal contains some of the most heavily used hiking trails and routes in the Juneau. They are important to both locals and tourists. Allowing hunting in this area would likely decrease the number of goats, and make the ones that remain more skittish, and inaccessible to wildlife viewers. There are other areas with goats that are on the Juneau road system that don't get as much use by hikers and Juneau visitors and are available to hunters.

Thanks for your consideration,

Mary Hausler
3240 Nowell Ave
Juneau, AK



From: Mary Hausler
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG proposal # 28 Bear Baiting
Date: Friday, December 28, 2018 2:00:20 PM

Dear BOG,

I strongly oppose the proposal(#28) to allow bear baiting in the Juneau area (1C). This seems to me a particularly ill advised proposal. Juneau already has a garbage bear problem where too many residents don't do an adequate job of keeping human and pet food out of the reach of bears, and the bears suffer the consequences. This proposal would allow hunters to purposely lure in bears with human food so they can shoot them. How is this any different from the person who puts out food to lure in bears because they like to have them around? The second person hopefully gets fined because what they are doing is illegal, and dangerous, particularly to the bears. Why would we allow hunters to add to the problem of garbage bears with this same irresponsible behavior? It's a bad proposal that ought to be voted down.

Sincerely,

Mary Hausler
3240 Nowell Ave
Juneau, AK



From: Dave Hunsaker
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: BOG proposals 22, 23, and 28
Date: Thursday, December 27, 2018 3:10:21 PM

Dear Alaska Board of Game:

As a 45 year resident of Southeast Alaska, I wish to object strenuously to proposals 22, 23, and 28. These seem to be from some wrong-headed source who knows nothing about the management of game in this part of Alaska.

#22: We recall the time a single Juneau trapper targeted and killed every wolf in a pack on Douglas Island. This is the reason for the 3 wolf limit currently in place. These are fascinating creatures and deserve to live alongside other prey and predators and not to be wiped out so that mediocre hunters have a better chance of bagging a deer without competition.

#23: The goats that are being proposed to hunt on Mt. Juneau are MUCH more valuable to our economy and wilderness pleasure live rather than hunted by a select few. I remember when they were helicoptered in to try to reinstate them on that mountain after having been hunted to the point of extinction previously. The population is not so robust that they can take hunting at this point in time. For many visitors and residents of Juneau these goats are the only ones that they will ever see in the wild in their lifetimes. Please leave them be.

#28: Baiting black bears in the Juneau area is cowardly and despicable. Don't allow this to happen.

It is discouraging to see proposals such as these set forward by members of the board who clearly know nothing about wildlife or hunting in southeast Alaska.

thank you,

Dave Hunsaker
20139 Cohen Dr.
Juneau 99801
(907) 789-3486



Submitted By
Ric Iannolino
Submitted On
12/23/2018 6:16:27 PM
Affiliation

Phone
9079574059
Email
ricpaddles.alaska@yahoo.com
Address
PO Box 210883
Auke Bay, Alaska 99821

I have lived in Juneau for 40 years. I am a licensed hunter and active sportsman. I am familiar with the history of each of these proposals.

I OPPOSE each of the following 3 proposals #22, #23 and #28 all of them relate to the Juneau area.

Please recognize special circumstances that apply to the Juneau area. The 3 proposals concerning the immediate Juneau vicinity (Unit 1-C) are bad public wildlife policy and in no way justified. The proposals are #22, #23 and #28.

PROPOSAL: #22, REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES

By Jesse Ross

This would eliminate the Douglas Island Management Area in GMU 1-C, removing the annual 3-wolf harvest quota for the island. This Management Area was set up years ago to restrict the number of wolves that could be killed on Douglas Island to no more than 3 a year. **A single Juneau trapper targeted an entire pack on the west side of the island and killed them all.** The public was outraged, charter companies complained because their clients no longer would be able to view wolves so close to Juneau while on board. The Game Board recognized the values and enjoyment to local residents and visitors that wolves provided as an important part of Douglas Island. The goal regulation is to guard against the over harvesting of wolves on the island, that is a very real possibility because of easy road and boat access.

PROPOSAL #23: ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS

By Jake Abbott

In the late 1980's, mountain goats were completely gone from Mount Juneau and Mount Roberts. The primary cause was overhunting. Goats on Mount Juneau were even shot in plain view of the city residents and visitors who were viewing them. A friend of mine shot a goat in the late 1970's when he returned home from his hunting trip he received 7 calls from people who watched the goat he shot fall off a cliff. He did not realize so many people each morning had watched the goat over coffee before work. The area was closed to hunting. A program was initiated by local residents with the cooperation of Alaska Department of Fish and Game to transplant goats to Mount Juneau. These animals are viewable for the enjoyment of locals and visitors in the spring and summer months

There is alternative hunting in the Juneau area to accommodate goat hunters; the mountains northwest of Mendenhall River are open and accessible by road.

PROPOSAL #28: ALLOW BEAR BAITING IN JUNEAU

By Jake Abbott

Baiting black bears has been prohibited in the Juneau Game area for over 20 years, in recognition of the problems caused by bears attraction to human food that resulted in a chronic garbage bear problem. The present Board of Game needs to understand that the Juneau is a densely populated along a narrow strip coast. I encourage the Board to strongly reject Juneau GMU 1-C from areas open to bear baiting.



Alaska Dept. of Fish and Game
Boards Support Section
Southeast BOG Meeting
Fax: 907-465-6094

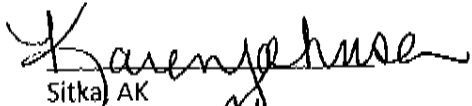
Board of Game members:


This comment is in support of **Proposal 16**, which would return the opening day of the Southeast Alaska waterfowl season to September 1st. Our family always participated in the waterfowl season during the first week of September and we strongly support changing the season back to the September 1 – December 16 time period.


Proposal 15 asks to extend the waterfowl season into January. We **strongly oppose Proposal 15** as this proposal would further delay the start of the waterfowl season until sometime in October.


Thank you for your time.

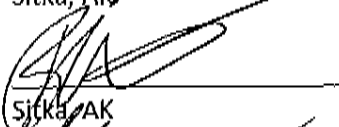
Sincerely,

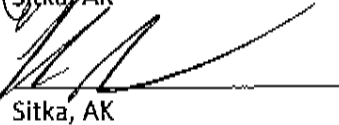
 → Karen Johnson
Sitka, AK

 Marty Johnson
Sitka, AK

 Chris Lilliohof
Sitka, AK

 Kevin Johnson
Sitka, AK

 Bob Widmeyer
Sitka, AK

 Chatham Connor
Sitka, AK

 Spencer Shute
Sitka, AK



Alaska Dept. of Fish and Game
Boards Support Section
Southeast BOG Meeting
Fax: 907-465-6094

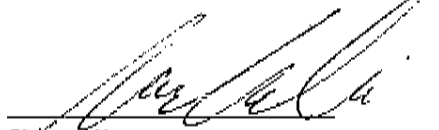
Board of Game members:

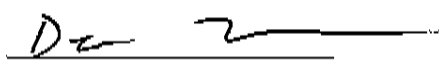
This comment is in **support of Proposal 16**, which would return the opening day of the Southeast Alaska waterfowl season to September 1st. Our family always participated in the waterfowl season during the first week of September and we strongly support changing the season back to the September 1 – December 16 time period.

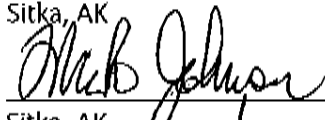
Proposal 15 asks to extend the waterfowl season into January. We **strongly oppose Proposal 15** as this proposal would further delay the start of the waterfowl season until sometime in October.

Thank you for your time.

Sincerely,


Sitka, AK Reid Sanocki


Sitka, AK Devon Johnson


Sitka, AK Mike Johnson


Sitka, AK Josh Johnson

Sitka, AK

Sitka, AK

Sitka, AK



Submitted By
Bob King
Submitted On
12/26/2018 1:40:31 PM
Affiliation

Phone
907-957-2355

Email
fishtorian@gmail.com

Address
419 Kennedy Street
Juneau, Alaska 99801

I oppose proposals #23 and 28, to allow bow hunting for goats on Mount Juneau, Roberts and other nearby mountains, and bear baiting in the Juneau area. I enjoy seeing the goats from my home in downtown Juneau and when I hike up Perseverance. I know they are enjoyed by many other local hikers and visitors even if they only view them from the scopes on the cruise ship docks. Let bow hunters find their goats further out of town. As for bear-baiting, there's no sport in that. It only attracts more trash bears to downtown Juneau, already a problem. Please reject these proposals. Thank you.



From: mary lou
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comments on Alaska Board of Game proposals #22, #23 and #28
Date: Monday, December 24, 2018 2:17:37 PM

#22 REMOVE HUNTING QUOTA ON DOUGLAS ISLAND WOLVES: Could information be found on how many deer are killed by wolves each year? And when there were more deer on the Island, how many deer were killed by hunters each year? Before this proposal is passed more information should be known to be able to make good rules for managing both wolf and deer populations.

#23 ALLOW ARCHERY HUNTING OF MOUNTAIN GOATS ON MT JUNEAU AND NEARBY AREAS: Viewing wild goats is a harmless and valuable attraction for both local people and tourists. Viewing wild goats on Mt. Juneau from the streets in downtown Juneau is a rare and exciting thing that very few people in world will have the opportunity to see. The Board should not allow any hunting of goats close to where people live in the Juneau area or along Gastineau Channel.

#28 ALLOW BEAR BAITING IN JUNEAU: Bear baiting is not fair chase hunting and is not a good way to treat bears. In the Juneau area with a large number of people living close together because of the constricted geography, bear baiting could cause bear conflicts that can be dangerous. Because we also have many trails and many people using them, having conflicts with baited bears along these trails would be dangerous. Please do not allow bear baiting in the Juneau area.

Juneau Resident
Mary Lou King



From: Daniel F Kirkwood
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comments on proposals #22/23 and 28
Date: Monday, December 24, 2018 7:01:46 AM

Dan Kirkwood
Juneau, AK

Dear Board of Game Members,
I am a licensed resident hunter. I love hunting to provide outstanding food for the table and rewarding outdoor experiences.

Proposal #20 Support

As a frequent Douglas hunter, I recognize the increased pressure that Douglas deer faced as busier schedules and increased gas prices encourage many of us to hunt closer to home. Limiting our harvest of does seems like the responsible step to helping the deer. Allowing one doe seems reasonable. Hopefully it will force me to up my hunting!

Proposal #22 Oppose

Part of what makes hunting in Alaska special is that the land is still wild. If we remove the predators that helped shape our prey, we might as well also put out salt licks and run some fences to improve our chances as well. Then I might as well just go buy some beef.

As a hunter, I enjoy seeing wolves and wolf tracks. It's a rare but thrilling Alaskan sight. I support reasonable, data based quotas for all species that ensures that others get a chance to enjoy our natural heritage, which is hunting truly wild game.

I grew up in Pennsylvania and have hunted deer in Maryland and Virginia. For me, our game in Alaska is more valuable because of the challenge and risk of hunting alongside other predators.

Proposal #23 Oppose

I would support opening up more archery opportunities for mountain goats on the road system. However, I feel like opening hunts on Mount Juneau, Mount Roberts or Thunder Mountain where goats are accustomed to close human presence would not qualify as fair chase. This would also impact my other use of them: enjoying watching them close to town to inform my hunting in other places.

When I had an office downtown, I would observe the Mt. Juneau goats with my spotting scope and binoculars during long conference calls. I would watch their behaviors and note their movements. I often take my spotting scope up Granite Creek or Thunder Mountain to observe goats, bears and other wildlife during the spring grouse hunting season. Having such awesome beasts close to town is a mark of what makes Juneau great. I would hate to see that population disperse due to hunting pressure.

I support limited bow opportunities for goats on the road system, but only with consideration given to ensuring that we can enjoy watching them as well.

28 Oppose



GMU 1-C is too densely populated to allow for responsible bear baiting. The likelihood of this creating conflicts with other land users and creating problem bears with other human attractants seems too high. The Board of Game has helped Juneau address its chronic human/bear conflict by prohibiting baiting. Please continue to stick to that excellent course of action.

--

Daniel F. Kirkwood

dfkirkwood@gmail.com



Submitted By
Gladi Kulp
Submitted On
12/24/2018 10:07:47 AM
Affiliation
Juneau resident

Phone
907-723-0460
Email
gladikulp@yahoo.com
Address
640 Hemlock St.
Juneau, Alaska 99801

December 24, 2018

Open letter to The Board of Game for the January 11-15th scheduled Meeting:

I have lived and worked in Juneau since 1985. While I am not a hunter, many of my friends are and I do enjoy cooking and eating wild game. I also enjoy watching wildlife and believe that a balance must be maintained so that animals are protected and not villianized.

I thank the Board for holding its scheduled meeting in Southeast Alaska and the opportunity to give my personal input on three key proposals in Unit 1-C that will directly impact our area.

Proposal #22:

I oppose proposal #22 because wolves are an integral part of our archipelago including Douglas Island. They have shown no negative impact on the local deer or domestic animal populations and provide the balance needed to maintain a distribution of healthy animals. To have an opportunity to see or hear a wolf on Douglas or anywhere, is a true Alaskan experience enjoyed my many – locals and visitors. To trap all the tiny population of the Douglas wolves is to eliminate the sense of true wilderness Douglas can provide for all users. Also, it's good animal conservation.

Proposal #23:

I oppose proposal #23 because I remember when there were no mountain goats on our ridges around Juneau. They were hunted out years ago. I remember the intense local effort, funded by energy and personal money, to reintroduce the goats to the ridges that they once inhabited. The herd has done well over the past 20 years. To walk Perseverance trail or hike the ridges or even look up from your porch or office window and see goats naturally positioned high on the ridges is a special opportunity especially as it is so close to town. Just the tourists who appreciate the experience makes it all worthwhile. The area is better served for viewing and non-consumptive uses. The opportunity to hunt goats is offered in numerous and more remote drainages accessed on the road system.

Proposal #28:

I oppose baiting Black Bears in the Juneau area for hunting. It is just not smart. The last thing we want to do is to habituate our local black



bears to human food. I have had a bear in my kitchen. I opened my front door this year greeted by a black bear.

One was eating on my deck one evening this year from the bird feeder for lack of berries and salmon. We have a chronic bear garbage problem in Juneau and the community works hard at trying to keep them on natural foods and not our garbage. Once they are habituated to garbage, their chances of being destroyed are greater and to be hunted with bait only compounds the issue and is frankly, poor hunting ethics in this part of Alaska.

Thank you for considering my views.

Gladi Kulp

640 Hemlock St.

Juneau, AK 99801



Submitted By
Stephan Lee
Submitted On
10/10/2018 7:48:22 AM
Affiliation

I support proposal 16. Significant numbers of sandhill cranes migrate through Gustavus prior to Sept 16. Also significant numbers of green winged teal and pintails migrate through the mendenhall refuge prior to Sept 16. The fall migration is over by Dec 16 and only fishy tasting mallards and seaducks teremain on the mendenhall wetlands with a wily local Vancouver goose population. Not many hunters use the area after the fall migration after the first week of November.



From: Steve Lewis and/or Rachel Myron
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Comments in Opposition to Proposals 22,23, and 28--
Date: Wednesday, December 26, 2018 11:05:33 AM

Gentlefolk:

I am opposed to several of the proposed regulation changes that will be discussed at the Petersburg meeting of the Board of Game.

Proposal 22 suggests that removing quotas on hunting wolves on Douglas Island. This is an ill conceived idea----with the easy access to most of Douglas Island, wolves could quickly be eliminated from the island-something that has already occurred in the past and something that the quotas were designed to protect against. ADF&G has proposed a slight change in deer harvest levels on Douglas Island as study of wolf and deer numbers continue. This is a much more sensible reaction to potentially higher populations of wolves on the Island.

Proposal 23 would allow archery hunting of goats closer to town on Mt Juneau and Mt. Roberts. These areas are better preserved as places for the public in general to observe goats while continuing to allow hunters to harvest goats in areas more distant from commonly accessible trails.

Proposal 28 suggests allowing baiting of black bears. This is an absurd proposal. It declares that since this is legal in the Mat Su area, that it should be legal in Juneau. Bosh. Baiting black bears will increase the garbage bear problem in Juneau and is an unethical means of hunting to boot. Not only should you reject this proposal, but you should consider eliminating baiting of black bears throughout the state.

Thank you for considering these comments.

Sincerely,

Steve Lewis,
Tenakee Springs, AK



Submitted By
Marina H Lindsey
Submitted On
12/9/2018 3:44:15 PM
Affiliation

Phone
9077231116
Email
marinahlindsey@gmail.com
Address
3431 Greenwood Ave
Juneau, Alaska 99801

Dear Board of Game,

I am writing in support of PROPOSAL 13: 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions. I have been a recreational fisherman in Southeast Alaska for decades and agree that trappers should have to put labels on their gear, just as recreational and commercial fisherman have to label their gear. Without proper labeling, Alaska State Troopers have a reduced capability of enforcing trapping regulations and seasons, and ADF&G cannot follow up on inquiries from the public about traps and snares. Without a visible name or identification number, individuals including other trappers and users of the forest like hikers and hunters, cannot let a trapper know (through ADF&G) if there are targeted or non-targeted animals alive, dead or injured in the traps/snares.

If people are trapping legally and ethically, I see no reason why they would have any issue with labeling their traps with their names or permanent identification numbers. I certainly have no problem labeling my shrimp and crab pots, and because of having my contact information on my crab pots, have had lost gear returned to me.

Thank you for considering the reinstatement of the fur trap tag requirement language. It is fair and reasonable requirement.

Sincerely,

Marina Lindsey



Submitted By
Brian Lynch
Submitted On
12/15/2018 11:13:09 AM
Affiliation
Self

To: Alaska Board of Game Re: Southeast Region 2019 Meeting Proposal #53

I am in support of Proposal #53 to modify the legal area description within the Petersburg Management Area (PMA) from "at least 1/2 mile from an airport property" ... to "at least 100 yards from an airport property." As one of the archers who drafted the existing PMA proposal in the early 2000's, I am in complete agreement with proposers rationale for the proposed change and his historical summary of the reasoning for the establishment of the PMA. I believe the change would help to reduce the deer population in and near the city of Petersburg and, in turn, reduce the numbrs of deer being killed or injured by motor vehicles as well as reducing the significant damage deer cause to both vegetable and flower gardens within the city.

I urge the Board of Game to approve and pass Proposal #53

-Brian Lynch



Submitted By
Jennifer MacDougall
Submitted On
12/28/2018 4:31:05 PM
Affiliation

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907-957-7042

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Address
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Douglas, Alaska 99824

I am writing to support the proposal 14 that requires trappers to post trapline signs. I often hike trails around Juneau with my two dogs, and I am concerned that trappers can set traps on public land without warning the public. Traps are dangerous to dogs (as well as non-target wildlife) and signs announcing trapline presence should be required to give hikers proper warning. Thank you.



Submitted By
Keegan
Submitted On
12/28/2018 10:13:18 AM
Affiliation
Coastal Alaska Adventures

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McCarthy
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akpointer@hotmail.com
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Juneau, Alaska 99801

Dear Board of Game and it's Members.

I am a lifelong resident of SE Alaska, as well as a Master Hunting Guide and owner and operator of Coastal Alaska Adventures. We offer guided bear and deer hunts in units 1-4. As a guide, commercial fisherman and tour operator I spend well over half the year on the waters and lands of SE Alaska. I am immersed in the area, as well as see and hear a lot of what happens here.

Please accept these written comments on the following proposals-

Proposal 3- Salvage of deer rib meat

I was raised and firmly believe that if you harvest an animal you consume the meat, all the edible meat. Having harvested deer in SE Alaska since 1984 I have never discarded the rib meat. It is easy to remove from the bone and makes excellent burger or sausage. We even often pressure cook them a bit on the bone and barbeque, they are excellent. Allowing hunters to not salvage edible meat simply because it's too much work seems like we would be headed down the wrong path as hunters. Sitka Black Tail deer is the best venison in the world, let's not make a precedent of wasting usable meat.

Proposal 4- Allow the harvest of game from a boat in Units 1-5

I believe this may be the most important proposal we address during this process. I will start by saying I am adamantly opposed to it. As stated I spend the majority of the year on the water, a great deal of this during hunting seasons. I have personally witnessed many vessels "running beaches" and gunning for deer. First and foremost it is not an ethical way to hunt nor does it in anyway represent one of the things I believe Alaska stands for- Fair chase.

Our State has a responsibility to maintain an ethical stance on this. Shooting any animal from a vessel based on saltwater is not ethical. We have first-hand experience of this, in 2017 we had a permit issued to attempt to harvest a brown bear from a vessel for a disabled hunter. After over 10 seperate stalks and attempts to get the vessel stable enough it was deemed not doable by me, my guides and the hunter. No shots were fired as the risk of wounding was too high. We ended up doing the smart thing and took more time and got our hunter out on the beach. Yes, it took some more work, but hunting is not always supposed to be easy. Do we want to make it easier to wound animals? That is truly what this is about. Just last deer season I found 3 deer in the timber that had been wounded by beach hunters in Seymour Canal, an area with a high abundance of "boat hunters". We witness them often shooting from boats, and later we find the results. We also find a few bears each year that have been wounded by hunters, to increase this is not acceptable.

We do not need to allow people to shoot from boats to be more successful. Opportunity abounds for hunters to safely and successfully harvest animals in SE Alaska from the ground. Simply making it easier for lazy hunters does not make sense. The perception of hunters nationwide is already at an all time low, lets not make us look like slobs that need to take pot shots at animals on a beach. Keep the pride in Alaska's hunting heritage of fair chase and ethical.

Proposal 8 and 9-

- Rescind the guide requirement for nonresidents hunting black bear in the Southeast Region
- Change the nonresident black bear permit hunts for Units 1B, 1C, and 1D to general season hunts

In the early 2000's to about 2010 we saw a massive increase in black bear harvest in SE Alaska. A true conservation issue existed and was addressed by those concerned and brought to the BOG. Regulations were developed through extensive meetings with the BOG, ADFG and USFS to create the system that is currently in place allowing for hunters that use a guide to not have to draw a tag for black bears in Units 1-3. If a non-resident hunter chooses to hunt black bear without a guide they must apply for a draw. This was done to put a limit on the number of non-resident hunters who harvest black bears in SE Alaska without a guide. The alternative was a region wide draw system for black bears, something we all hoped to avoid. This current system as adopted gives excellent, and well-regulated opportunity for all hunters, with nothing but positive benefit to the RESIDENT hunter.

Guides already face tight restrictions on the numbers we can harvest, and as part of this agreement guides across the region agreed to



take 20% less hunters than what we are even allocated to help alleviate conservation issues. The goal was simply to regulate the number of bears harvested. Without this system the unguided segment of black bear hunters in SE Alaska was not regulated, harvest was high and hunting pressure unacceptable. To those not involved in the original development of this, it was not done in haste, or in an unfair manner. It was done solely to keep hunting opportunity available in SE Alaska for residents first, and second the nonresident sector.

A few key things to remember-

- This in no way effected the resident hunter
- Guides did not receive any additional hunting allocation, in fact resulted in reduction
- Harvest levels have decreased in many areas
- Wounding loss was at an all-time high with nonresident unguided hunters
- The hunting experience in SE Alaska was severely impacted by overabundance of hunters

As a guide, and someone who is in the field consistently I can tell you a few things. Prior to the implementation of this regulation the black bear hunting pressure was unmanageable. It would not be uncommon to see up to 10 Unguided NON-RESIDENT hunters on one boat in a bay hunting black bears. What resident hunters may not realize is that these unguided hunters were decimating bear populations. Sow harvest was high, wounding rates off the charts. They were not only impacting our businesses and way of life, as a resident hunter I knew they were limiting the resident opportunity. Most residents do not spend the time in the field a guide does, they do not see what is really happening out there, we do. We keep tabs on everything happening in our units. To watch a conservation issue develop, grow and go unaddressed is unacceptable. But, there are other issues at hand as well, social issues. The unregulated non-resident hunters through sheer numbers were destroying opportunity for the resident hunter, if not through harvest numbers then by limiting areas for people to hunt.

We have now witnessed the success of this regulation, but it is not time to stop. We are slowly starting to see higher bear numbers, but still not the number of quality mature males we would see in the past. The good thing is we are seeing more "recruits", subadult male bears, or more important the bears we most need to protect. Increasing harvest at this point in time, risk us moving back to an area where we may see a conservation issue again. From experience, and numbers we saw in the past, the unguided nonresident hunter is less educated on harvesting mature male animals, black bears being very difficult to judge. We do not want to head back down this slippery slope. Bears take time to mature and age, we are on the right track to seeing a quality hunting experience reemerge in SE Alaska.

I implore the Board to take all this into consideration and not approve these proposals, from someone who is in the field every day of the season. We imposed the regulations to keep a quality, ethical and conservation minded experience available in SE Alaska. While I seldom question ADFG and their opinions I must on this. They work hard but they are not in the field, they do not see what we see. Their job is conservation, and that is excellent, but as stated, there is much more to think about here. To simply judge the health of an animal population by hunter success is not always accurate. ADFG has done no formal black bear population estimates to my knowledge in nearly 15+ years. We are in the field daily seeing what is happening. I would propose the inverse of what ADFG sees, hunter success and numbers seem higher because there are **less** hunters in the field. There is less pressure on the resource, bears being human sensitive, are frequenting beaches at higher rates, allowing for fewer hunters in the field to be more successful at harvesting larger mature males. This was one of the purposes of the draw, to make the hunt seem special, more of a rare chance than kill a bear each year. Hunters now may be taking time to think about what they are about to shoot, knowing the tag took effort to get. Keep these things in consideration when reviewing these proposals. We are on the cusp of what we were hoping to accomplish, let's not stop now.

We are rebuilding what can be one of the best black bear hunting opportunities in the world for everyone, to stop short now makes no sense. I hope someday to take my kids out and be able to share with them what SE Alaska was and can be if properly managed and not given away to unregulated non-resident hunters.



Submitted By
James McKnight
Submitted On
12/11/2018 12:53:08 PM
Affiliation
none

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Juneau, Alaska 99801

Proposal #3: I am in favor of this proposal. The current requirement to salvage rib meat for Sitka Blacktail deer does not make a whole lot of sense from a wanton waste standpoint. The very small amount of actual edible meat on the ribcage does not justify spending the time and energy to salvage it. I would argue the belly flap contains more meat than the rib cage but there is no requirement to salvage it. (even though I do anyway). There are some states that do not require salvaging rib meat from moose, even though moose are many times larger than Sitka Blacktails.



From: KJ METCALF
To: [DFG, BOG Comments \(DFG sponsored\)](#)
Subject: Proposals #22, 23, & 28
Date: Thursday, December 27, 2018 11:23:30 AM

I urge the Board of Game to reject proposals 23,24 and 28. I am a 54 year resident of Southeast Alaska - have been a subsistence , as well as a sports hunter. I'm adamantly opposed to these three proposals:

#22 Wolves on Douglas Is (where I live) - we worked hard to have the trapping restricted in order to maintain a viable population of wolves.

#23 Mt goats are more valuable viewing than hunted.

#28 Totally unsafe to habituate bears to food. This runs counter to all forms of camping, remote cabins and urban settings. This has no relation to "fair chase."

K.J. Metcalf
PO box 20221 Juneau 99802



Submitted By
Mark Miller
Submitted On
12/15/2018 4:58:45 PM
Affiliation

I agree that proposal 13 5 AA 92.095 should be enacted to require trappers to identify their traps with their name and contact information. This facilitates resolution of any issues that are almost impossible to settle if contact information is unavailable. It seems only practice to have some means of identifying trap ownership. I would think trappers would identify their traps without being required to do so.

Thank you for your consideration.....Mark Miller



Submitted By
MARK J MILLER
Submitted On
12/23/2018 7:44:36 PM
Affiliation

Hi I'm writing to express my opposition to proposals 22, 23, and 28.

I oppose proposal # 22 concerning removal of hunting quota on Douglas Island wolves.

I know there are presently fewer deer on Douglas Island because of the wolves. I also understand that many wolf studies indicate the need for wolves to keep a healthy balance of other animal populations. I traverse Douglas Island quite a lot and I have yet to see a wolf on Douglas Island. I am very much looking forward to that opportunity.

I oppose proposal # 23: Allow archery hunting of mountain goats on Mt Juneau and nearby areas.

When I moved to Juneau in 1974, it was rare or impossible to view mountain goats in the proposed areas. I hike these areas regularly and very much appreciate seeing the goats now, as do many other people I see while hiking. Goat viewing by many, is a much more valuable asset to the Juneau area than the small harvest benefit of a few bow hunters.

I oppose Proposal # 28: Allow bear baiting in Juneau.

It seems counter productive to make a big effort every year to keep bears out of waste human foods and then allow waste human foods to be used as an attractant.

I also think it would be very dangerous for an unsuspecting hiker to approach a bait station and startle a bear. It seems likely the bear would aggressively protect its food supply and put hikers at risk.

Thanks you for your consideration of my comments.

Sincerely, Mark Miller



United States Department of the Interior

NATIONAL PARK SERVICE

Alaska Region

240 West 5th Avenue, Room 114

Anchorage, Alaska 99501

IN REPLY REFER TO:
10.A. (AKRO-RNR) 20181203

DEC 12 2018

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

Dear Chairman Spraker:

The National Park Service (NPS) appreciates the opportunity to comment on the 53 proposals for the Southeast Region Game Management Units (GMUs) 1-5 being considered by the Alaska Board of Game (BOG). Below are our recommendations on proposals that affect or have the potential to affect NPS areas.

The National Park Service mission and mandates differ from the State of Alaska and other federal agencies, and hunting activities in NPS areas may therefore require different management approaches that are consistent with NPS enabling legislation and the Alaska National Interest Lands Conservation Act (ANILCA).

We recognize and support the State's primary stewardship role in wildlife management. At the same time, we must ensure that federal laws and regulations applicable to national preserves are upheld.

Proposal 3: NPS Recommendation: Oppose

This proposal would remove the salvage of rib meat requirements for Sitka black-tailed deer in Unit 1-5.

Failure to salvage edible meat from harvested ungulates is prohibited under both Alaska Hunting Regulations and Federal Subsistence Management Regulations for the Harvest of Wildlife on Federal Public Lands in Alaska. The NPS opposes exceptions to these provisions.

Proposal 13 and 14: NPS Recommendation: Support

These proposals would require trappers to use identification tags (proposal #13) and signage (proposal #14) near traps and snares.

The NPS supports the intent of these proposals. Identifying owners of specific traps or snares would reduce any confusion or conflicts regarding ownership. In addition, visitor enjoyment and



safety is a high priority for the NPS, and posted signs would alert visitors to trapping or snaring activity and reduce the chances of visitor injury.

Proposal 15: NPS Recommendation: Oppose

This proposal would extend the waterfowl hunting season by 30-60 days, from 31 December to January and February.

The season length for waterfowl hunting is determined annually under the Migratory Bird Treaty Act and may not exceed 107 days. Seasons in GMUs 1-5 are already at the maximum length allowed by the Act. To extend the season would violate federal law.

Thank you for this opportunity to provide comments on these important wildlife regulatory matters. 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

Enclosure

cc: Doug Vincent-Lang, Acting Commissioner, ADF&G
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Acting 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
Philip Hooge, Superintendent, Glacier Bay 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



BOG Wildlife Proposals for January and March - 2019

Find full proposal descriptions at <http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.proposalbook>

Please review - Deadline for Priority and Comments: October 15, 2018

| No. | Species | Park(s) | Proposal Description | GMU | NPS Comment |
|--|-------------------------|-------------|---|-------------|---|
| Southeast Region Wide and Multiple Units 1 - 5 | | | | | |
| 1 | Big game | WRST & GLBA | Allow the use of crossbows in restricted-weapons hunt | 1 - 5 | WRST: no comment -- best I can tell there are no restricted-weapons hunts in Unit 5 (BAC) GLBA: No comment. There are no restricted weapon hunts in 5A or 5B. (Jim Capra). |
| 2 | Deer | | Allow the feeding and harvesting year-round on private land | 1 - 5 | |
| 3 | Sitka black-tailed deer | WRST & GLBA | Modify the salvage requirement to make the salvage of rib meat optional | 1 - 5 | WRST: no comment -- no open season for deer in 5B (Barbara Cellarius) GLBA: Oppose. Deer are barely present in GLBA portion of 5A, but the season is open. Oppose on the basis of leaving edible meat in the field (Jim Capra). AKRO: See pg. 22 of 2018-2019 Alaska Hunting Regulations. All rib meat must be salvaged from all big game species, otherwise it is considered wanton waste. There are no exceptions for smaller animals, and no consideration to time spent processing. This is a potentially slippery slope, and should be opposed (Dave Payer). |
| 4 | Game | WRST & GLBA | Allow the harvest from a boat not under power | 1 - 5 | WRST: no comment -- seems mostly related to deer and no open season for deer in 5B. But I'd defer to law enforcement concerns if Jim or Adam weight in (Barbara Cellarius). GLBA: Support with the clarification that this is fresh waters. (Jim Capra) |
| 5 | Moose | WRST & GLBA | Shorten the season to two weeks (from 1 October to 15 October) and allow "any bull" to be legally taken | 1 - 5 | WRST: no comment. Harvest limit in 5B is currently "one bull" and hunt is managed using a quota which presumably would address conservation concerns. So there doesn't really seem to be a good justification for shortening the season. I still think no comment, but if someone thought we should oppose, part of the justification could be that seasons should be set on a unit by unit basis reflecting local conditions, rather than aligning the season in all of SE AK. (Barbara Cellarius) GLBA: Oppose - Seasons in GMU 5 are limited by quota and management is further guided by area specific data. There is no reason to include GMU 5 in a regionwide proposal (Jim Capra). |
| 6 | Black Bear | WRST & GLBA | Remove requirements for residents to salvage hides and instead require salvage of meat season-round | 1 - 5 | WRST: no comment. Seems like there would be a salvage requirement either way. |
| 7 | Black Bear | WRST & GLBA | Eliminate the sealing requirement by resident hunters | 1 - 5 | WRST: not sure about this one. Sealing provides more information than a harvest ticket might, but I don't know that there is much black bear harvest in 5B. Sealing does not appear to be required for black bears harvested elsewhere in WRST. Leaning toward no comment. (Barbara Cellarius) GLBA: No comment (Jim Capra). From Tania Lewis GLBA Wildlife Biologist: Oppose. Sealing black bears provides opportunity for ADF&G to collect important information on bears' age, size and health for management purposes, as well as color phase and genetic material for research interests. We are currently collaborating with ADF&G to analyze over 270 such black bear samples from GMUs 1C, 1D, 5A and 5B to examine genetic population structure of black bears within the range of the glacier bear. AKRO: Agree with Tania re. value of sealing info but would defer to ADFG, since it is their requirement. No comment (Dave Payer). Oppose (as in the past) resident tag fee exemptions for brown bears as it is just an incentive to kill bears and population densities of bears in our region is relatively low (Kyle Joly). |
| 8 | Black Bear | WRST & GLBA | Rescind the guide requirement for nonresident hunting | 1 - 5 | WRST: no comment. Assuming this requirement exists (I haven't obviously found it in the handy dandy, but maybe it is hiding somewhere), the proposal seems to be an allocation issue. (Barbara Cellarius) GLBA: - No comment. This requirement does not exist in GMU 5 (Jim Capra) |
| 9 | Black Bear | | Change the nonresident permit hunts to a general season | 1B, 1C & 1D | |

Oppose



| | | | | | |
|--|----------------------|-------------|---|-------|--|
| 10 | Coyote | WRST & GLBA | Require sealing | 1 - 5 | WRST: could support because requiring sealing would provide information on harvest levels. Although I suspect Unit 5B coyote harvests are limited, so no comment would also be a reasonable position. (Barbara Cellarius) GLBA: - No comment. Harvest is small and reported through the trapper questionnaire (Jim Capra). AKRO: No comment. If further information on harvest intensity is required, harvest tickets would be a simpler way to go. (Dave Payer) |
| 11 | Beaver | WRST & GLBA | Extend the trapping season from April 30 to May 15 (15 additional days) with no limit | 1 - 5 | WRST: no comment. trapping in the WRST preserve, especially by folks who aren't federally qualified, is very limited. (Barbara Cellarius) GLBA: - Support. This was the traditional season length in GMU 5 until a recent change (Jim Capra). AKRO: I would like to know what the justification for the recent change was before supporting this. The proposal has no information. (Dave Payer) |
| 12 | Beaver | | Modify the trapping season to have no closed season | 1 | |
| 13 | All | WRST & GLBA | Require ID tags for traps and snares | 1 - 5 | WRST: my recollection is that NPS may have supported this kind of requirement in the past, for enforcement reasons. Maybe check some of the old letters? (I did go back to old letters and couldn't find anything on this, maybe Deb Cooper will remember (M Hake). Would be interested in what Jim suggests. (Barbara Cellarius) GLBA: - Support. For both enforcement and reducing conflicts. Allow trappers to use their name and address or hunting license number or drivers license number on the tag (Jim Capra). |
| 14 | All | WRST & GLBA | Require trappers to post ID signs for traps and snares | 1 - 5 | WRST: my recollection is that NPS may have supported this kind of requirement in the past, for enforcement reasons. Maybe check some of the old letters?. Couldn't find any old letters (M Hake). Would be interested in what Jim suggests (Barbara Cellarius). GLBA: - NO comment. I support the idea, but in practice I have seen too many cases when this was required that it did not happen and the trapper stated the sign fell down or anti-trappers stole it (Jim Capra). |
| 15 | Waterfowl | WRST & GLBA | Lengthen hunting season from December 31 to January and February (additional 30-60 days) | 1 - 5 | WRST: I don't know enough about this one (i.e., whether there are federal migratory bird seasons that overlay the state seasons, but suspect that waterfowl harvest in the winter in 5B would be very limited. So no comment would probably be fine. Also with respect to migratory bird harvest regs/hunting zones, Southeast is Units 1-4, Unit 5 is included in the gulf coast regs. So this proposal might not even apply to Unit 5. (Barbara Cellarius). GLBA: Oppose. Season length is determined annually under the MBTA. Alaska seasons in GMUs 1-5 are already at their maximum length allowed by treaty. To extend the season would require starting later. In GMU 5 the peak migration is approx. Oct. 10. This proposal would possibly delay the season until most of the opportunity is past. (Jim Capra). AKRO: Oppose, for the reasons well articulated by Jim (Dave Payer) |
| 16 | Migratory game birds | | Shift hunting opportunities two weeks later in the season (from September 1- December 16 to September 16 - December 31) | 1 - 4 | |
| Sitka Area - Unit 4 | | | | | |
| 17 | Waterfowl | | Reserve waterfowl hunting areas for local hunters | 4 | |
| 18 | Deer | | Increase bag limit from 4 to 6 deers in some areas | 4 | |
| 19 | All | | Close hunting area around Green Creek Mine road system and mine infrastructure | 4 | |
| Unit 1C, 1D and 5 - Juneau, Haines, Skagway and Yakutat Areas | | | | | |
| 20 | Deer | | Change the bag limit on Douglas Island | 1C | |
| 21 | All | | Amend the area that is closed to hunting along Douglas Highway | 1C | |
| 22 | All | | Eliminate the Douglas Island Management Area | 1C | |



| | | | | | |
|----|------------------------|------|---|---------|---|
| 23 | Mountain Goat | | Expand the archery-only registration permit hunt area | 1C | |
| 24 | Mountain Goat | | Clarify the boundary description for the RG014 | 1C | |
| 25 | Moose | GLBA | Restructure hunt to align with the federal subsistence regulations | 5A | GLBA: - Support to reduce confusion and spread out harvest. (Jim Capra) |
| 26 | Moose | GLBA | Reauthorize the antlerless season - Nunatak Beach | 5A | GLBA: - Support. Recent surveys show that the hunt may be viable again in the near future (Jim Capra). AKRO: No comment/neutral. From the data provided by ADFG in the proposal, its not clear to me that there is any rush to reauthorize the antlerless season. The population declined severely and has apparently been very slow to recover. However, this proposal merely reauthorizes a registration hunt, and permits would only be issued if the population increased to at least 25 animals. I suggest we remain neutral. (Dave Payer) |
| 27 | Moose | | Reauthorize the antlerless season | 1C | |
| 28 | Black Bear | | Issue permits for using bait or scent | 1C | GLBA: Oppose for Unit 1C. This proposal would allow for black bear baiting in Gustavus which is surrounded by National Park lands. Black and brown bears move in and out of the park and Gustavus frequently so essentially this could lead to conditioning of park black and brown bears to anthropogenic food. (Tania Lewis). AKRO: No comment. Baiting is prohibited on NPS lands, but NPS has no control outside boundaries. (Dave Payer) |
| 29 | Waterfowl | | Shift hunting opportunities two weeks earlier in the season (from September 16- December 31 to September 1 - December 16) | 1C | |
| 30 | Waterfowl | | Create a youth hunt at Mendenhall Wetlands State Game Refuge | 1C | |
| 31 | Mink, Otter and Beaver | | Allow the use of submerged traps in the Juneau closed area | 1C | |
| 32 | Furbearers | | Modify the regulation to close trapping and restrict the use of certain traps near roads and trails within the Skagway Borough | 1D | |
| 33 | Mountain Goat | | Open a drawing hunt on Cleveland Peninsula | 1A & 1B | |
| 34 | Mountain Goat | | Open a registration hunt on Cleveland Peninsula | 1A & 1B | |
| 35 | Mountain Goat | | Change the hunt structure for Revillagigedo Island | 1A | |
| 36 | Deer | | Increase the bag limit along Cleveland Peninsula to four bucks (from 2) | 1A | |
| 37 | Deer | | Reduce the harvest objectives from 700 to 350-400 | 1A | |
| 38 | Beaver | | Extend the trapping season (from 2 weeks to 4 weeks) | 1A | |
| 39 | Deer | | Shorten hunting season by one month (August 1 to November 30) | 2 | |
| 40 | Deer | | Decrease the nonresident bag limit (from four to two) | 2 | |
| 41 | Deer | | Require harvest tickets to be attached at the time of harvest | 2 | |
| 42 | Wolves | | Increase the annual harvest (from 20% to 30%) | 2 | |
| 43 | Wolves | | Change harvest mgmt. strategy (to within a population range vs. not to exceed 20% of the unitwide, preseason population estimate) | 2 | |
| 44 | Wolves | | Extend the trapping season on state and private lands to align with the starting date for wolf trapping season on federal land. | 2 | |



| Unit 1B and 3 - Petersburg and Wrangell Areas | | | | | |
|---|------------|--|---|-------|--|
| 45 | Deer | | Extend hunting season for residents on Mitkof, Woewodski, & Butterworth Island | 3 | |
| 46 | Deer | | Extend hunting season for residents on Kupreanof Island | 3 | |
| 47 | Elk | | Change harvest mgmt. strategy (to within a population range vs. not to exceed 20% of the unit wide, preseason population est) | 1 - 3 | |
| 48 | Brown Bear | | Change the bag limit (from 1 to 4 bears every regulatory year) and open a fall season (Sept. 15 - Dec. 31) | 3 | |
| 49 | Black Bear | | Increase "up to number" for drawing permits (DL029) for nonresident hunters without a guide on Kuiu Island | 3 | |
| 50 | Black Bear | | Increase "up to number" for drawing permits (DL030) for unguided nonresident hunters on Kupreanof Island | 3 | |
| 51 | Black Bear | | Modify the sealing requirement for nonresident hunters | 3 | |
| 52 | Black Bear | | Repeal the shorter harvest reporting and sealing requirements for nonresidents on Kuiu Island | 3 | |
| 53 | --- | | Modify the hunting area description within the Petersburg Mgmt. Area | 3 | |