



## 2019/2020 Alaska Board of Game – Interior Region Proposal Comments

### Interior and Eastern Arctic Region Proposals

#### Regionwide & Multiple Units

##### **PROPOSAL 44**

5 AAC 99.025. Customary and traditional uses of game populations.

##### **Comments:**

Alaska Board of Game approved CT for waterfowl in 2017 on a statewide basis.

##### **PROPOSAL 45**

**5 AAC 92.080(15). Unlawful methods of taking game; exceptions.**

Prohibit the use of moose, caribou and reindeer urine as scent lures in the Interior and Eastern Arctic Region as follows:

##### **Comments:**

We support Proposal 45 if this is occurring in Region III. Including under 5 ACC 92.084 - Unlawful methods of taking big game; exceptions, the use of moose, caribou/reindeer urine as scent lures should be added to the list of prohibitions to take big game. Disease may occur if urine from caribou/reindeer or moose were used while hunting for moose. Scent lures should never be used to hunt moose or caribou.

##### **PROPOSAL 46**

**5 AAC 92.115. Control of predation by bears.**

Establish intensive management programs for bear across the Interior and Eastern Arctic Region as follows:

##### **Comments:**

We support Proposal 46 to establish intensive management programs for bears, specifically in Game Management Unit 12, to effectively reduce bear populations. Bears are preying upon calves of moose and caribou, and are reducing the number of caribou and moose in GMU 12. Mentasta Caribou herd range areas is between GMU 11 and GMU 12, its population count is estimated at 470, Chisana Caribou Herd's composition sample size was 373 (ADFG). These low numbers are due to grizzly bears preying upon calves. Mentasta Caribou herd is closed to hunting, so low caribou is not human caused. Low Chisana caribou count is not caused by humans. Chisana Caribou hunting harvest limit is 7 caribou per year under the federal hunting regulations.



## **PROPOSAL 47**

Prohibit non-resident hunting of any prey species under intensive management in the Interior and Eastern Arctic Region until harvest or population objectives are met as follows:

### **Comments:**

No comments on Proposal 47 to prohibit nonresident hunting of any prey species under intensive management in the Interior and Eastern Arctic Region until harvest or population objectives are met.

## **PROPOSAL 48**

### **5 AAC 85.056. Hunting seasons and bag limits for wolf**

### **Comments:**

We are neutral on Proposal 48 to extend hunting season for wolf only in GMU 20 to reduce wolf population.

## **PROPOSAL 49**

### **5 AAC 92.085. Unlawful methods of taking big game; exceptions.**

For the Interior and Eastern Arctic Region, allow the use of crossbows in archery only hunt areas for hunters possessing permanent identification cards as follows:

### **Comments:**

We oppose Proposal 49 to allow a specialized crossbow hunt for elderly people in Unit 12 and Unit 20A.

In considering any proposals where it is relevant to subsistence hunt areas, and is related to authorizing specialized hunts, the Board of Game should consider any potential impact on providing for subsistence uses which is the priority use of wildlife population under Alaska law. Specialized hunt proposals often request extended seasons or other additional hunting opportunity and target the same wildlife populations that subsistence users depend upon to meet their needs. Consequently, specialized hunts can result in additional direct competition with subsistence users in areas and times that are critical to providing reasonable opportunity to meet subsistence needs.



## **PROPOSAL 50**

### **5 AAC 85.045. Hunting seasons and bag limits for moose.**

Establish registration archery only hunts for bull moose in the Interior and Eastern Arctic Region Units that have general moose seasons as follows:

#### **Comments:**

We oppose Proposal 50, see comments under Proposal 49.

## **PROPOSAL 51**

5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

#### **Comments:**

We oppose Proposal 51 to allow removal of the bag limit restriction of one sheep every four years of nonresidents over the age of 60 in GMU 12 which is a part of Interior Region. Non-residents should have to comply with existing regulations. Restrictions to nonresidents are in the regulations for a reason, to allow more opportunity for residents to harvest a Ram Sheep without competition from nonresidents in GMU 12. Restriction to allow only a Ram Sheep suggests that sheep population is low in this game management unit. Hunting regulations should stay status quo.

## **PROPOSAL 53**

### **5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.**

Establish an archery only registration permit hunt for Dall sheep in the Interior and Eastern Arctic Region as follows:

#### **Comments:**

We oppose Proposal 53, see comments under Proposal 49.

## **PROPOSAL 54**

### **5 AAC 92.015(a)(4). Brown bear tag fee exemptions.**

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska as follows:



**Comments:**

We support Proposal 54 to reauthorize Brown Bear tag fee exemption for Game Management Units 12 and GMU 20. Brown bears may not be counted, however, they are at a healthy population. If there was a conservation concern, Alaska Department of Fish and Game would close all brown bear hunting seasons. There is no conservation concern for Brown Bear population. Additionally, brown bears are well known to prey upon calves of caribou and moose, thereby reducing the moose and caribou population recruitment.

**PROPOSAL 55**

**5 AAC 92.085(5). Unlawful methods of taking big game; exceptions.**

Allow the use of dogs for hunting for lynx in Units 12 and 20 as follows:

**Comments:**

We oppose Proposal 55 to allow hound hunting for lynx for residents and non-residents on October 15<sup>th</sup> to December 31<sup>st</sup> in GMU 12 and GMU 20. Also, hunting limits in GMU 12 and GMU 20 is 2 lynx per hunting season, regulations should remain at it exists in regulations. Dogs may spread disease to wildlife. Additionally, dogs may step onto a trapper's trap or get entangled in a snare.

In Alaska Statute, in Sec. 16.05.790 – Obstruction, or hindrance of lawful hunting, fishing, **trapping**, or viewing of fish or game, it states that a person **may not obstruct or hinder** another person's...trapping, and/or creating physical stimulus in order to alter the behavior of game that a person is attempting to take. It appears that creating a hound hunt for lynx during trapping season will violate the intent of Sec. 16.05.790, creating a hindrance or obstruction to trappers attempting to take lynx to provide for their livelihood.

**PROPOSAL 56**

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

Establish minimum distance requirements for trapping around dwellings in the Interior and Eastern Arctic Region as follows:

**Comments:**

We support Proposal 56 to establish minimum a distance requirement of one mile from house/cabin/dwelling/mailbox. Trappers could easily catch dogs and cats in their snares, not to mention humans. Setting traps too close to communities or homes/cabins will cause undue harm to pets and humans.



## **Tok Area Proposals – Units 12 and 20E**

### **PROPOSAL 86**

#### **5AAC 92.113(a). Intensive Management Plans III.**

Reauthorize the Upper Yukon–Tanana Predation Control Program as follows:

#### **Comments:**

We support Proposal 86 to reauthorize Intensive Management in Region III. Unit 12 does have a wolf population increase, wolf population needs to be maintained. In Unit 12 wolves are preying upon calves of moose and caribou.

### **PROPOSAL 87**

#### **5 AAC 85.025. Hunting seasons and bag limits for caribou.**

Change for the Fortymile caribou registration hunt in Unit 20 to a drawing hunt with a longer season as follows:

#### **Comments:**

No comment. Most of Ahtna People do not participate in drawing permit hunts.

### **PROPOSAL 88**

#### **5 AAC 92.113. 113(1). Intensive Management Plans.**

Resume intensive management for wolves in a portion of Unit 12 and 20D as follows:

#### **Comments:**

We support Proposal 86 Intensive Management in Region III. Ahtna recognizes there is a wolf population increase. Wolf population should be managed by the department.



## **PROPOSAL 122**

### **5 AAC 85.045(18). Hunting seasons and bag limits for moose.**

#### **Comments:**

We oppose Proposal 122 to re-authorize an antlerless moose hunt in Unit 20(A), the Ferry Trail Management Area, Wood River Controlled Use Area, and the Yanert Controlled Use Area.

#### **Generalized Statement:**

In considering any proposals that are relevant to subsistence hunt areas, or other actions related to authorizing the taking of antlerless moose, the Board of Game should consider any potential impact on a community's ability to take an antlerless moose for a funeral potlatch ceremonies. The Alaska Supreme Court held in *Frank v. State* that the taking of a moose for a funeral potlatch ceremony was protected under the U.S. and Alaska Constitution. It is therefore a priority use of the moose population that is traditionally hunted and accessible to a community in need of a moose for a funeral potlatch ceremony. Authorizing an antlerless moose hunt should not result in restricting this constitutional right.

## **PROPOSAL 123**

### **5 AAC 92.530 (13). Management areas.**

Expand the Healy-Lignite Management Area in Unit 20A as follows:

13 Healy-Lignite Management area

#### **Comments:**

See comments under Proposal 49.



## **PROPOSAL 124**

### **Comments:**

We support Proposal 124 to all shot gun to harvest small game. Small game and game birds could be harvested within the Healy-Lignite Management Area in Unit 20A. Hunters will have an opportunity to harvest small game birds and small wild game. We oppose any restriction that does not follow best practices.

## **PROPOSAL 125**

### **5 AAC 92.530(13). Management areas.**

### **Comments:**

See comments under Proposal 124.

## **PROPOSAL 126**

### **5 AAC 92.530(13). Management areas.**

### **Comments:**

See comments under Proposal 124.

## **PROPOSAL 127**

### **Comments:**

We oppose Proposal 127 to modify the boundary of the Wood River Controlled Use Area in Unit 20A. Motorized vehicles should not be used in these areas, it is an area for hunters who prefer to walk out to hunt. It is a good area to hunt for those hunters who do not have off road vehicles or cannot afford ATVs. There are so many other areas in GMU 20A that hunters who use ATVs to hunt with.

The Board should keep areas for those who walk out to hunt and keep those areas open for them to hunt in. Some hunters may actually like to walk out to hunt for wildlife, without the noise and invasion from ATVs or other off-road vehicles.



Hunters who use ATVs have many advantages over those who do not have ATVs, they also have excessive amounts of land areas to hunt in GMU 20A. Hunters who hunt with ATVs really do not need to have this area to hunt, leave it as it is, for hunters who walk in to hunt.

### **PROPOSAL 128**

#### **5 AAC 92.540(3)(F). Controlled use areas.**

##### **Comments:**

See comments under Proposal 127.

### **PROPOSAL 129**

#### **5 AAC 92.540(3)(H)(ii). Controlled use areas.**

##### **Comments:**

We oppose Proposal 129 to “change the closure dates for the Yanert Controlled Use Area (CUA) in Unit 20A to align with the Wood River CUA, and clarify whether horse feed is considered “hunting gear”.

Keep Wood River and Yanert Controlled Use Area as it is in regulation. These two controlled use areas should not be opened to motorized vehicles to hunt in, nor should hay or grain be allowed to be transported into controlled use areas. Grain, hay or other contaminated particles or hay may begin to grow in wild, natural pristine areas, which may cause harm to the environment or replace natural grass with un-natural grass. Imported un-natural hay or grain may negatively affect wild game or attract more white-tailed deer and mule deer into the areas.

### **PROPOSAL 130**

#### **5 AAC 5 AAC 92.104. Authorization for methods and means disability exemptions. 5 AAC 92.540(3)(h). Controlled use areas.**

##### **Comments:**

We oppose Proposal 130 to disallow the issuance of methods and means disability exemption permits for the Yanert Controlled Use Area in Unit 20A. There are not that many disabled people using ATVs to hunt with or to get access to hunting areas.





Additionally, men or women who have served in the military and are disabled would not be able to hunt. They should be able to have an exemption permit to hunt in Yanert Controlled Use Area in Unit 20A, they deserve this, for serving voluntarily for our country.

Youth could hunt for Elders who may not be able to hunt for themselves.

### **PROPOSAL 131**

#### **5 AAC 92.085. Unlawful methods of taking big game; exceptions.**

Limit the use of off-road vehicles for moose hunting in Unit 20A as follows:

#### **Comments:**

We oppose Proposal 131 to limit the use of off-road vehicles for moose hunting in Unit 20A as follows:

change regulations to read: In Unit 20A it is against the law to hunt moose until after 3:00 am the day following the day you operated or were conveyed by any off-road vehicle (ORV) in Unit 20A.

This would be an ineffective regulation. It would be difficult for enforcement to enforce and monitor, in-addition to writing citations to those who will break this proposed regulatory change. Un-ethical hunting and deterioration of the environment will occur even if this was in the regulations.

### **PROPOSAL 132**

#### **5 AAC 85.045. Hunting seasons and bag limits for moose.**

#### **Comments:**

We support Proposal 132 to shorten moose season in Units 20A and 20C. Hunting for Bull Moose during rutting season is a waste of moose and moose meat. Moose meat taste terrible during the rutting season. Bull moose are vulnerable during the rutting season and are highly susceptible to being over harvested. Moose season should closed on September 20<sup>th</sup> to avoid killing Bull Moose during the rutting season.



### **PROPOSAL 133**

**5 AAC 85.045. Hunting seasons and bag limits for moose. 5 AAC 92.530. Management areas.**

#### **Comments:**

See comments under Proposal 49.

### **PROPOSAL 134**

**5 AAC 85.045. Hunting seasons and bag limits for moose.**

#### **Comments:**

See comments under Proposal 49.

### **PROPOSAL 144**

**5 AAC 85.045 Hunting seasons and bag limits for moose.**

#### **Comments:**

We support Proposal 144 with modification to close moose season in GMU 20A to September 30<sup>th</sup>. Harvesting moose during rutting season is a waste of killing a moose, moose cannot be used for food.

### **PROPOSAL 147**

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

#### **Comments:**

We support Proposal 147 to extend hunting season in GMU 20A from September 1 to June 30. If there should be a conservation concern, ADFG has the authority to close the bear hunting season. However, there doesn't appear to be a conservation concern for brown/grizzly bears. These species seem to be well populated.

Additionally, brown bears could be incidentally caught in a black bear bait during the open bait season for black bears. Hunters could be cited for killing a brown/grizzly bear, if this were to happen.



## **PROPOSAL 151**

### **5 AAC 85.056. Hunting seasons and bag limits for wolf.**

#### **Comments:**

We support Proposal 151 to change wolf hunting season date back to May 31<sup>st</sup> if best management is practiced. Changing the season dates back to former season date will provide hunters more opportunity to harvest wolves for their livelihood.

## **PROPOSAL 152**

### **5 AAC 92.510. Areas closed to hunting. 5 AAC 92.550. Areas closed to trapping.**

Establish closed areas for the taking of wolves near Denali National Park in Unit 20C as follows:

We adamantly oppose Proposal 152 to both Closure 1 and Closure 2 as proposed in this proposal. We are opposed to adding more acreage to close and restrict wolf hunting and trapping seasons to hunters and trappers in Unit 20C near Denali Park Lands.

An opportunity for hunters and trappers to kill a wolf to provide for themselves and their families will be taken from them. Wolf furs could be used for clothing or sold to provide monies to pay for bills. Providing an opportunity for tourists to gaze at wolves above Alaskans being able to kill or trap a wolf so they can pay bills or feed themselves is intolerable.

Additionally, it is dangerous to assume that there will be only be 2 people trapping wolves, now and in the future. This would be setting a precedent to ask members of the Alaska Board of Game to change regulations because only 2 people are harvesting wolves. More people in the future may be using these resources in the Park.

Alaska Board of Game member's priority should be to protect subsistence uses - trapping wolves near the Park boundaries. Nor should the Board add more acreage, so that tourist could view wolves up close.

Road traffic during tourist season has caused in no wolf sightings in the Denali National Park in Unit 20C. Wolves are wary and will avoid humans.

## **PROPOSAL 158**

### **5 AAC 085.045(4) Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 13 as follows:



**Comments:**

We oppose Proposal 165 to open an antlerless moose season in GMU 13.

In considering any proposals or other actions related to authorizing the taking of antlerless moose, the Board of Game should consider any potential impact on a community's ability to take an antlerless moose for a funeral potlatch ceremonies. The Alaska Supreme Court held in *Frank v. State* that the taking of a moose for a funeral potlatch ceremony was protected under the U.S. and Alaska Constitution. It is therefore a priority use of the moose population that is traditionally hunted and accessible to a community in need of a moose for a funeral potlatch ceremony. Authorizing an antlerless moose hunt should not result in restricting this constitutional right.

**PROPOSAL 166**

**5 AAC 92.015. Brown bear tag fee exemption.**

Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region as follows:

**Comments:**

We support Proposal 166 to reauthorize brown bear tag fee exemption GMU 11 and GMU 13. Brown bears are considered to be at a healthy population within these two game management units. And if there should be a conservation concern ADFG could always take management action. Brown Bears prey upon calves of moose and caribou.

Submitted by Ahtna Tene Nene



Submitted By  
Thor Stacey  
Submitted On  
2/21/2020 9:32:26 PM  
Affiliation  
Alaska Professional Hunters Association

Phone  
9077231494  
Email  
[thorstacey@gmail.com](mailto:thorstacey@gmail.com)  
Address  
PO Box 211231  
Auke Bay, Alaska 99821

February 21st, 2020

Dear Alaska Board of Game Members,

Please find the following comments regarding proposals you will be considering during the March meeting in Fairbanks. 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 current 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 SCl 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.

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

**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 Alaska, with many guides living in remote communities or “Bush Alaska.” APHA worked with McDowell to quantify 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 III 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 #47- OPPOSE:

Proposal #47 would contravene legislative intent and should be summarily rejected.

AS 16.05.255 is clear that residents have a statutory allocation priority (AS16.05.255(d)) but that intensive management (IM) should:

*“...restore the abundance or productivity of identified big game prey populations as necessary to achieve human consumptive use goals of the board” (AS16.05.255(e))*

Nothing in AS 16.05.255 suggests that the *“human consumptive goals of the board”* may not include a non-resident allocation. Aside from the long-term human consumptive goals alluded to in AS16.05.255, the legislature had the opportunity to clarify in plain statutory language its intent to close non-resident participation during an IM program. Nowhere in Alaska statute does the legislature give any such direction. Non-resident participation and an active IM program are not mutually exclusive.

Proposal 47 should fail because it misconstrues the plain statutory language in AS 16.05.255 by suggesting there is a need to enshrine another layer resident hunter preference, above and beyond *amount(s) necessary for subsistence (ANS)*. The legislature and the Board of Game have done a good job describing their goals and implementing IM programs, while giving preference to Alaskan residents. This Board of Game should not tie future boards hands with an additional layer of pre-emptive regulation. APHA supports the legislature’s intent outlined in AS16.05.255 that provides for IM and a strict resident preference for moose, caribou, deer and elk.

### *Intensive Management Population Thresholds Change:*

An important aspect of how the IM population objectives are set is that they are flexible and can be changed depending on a variety of criteria. Certain areas in the state initiate IM when populations are not severely depleted but are more at a midpoint in their cycle. These areas often times have non-resident opportunity allocated even when IM is being considered. Non-residents should not be excluded from allocation schemes where the population thresholds for IM are well above population low points. Proposal 1 could have the unfortunate and unintended effect of lowering population thresholds for considering IM in GMUs and Regions that have done the work to make IM a more proactive rather than a reactive management tool.



Guided non-residents harvest predators in remote areas of the state while hunting for “prey species.” Often times these harvest patterns can show a “net gain” where

the effects of secondary predator harvest not only compensate for ungulate harvest but are a net gain where predator:prey is concern. Guided non-resident hunters can be another tool in ADFG’s toolbox, especially in remote areas, where additional harvest of predators is desired. Passing a blanket exclusion on non-resident participation when IM plans are in place will take a tool out of ADFG’s tool box at a time when we are trying to give ADFG more options, not less.

*Non-residents Pay the Intensive Management Surcharge:*

In 2016 the legislature passed HB137 and updated hunting license and non-resident tag fees. HB137 also incorporated an *intensive managementsurcharge* that would be paid by both residents and non-residents (resident IM charge \$10, non-resident IM charge \$30) as part of purchasing their hunting license. That the legislature agreed that IM benefits both residents and non-residents is important when considering Prop 47. The legislature could have defined IM as a “resident benefit” and only required residents to pay the surcharge. Instead, the legislature applied the same differential ratio paid by residents and non-resident for hunting licenses to the IM charge. IM was thus treated the same as plain-vanilla wildlife management where residents and non-residents fees are concerned. A blanked exclusion of non-residents when an IM plan is place will work against the benefits provided by IM to all hunters and reduce critical revenue that state should use to accomplish its management objectives.

**Proposal #48: SUPPORT**

APHA supports this proposal based on the points presented by the proponent and the fact it will only offer more hunting opportunity without causing a conservation concern.

**Proposals 51: SUPPORT- Amend to Statewide**

APHA supports this proposal because it will not cause a conservation concern but it will offer a little more opportunity for older hunters who will not be able to sheep hunt for many more years.

**Proposal #52: OPPOSE**

APHA opposes prop. 52 because it does not have a conservation basis but is allocative in nature. Sheep numbers and lamb recruitment in the Alaska Range are on a positive to increasing trend. This combined with the good numbers of 8 year old plus rams harvested show a healthy resource with mature rams surviving multiple seasons after they are legal to take. Drawing hunts without guide concessions destabilize small guide businesses and do not enhance the overall value of the resource. Prop 52 should fail because sheep in the Alaska Range are increasing and allocating non-resident opportunity via draw will needlessly hurt small, Alaska owned guide businesses.

**Proposal #62: OPPOSE**

**Back Ground:**

In 2008 the Board of Game passed Proposal 55 creating DM810 in an extremely remote portion of GMU 21B that includes portions of the



Nowitna National Wildlife Refuge. DM810 was deemed necessary to address conservation concerns but the board practical concerns of how tags would be utilized in such a remote and economically depressed region. The board allocation policy, based on average historical use, and allocated 50% of the tags to residents and 50% to non-residents. To ensure the maximum participation and benefit of the limited number of allocated tags, non-resident tags were further broken down into two categories; guided non-resident and non-guided non-resident. No less than 25% of the non-resident tags would be unguided, no more than 75% would be guided. The board applied its own policy for resident/non-resident allocation when going to a draw hunt and created a hunt structure that maximized the benefits of the limited non-resident allocation.

## Legal Concerns

The proponent of Prop 62 complains that DM 810 is an illegal hunt structure that is unconstitutional and in violation of statutory authority not explicitly granted the Board of Game. The authors argue that resident hunters are enshrined with a constitutional allocation priority (Article 8) and that the board of game has somehow illegally broadened AS 16.04.407 by allocating some non-resident drawing tags to “guided non-residents.” The authors of Prop 62 disagree with the Board of Game and the Department of Law and assert DM810 illegally provides for a “guided non-resident” moose allocation.

## DM810- A Constitutionally Sound and Statutorily Defensible Hunt Structure-

Article VIII of Alaska constitution addresses “natural resources” with the following sections being germane to the discussion on Prop. 62:

### Section 1: Statement of Policy

*It is the policy of the State to encourage the settlement of its land and the development of its resources by making them available for the maximum use consistent with the public interest.*

### Section 2: General Authority

*The legislature shall provide for the utilization, development and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people.*

### Section 4: Sustained Yield

*Fish, forests, wildlife, grasslands, and all other replenishable resources belonging to the State shall be utilized, developed, and maintained on the sustained yield principle, subject to preferences among beneficial uses.*

The Framers of Alaska’s constitution had the opportunity to enshrine a “clear resident hunter priority” in the constitution; they did not do so. The Framers did make it clear that they wanted Alaska’s resources developed for “...*the maximum benefit of its people.*” Article VIII, section 4, empowers the legislature as the body that will make game allocations or “*preference(s) among beneficial uses.*” Recognizing the strength of a decentralized power structure, the legislature delegated most of its wildlife allocation authority when it constituted the joint boards of fish and game. Proponents of Prop 62 falsely assert the existence of a “clear resident hunting priority” in Alaska’s constitution; the board of game has broad authority to make allocations for “*the maximum benefit of its people(s).*”

## Geographic, Economic and Social Concerns





GMU 21B is an extremely remote and sparsely populated region of Alaska. Most of 21B is Federal land that is closed to mineral entry and timber harvest. Federal land management policy further disadvantages Alaskans where building of new cabins or structures is, for all practical purposes, impossible. Fish, wildlife and fur animals are the primary resources local residents rely on for food security and a limited cash economy. Guiding hunters may be the most important economic opportunity in the area and other rural areas similar to GMU 21B (McDowell, 2013). Economic opportunities provided by game allocations to hunting guides sustains critical employment; meat sharing (McDowell, 2017); and transportation and logistical support to locals for remote traplines, fish counting stations (ADF&G), subsistence fish wheels and subsistence farming. The portion of GMU 21B that includes DM810 realizes all of these social and economic benefits of the guide industry.

### **Traplines, Wolves and Resident Hunting Opportunity**

Much of GMU 21B is federal land managed by USFWS and therefore off limits to state intensive management. Predator harvest that offsets human harvest of ungulates is almost solely attributed to the region's trappers. Some wolf and bear harvest does occur annually from subsistence users, resident hunters and non-residents hunting with the local guide. DM810's region includes a number of active traplines that benefit from having a local hunting guide help with transportation of goods and necessary supplies, the number one expense for the local trappers. The sustained wolf harvest from these local traplines, a known benefit to resource management, is therefore an indirect benefit of guided non-resident hunters. Guided non-resident moose hunting opportunity is a critical link in the chain that bonds Alaskan hunters to a healthy and wild Nowitna River.

Resident hunters and the harvestable surplus of moose they rely on for their allocation are currently benefitting from local trapping and guided non-resident bear and wolf harvest. Passage of Prop 62 would destabilize the relationships between necessary logistic support of local trapping, guided predator harvest, and the moose resource. Trapping and guiding hunters are currently working to *"encourage the settlement of its (Alaska's) land and the development of its resources by making them available for the maximum use."* Total or gross numbers of resident hunters should not be the sole consideration while seeking *"the maximum benefit of its people(s)."*

### **Guides are Alaska Residents**

Alaska's active registered guides are overwhelmingly Alaskan residents. According to the 2012 McDowell study, 89% of the active contracting guides in Alaska are residents. That means virtually all of the new dollars and other associated economic benefits (employment, spending etc.) from guiding hunters in Alaska stays in Alaska. Alaska's near total capture of the benefits brought by guided hunting is magnified in rural areas. Fully 50% of the economic benefits of guiding hunters stay in rural Alaska (McDowell, 2012). It is easy to argue against "non-resident hunters" but we should be arguing FOR resident Alaskan hunting guides who bring a necessary economy to depressed rural areas. The current hunt structure in DM 810 is a manifestation of the legislature's constitutional command to: *"provide for the utilization, development and conservation of all natural resources belonging to the State, including land and waters, for the maximum benefit of its people."*

A strong case can be made that the residency of the guide should determine whether or not the allocation is "resident" or "non-resident."

### **Mixed Cash Subsistence Economy- Shared Meat**

In 2015 hunting guides and their non-resident clients shared 230,000 lbs. of game meat in Alaska (McDowell, 2017). Meat shared by guides was conservatively valued at a 1.1 million dollars replacement (beef) cost. Sharing meat is particularly important in the aforementioned economically depressed areas in rural Alaska.

GMU 21B is entirely rural with 100% of its residents qualifying both as State and Federal subsistence users. Moose are the most important terrestrial source of protein to the area's residents. DM 810 encompasses an exclusive federal guide concession. This concessionaire is a local resident, who hires other experienced local residents as assistant guides. Guiding hunters does not disqualify a person from qualifying for state or federal subsistence hunting opportunities. Shared guided non-resident moose meat directly replaces moose that would have to be allocated and harvested under state or federal subsistence seasons if there was a loss of guided-moose



## **Conclusion**

DM 810 is a statutorily defensible and constitutionally sound hunt structure. DM810 is evidence that the Board of Game works to evaluate the complex social and economic relationships that surround wildlife use in rural Alaska. DM 810 provides excellent opportunity to hunt an extremely remote moose population in a way that allows locals to work for the greatest interests of all Alaskans. Clearly resident hunters support sound wildlife management, to include sustainable predator harvest. Local trappers catch wolves in the unit and they are partly reliant of the benefits brought by the local guide. Locals employed as guides do not need to hunt under subsistence seasons to fill their freezers with valuable moose meat. Urban resident hunters can now travel to a remote and wild region that has a more abundant moose population than it would have without the benefits brought by guided moose hunters. Resident hunters enjoy other benefits to the current situation as well. Having a local guide and local residents living in the region provides a safety net in these times of reduced public safety budgets. Guides don't just share meat, employ people and bring new money to Alaska, they also help resident hunters in need and act as stewards of the country.

Passage of Prop 62 would unnecessarily upset and impoverish a remote portion of Alaska that is currently self sufficient. Only a very few urban resident hunters would benefit until the moose population declines and the number of tags available diminishes. Transporters would also benefit from removing the "guided non-resident moose hunter" requirement. Unit 21B is remote, and its residents rely on subsistence use of fish and game. Non-guided non-residents are much more likely to waste meat, and less likely to share with locals, than are guided non-residents. Proposal 62 should fail because of the many enumerated and defensible benefits for all Alaskans (Alaskan resident hunters, Alaskan guides, Alaskan residents of the area and Alaskans that can no longer hunt) under the current regulations; whereas the proposed solution only benefits non-residents who don't want to hire a guide, transporters and urban resident hunters who must draw.

## **Proposals 68&69: SUPPORT**

APHA supports these proposals based on the given merits offered by the proponents.

## **Proposal 70: SUPPORT**

APHA supports Prop 70 because it will offer more hunting opportunity without causing a conservation concern. If additional harvest begins to affect bear populations it will be easy to shorten the seasons again.

## **Proposal 80: OPPOSE**

Prop 80 is poorly thought-out and could exacerbate conservation concerns. References to bills in the legislature are meaningless as they are proposed measures and not current law.

## **Proposal 82: SUPPORT**

APHA supports this proposal because it will offer additional hunting opportunity without causing conservation concerns. Guided hunting in the area is managed by USFWS concession and those concession require sensitivity to conflicts with non-commercial users. APHA is confident that conservation and social concerns will not arise by the passage of Prop 82.

## **Proposal 83: SUPPORT**



APHA supports this proposal based on the given merits.

**Proposal 86: SUPPORT**

APHA supports Prop 86 based on the given merits of the proposals and the obvious conservation merits.

**Proposal 90: SUPPORT**

APHA supports this proposal because it is more aligned with policy on 2DK allocations in other units that have proven successful.

**Proposal 131: OPPOSE**

APHA opposes prop 131.

**Proposal 146: OPPOSE**

APHA opposes Prop 146 because it will result in caribou hunting opportunities going un-utilized while destabilizing local guide businesses. The current system is working and doesn't need to be changed.

**Proposal 151: SUPPORT**

APHA supports Prop 151 based on the given merits.

**Proposal 152: OPPOSE**

APHA opposes closed areas outside being created outside of federal conservation units. The border is the border, state management practices should be primary on state land.





Submitted By  
Nicole Schmitt  
Submitted On  
2/21/2020 4:27:52 PM  
Affiliation  
Alaska Wildlife Alliance

Phone  
907-917-9453  
Email  
[nicole@akwildlife.org](mailto:nicole@akwildlife.org)  
Address  
PO Box 202022  
Anchorage, Alaska 99520

### Proposal 46: Oppose

Alaska Wildlife Alliance opposes this proposal on the grounds that, at the very least, a feasibility assessment should be conducted to determine if predators are the true cause of ungulate declines. Further, an Intensive Management program should only be implemented with a statement of objectives and an outcome monitoring protocol to the degree prescribed by the ADF&G Intensive Management protocols.

In 2013, the Alaska Chapter of The Wildlife Society adopted their position statement on Intensive Management (IM). This multiagency group of wildlife professionals concluded that while the IM protocol is a positive advance in implementing IM, there are still several outstanding concerns including:

- (1) the authority of Advisory Committees to revoke cow and calf moose hunts in their geographic areas (which can skew bull:cow ratios and/or give the appearance of reduced populations for harvest);
- (2) the fact that achieving IM objectives may require removing more predators or more predator species than is possible in some programs, especially where predator reduction is primarily based on public participation;
- (3) some ungulate population objectives may be unattainable due to habitat limitations or other environmental factors;
- (4) the operational costs for IM are high, requiring as much as a third of the operations and salary budget of the Division of Wildlife Conservation in some regions;
- (5) IM programs are not usually intended as research into predator-prey dynamics, which would require designed experiments with explicit controls; and
- (6) the efficacy of IM programs are difficult to assess when they deviate from a structured decision framework in response to public demand for increased efficacy or participation.

None of these concerns are addressed in the proposal.

The Alaska Wildlife Alliance acknowledges that Intensive Management is a law that can be applied to *temporarily* increase the recreational harvest of moose, caribou and Sitka black-tailed deer on lands that the State of Alaska has authority over. We recognize that control of predators is a tool in wildlife management that in *some* circumstances may be appropriate to restore or prevent the extinction of rare, threatened and endangered species, small populations, and insular populations such as islands.

However,

- We are concerned that IM population and harvest objectives have not been reassessed since their inception as recommended by the Alaska Chapter of The Wildlife Society;
- We are concerned that ADF&G and BOG have not established a standard to determine if the “prey population is feasibly achievable utilizing recognized and prudent active management techniques” nor a process to disapprove IM action if it is likely to be “ineffective, based on scientific information”;
- We are concerned that predator control is effectively the default mechanism that BOG uses to accomplish the IM law’s desired outcome of increasing recreational harvests of moose and caribou;
- We are concerned that the BOG is disingenuously stepping around the rigorous and expensive demands of a scientifically-based IM program by promoting liberalized hunting and trapping regulations for carnivores outside designated Predator Control Areas;
- We are concerned that big game management in Alaska has become a process whereby population objectives for wild ungulates are established based on public demand rather than on habitat capacity, promoting unsustainable management;
- We are concerned that “sustained yield” as currently used is an artificial construct (a definition has not yet been codified) that does not appropriately consider large scale variation in ungulate populations that occur because of wildfire regimes and cyclic insect defoliation, as well as the cascading effects of a warming climate (in fact, the need to apply predator control is antithetical to scientifically-accepted definitions of sustained yield);
- We are concerned that the economic costs of sustained predator control at landscape scales are generally so high that sustained yield becomes a euphemism for subsidized yield;
- We are concerned that other human sources of ungulate mortality (e.g., moose-vehicle collisions, illegal and unreported harvest) are being ignored in the BOG’s interest in promoting predator control;

- We are concerned that predator control undermines the ethos of humans learning to coexist with wildlife.



### **Proposal 55: Oppose**

Alaska Wildlife Alliance opposes this proposal because the proposed hound hunting season overlaps with the trapping season and would likely lead to dogs being caught in traps.

### **Proposal 56: Support**

Alaska Wildlife Alliance supports this proposal. Establishing a one-mile buffer around dwellings does not pose a significant restriction on trappers, and protects the pets of local residents. This proposal is both ethical and reasonable. The Board of Game is tasked to manage for all Alaskans, including those who wish to have their pets and children roam free around their homes.

### **Proposal 57: Oppose**

Alaska Wildlife Alliance opposes this proposal on the grounds that it violates tenants of ethical sport hunting and fair chase. Residents are already at an advantage in boats, and if taking caribou without power poses a significant safety risk or restriction, we recommend these hunters utilize alternative tactics.

The hunters in our membership agree that one of the most basic tenets of fair chase is determining if an animal has a reasonable opportunity to escape. If it does not, the sport hunt cannot be considered fair chase. That is because fair chase applies the hunter's acquired knowledge of the animal against the animal's own superior senses and evasive capability.

When the challenges of hunting are eliminated, we risk losing the special nature of the hunting experience itself. Most hunters agree that the uncertainty and the "no-guarantees" character of sport hunting is its most powerful attraction.

Recognizing that humans are the alpha predator and that there is a need to limit our hunting advantage over wildlife is key to using technology in an ethical manner. A fair chase sport hunter does not measure success by the sophistication of the technology they employ, but by the level of restraint they use.

### **Proposal 63: Oppose**

Alaska Wildlife Alliance and its members oppose this proposal on the grounds that this would liberalize sport hunting in an area essential to the Central Arctic Caribou herd while their numbers continue to decline. Since it peaked in 2010 at 70,000 animals, the size of the Central Arctic herd has fallen 69 percent — to 50,000 in 2013 and 22,000 in 2016. This repeal would remove significant protections against sport hunting from the road in the corridor. These protections were put in place upon the approval of the highway to:

1. Protect the pipeline from bullet-fire;
2. Satisfy citizenry concerns that the road would open remote country to liberalized hunting practices.

Many of our members and Board have bow hunted in the area and request that the status quo be maintained to avoid further pressure on the Central Arctic caribou herd. We also note that this proposal does not address a subsistence issue, as subsistence use is recognized in the existing management plan.

### **Proposal 64: Oppose**

Alaska Wildlife Alliance opposes this proposal on the grounds that what is set forth as a request for clarity would open the Dalton Highway Corridor to unsustainable sport hunting. When the Pipeline Authorization Act was considered, and then passed [1973], one prevailing argument against the pipeline was that the road and pipeline would open the central Brooks Range to roadside sport hunting. Sport hunting was thus prohibited within 5 miles of the road. That protection has been an Alaska statute, now codified as AS 19.59.

Members of our Board have hunted the Dalton several times with gun and bow. Recreational gun hunting needs to be greater than 5 miles away from road, both to protect the declining Central Arctic Caribou herd and shelter the pipeline from being damaged by bullet fire. The Central Arctic caribou herd has been in decline for the past 5 years and thus it would be a mistake to open the corridor to the possibility of roadside gun hunts at this time.

### **Proposal 75: Oppose**

Alaska Wildlife Alliance opposes this proposal. We acknowledge that Intensive Management (IM) is a law that can be applied to *temporarily* increase the recreational harvest of moose, caribou and Sitka black-tailed deer on lands that the State of Alaska has authority over. We recognize that control of predators is a tool in wildlife management that in *some* circumstances may be appropriate to restore or prevent the extinction of rare, threatened and endangered species, small populations, and insular populations such as islands.

At present, this proposal does not satisfy the temporary or extreme circumstances listed above.

We are concerned that ADF&G and BOG have not established a standard to determine if the "prey population is feasibly achievable utilizing recognized and prudent active management techniques" nor a process to disapprove IM action if it is likely to be "ineffective, based on scientific information". Thus, such standards should be clarified before a feasibility study can be conducted responsibly.

We further request that the following concerns be addressed if such a feasibility assessment were conducted:



- We are concerned that some methods (i.e., snaring of bears and wolves, “denning” of wolf pups) used in Pre continue to be inhumane;
- We are concerned that IM population and harvest objectives have not been reassessed since their inception;
- We are concerned that predator control is effectively the default mechanism that BOG uses to accomplish the IM law’s desired outcome of increasing recreational harvests of moose and caribou;
- We are concerned that the BOG is disingenuously stepping around the rigorous and expensive demands of a scientifically-based IM program by promoting liberalized hunting and trapping regulations for carnivores outside designated Predator Control Areas;
- We are concerned that big game management in Alaska has become a process whereby population objectives for wild ungulates are established based on public demand rather than on habitat capacity, promoting unsustainable management;
- We are concerned that “sustained yield” as currently used is an artificial construct (a definition has not yet been codified) that does not appropriately consider large scale variation in ungulate populations that occur because of wildfire regimes and cyclic insect defoliation, as well as the cascading effects of a warming climate (in fact, the need to apply predator control is antithetical to scientifically-accepted definitions of sustained yield);
- We are concerned that the economic costs of sustained predator control at landscape scales are generally so high that sustained yield becomes a euphemism for subsidized yield;
- We are concerned that the secondary ecological (e.g., loss of marine derived nutrients) and economic (e.g., loss of bear viewing) effects of predator control are not considered;
- We are concerned that other human sources of ungulate mortality (e.g., moose-vehicle collisions, illegal and unreported harvest) are being ignored in the BOG’s interest in promoting predator control;
- We are concerned that the BOG, at most, only represents the interests of ~25% of Alaskans who hunt but is promoting practices such as predator control and liberalized harvest that have outcomes that affect all Alaskans;
- We are concerned that predator control undermines the ethos of humans learning to coexist with wildlife;
- Lastly, we are concerned that predator control promotes a utilitarian view of wildlife as commodities rather than recognizing the intrinsic value of all wildlife (including large carnivores) and sustaining intact ecosystems.

### **Proposal 105: Oppose**

Alaska Wildlife Alliance opposes this proposal. Such a regulatory amendment should, at the very least, be subjected to feasibility assessments prior to determining if the area is truly deserving of Intensive Management (IM). Part of that assessment should include a statement of objectives and plans to monitor outcomes to the degree prescribed by the ADF&G IM protocols. We are also concerned that ADF&G and BOG have not established a standard to determine if the “prey population is feasibly achievable utilizing recognized and prudent active management techniques” nor a process to disapprove IM action if it is likely to be “ineffective, based on scientific information”. Such standards should be clarified before a feasibility assessment can be responsibly conducted.

We also request the following concerns be addressed before implementing an intensive management plan per this proposal:

- We are concerned that predator control is effectively the default mechanism that BOG uses to accomplish the IM law’s desired outcome of increasing recreational harvests of moose and caribou;
- We are concerned that the BOG is disingenuously stepping around the rigorous and expensive demands of a scientifically-based IM program by promoting liberalized hunting and trapping regulations for carnivores outside designated Predator Control Areas;
- We are concerned that big game management in Alaska has become a process whereby population objectives for wild ungulates are established based on public demand rather than on habitat capacity, promoting unsustainable management;
- We are concerned that “sustained yield” as currently used is an artificial construct (a definition has not yet been codified) that does not appropriately consider large scale variation in ungulate populations that occur because of wildfire regimes and cyclic insect defoliation, as well as the cascading effects of a warming climate (in fact, the need to apply predator control is antithetical to scientifically-accepted definitions of sustained yield);
- We are concerned that the economic costs of sustained predator control at landscape scales are generally so high that sustained yield becomes a euphemism for subsidized yield;
- We are concerned that the secondary ecological (e.g., loss of marine derived nutrients) and economic (e.g., loss of bear viewing) effects of predator control are not considered;
- We are concerned that other human sources of ungulate mortality (e.g., moose-vehicle collisions, illegal and unreported harvest) are being ignored in the BOG’s interest in promoting predator control.

### **Proposal 150: Oppose**

Alaska Wildlife Alliance opposes this proposal and requests that the following concerns be considered if such a feasibility assessment were conducted:

- We are concerned that some methods (i.e., snaring of bears and wolves, “denning” of wolf pups) used in Predator Control Areas continue to be inhumane;
- We are concerned that IM population and harvest objectives have not been reassessed since their inception;
- We are concerned that ADF&G and BOG have not established a standard to determine if the “prey population is feasibly achievable utilizing recognized and prudent active management techniques” nor a process to disapprove IM action if it is likely to be “ineffective, based on scientific information”;
- We are concerned that predator control is effectively the default mechanism that BOG uses to accomplish the IM law’s desired



- outcome of increasing recreational harvests of moose and caribou;
- We are concerned that the BOG is disingenuously stepping around the rigorous and expensive demands of the program by promoting liberalized hunting and trapping regulations for carnivores outside designated Predator Control Areas;
  - We are concerned that big game management in Alaska has become a process whereby population objectives for wild ungulates are established based on public demand rather than on habitat capacity, promoting unsustainable management;
  - We are concerned that “sustained yield” as currently used is an artificial construct (a definition has not yet been codified) that does not appropriately consider large scale variation in ungulate populations that occur because of wildfire regimes and cyclic insect defoliation, as well as the cascading effects of a warming climate (in fact, the need to apply predator control is antithetical to scientifically-accepted definitions of sustained yield);
  - We are concerned that the economic costs of sustained predator control at landscape scales are generally so high that sustained yield becomes a euphemism for subsidized yield;
  - We are concerned that the secondary ecological (e.g., loss of marine derived nutrients) and economic (e.g., loss of bear viewing) effects of predator control are not considered;
  - We are concerned that other human sources of ungulate mortality (e.g., moose-vehicle collisions, illegal and unreported harvest) are being ignored in the BOG’s interest in promoting predator control;
  - We are concerned that the BOG, at most, only represents the interests of ~25% of Alaskans who hunt but is promoting practices such as predator control and liberalized harvest that have outcomes that affect all Alaskans;
  - We are concerned that predator control undermines the ethos of humans learning to coexist with wildlife;
  - Lastly, we are concerned that predator control promotes a utilitarian view of wildlife as commodities rather than recognizing the intrinsic value of all wildlife (including large carnivores) and sustaining intact ecosystems.

### Proposal 151: Oppose

Alaska Wildlife Alliance opposes this proposal because the conditions that gave rise to the shortened season in 2016, per 2016 Proposal 141, have not been resolved—realigning the two seasons would simply repeat the history that led to an emergency closure in May 2015.

In 2016, Denali National Park put forward Proposal 141. The proposal argued that the changes in hunting regulations that allowed for the taking of brown bears at bait stations along with the lengthening of the wolf hunting season to May 31 had exposed wolves that are attracted to bait stations to increased and unforeseen harvest pressure in the Stampede Corridor within Unit 20C. The proposal was supported by the Middle Nenana AC and the BOG.

In early May 2015, Denali National Park and Preserve staff learned that a collared male wolf from the East Fork pack (1507GM) and an un-collared and reportedly pregnant female wolf were shot by a hunter at an illegally kept bear baiting station outside of the park near the Stampede Trail. GPS data provided by 1507GM’s collar indicated that he had spent most of the prior week at a location within a mile of the location where he was shot. Upon investigation, park staff learned that there was a bear baiting station within a quarter of a mile from where the two wolves were shot and the bait station was the same location where GPS data indicated the collared wolf had been the prior week.

There was no evidence that the East Fork pack denned in 2015. The loss of the pregnant female thus may have represented a loss of the reproductive potential for this pack and potentially represents the first time that the East Fork pack has not produced pups in over 28 years of continuous monitoring of this pack.

Although it was known that the open season for bear baiting in the Stampede area (April 15–June 30) would overlap the hunting season for wolves, this was the first time that there was evidence that a bear baiting station attracted wolves and increased their vulnerability to hunting. Park staff shared the information gathered from their investigation with the Alaska Department of Fish and Game. Soon after, the Commissioner issued an emergency order closing the wolf hunting season in the area two weeks early, stating that:

*“The department has received new information that has led to the decision to close wolf hunting in the area of Game Management Unit 20C along the Stampede Trail near Denali National Park. Trapping seasons are already closed for this regulatory year. The normal hunting season for wolves ends on May 31 in this area. There are no conservation concerns for wolves in Game Management Unit 20C, which includes a large portion of the park. However, changes in bear hunting regulations have increased the chances of wolves that primarily inhabit the park being taken as they venture on to adjacent lands. On average, this general area has a harvest of about four wolves per year and, prior to this year, little of that harvest had occurred in May. The controversy regarding the so-called “wolf buffer” is centered around the allocation of wolves between harvest through trapping and hunting and wildlife viewing opportunities for Park visitors. Allocation issues are the purview of the Board of Game. This temporary closure will allow the board to revisit the issue in light of the new information without additional take of wolves this May adding to the controversy.”*

Although wolf populations may be able to compensate for losses from low levels of harvest through increases in reproduction or immigration or reductions in emigration, at low densities, the ability for the wolf population to compensate through movement in or out of the population is limited by fewer wolves available. The unforeseen effect of additional harvest, particularly during the season when females are pregnant, can remove the reproductive capacity of for entire packs. Thus, the timing of this unforeseen additional harvest (which overlaps with the whelping and nursing period) combined with the current population status indicate the potential for population level impacts and present a legitimate conservation concern.

This proposal requests a concurrent change to the wolf hunting season to extend wolf hunting through the end of May. Wolves are known to be attracted to bear baiting stations (Bump et al 2013) but the effect of these bear hunting regulations on wolf take (legal until May 31 under existing regulations) was unforeseen when the bear hunting regulations were adopted in 2012. However, as evidenced by the 2015 emergency closure and 2016 proposal, they have now been tested and found unacceptable.





For all the reasons listed above, and with the support of the Middle Nenana Advisory Committee in 2016, the seas open the season again so that it overlaps with the brown bear baiting season would simply be history repeating itself.

- There are no additional wildlife troopers to ensure that bear baiting stations are legally kept;
- Wolves will still be attracted to the bait stations;
- Wolf movement is largely the same in this area;
- The hunter who took these wolves under illegal circumstances is *still* permitted to bait in this area, despite the outcry from local trappers that they not be permitted to operate in the area because of their behavior in 2015.

Finally, the shortened season (again, with the support of the local AC in 2016) does not burden hunter opportunity, as only two trappers (on average) utilize the area and the closure is at a time when pelts are of less quality.

## Proposal 152: Support

Alaska Wildlife Alliance supports this proposal, Closure Option 1 for the following reasons:

1. Proposal 152 is NOT an attempt to expand the park. It is an attempt to reduce the risk on wolves that venture onto state lands, during those weeks and months from February until summer, when research (Borg et.al 2016) finds they are consolidating their family groups, mating, and establishing territories, and when the death of a breeding wolf is most damaging to the integrity of the pack.
2. This is well within the interests and mandates of the Board of Game:
  - Statewide policy recognizes both consumptive and non-consumptive management options. "...ADF&G will manage wolf populations to provide for human uses and to ensure that wolves remain an integral part of Interior Alaska's ecosystems. Compatible human uses include hunting and trapping (both for personal use and commercial sale of furs), photography, viewing, listening, and scientific and educational purposes (ADF&G 2002). The aesthetic value of being aware of or observing wolves in their natural environment is also recognized as an important human use of wolves. We also recognize that integral to wolf management is the premise that wolf populations are renewable resources that can be harvested and manipulated to enhance human uses of other resources. Management may include both the manipulation of wolf population size and total protection of wolves from human influence..." - *Species Management Report and Plan ADFG/DWC/SMR&P – 2018-30*
  - The Denali region, and specifically the Stampede townships, are by history, science and public opinion the ideal state lands on which to practice non-consumptive use of wolves. Furthermore, there is nothing in the Board of Game policies that prevents managing at a sub-population level.
3. This is not a subsistence issue. Wolf hunting and trapping in the area identified for closure in Stampede lands does not satisfy the eight criteria for Customary and Traditional Use (5 AAC 99.010).
4. This proposal does not assert a biological emergency or population-level crisis. It is meant to prevent disruption of wolf packs during late winter and spring, making it more likely that their denning activities inside the National Park are completed successfully.
5. Wildlife viewing also brings an important socio-economic benefit to the state of Alaska, with wildlife viewing activities in Alaska supporting over \$2.7 billion dollars in economic activity in 2011. Forty percent of visitors to Alaska reported hoping to view wild wolves during their visit. (ECONorthwest 2012). This proposal provides wildlife viewers an increased *opportunity* to see wolves, just as the Board of Game provides increased *opportunity* for hunters to utilize wildlife through consumption with annual proposals.
6. The average number of people hunting and trapping wolves in the proposed closure **is less than two people per year over the last 20 years**. Those average two individuals would only lose 29% of their access to wolf hunting and 50% of their access to wolf trapping (in days) in this area. It is important to note that wolf hunting and trapping opportunities are still available in surrounding game units— this would not preclude people from trapping anywhere else outside this small area during the breeding season. The impact on trappers presents less than a 50% compromise. Meanwhile, over 400,000 people visit DNPP and, like the hunters who have *opportunity* to consume these wolves, have a right for the *opportunity* to view wolves.
7. **As Alaskans, we ask that the Board of Game recognize non-consumptive interests as legitimate user group that deserves consideration, particularly when hunter interests are also considered and protected in the proposal.** If this proposal passes, the Board of Game can take credit for supporting compromise in an area known for controversy since the 1990s. This is a compromise between hunting opportunity and wildlife viewing in its most studied and reasonable form.
8. A lack of compromise has led many Alaskan wildlife viewers and advocates to pursue protections outside the authority of the Board of Game, and if continually sidelined from management discussions, those efforts will likely continue. In 2017, the Alaska House approved HB 105 to create a 530 square mile buffer in this area, there is currently a petition with over 371,000 signatures requesting a full buffer, and in 2019 an Alaska-based petition requested an emergency closure. A compromise, as outlined in this proposal, may satisfy the viewability concerns by making denning inside the Park more successful. The Board has a responsibility to manage State lands for all Alaskans, and this proposal provides the opportunity for scientists to see if a wolf buffer is necessary for meeting the needs of viewability advocates, thus resolving the issue through the Board of Game as intended.
9. Protections in this area have historically been win-win. The presence of the buffer did not decrease the average annual number of wolves hunted or trapped in UCUs overlapping the Stampede Corridor (UCUs 502, 605, 607), in fact wolf take was higher during the

years the buffer was in place (Alaska Department of Fish & Game 2013). During the presence of the buffer z trapping of wolves adjacent to DNPP was on average greater than during the period without the presence of Simultaneously, the buffer was associated with substantially increased wolf sightings (Borg et al 2016).



10. We recognize that this proposal does not remove all risks to wolves. However, given the almost unlimited take authorized under current Fish and Game hunting/trapping regulations, those local wolves that are most viewed and studied remain vulnerable to disruption and possible complete loss of the pack.

As an organization, we appreciate the contributions hunters have made to Alaska's economy and conservation efforts. We also advocate for our non-consumptive members who utilize wildlife through tourism revenue, photography, or personal wildlife viewing. Those Alaskans, equal under the State Constitution, must also be considered. This proposal, unique to the past proposals in the long history surrounding this issue, addresses both user group interests in an effort at compromise.

Thank you for your consideration.



**The Alaskan Bowhunters Association**  
**Comments to the Alaska Board of Game**  
**Interior/Northeast Arctic Region**  
**Fairbanks, AK. March 6-14, 2020**  
Submitted February 21,2020

The Alaskan Bowhunters Association (ABA) is a membership 501C-3 nonprofit association representing conventional bowhunters. Our membership consists of both Alaska resident and non-residents who use archery tackle to hunt in Alaska. We thank the Board of Game for allowing us to comment on some of the proposals before you at this meeting.

Bowhunters are not a special interest group but rather are individuals who greatly enjoy the added challenges of hunting with gear that is significantly less effective than modern firearms. The challenge in bowhunting is spending enough time with your quarry to get inside of its normal defensive perimeter for an ethical killing shot. To many of us bowhunting seems to be an inherently more fair way of hunting. To be certain bowhunters must be persistent and usually spend considerably more time in the field with lower chance of success.

Most states have recognized that the limitations of equipment of bowhunting result in greater opportunity for hunters to spend time in the field with lower impact on the game resources. As a result nearly every state (except Alaska) has established long archery seasons both before and/or after the regular firearms seasons.

The ABA has submitted proposals for special archery hunts for both moose (PROPOSAL #50) and sheep (PROPOSAL #53) and we would urge you to seriously consider these proposals from the prospective of significantly increasing hunter opportunity while having very low or minimal impact on the respective game populations.

Both proposals have certain concepts in common. Specifically we are requesting that they be implemented in only the Interior and Eastern



ABA PAGE 2

Arctic Regions and only in hunts, which are available to anyone with a harvest ticket. In other words that they would not apply to units or subunits in which there were drawing permits. The purpose here is to try the concept in a region and not statewide. The idea of only having them in general (over the counter harvest ticket hunts) is that by implication those hunts are ones in which ADF&G is NOT worried about an overharvest of the resource. Our concept is that initially these special archery hunts would be by Registration Permit. This would give the ADF&G a much better handle on the actual participation and success rates in these hunts. We believe that by having them region wide there would be less chance of overcrowding that might occur if the special archery hunt was introduced in only one hunt area.

**Proposal #50** requests a conventional archery moose hunt for 7-10 days immediately following any regular (over the counter harvest ticket hunt). The advantage of a moose hunt following the regular firearms season is cooler weather for less chance of spoiling of meat and the possibility that (depending on the dates of the regular any weapon hunt) the archery hunt might be more in the rut when the bulls are moving and there is less foliage on the trees. There has been concern expressed by ADF&G that this might lead to overharvest and a declining bull cow ratio. We believe that if there was serious concern of overharvest of bulls with any late archery hunt that perhaps the department should be restricting the number of tags and not be having a general hunt. It would always be possible to close the hunt on an emergency basis if it appeared that the firearms season was overharvesting the resource. Our understanding is that over harvest is generally controlled by antler restrictions and it is important to note that this proposal is NOT requesting any less antler restriction for the archery season.

**Proposal #53** requests a conventional archery season for Dahl sheep from August 1-9. This would be a registration hunt to allow close monitoring of participation and success rates. A legal sheep would be the same as in the general any weapon hunt ie. Full curl, eight years old or double broomed. More than 20 years history of archery Dahl sheep hunts in unit 14C has shown that there is less than a 2% success rate on mature full curl rams. The advantages of holding this hunt prior to the



ABA Page 3

any weapon sheep hunt from the bowhunter's perspective would be longer daylight hours more conducive to the long stalks sometimes required of bowhunters. There are possible advantages of hunting undisturbed animals but this probably would be offset by the sheep being higher and in more rugged country in early August. This hunt would be open to nonresidents as well as resident bowhunters. But nonresidents would be required to have a guide. This would allow some guides, willing to take bowhunters for sheep, the ability to book another hunt and increase their income by extending their season. The fact that some guides prefer to NOT take bowhunters should not restrict guides who are willing to guide bowhunters.

Therefore The Alaskan Bowhunters Association would ask that you seriously consider **SUPPORTING both Proposals 50 and 53.**

We would like to briefly comment on a few more proposals:

**PROPOSAL #49. OPPOSE** Age and a permanent identification card is not a definition of a disability. There is already a mechanism for getting a medical disability card that allows a hunter to use a crossbow in conventional archery areas. At present the Dalton Highway corridor is limited to conventional archery only and it is best to keep it that way. We are concerned that the ability to shoot a cross bow from inside a vehicle may lead to temptation to shoot illegally in this area.

**PROPOSAL #63 OPPOSE** The complete repeal of 5AAC 92.530(7) would open the Prudoe Bay closed area and would allow hunting with crossbows as well as not really answering the concerns expressed in the ADF&G **PROPOSAL #64, which the ABA SUPPORTS.** This proposal requests a public process which **CLARIFIES** certain discrepancies and poorly worded parts of the regulation 5AAC 92.530(7) with the Alaska Statutes. Because of the importance of the Dalton Highway Management Area as the largest currently bowhunting only area in North America The Alaskan Bowhunters Association would respectfully request to be deeply involved in discussions about any specific modifications of these regulations for the Dalton Highway Management Area.



ABA Page 4

**PROPOSAL #69: SUPPORT** We generally support taking grizzly bear over bait especially in areas where black bear baiting is allowed. This can allow for more selective harvest of male bear. Apparently in this area the harvest objective is not being reached and it makes sense to align the regulations with adjacent units.

**PROPOSAL # 70: SUPPORT** It certainly seems reasonable to align the opening dates in adjacent units that are defined by a highway.

**PROPOSAL #71:** Normally the ABA would support taking a grizzly bear at a black bear bait site. However we have had several of our members who hunt in this area express concern over this proposal because apparently much of the area is very open and quite conducive to stalking grizzly bear.

**PROPOSALS #84 & 85** appear to be the same proposal by the same individual. They are requesting lengthening sheep season in the Dalton Highway Management Area by two weeks at the end of the season. This is currently a bowhunting only area for sheep from August 10 through September 20. Weather can become very hazardous in late September and early October in the Brooks Range. While the ABA does not oppose any increase in bowhunting opportunity we would prefer for the Board of Game to pass the ABA Proposal #53, which would create an additional opportunity in this area in early August rather than Late September.

Thank you for your consideration of our opinions.

Sincerely,

John D. "Jack" Frost –Legislative Vice President Alaskan Bowhunters  
907-360-1301  
jackfrost@gci.net





## Comments to Alaska Board of Game on Proposal #152 By Alaskans For Wildlife

POBox 81957 Fairbanks, Ak. 99708

We consider proposal #152 by the National Park Service to be inappropriate and completely inadequate.

We would like the Alaska Board of Game to adopt the following amendments to proposal 152:

- 1) To reestablish a closed area that aligns with that which is included and passed as HB 105 in 2017 by the House of Representatives of the Alaska Legislature;
- 2) making it a year-round closure, which
- 3) prohibits taking of all predator species, eg: wolves, bears black and brown, lynx, wolverine and coyotes.

This amendment addresses the question of declining wolf viewing success in the park which has dropped to 1% this past season. We wish to have the board return an expanded no kill buffer that you authorized from 2000 to 2010 during which viewing success in the park was excellent. We encourage the idea that such a reinstated closure for the next decade should be considered an experiment during which viewing success by park visitors would be monitored.

Thank you,

Jim Kowalsky, Chair

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







Submitted By  
Sharon Alden  
Submitted On  
2/21/2020 4:56:23 PM  
Affiliation

I am requesting an ammendment to the NPS proposal #152.

The viability of the wolves of Denali National Park is important for the tourism industry this could be a world class opportunity yet it is sacrificed for the benefit of a hand ful of trappers and hunters. The value of these wolves for viewing is much greater than the value of their pelts.

I request the ammendment be that the area in the Stampede Corridor be closed to the taking of predators year round.



Submitted By  
Chris Alderman  
Submitted On  
2/20/2020 1:58:38 PM  
Affiliation

Phone  
9074145452

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

Address  
210 E. Park Avenue  
Wasilla, Alaska 99654

I would just like to say I support Proposal 50, 53, 84, 85. Thank You



Arctic Bird Dog Association  
P.O. Box 90914  
Anchorage, AK 99509



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

Chairman Ted Spraker and Board Members:

Please consider comments from the Arctic Bird Dog Association (ABDA) regarding one proposal to be addressed by the Board of Game (BOG) at its March 6-14, 2020 meeting in Fairbanks, Alaska. Proposal 91 could affect hunting activities enjoyed by ABDA members and other bird hunters using working dogs. ABDA is affiliated with the American Kennel Club and currently has about 77 memberships, including 28 family groups and 4 corporate sponsors. Among other objectives, the association strives to promote conservation through education regarding the use of dogs for hunting.

**PROPOSAL 91 – 5 AAC 85.065. Hunting seasons and bag limits for small game.** Reduce the bag and possession limits for grouse in a portion of Unit 20D as follows:

**Unit 20D**, that portion lying west of the east bank of the Johnson River and south of the north bank of the Tanana River:

**The Hunting Regulations Booklet would read:**

**Five per day, fifteen in possession**, provided that not more than ten in possession may be ruffed grouse or sharp-tailed grouse ..... August 25-  
Mar 31

**By falconry only, five per day**, ten in possession, provided that not more than two per day and two in possession may be ruffed grouse or sharptailed grouse ..... Aug 10 –  
Aug 24

This proposal would reduce the bag limit for falconry from 10 per day to **5 per day** of which not more than 2 may be **ruffed grouse** or sharptailed grouse. Possession limit would be 10. The falconry season would remain the same at August 10 to August 24.

This proposal would also reduce the daily bag limit for grouse from 15 per day to **5 per day** for all forms of hunting, **15 in possession**, of which **not more than 10 may be ruffed grouse or sharp-tailed grouse**. This is down from 15 per day and 30 in possession. The season would remain from August 25 to March 31.

**We support this proposal.** ADFG indicates no known biological issues for these species in Unit 20D; however, we agree that ruffed grouse are recently in decline and sharp-tailed grouse are also in decline after recent population highs. The issue has more to do with a fair allocation of the resource to hunters throughout the season. The local AAC, of which one member is also a member in good standing with ABDA, proposes to make these changes for the following reasons:

The subject portion of Unit 20D has become a destination grouse hunting area because it is accessible;

The area has a good road and trail network throughout;

The area has been buoyed by outdoor TV show coverage and hunting periodicals. Subsequently, this area draws hunters from throughout Alaska and nonresidents;

Many hunters target this area early in the season and decimate the local grouse populations early



in the season. This leaves few grouse for hunters after mid-September;

The daily bag limit would remove the potential for accidental exceedances of species limits because many hunters fail to identify between the 3 species available in the area (ruffed, sharp-tailed, and spruce grouse), and they overharvest those species with limits.

The proposed daily bag limits and possession limits would remedy the problems outlined by the Delta AAC. We discussed this proposal at a recent association member meeting and all supported this proposal.

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

Sincerely,

A handwritten signature in cursive script, appearing to read "Tim Gallagher".

Tim Gallagher, President Arctic Bird Dog Association



# United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE  
101 12th Avenue, Suite 236  
Fairbanks, Alaska 99701



PC009  
1 of 2



In Reply Refer To:

February 4, 2020

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

Re: Comments for Board of Game Proposal 82

Dear Chairman Spraker:

The United States Fish and Wildlife Service – Arctic National Wildlife Refuge (NWR) would like to submit the following comments for consideration on Hunting Proposal 82 submitted by the Eastern Interior Regional Advisory Council to change seasons and harvest limits for Dall sheep within areas of the Arctic NWR:

1. The Arctic NWR supports the establishment of a drawing hunt opportunity for both resident and nonresident hunters within Unit 25A in the area known as the Arctic Village Sheep Management Area (AVSMA). The Arctic NWR remains neutral on the removal of the Federal AVSMA closure. In the event that the Federal closure is lifted, a limited drawing hunt offered by Proposal 82 would be more acceptable than the less restrictive general harvest ticket hunt that would occur absent this proposal. The general season hunt would be open to any resident or nonresident hunting with a guide, thereby potentially increasing hunter presence and possible conflict with local user groups. By limiting the number of hunters through a drawing hunt, the impacts to the local community of Arctic Village would be minimized.
2. If the proposal is approved, thereby establishing a drawing hunt, the Arctic NWR supports the requirement for hunters who successfully draw the permit to hunt in the AVSMA to take a department-approved hunter ethics and orientation course. The intent of the course would be to minimize conflict between users and to avoid trespass on private land holdings within the AVSMA. These two issues are commonly referenced during public testimony at Eastern Interior Regional Advisory Council meetings when the topic of the AVSMA is discussed.
3. Please note, the majority (>90 percent) of the AVSMA currently is an unappropriated Federal Guide Use Area. There are currently no plans for the Arctic NWR to advertise and fill that guide use area (identified as ARC12). If this proposal was to pass and the Federal closure was lifted for the AVSMA, this would effectively limit the nonresident



Chairman Ted Spraker

2

hunter who successfully draws the permit to hunt in a significantly reduced hunting area on the very northeast end of the AVSMA.

4. The Arctic NWR supports the proposed harvest limit reduction for permit RS595 (Units 25A and 26C) from any three sheep to one full curl or larger ram per year. The Arctic NWR supports retaining some level of harvest opportunity during winter months for all state residents while reducing the bag limit and restricting harvest to that of only older rams. The Arctic NWR supports the continued prohibitions on means of access for the RS595 hunt as well.
5. The Arctic NWR suggests excluding the AVSMA from the RS595 (Unit 25A) hunt in order to avoid local user and landowner conflict during the winter hunting season.

Thank you for the opportunity to share the Arctic NWR's comments on this proposal. If there are questions, please contact me at 907-456-0253 or [Steve\\_Berendzen@fws.gov](mailto:Steve_Berendzen@fws.gov).

Sincerely,

Arctic National Wildlife Refuge Manager

cc: Mr. Greg Siekaniec, Regional Director, U.S. Fish and Wildlife Service  
Mr. Brian Glaspell, Chief of Refuges, Alaska Region  
Mr. Doug Damberg, North Zone Refuge Supervisor  
Mr. Chris McKee, Supervisory Biologist, Office of Subsistence Management  
Ms. Carol Damberg, Regional Subsistence Coordinator  
Ms. Susan Entsminger, Eastern Interior RAC Chairwoman  
Mr. Zachery Stevenson, Eastern Interior RAC Coordinator  
Arctic Village Tribal Council



Submitted By

Anthony Asher

Submitted On

2/21/2020 11:15:31 AM

Affiliation

I oppose Anti-trapping proposal 56!





Submitted By  
DRAKE ATWOOD  
Submitted On  
2/13/2020 9:35:16 AM  
Affiliation

I would like to voice my support in favor of proposals 50 and 53. Providing the addition of these archery only seasons would be a massive attraction to people like me who only bowhunt and prefer to hunt in archery only seasons. For a middle class non resident like myself, the investment in time required, physical conditioning and financial means that goes into a Dall sheep or late season moose hunt cannot be overstated. So having the security of archery only seasons for these particular hunts and not having to worry about rifle hunters is extremely attractive. It also makes sense, as these hunts are extremely challenging. Success rates will be lower and will not have much effect on game populations but at the same time will provide quality opportunities for bow hunters and allow us more time in the field. I would also like to voice my concern with proposal 49 and my strong position against it. Crossbows should be allowed during archery seasons on a case by case basis due solely to disabilities, not because of age. As that makes absolutely no sense and would only dilute the quality experience of an archery only season.



Submitted By  
Adam Babcock  
Submitted On  
2/20/2020 6:19:17 AM  
Affiliation

Proposal 152 does not protect Denali's wolves and other predators enough. It's time to realize that tourism is the best, most sustainable economic building block that Alaska needs to capitalize on. That means protecting Alaska's wildlife for visitors and residents alike. I live here because of the unique wildness that can't be found anywhere else in our nation. Millions of people visit Alaska each year contributing to the multi-billion dollar industry of tourism that is second only to oil in the state's economy, and Tourism could easily be number 1 if the state would invest a fraction of the time & money that it does for oil...and amending Proposal 152 is the first step.

Please amend Proposal 152 as per the recommendations from Alaskans for Wildlife and Dr. Richard Steiner which would enact the following:

1. Closed area enlarged, to align with that which was passed by the Alaska House of Representatives in HB 105 (in 2017);
2. A year-round closure;
3. Prohibit take of all predator species (wolves, brown bear, black bear, lynx, wolverine, coyote)

Sincerely,

Adam Babcock



Submitted By  
Kevin Bahr  
Submitted On  
2/20/2020 4:42:24 AM  
Affiliation

Phone  
309-635-6586  
Email  
[kevinbahr1234@gmail.com](mailto:kevinbahr1234@gmail.com)  
Address  
224 Ossami Lake Drive  
Morton, Illinois 61550

I'm writing to express my displeasure with proposal 49. The inclusion of crossbows in any archery season always creates adverse effects and has been proven to be detrimental to game numbers and bowhunting experiences by regular bowhunters throughout the lower 48. I'm 60 years old now and find it ludicrous that just because of a specific age, a person is no longer able to hunt with a conventional bow that uses one's own physical strength to draw, hold and shoot. This would be the same as allowing anyone to have a handicap parking permit when they reach a certain age, regardless of their physical status. Legalization of crossbows in archery seasons has generally been driven by manufacturers of the devices or people who just want to make it easier on themselves, regardless if the use thereof has any detrimental effects on the resources or other bowhunters. I urge you to please vote against proposal 49.

Please vote yes on proposals 50 and 53. More opportunities for "bowhunting only" seasons are always needed. Crossbows are not bows and therefore should not be allowed in any archery only seasons or areas.

Thank you.



Submitted By  
Garrett Baker  
Submitted On  
2/18/2020 3:01:45 AM  
Affiliation

Phone  
7656988012

Email  
[Bakerg2006@gmail.com](mailto:Bakerg2006@gmail.com)

Address  
3441 Hoover Rd  
North Pole, Alaska 99705

I support proposal #50. As long as the population can sustain the addition of an archery season. By adding a archery season it maximizes subsistence opportunity.



Submitted By  
Gregory Barmer  
Submitted On  
2/21/2020 10:02:06 AM  
Affiliation

I fully support Proposal #50 and #53. We need more bowhunting opportunities in the state of Alaska.

I am opposed to Proposal #49. Crossbows should not be considered as archery equipment they are closer to a rifle than a hand drawn bow.



Submitted By  
Alan Batten  
Submitted On  
2/18/2020 2:28:44 PM  
Affiliation

Phone  
907-488-3205  
Email  
[alanbatten@acsalaska.net](mailto:alanbatten@acsalaska.net)  
Address  
946 Smallwood Trail  
Fairbanks, Alaska 99712

Dear Board of Game,

This comment is in support of Proposal 152, Option 1, to close the three townships in the Stampede Corridor to the taking of wolves for half of the year. The wolves taken in this area under current regulations are wolves that spend much of each year in the eastern part of Denali National Park. Not only are these families of wolves the ones with decades-long records of study by prominent biologists, they are also the ones most likely to be seen along the park road by visitors.

It's clear that visitors to Denali National Park are attracted at least as much by the opportunity to observe wildlife as the opportunity to see the mountain. It is one of very few places in the world where one can see large mammals, including predators, in their natural environment. While most park visitors are aware that seeing wildlife, and predators in particular, is never guaranteed, I believe that there are some for whom having a reasonable chance of seeing predators makes the difference between deciding to come and deciding not to bother. It's also clear that for whatever reason, wolf sightings along the park road have declined sharply since the protective buffer was removed in 2010. It seems very likely that hunting and trapping of wolves in the former buffer area have contributed significantly to the decline

For a decade between 2000 and 2010 there were buffers of various shapes to protect "Denali wolves" on state land, so the Board of Game has clearly considered this a reasonable policy in the past. It's true that the wolf population in Denali National Park and surrounding areas is in good shape, but there are circumstances where the conservation of individual lives matter. Bill Sherwonit's observation published in Alaska Dispatch, 14 March 2017, is still pertinent. He points out that Denali National Park is one of very few places in the state (the McNeil River bear sanctuary being another) where protection of individual animals makes a huge difference and takes on an importance extending far beyond Alaska's borders. "The Game Board can make a decision that benefits wildlife watchers and others -- many of them Alaskans -- who place great value on the ability to share wild landscapes with living animals, not to kill them."

I would be happy to see the proposal go further, as per the proposed amendment from Alaskans For Wildlife for year-round protection for all carnivores in an expanded area. I believe that in previous years there has been year-round protection and that the buffer also extended east of the Nenana River.

At any rate, the wolves who summer in the eastern part of the park have taken on a world-wide significance, and we are long overdue to provide some protection for them on adjacent state lands, as we have done in the past.

Thank you.



Submitted By  
Kate Batten  
Submitted On  
2/21/2020 3:18:01 PM  
Affiliation

Thank you allowing public comment.

I have lived in the Denali area for fifteen years and recreate by ski, fatbike, hiking, backpacking and camping. I have often had sightings and encounters with wolves and want that to continue-both for myself and my neighbors and also for visitors and generations to come.

I support **Proposal 152**.

I support **Closure 1**, the larger map, as it is less confusing and easier to administer.



Submitted By  
Emily Becker  
Submitted On  
2/21/2020 12:08:02 PM  
Affiliation

Phone  
3067011

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

Address  
2710 E. 20th Ave  
Anchorage, Alaska 99508-3220

Board of Game:

I am writing in support of Proposal 152. This proposal provides a small measure of protection to the wolves of Denali. They are an important resource for the tourism economy. This proposal will better balance the competing interests of trappers and people who want to see wolves in their natural habitat, a rare and special opportunity.  
Thank you for your consideration.





Submitted By  
Joseph Benetka  
Submitted On  
2/21/2020 8:04:37 AM  
Affiliation

PROPOSAL 112 - The Farewell Moose hunt is an essential part of my Business. We are an air cargo company, and a good portion of my yearly revenue is based on taking groups out there for their hunts, if the number of permits is restricted, it could cause financial harm to me. Beyond me, taxidermist, meat processors, other air carriers would be affected by this.



Submitted By  
joel Bennett  
Submitted On  
2/20/2020 11:35:52 AM  
Affiliation  
self

Phone  
9077238961

Email  
[joelbennett222@gmail.com](mailto:joelbennett222@gmail.com)

Address  
15255 point Louisa Rd  
Juneau, Alaska 99801, Alaska 99801

**Support Proposal #152 with Amendment**, closing the described buffer area to both wolf hunting and trapping for the entire year, January 1-December 31.

I served on the Board of Game when the original buffer zone was created for Denali wolves (2000-2001). At that time, a consensus was reached by Board members that provided for a compromise closure that recognized the value of this resource for all concerned. I emphasize compromise because that is what it truly was. Gordon Haber and others wanted much more, accusing the prevailing members of the Board of selling out. To the contrary, I believe the earlier buffer closure to be a reasonable response to competing interests, as well as an appropriate adherence to our legal requirement to observe multiple use management. That the closure lasted for 10 years was further evidence that what we had done was sound policy, adopted in the broad public interest. My view is that a return to the previous closure is even more desirable now than ever, given increased Denali Park visitation and growing wildlife viewing preferences. The impact on the few hunters and trappers who use the area is, as before, minimal. Much good work by the Board, Department of Fish and Game and Park Service went into the earlier compromise proposal. Please amend #152 to readopt the terms of the 2000-2010 buffer. As background, I served on the Board of Game for 13 years under four different governors and have been a licensed active hunter in this state for 51 years. Thank You.



Submitted By  
Susan Borko  
Submitted On  
2/20/2020 5:06:42 AM  
Affiliation

To AK Board of Game:

We encourage you to put Proposal 152 into place. Wolves have more value today alive than dead, and yet this proposal allows opportunity for both consumptive and non-consumptive users.

Susan and Victor Borko



Submitted By  
Juliette boselli  
Submitted On  
2/14/2020 8:28:31 AM  
Affiliation

Phone  
906-687-0176  
Email  
[Julietteboselli@yahoo.com](mailto:Julietteboselli@yahoo.com)  
Address  
PO Box 106  
Denali, Alaska 99755

I would like to comment on proposal 152, the wolf buffer zone along the Denali NP boundary. I am in full support of the closure as proposed with the larger map area as the buffer zone. I am a full time resident of Denali and also own a business in Denali. Protecting the wolf populations in Denali is very important to tourism in the state and Denali. Please pass this proposal to establish a buffer zone for the taking of wolves on the north boundary of Denali as proposed. Thank you, Juliette Boselli, owner Denali Mountain Works

Submitted By  
Juliette boselli  
Submitted On  
2/14/2020 11:19:49 AM  
Affiliation

Phone  
907-687-0176  
Email  
[Julietteboselli@yahoo.com](mailto:Julietteboselli@yahoo.com)  
Address  
P.O. Box 106  
Denali, Alaska 99755

I have already commented to support the wolf buffer zone, proposal 152, but I failed to convey that I find it falls short of its goal to truly protect Denali's wolves. A year round ban on the taking of wolves in the full buffer zone area is what is truly needed and what I request be changed in the proposal as an amendment. As a year round resident of Denali and a business owner, I request that a year round ban on the taking of wolves in the buffer zone area be approved. If we are to truly protect this important Alaska resource this is your only course of action. Thank you, Juliette Boselli, owner, Denali Mountain Works



Submitted By  
Justin Buckingham  
Submitted On  
2/20/2020 9:25:17 AM  
Affiliation  
NA

Good day to you, i have comments for 3 proposals.

Proposal 50 and 53: For these i am always for a longer season and more opertunity for hunters. This season would bring more money to alaska, have cooler temps for better hunting and less loss of meat of moose. For the sheep hunt, giving bowhunters an opertunity to hunt before the rifle season is a win. Sheep will have less pressure and provide a better hunting experince to bowhunters well creating a revenuw stream for the state.

For Proposal 49: As a bowhunter i do not think that crossbows belong in an archery season, it is a longer range triggered device that belongs in a muzzle loader season. I support our seniors and know of many that still prefer to shoot a bow. Allowing crossbows into the season would be doing the state a diservice for the future of bowhunting.

Thank you for your time and consideration.



Submitted By  
Ralph J. Burke  
Submitted On  
2/20/2020 5:06:37 PM  
Affiliation  
NWA, CIA

In reference to Proposal 49:

**To allow the use of crossbows in an archery/bow only area by anyone possessing an Alaska permanent identification card and who has completed the crossbow certification course by ADF&G in Units 12, 19, 20, 21, 24, 25, 26B, and 26C.**

My opposition to this cannot be overstated. I hold an AK PID and I still think it is a bad idea: we might as well allow rifles in archery hunts.

The justification in the proposal has no point: *Alaska seniors may no longer be able to hold a draw on a traditional/compound bow or may have lost the strength over time to shoot one.*

First, individuals with disabilities already can apply for a Method and Means exemption to allow the use of a crossbow in an archery season regardless of age. Second, the proposal is misleading as to the ability required. Modern compound bows generally have an 85% let off. This means that a bow with a 50# peak draw weight (legal for moose and other large animals) only requires the archer to hold 7.5# at full draw. To put this in perspective a gallon of milk weighs about 8.5#. For smaller species such as caribou the required draw weight is only 40# which would equate to 6# at full draw.

I routinely shoot a longbow –no let off at all-that pulls 52# at full draw. I can easily shoot 60 -75 shots and have gone over 120 shots in a single day. I will be 65 in less than 3 months.

In addition, in the GMUs covered by this proposal I found there appear to be only a handful of weapon restricted hunts (other who have counted carefully tell me only 14 out of 334). All but those few are already open to crossbow use without the age restriction.

The bottom line is that this proposal has no legitimate function. This nothing but a way for non-bow hunters/non archers to take advantage of special areas and seasons. I believe this is simply an attempt to find a backdoor way around the game regulations as I have seen something similar before with muzzleloader seasons. A number years ago there was a hard push to allow inline “modern muzzleloaders” during ML only seasons. These weapons are for all intents a modern rifle modified to load the components separately instead of using a cartridge. They use conical bullets and some are even designed to use smokeless powder and large rifle primers instead of black powder and percussion caps. The whole reason for the “modern muzzleloader” is for people who don’t shoot actual MLs and don’t want to have anything to do with them to be able to get in that extra season. The inlines are simply a way to bend the law from what was intended – a way to use a modern weapon in what was intended as a primitive weapon season.

This proposal has the same bad aroma and is I fear the beginning of the slippery slope. If this is implemented the next step will be to expand it statewide, perhaps in stages, then to remove the age restriction and eventually to include crossbows as just another acceptable method in all archery seasons just like any other bow. The problem is that a cross bow is *not* just another bow. It is closer to a rifle than to a long bow or even a compound.

I have been an archer and bow hunter for over half a century and I can see no way in which this is a good idea. It is in fact a very bad idea. Please do not be taken in by it.

Thank you.

R. J. Burke



Submitted By  
Christine Byl  
Submitted On  
2/21/2020 6:50:35 AM  
Affiliation

To the Board of Game:

I am writing to urge you to support Prproposal 152 to provide seasonal wolf protection north of Denali National Park. I support Closure #1 which is less confusing and easier to administer.

I live in the Wolf townships, off Stampede Road, which borders the closure. Based on the low numbers of Denali's historic Wolf packs and the recent human-caused deaths, I am requesting that the wolf closure be reinstated. A buffer worked well for many, many years. When I first moved to the area, I saw wolves in the park every year for 5 or 6 years. Numbers of sightings have plummeted in recent years and this closure is an attempt to reduce the risk on wolves that venture onto state lands, during those weeks and months from February until summer, when they are consolidating their family groups, mating, and establishing territories, and when the death of a breeding wolf is most damaging to the integrity of the pack.

This pack has special significance in that it has been studied for over 50 years and is a symbol of stellar wildlife research. Please protect this distinctly Alaskan resource, and balance the desires of trappers and non-consumptive users.  
Thanks for your consideration.

Christine Byl, Healy AK



Submitted By  
Dominic M Canale  
Submitted On  
2/21/2020 2:34:53 PM  
Affiliation

Phone  
9073013222  
Email  
[dcanale777@gmail.com](mailto:dcanale777@gmail.com)  
Address  
PO Box 171  
Cantwell, Alaska 99729

To Whom it May Concern,

I am submitting comments in **support of Proposal 152**, submitted by the National Park Service last spring to the Board of Game and to be considered and debated at the upcoming Region III Alaska Board of Game meeting, March 6-14, 2020. Proposal 152 will provide additional protection of wolves that venture outside Denali National Park with a seasonal closure that would not restrict hunting/trapping of wolves, but acknowledges a seasonal closure at a critical time for Denali wolf packs. In addition, of the two options provided for the size of the seasonal closure, **I support Closure 1.**

Thank You,

Dominic Canale





Submitted By  
Anne Carrington  
Submitted On  
2/20/2020 3:47:05 PM  
Affiliation

Re: Proposal 152...Please establish closed areas for the taking of wolves (by any means), near Denali National Park, in Unit 20C. The wolves are important and need our support in this particular ecosystem. Thank you.



Submitted By  
Robert Cassell  
Submitted On  
2/16/2020 4:30:12 PM  
Affiliation

Robert Cassell, February 16, 2020

I support Proposal 62

Allocating 50% of the trophy moose permits DM809 and DM811 to non-residents in the upper Nowitna River corridor hunt is in violation of the State of Alaska's constitutional mandate that the wildlife of the state be reserved to the people of the state. I previously testified on this same issue in February 2017 at the Board of Game meeting in Fairbanks with no action taken by the board of game to change this unconstitutional allocation. Please change the allocation for this moose hunt to 90% for the residents of Alaska, DM810.

Note: I also support proposal 52.



Submitted By  
Roy Catalano  
Submitted On  
2/20/2020 9:42:53 AM  
Affiliation

Ms. Tibbles,

Please accept my comments on proposal 152. I needs to be amended. Thank you.

Policies should be made considering other interest other than hunting and trapping. There is a large contingent of citizens that just want to watch wildlife and take picture. The second largest industry in Alaska is tourism. I was a naturalist in Denali National Park for 6 seasons and our hikes were designed to find and look at wildlife. We saw very few to no wolves on must trips. The buffer zone on Stampede road needs to be closed to allow the current litter of wolves to survive the winter feeding after caribou. When parents die, the whole pack suffers.

I am not in favor of the NPS proposal #152 for a partial closing. It makes no ecological sense to do six months of protection and six months of hunting. The BOG no-kill buffer that existed in 2000 to 2010 demonstrated clearly the increase in wolves and all predators and prey during that 10 year period. The repeal of the buffer in 2010 to 2019 demonstrated the lack of viewing and population of animals declining. Why not rotate and put the no-kill of any animals in the Stampede corridor again and let the pop increase. Give the business that do viewing and photography have a chance to help their business as well as tourist during another 10 year period. These animals are for all citizens of Alaska to enjoy and not a minority of a specialised group.

Thank you, Roy Catalano

Colorado Srings, CO

Submitted By  
Roy Catalano  
Submitted On  
2/17/2020 12:08:41 PM  
Affiliation  
Alaskans FOR Wildlife

Phone  
7193317221

Email  
[roycatalano@gmx.com](mailto:roycatalano@gmx.com)

Address  
6065 Twin Rock Court  
Colorado Springs, Colorado 80918

Policies should be made considering other interest other than hunting and trapping. There is a large contingent of citizens that just want to watch wildlife and take picture. The second largest industry in Alaska is tourism. I was a naturalist in Denali National Park for 6 seasons and our hikes were designed to find and look at wildlife. We saw very few to no wolves on must trips. The buffer zone on Stampede road needs to be closed to allow the current litter of wolves to survive the winter feeding after caribou. When parents die, the whole pack suffers.

I am not in favor of the NPS proposal #152 for a partial closing. It makes no ecological sense to do six months of protection and six months of hunting. The BOG no-kill buffer that existed in 2000 to 2010 demonstrated clearly the increase in wolves and all predators and prey during that 10 year period. The repeal of the buffer in 2010 to 2019 demonstrated the lack of viewing and population of animals declining. Why not rotate and put the no-kill of any animals in the Stampede corridor again and let the pop increase. Give the business that do viewing and photography have a chance to help their business as well as tourist during another 10 year period. These animals are for all citizens of Alaska to enjoy and not a minority of a specialised group. Thank you, Roy Catalano



## CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

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

November 11, 2019

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

### **Subject: 2019/2020 Board of Game Proposals**

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

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

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

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

We have carefully reviewed the 2019/2020 Board of Game regulatory proposal that will affect the park's wildlife and users. Our recommendation and any proposed amendments are included below. This proposal was discussed and voted upon during our October 14, 2019 meeting. Ten members of the board were present, with three members being excused.

**PROPOSAL 161**      REAUTHORIZE THE ANTLERLESS MOOSE SEASONS IN UNIT 14C  
AS PROPOSED BY THE ALASKA DEPARTMENT OF FISH AND GAME.

**Amendment(s) Discussed:** None

**Recommendation:** Approval (4 Yes, 1 No, 4 Abstain)

**Findings:**                      This hunt has proven to be an effective tool at managing the moose population within Unit 14C for several years. This proposal comes



directly from the state's authority on wildlife management, the Alaska Department of Fish and Game. Requiring annual renewal of this hunt allows the Department of Fish and Game to closely regulate antlerless moose harvest quotas to keep the moose population within a sustainable number. Keeping the moose population at or near the goal of between 1,500-1,800 moose within subunit 14C helps to avoid over-browsing of winter habitat and the resulting die-offs from starvation.

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

Sincerely,

A handwritten signature in black ink that reads "Rosa Meehan".

Rosa Meehan  
Chair

cc: Kurt Hensel, Superintendent, Chugach State Park  
Dave Battle, Wildlife Biologist, ADF&G



Submitted By  
Shayne  
Submitted On  
2/13/2020 9:11:30 PM  
Affiliation

Proposal 44 Customary and traditional use of game populations.

The spring and summer subsistence harvest is allowed by an amendment to the Migratory Bird Treaty Act. Fall regulations are set by U.S. Fish and Wildlife Service, any change would require another treaty amendment. Interior region rural Alaskans can already pursue waterfowl during the fall, just like they have since the Migratory Bird Treaty act of 1918.

Shayne Coisman, Wasilla AK

Submitted By  
Shayne Coisman  
Submitted On  
2/13/2020 9:17:12 PM  
Affiliation

-- Proposal 56 Unlawful methods of taking furbearer; exceptions.

The proposal would put an undue hardship on those who trap. It would reduce the length of a trap line that looped out from any cabin by 2 miles. It would make it nearly impossible for those who wanted to set short trap lines on foot from their homes. It would also do away with another valuable tool to defend domestic animals (chickens, ducks, and goats) from some predators.

Shayne Coisman, Wasilla AK



Submitted By  
Ruth Colianni  
Submitted On  
2/21/2020 2:37:56 PM  
Affiliation

Dear Board Of Game Officials,

I am a local resident of Cantwell, Alaska and would like to express **my support of proposal 152** which would give wolves that use Denali NP&P limited protection within part of their territory. I believe this proposal strikes a balance between the desires of subsistence users, as well as the importance of this key predator to Denali NP&P in terms of a healthy ecosystem, research value, and of course viewing opportunities for visitors to Denali. Denali offers the opportunity to see a wolf in the wild which is an experience that many visitors will cherish for a lifetime. Research shows that wolves in Denali use the area in question and I believe **closure 1** is an easier swath to manage. For these reasons **I support closure 1**.

To allow for safe passage during a critical time in the life cycle of a wolf pack **could** preserve the opportunities for humans who hunt, or study, or simply believe in the intrinsic value of wolves and hope to view one in their lifetime.

**\* I support proposal 152**

**\* I support closure 1**

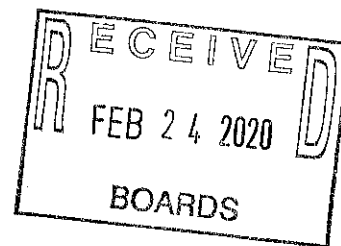
Thank You for Your Time,

Ruth Colianni



**Miki & Julie Collins**

ALASKAN FREELANCE WRITERS/PHOTOGRAPHERS  
P.O. BOX 69  
LAKE MINCHUMINA, ALASKA 99757



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

February 17, 2020

Hi,

My comments on the 2019-2020 Proposed Changes to Regulations. A lot of these don't actually affect me and I feel those whom regulations will actually impact should be given the strongest weight (after biological indicators have been taken into consideration).

Prop. 45: I support this if there is any possibility of imported lures bringing in CWD. I would prefer to allow local use of locally-produced lures while banning importation of any product that may carry CWD.

Prop. 48 I only support this if there is sound biological evidence of increasing wolf populations contributing to decreasing game populations. Since I value wolves as a renewable resource and valuable fur, I personally prefer wolf seasons (trap/hunt) coincide with fur being prime and when they are not denning/raising young until pups no longer depend upon their mother. This would maximize the value of the pelts and minimize not just the loss of young but also the seriously bad impression such losses causes.

Prop 56 I see the reasoning behind this, but would this eliminate our ability to trap furbearers stealing our cached fish, tearing into chicken coops, harassing sled dogs etc on our own property? We have had fox, mink, marten, ermine, muskrats and even wolves right in our yard.

Prop. 59, 61, 74 & 100 I support proposals that better serve local people who depend upon fish & game as long as there is no sound biological reason not to. They are at the forefront of seeing and being affected by local and global weather pattern changes, and shifting of open seasons may be necessary to both increase success and decrease spoilage.

Prop 73 Support; the more regulations can be simplified without harming the resource or local users, the better.

Prop. 80 Question re chart on page 92: why did residents have less success than non-residents?





Collins p. 2

Prop. 82 & 99 I support regs that support rural traditional use. Note on Prop. 82: winter hunts should not be eliminated unless quite necessary since this is often the only season that allows local residents to travel to the site.

Prop. 86 & 88. I oppose predator control except when there is a demonstrable depression of prey populations due to high wolf predation. It costs too much money and removes resources (wolves, here) that people value for their own use. I would only support this if local residents felt it necessary and it was biologically sound. Question: is the low bull: cow ratio driven by human hunters, wolves, lack of nutritional, or--?? You need to address the **cause**.

Prop. 95 & 107 I support this **if** it would not harm moose populations. Seems like it was around 2001 that moose were in serious trouble in that area, and a doubling of nothing is still nothing. But if they are limited by lack of feed, then increased hunting is warranted.

Prop. 114 I support this. I don't think enough attention has been given to locals who can only access certain areas during certain time of years.

Prop. 115 Support; simplifies reg's and reduces loss of meat to spoilage.

Prop. 116 Seems like a worthy goal **if** affordable in spite of budget cuts, and if habitat is suitable for muskoxen.

Prop. 117-118 Grouse are obviously C & T and it is patently ridiculous that they are not listed as such.

Prop. 126 When considering this please note that a .22 LR is capable of traveling a mile.

Prop. 135 In general I support shortening seasons when overhunting has depressed populations or thrown off healthy ratios.

Prop. 140 When biologically appropriate I support reauthorizing cow hunts.

Prop. 145 I support giving Alaska residents priority over nonresidents when game is limited,

Prop. 152 While I am not rabidly opposed to this, in general I don't feel that Park rules should extend beyond Park boundaries.

Prop 153 I support this as it simplifies regulations **IF** wolverine populations can handle extra harvest and **IF** wolverine are still fully prime by mid-March. We have caught wolverine (in 20-C) as early as mid-February that had already started losing their prime.

Thanks for taking my views into consideration.

*Misti Collins*



Submitted By  
Terry Cummings  
Submitted On  
2/19/2020 7:56:08 AM  
Affiliation

Re: Proposal 152 - Closure Option 1

I am writing to ask you to support Closure Option 1 - Proposal 152

This would allow wolves to repopulate Denali Park while not harming the several trappers who kill the wolves of Denali. I frequent the park and have yet to see a wolf (after living in Alaska for over 57 years). Alaska's wildlife should be available for all Alaskans, not just a few.

Thank you.



Submitted By  
LAUREL Dalrymple  
Submitted On  
2/21/2020 1:57:54 PM  
Affiliation

Phone  
4045452320  
Email  
[ldalry@gmail.com](mailto:ldalry@gmail.com)  
Address  
203 E Lincoln Ave  
Wheaton, Illinois 60187

Dear Alaska Board of Game, I am writing to support Proposal 152, which would implement a seasonal closure on hunting and trapping of wolves within the Stampede Corridor of the Denali Borough. My husband and I have relatives in Alaska, and we visit and LOVE your state, which, could someday be our home. We stayed at Camp Denali last summer and heard about the loss of wolves in the park due to the hunting in that area, and the resulting problems with wildlife management. I appreciate that hunters like to hunt, but to kill wolves off and take away the natural order of things with the caribou migrations, is wrong, and goes against what Alaska stands for.

PLEASE implement the seasonal closure within the Stampede Corridor which sounds to us like a reasonable measures. This is Closure 1, which would protect the larger area in the corridor. Thank you for the opportunity to comment.



Submitted By  
Jesse deaton  
Submitted On  
2/7/2020 5:08:55 AM  
Affiliation

Phone  
907-831-1505

Email  
[Jesse-deaton@hotmail.com](mailto:Jesse-deaton@hotmail.com)

Address  
P.O. Box 2916  
Valdez, Alaska 99686

I would like to support proposal 48. Due to declining numbers of sheep and caribou and the impact they can have on moose populations, I would like to see an increase on the season of taking wolves and the increased bag limit for taking wolves. By doing so this would help decrease the mortality rate in lambs and calves



Submitted By  
Linda DeFoliart  
Submitted On  
2/20/2020 5:55:28 PM  
Affiliation

Phone  
9078885225

Email  
[linda.defoliart@gmail.com](mailto:linda.defoliart@gmail.com)

Address  
1743 Coyote Trail  
Fairbanks, Alaska 99709

I am writing regarding Proposal 152. I strongly believe that this Proposal does not ask for enough. The ban on taking fur-bearing animals should be year-round, not just the period proposed in the NPS's compromise.

350 million acres are available for trapping in the state of Alaska. **This closure would affect less than 0.1% of that.** The proposed buffer is on PUBLIC land yet it is consistently managed as if it were the private domain of two or three trappers. Presumably the wildlife inhabiting this PUBLIC land is as much mine and every other Alaskans' as those few trappers. The majority of Alaskans do not trap nor approve of trapping. Why are the wishes of the vast majority continually superseded?

One animal, if left alone, can enhance the outdoor experience for scores of people. Scores of people who bring tourist dollars to our state. A successful trapper lines only his own pockets. Ethics aside, basic economics dictate that this closure is the right choice.

Please, for once, act on behalf of the people and animals you are commissioned to represent, not your cronies in the Cantwell area.



Home of the Delta Rifles Juniors Shooting Pro

# Delta Sportsman's Association, Inc

(A non-profit corporation and an AOC, USAS, CMP & NRA Member Club)

P.O. Box 1309

Delta Junction, Alaska 99737



PC038  
1 of 1

Gun Show  
Bench Matches  
Women on Target  
Relay For Life  
Indoor Gallery Range & Matches  
Outdoor Ranges & Matches

THE ALASKA BOARD OF GAME  
2019/2020 Proposed Changes To Regulations

## **DELTA SPORTSMEN'S ASSOCIATION SUPPORTS PROPOSAL 91** **REGARDING REDUCTION OF GROUSE LIMITS**

The Delta Junction Area Unit 20D South of the Tanana River and West of Johnson River has a current grouse limit of 15 per day provided that not more than five per day can be sharptail grouse. This allows hunters to take 15 ruffed grouse per day yet sharptail grouse far outnumber ruffed grouse. *This just doesn't make sense!*

The Delta Junction area attracts hunters from several Lower 48 states and as far as Eastern Europe as they have seen the TV programs, books and articles headlined *Hunt Five Species Upland Birds In One Day. Some of these hunters do not know what specie they have bagged!*

Moose hunters and waterfowl hunters add to the incidental grouse harvest.

The ruffed grouse are currently in low cycle yet died-in-the-wool ruffed grouse hunters from Eastern States are attracted to the Delta Area because of the excessively high published bag limit of 15 even though the chance of bagging a limit is not possible. Those of us that spend months in the fields are seeing one or two ruffed grouse in a fall.

*Liberal bag limits have placed excessive hunting pressure on grouse in the Delta Area..*

We appreciate your support for our ruffed grouse!

Vern Aiton  
President



February 21, 2020

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

Chairman Spraker and Board of Game members;

On behalf of the board and members of the Denali Citizens Council (DCC), thank you for the opportunity to comment on Proposals for the March 2020 Region III meeting. The Denali Citizens Council was founded in Cantwell in 1974 to represent local, regional and national citizens. Many of our more than 200 members either live full time or seasonally in Denali's gateway communities of Healy, McKinley Village and Cantwell or have lived in the Denali community and remain engaged in the region. Many have joined DCC because of our vision of a vibrant community, involved citizenry, and responsive government. Our five Directors own property in the Denali Borough and support the diversity of uses currently practiced on state lands. We recreate on public lands in GMUs 20A and 20C. All of the Directors have at one time or another worked within Denali National Park. We support the park mission but are not a "park friends" organization, and in fact we cooperate and disagree with the National Park Service (NPS) in about equal measure. We have, in the past, submitted proposals to the Board of Game, and continue to take positions on a variety of proposals. We think that citizen input on Board of Game decisions is vitally important for our valued Alaskan resources.

### **DCC Positions on selected proposals for Region III meeting March 6-14 – Fairbanks**

#### **Region wide and Multiple Units**

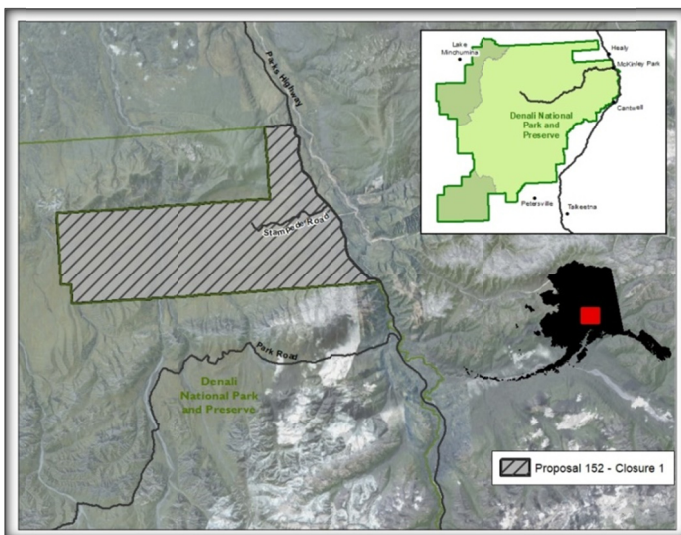
- **Proposal 47 - *No nonresident hunting of moose or caribou currently under an Intensive Management predation control program until harvest objective has been met.***  
**DCC Supports** – We agree with Resident Hunters of Alaska that "Intensive Management when necessary is first and foremost about putting food on the table for Alaskans." Limiting the application of Intensive Management predation control efforts according to this Proposal is consistent with the intent of the Intensive Management Law and will prevent overly zealous use of that tool.
- **Proposal 48 – *Extend season for taking wolves in multiple units to start Aug 1, not Aug 10***  
**DCC opposes** – We oppose this extension on many grounds, but most importantly, we think that applying such a change to multiple areas, where different relationships between predator and prey exist, is unscientific and extends an already unnecessarily long wolf season.
- **Proposal 51 – *Remove bag limit restriction of one Dall sheep every four years for nonresident hunters 60+ years old.***  
**DCC opposes** – Given recent changes and threats to sheep populations, and the lack of any scientific data in this proposal we feel it is premature at best to change existing policy.



- **Proposal 54 – Reauthorize brown bear tag fee exemptions.**  
**DCC opposes** – Given the nominal cost of this tag and ongoing budget challenges in the state, we feel it is not prudent to continue the exemptions.

### **Fairbanks Area Proposals (focus on 20C and 20A)**

- **Proposal 122 – Reauthorize antlerless moose hunt in Unit 20A**  
**DCC supports in principle** - However, given the stresses of winter on all moose, we oppose any general hunt that ends later than November 15<sup>th</sup>.
- **Proposals 127 and 128 – Change the boundary of the Wood River CUA to increase motorized access**  
**DCC opposes** – DCC feels that the Wood River and Yanert non-motorized CUAs are well-designed and popular areas where hunters can enjoy a more traditional experience. We join the Middle Nenana AC in opposing both of these proposals.
- **Proposal 129 – Change dates of closure in Yanert CUA to align with Wood River CUA**  
**DCC opposes** – We believe this will lead to a damaging level of ATV use during snow-free months in the Yanert Valley, a relatively narrow valley with one major trail. We doubt that very many folks will haul feed in winter by snowmachine, the less damaging option. Already, the existing trail is experiencing degradation. We do not want to see a repeat of Rex Trail impacts in the Yanert.
- **Proposal 152 - Areas closed to the taking of wolves near Denali National Park in Unit 20C.**  
Proposed by the National Park Service, Denali National Park.



**Closure 1:** Closure would run from Feb 1 – Aug 10. Hunting season would begin Aug 10 and end Feb 1. Trapping season would run Nov 1 - Feb 1

We support Closure 1, as described in this proposal and depicted on attached map. This closure of approx. 200 sq. miles would cover the entire area of Stampede townships (a cutout of state lands surrounded on three sides by Denali National Park) up to the George Parks Highway.

There is a smaller option, Closure 2, which exempts portions of the Western townships. We oppose Closure 2 because of the complexity of administering such a remote open area.

We support the seasonal closure in Proposal 152 as a way to protect the integrity of wolf packs that den and spend summers in Denali National Park, and move onto state lands in the Stampede Townships during late winter and spring.





**DCC's reasons for supporting the National Park Service in its request (Proposal 152) to establish a closure are listed below:**

**1. The Board of Game has the authority to manage wolves through both harvest and conservation.**

In general the Board of Game has chosen to manage wolves for consumptive uses, but the Board has the right and responsibility to manage for conservation, where the public has asked and in areas where such conservation makes sense. We argue that the Denali region, and specifically the Stampede townships, are by history, science and public opinion the ideal state lands on which to practice non-consumptive use of wolves. Furthermore, there is nothing in the Board of Game policies that prevents managing at a sub-population level. In the case of Proposal 152, a closure is suggested that would reduce risk on identified subpopulations of wolves, something that the Board of Game is authorized to do, just as it does for hunting regulations with certain subpopulations of ungulates. This proposal is not about expanding the national park, but more about recognizing that the state can conduct closures in areas where those closures have been asked for, are justified through scientific study, and make sense.

a. **Duties of the Board of Game allow both opening and closing areas to hunting and trapping** (*AS 16.05.255. Regulations of the Board of Game; Management Requirements*)

b. **ADF&G management goals for wolves allow both use and complete protection.**

“...ADF&G will manage wolf populations to provide for human uses and to ensure that wolves remain an integral part of Interior Alaska's ecosystems. Compatible human uses include hunting and trapping (both for personal use and commercial sale of furs), photography, viewing, listening, and scientific and educational purposes (ADF&G 2002). The aesthetic value of being aware of or observing wolves in their natural environment is also recognized as an important human use of wolves. We also recognize that integral to wolf management is the premise that wolf populations are renewable resources that can be harvested and manipulated to enhance human uses of other resources. Management may include both the manipulation of wolf population size and total protection of wolves from human influence...”

*Species Management Report and Plan ADFG/DWC/SMR&P – 2018-30*  
(available in ADF&G Research archive)

**2. The first “Denali wolf buffer” was actually devised by the State of Alaska through a cooperative process in 1991-1992. Completing the process with a scientifically supported closure would honor long-standing intent.**

The *Strategic Wolf Management Plan*, a cooperative effort under the auspices of the Department, was adopted by the Board of Game in October 1991, and led to the development of Area-Specific Wolf Management Plans.



The *Area-Specific Wolf Management Plan for GMUs 12, 20 and 25C* (Rosier and Kelleyhouse, March 1992), had the following goals:

- a. *To ensure the long-term conservation of wolves throughout their historic range in Alaska in relation to their prey and habitat.*
- b. *To provide for the broadest possible range of human uses and values of wolves and their prey populations consistent with wildlife conservation principles and the public's interests.*
- c. *To increase public awareness and understanding of the uses, conservation and management of wolves, their prey and habitat in Alaska.*

It was in this *Area-Specific Plan* that the original “no take area” of state lands along the northeast boundary of Denali National Park was proposed. Much has occurred since that time, including passage of the intensive management law, prohibition of same day airborne hunting, and the establishment and rescinding of “no take” buffers on Stampede lands by the Board of Game in the early 2000s. However, to this day, the values espoused in the language of these 1991-1992 plans provide a basis for Alaska Fish and Game management actions. These values do not emanate from some form of “federal overreach” or “national park expansion” but have a solid foundation in our own state wildlife management.

3. **The small area identified in Unit 20C (approx. 200 sq. mi. in Closure 1) for closure in Proposal 152 presents no wildlife management impediments to enacting wolf conservation.**
  - a. Wolf hunting and trapping in the area identified are not conducted according to the eight criteria for Customary and Traditional Use (5 AAC 99.010).
  - b. State lands in Unit 20C have relatively low densities of moose and wolves, according to the most recent management documents. No predation control management actions to increase numbers of ungulates have been contemplated for these lands over many years. Harvest objectives for moose in 20C have generally been met.
  - c. Similar densities of moose and wolves exist within federal and state lands in 20C.
  - d. *Closure 1* occupies a small portion of the total area of state lands in GMU 20C.
  
4. **Scientific data from over three decades of radio-collaring under the NPS Denali Wolf Program have shown a consistent pattern of back and forth movement of wolves between Denali National Park and state lands in the Stampede townships, placing more wolves on state lands during late winter and spring. It is during this time that Proposal 152 seeks to reduce risk on these wolves.**

The Denali Wolf program began using radio-collaring in 1986, to track movements of wolves that den in the national park and to gather comprehensive biologic data on a relatively un-hunted population of wolves. This program is known internationally, provides valuable information for both the scientific community and the general public, and shares information with the State of Alaska. Because of access to research grants and federal funds, the Denali Wolf program is able to produce an important record on these animals, something unique and valuable. Read about the program at <https://www.nps.gov/dena/learn/nature/wolf-research.htm>



The particular packs that foray into the Stampede townships include the Eastern Packs - Grant Creek, Riley Creek, Sunday Creek and Tekla. These are the packs most likely to be affected by hunting and trapping within the Stampede area. These wolves are not leaving the park because of diminished prey populations, but because of seasonal and weather-related availability of caribou. Some disperse, and collared wolves from Denali National Park have been found hundreds of miles away, but collaring data show that the Stampede area is crucially important to wolves that den, pup and summer in Denali National Park.

- 5. The seasonal closure in Proposal 152 (*hunting season opens Aug 10, closes February 1<sup>st</sup>, shortening hunting season in most of the area by 2.5 months; trapping season opens Nov 1, closes February 1<sup>st</sup>, shortening the season by 3 months*) is meant to reduce risk to wolves on state lands north of the park at a time of year when the death of breeding wolves can most affect pack dynamics.**

**A recent study indicated that the death of a breeding wolf, once pair bonding and breeding have occurred (a process that begins in early February and extends to birth of pups in May) can cause dissolution of the entire pack, with potential loss of productivity for the entire year.**

The study is available at <https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2656.12256> . In a review described in this study, breeder loss preceded 77% of cases of pack dissolution. Hunting and trapping can be highly significant during the late winter and spring months. After all, in the lands concerned, bag limit is 10 per hunter, and trappers have no bag limit for wolf take.

We think the seasonal closure to hunting/trapping in Proposal 152 will provide enhanced protection for wolf families who den and spend summers inside Denali National Park, but travel into the area of the proposed closure predictably. Many of our members would prefer a full-year closure, but we've concluded that if the seasonal closure outlined in Proposal 152 enhances pack survival, we can support it. We are not arguing a biological problem or emergency for wolves in 20C. We contend, however, that state management actions in this small area of Unit 20C could be highly significant for the survival of wolf family groups in the eastern portion of Denali National Park, thereby promoting the opportunity of viewing these animals.

- 6. Large numbers of Alaskans and wildlife advocates have asked for increased non-consumptive opportunities in the Denali region, which hosts visitors from around the world who hope to see wild animals in their natural habitat. Proposal 152 will enhance wolf viewing opportunity by allocating part of the year to non-consumptive uses.** This Proposal is about creating opportunity for the viewing public and the scientific community...not a guarantee, but an enhanced opportunity. As the Proposal states, these wolves are important to a wide array of citizens, local, regional and national. For many citizens, simply knowing that these wolves have been protected by the State of Alaska will be highly significant.



7. **We have long hoped for a day when the State of Alaska and the National Park Service could engage in meaningful, cooperative management strategies. We believe Proposal 152, more than any previous proposal concerning wolf conservation next to Denali National Park, promotes such cooperation. Opportunities for both consumptive and non-consumptive users are provided within this proposal. If Proposal 152 is enacted, the State of Alaska can take credit for supporting wolf conservation in an area of the state where that conservation has had a strong constituency for thirty years.**

**By passing Proposal 152, the Board of Game and the State of Alaska can deliver on its promise to consider all users and values in wildlife management.**

**Sincerely,**

**Denali Citizens Council Board of Directors  
PO Box 78  
Denali Park, Alaska 99755  
907-244-2510**

*Nancy Bale*

*Steve Carwile*

*Nan Eagleson*

*Charlie Loeb*

*Hannah Ragland*



Submitted By  
Temple Dillard  
Submitted On  
2/21/2020 9:24:51 PM  
Affiliation  
Trapper, skin sewer

Phone  
9079784364

Email  
[temple\\_dillard@yahoo.com](mailto:temple_dillard@yahoo.com)

Address  
PO Box 750626  
Fairbanks, Alaska 99775

Proposal 56 is unecessary. Trapping season is short, there is already a great setback from residential structures, and people need to be responsible for their loose animals. Even in the FNSB where there is a leash law loose dogs are a RAMPANT problem about which nothing is done. This proposal is downright anti Alaskan.



Submitted By  
Ron Diltz  
Submitted On  
2/20/2020 3:07:56 PM  
Affiliation

In regards to proposal 112 for registration hunt , I strongly oppose this for the following reasons- I am 74 years old and have hunted the Farewell area for 25+ years and am currently under going Cancer treatment and may only have a few hunts left. There are plenty of moose in this area .

The current regulations seems to be working ( 4 brow times/50") do not make unnecessary changes.

It's a very expensive hunt because of the logistics. Must have a group to make it affordable.

Suggest you make it a resident only hunt.



Submitted By  
Regan Downey  
Submitted On  
2/21/2020 2:07:05 PM  
Affiliation

Phone  
9147632373  
Email  
[regan@nywolf.org](mailto:regan@nywolf.org)  
Address  
P.O. Box 421  
South Salem, New York 10590

Dear Board of Game members:

I respectfully ask the Board of Game to approve Proposal 152 and partially close hunting and trapping outside of Denali National Park so the desires of both consumptive and non-consumptive users will be recognized.

Alaska serves as one of the “last wild places” in North America; its vast forests and wilderness areas draw visitors from every state and numerous countries. A majority of these tourists visit with the same overarching dream – seeing Alaska’s touted wildlife such as wolves and bears. However, many visitors leave with this dream unfulfilled, especially those departing from Denali. For a period of ten years, from 2000 – 2010, the State of Alaska prohibited wolf hunting and trapping in two areas bordering the park in order to protect two of the park’s three most-commonly viewed wolf packs. Unfortunately, the state chose to resume hunting and trapping in these areas in 2010; visitor wolf-viewing success has declined from 45 percent in 2010 to 1 percent. The numbers are striking: a survey of forty-three Denali bus drivers tallied just 15 sightings of 25 wolves over a 75-day period between April and July. The probability for seeing a wolf was twice as high when a buffer was in place, wolf biologist Bridget Borg found in 2016.

Approving this proposal is well within the interests and mandates of the Board of Game, as statewide policy recognizes both consumptive and non-consumptive management options.

“...ADF&G will manage wolf populations to provide for human uses and to ensure that wolves remain an integral part of Interior Alaska's ecosystems. Compatible human uses include hunting and trapping (both for personal use and commercial sale of furs), photography, viewing, listening, and scientific and educational purposes (ADF&G 2002). The aesthetic value of being aware of or observing wolves in their natural environment is also recognized as an important human use of wolves. We also recognize that integral to wolf management is the premise that wolf populations are renewable resources that can be harvested and manipulated to enhance human uses of other resources. Management may include both the manipulation of wolf population size and total protection of wolves from human influence...”  
Species Management Report and Plan ADFG/DWC/SMR&P – 2018-30

Thank you for the opportunity to comment.

Regan Downey



Submitted By  
Michael Elsner  
Submitted On  
2/21/2020 3:22:54 PM  
Affiliation

Phone  
9077235197

Email  
[melsner@gci.net](mailto:melsner@gci.net)

Address  
19901 Cohen Dr  
Juneau, Alaska 99801

I would like to comment regarding Proposal 56. The idea of having additional lands restricted from being used for trapping does not support conservation nor safety. Here in Southeast we have fought to push back the restrictions imposed on a single user group, trappers, by trail set backs. So far the recent legalizing elevated sets or fully submerged sets placed nearer trails has proven to have little or no conflict between user groups and is key in being able to get young trappers into areas accessible easily by foot trails. I ask that the Board go with not adopting as proposed nor adopting any modified version of proposal 56 as it will not resolve conflict by merely eliminating one group exclusively from, as worded, a significant portion of this state's lands.





Submitted By  
Nina Faust  
Submitted On  
2/20/2020 7:41:13 AM  
Affiliation

Phone  
907-235-6262  
Email  
[aknina51@yahoo.com](mailto:aknina51@yahoo.com)  
Address  
P.O. Box 2994  
Homer, Alaska 99603

P.O. Box 2994  
Homer, AK 99603  
February 20, 2020  
Board of Game

Juneau AK

Dear Board Members:

I support Proposal 152. For many years efforts to get the State to cooperate with Denali National Park management proposals to provide a buffer zone to protect the well-researched and popular Denali Park wolves have failed. Year after year, the State has recalcitrantly refused to support a buffer to provide "hunter opportunity" for a very few trappers in nearby communities. This is nonsensical when management should be in the best interests of all Alaskans, who would benefit from the opportunity to view these wolves at Denali National Park. More importantly, the economic benefits from all who come to view wolves far exceeds the benefit to just a few trappers or hunters.

I support Proposal 152's Closure Option 1: to close Uniform Coding Units 0607, 0605, and 0502 west of George Parks Highway and bounded by Denali National Park on three sides to be closed to wolf hunting and trapping from February 1 to July 31 and by trapping from February 1 to October 31. I do not want to see another disaster to the Denali wolves that wipes out virtually all members of these valuable, viewable wolves.

It is time for cooperation. It is clear the public supports protection of these wolves and that Alaska benefits. Let's stop this stand-off of non-cooperation that is not in Alaska's best interest and ends up wasting so much of the research money that has been spent learning about these wolves. It is time to implement this buffer, protect the wolves, support the economies of the area that benefit from all the visitors who come to see the wolves, and start working together to learn about these special wolves.

Please pass Proposal 152, Option 1. Thank you.

Sincerely,

Nina Faust  
907-235-6262



Submitted By  
SARAH FENTON  
Submitted On  
2/18/2020 6:07:00 PM  
Affiliation

I support proposal 152. Please vote to support this. Really, there is no reason why there shouldn't be a no hunting/trapping zone around Denali National Park but, I suppose this is all we have left to hope for. Montana is beginning to see how important wolves are and you should to. It didn't take them very long to see the importance of the wolf. Montana just voted to lower hunting quotas around Yellowstone National Park even though the park and surrounding areas house many wolves. They understand the importance of wolves, not only to the environment, but also the local economy and the public. They also voted down to extend wolf hunting season. Alaska should take a hint from Montana and realize the vital importance of the wolf. Every year i grow more disgusted with Alaska on its view and treatment of wolves...so much that I stopped visiting....Afterall, the only place i have seen a wolf in Alaska, after multiple attempts, was in Katmai. Until things change, I will continue to visit Montana, which is unfortunate, because Alaska has such beautiful wildlands and wildlife, yet some ugly leadership. Please prove me wrong and do the right thing!!! Save some wolves already!!



Submitted By  
Tyler Fenton  
Submitted On  
2/14/2020 5:13:31 PM  
Affiliation

Phone  
9073982723

Email  
[tfenton907@gmail.com](mailto:tfenton907@gmail.com)

Address  
3331 E 46th Ave  
Anchorage, Alaska 99507-1547

My name is Tyler Fenton and I am a 23 year old Alaska resident. I would like to voice my opinions regarding several proposals involving bowhunting regulations.

Proposal 50: I fully SUPPORT implementing a 10 day archery only registration hunt for bull moose in units 12, 19, 20, 21, 24, 25, 26B, and 26C. This late season archery hunt would allow more opportunity for hunters to stay in the field longer with very little impact on moose populations. This would also bring in more state revenue created by non-resident hunters booking additional archery moose hunts through outfitters. Registration hunt allows for close monitoring of participation and success rates by the Alaska Department of Fish and Game. Bowhunters would still be limited to the same restrictions outlined in the general season.

Proposal 53: I also fully SUPPORT the addition of an archery only registration hunt for Dall sheep in units 12, 19, 20, 21, 24, 25, 26B, and 26C. This proposal would allow great opportunity for bowhunters to pursue dall sheep before the rifle hunters storm the mountains. The reasons for my support of this proposal mirrors those of proposal 50. More opportunity and state income with very little additional impact on species population.

Proposal 49: I strongly OPPOSE the allowance of any resident hunter who is 60 years or older who possesses a senior alaska resident card to hunt with a crossbow during any archery hunt in units 12, 19, 20, 21, 24, 25, 26B, & 26C. The State of Alaska already allows individuals with disabilities to apply for a Method and Means Exemption allowing the use of crossbows during archery only seasons. The average person age 60 and older has no problem handling a 50 pound compound bow with 85% let off (7.5 lbs). Allowing a mass of crossbows could have a significant impact on wildlife population creating more restrictions and less opportunity for bowhunters. Out of 334 general, registration, and draw hunts in the affected region, 320 are non weapon restricted and already allow the use of crossbows as a legal method of take. This proposal is obviously meant for non-bowhunters to take advantage of special areas including the Dalton Highway Corridor. Allowing less restricted crossbow use in this region could eventually effect our bowhunting opportunities across the state.



Submitted By  
Brandon Fischer  
Submitted On  
2/21/2020 3:25:17 PM  
Affiliation

I am strongly against Proposal 56 that would ban trapping within certain distances of a dwelling or place of residence. Please do not pass this. Trappers would lose many valuable acres and it would become more difficult to keep wildlife populations in check.



Submitted By  
John Flanagan  
Submitted On  
2/18/2020 10:15:03 PM  
Affiliation

This comment regards proposal 87. I would like to see changes made to the fall 40 mile registration caribou tag RC860. The current hunt allows too many people to hunt at the same time in zones 1 and 3, which have road access. This hunt historically closes by emergency order only a few days after the season opens. Knowing this, a very large number of hunters are present in the field to harvest a caribou quickly before the season closes. This has led to over harvest of caribou and a dangerous environment for hunters.

During this hunt in the fall of 2019, I personally had dangerous encounters with other hunters. While stalking a small group of caribou on opening day, two hunters on ATVs came racing past me to get to the caribou first and shot them right in front of me. Later that same day while I was sitting on top of a ridge, I heard a bullet ricochet past me. Hunters were scattered across the land as far as I could see and the sound of gunfire was constant.

Changes need to be made to this hunt so there are less hunters in the field at the same time, creating a safer environment. Perhaps this hunt needs to be modeled after the Nelchina caribou tier 1 hunt. The Nelchina tier 1 fall caribou season is split into an August and September season. Hunters can choose to hunt either August or September, but not both. Each month has its own harvest quota to allow equal opportunity at harvesting a caribou. This theoretically will split the number of hunters in the field at the same time in half. For the 40 mile hunt, it may even be necessary to limit one tag per household to further reduce the dangerous hunting conditions.



Submitted By  
Paul Forward  
Submitted On  
2/17/2020 7:25:58 PM  
Affiliation  
  
Phone  
9078542959  
Email  
[paulforward@gmail.com](mailto:paulforward@gmail.com)  
Address  
191 Agostino Mine Rd  
PO Box 493  
Girdwood, Alaska 99587

To whom it may concern,

I grew up in Eagle River, AK and have been bowhunting avidly since the age of 13 when I shot my first moose and caribou with a recurve bow. Now, 27 years later, bowhunting, particularly hunting with longbows and recurves, has been a central focus in my life and that of my family's. I am writing you because I have strong feeling on three proposals currently up for your review as informed by over 3 decades of avidly pursuing big game with traditional archery equipment.

Proposal 53 is the one most dear to me. There is nothing in this world that I enjoy more than spending time in sheep country with my bow. I have killed an old ram with my longbow but as more and more sheep hunters are willing to hike deep into the mountains and as rifle hunters continue to shoot longer and longer distances, my enthusiasm has waned and the quality of the experience has deteriorated. In addition, I often spend hours or even days slowly stalking and crawling in my approach and I constantly fear that someone is going to shoot over my back. I have dreamed of a archery sheep season for many years and I think the time is now. There is essentially no downside to this proposal. Current statistics drawn from the Draw archery hunts demonstrate that even in readily accessible areas of the Chugach and on any ram tags, success rates for archery are quite low. Bowhunters might kill a couple of rams every year but it will have essentially zero impact on rifle hunters success rates. Furthermore, I have heard concerns raised about bowhunters pushing sheep around prior to the general season but after many years of sheep hunting I reject this possibility. While I'm sure there are exceptions, I've never seen rams move more than a few miles in response to hunters and much more commonly they just move into escape terrain and stay alter their feeding habits for a few days before going back to their usual haunts.

Compared to almost any state in the lower 48 Alaska has extremely limited dedicated bowhunting seasons and for the sake of safety and hunter enjoyment I feel strongly that a registration archery sheep season would be a wonderful opportunity with essentially no downside.

In addition to increased hunter satisfaction and opportunity this season would also provide guides and outfitters with an additional hunt to sell for increase revenue. My good friend Cole Kramer is an Alaskan hunting guide and relishes the opportunity to take people on archery sheep hunts.

Please consider proposal 53 favorably. There really seem to be only positive repercussions and it will be carefully monitored via the registration hunt process. Personally, I think it would be even more palatable if hunters were forced to choose a weapon at the begging of the season and could only participate in the bow season if they gave up the right to use a firearm for sheep for that hunting season.

Proposal 50: I have moose hunted with a bow for almost 30 years and, similar to the sheep proposal, I think that this proposal offers many benefits without any downside. overall moose harvest will not be impacted and if there is an increase in moose killed it will be closely monitored and shut down as with all registration hunts. Personally I have struggled over the last decade with repeated seasons that were unseasonably warm and feel like it's only really responsible to start hunting most years by the end of the second or even third week of September. This leaves precious few days especially for those of us hunting with primitive weapons to responsibly fill our freezers without risk of spoilage, especially on wilderness hunts. More than anything I just want to be able to spend more days in the field and this would allow that. Similar to the sheep proposal, it would also allow for increased revenue for guides, outfitters and transporters.

Proposal 49:

I empathize with those who have age or injuries that do not allow them to draw a bow but Alaska has myriad options for rifle and crossbow hunting and very limited bow seasons. I've been around crossbows enough to full understand that the range of them makes them makes them a completely different sport/pursuit even when compared with modern archery equipment. furthermore, barring a specific injury, most 60+ y/o people should be able to pull a modern 50# compound with 80% letoff at full draw. Like all bowhunters, they might have to train and exercise to attain proficiency but as a lifelong bowhunter and licensed physician (MD) I reject the proposal that because someone is over the age of 60 they need special accommodations for bowhunting. Furthermore, the acceptance of bowhunting is often predicated on the idea that our self imposed range limitation makes us less likely to be successful. Crossbows dramatically extend that range with many allowing rifle like accuracy at over 100 yards. This is simply not bowhunting range and allowing them into bowhunting seasons/areas could jeopardize the future of bowhunting seasons. My 75 year old father has worked hard at maintaining his fitness because he loves to hunt

and continues to pull his 50# recurve. I think it's reasonable to expect other hunters to assume a similar level of to their craft.



Thank you so much for considering my comments. I am happy to discuss further or clarify any of these points either via phone or email.

Sincerely,

Paul A Forward

Girdwood, AK

907-854-2959



Submitted By  
Adam Foss  
Submitted On  
2/18/2020 12:32:33 PM  
Affiliation

Background:

I've been fortunate enough to draw tags and hunt in the wild and wondrous state of Alaska as a non-resident and those adventures and experiences have been some of my fondest memories. Non-resident bowhunters stimulate the hunting economy significantly with out of state tag costs, guiding fees and travel expenses. They are an important part of the picture of protecting hunting opportunity and wildlife habitat throughout North America.

Proposition 50 and 53

These season extensions could allow outfitters to sell more hunts with a very limited impact on harvest, as archery success rates are significantly low — especially for dall sheep. Also, it would give a unique and challenging hunting opportunity for those willing to take it on. I am support of both of these Propsotions.

Proposition 49

I am not in support of Propposition 49 which aims to legalize crossbows in an archery-only season, unless the hunter is disabled and unable to operate the legal compound bow requirements (in that case I am in full support of getting those with disabilities afield). The average person age 60 and older has no problem handling a 50 pound compound bow with 85% let off (7.5 lbs).

Thank you for what AKDFG does for wildlife and for the consideration of these comments.

Sincerely,

Adam Foss