



To: Alaska Dept. of Fish and Game – Board Support Section
FAX: 907-465-6094
ATTN: Board of Game Comments
From: John Frost Date: February 20, 2020
Reference: Comments for Interior/Northeast Arctic Region
meeting – Fairbanks, AK March 6-14, 2020

Dear Members of the Alaska Board of Game,

My name is John Frost. I am a 47 year resident of Alaska living in Anchorage. I am a retired surgeon. I am an avid bowhunter and volunteer for many national and state bowhunting, conservation and education programs. I have hunted all of the Alaskan species of big game but especially enjoy mountain hunting for sheep. I have been a member of the Sheep Working Group set up by this Board. I have also been a representative for the ABA on the Thinhorn Sheep Group .

There can be no doubt that we have problems with management and allocation of Dall sheep here in Alaska. For years there have been multiple proposals regarding sheep hunting and this year is no different. The fact that difficult problems exist was recognized by the Board and to your credit you established the “Sheep Working Group” moderated by Allistar Bath. Unfortunately, this skilled facilitator was unable to obtain a concensus regarding a solution. Some solutions were (in my opinion) not given adequate or any consideration. In particular the concept of limiting the method of take was never well discussed.

Proposal #53 by the Alaskan Bowhunters **I SUPPORT.**
Conventional bowhunting is recognized in nearly every state as a way to allow increased hunter participation with minimal effect on the game resource. Consider these statistics:



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20 year experience with Archery hunting for Dall sheep in Alaska GMU 14-C

The following statistics are compiled from ADF&G statistics on Dall sheep harvest success over a 20-year period from 1993 to 2013 for the drawing permits in unit 14-C. Drawing hunts #140 & 141

Total permits awarded – 2424 = 1845 in DS140 and 579 in DS141

Total permittees who actually hunted – 1500 = 62%

Sheep killed 143 = 9.5% success for those who actually hunted.

4.9 days actually hunted for successful residents.

5.8% success for those who had the opportunity to hunt ie; permit holders.

Rams killed 106. Ewes killed 37. So about 3 Rams/Ewe killed even though these hunts are for “any sheep”

Rams killed 106 of those 67 were over 30”; 26 were over 36”;
10 were over 38” and 2 were over 40”
39 were under 30”

Making the assumption that rams over 36” are mature full curl rams
Then success rate for mature full curl rams among those who actually hunted was 1.7%

Total number of days actually in the field hunting – 6533

- 4.3 days average in the field for hunters who actually hunted
- 4.2 days average for unsuccessful hunters
- 5.0 days average for successful hunters

Non-Resident success

- 18 sheep were killed by non residents
- 12.6% of the sheep were killed by non residents
- Non-residents killed 10 ewes and 8 rams none were over 36”



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The purpose in providing these statistics is to document that use of archery gear as a method and means of harvesting Dall sheep by its nature requires that hunters get much closer to sheep. As a result the harvest success level is significantly less than the harvest success with modern scope sight equipped firearms.

During the period of time that these hunts were conducted it was legal for a permit holder to harvest "ANY SHEEP" yet still there was a low success rate. If only mature rams greater than 36" are counted the success rate was only 1.7% of those who actually hunted. So restricting the legal methods of hunting has the potential to provide opportunity for hunting to a large number of hunters while minimizing the actual harvest of rams at a time when sheep populations are low. Note that restricting the means of hunting has not limited the number of hunters who apply for these very popular drawing hunts.

Proposal #53 requests an archery season for sheep prior to the regular firearm season. This would reduce crowding on August 10th. It would provide guides with an extra hunt to sell if they were willing to book non-resident bowhunters. Not all sheep guides would choose to guide bowhunters but some would. The low harvest rate among bowhunters would not harm the sheep population. It should be noted that this proposal does not ask for "any sheep" or "any ram" but only for full curl, double broomed or eight plus years old.

I would also like to comment briefly on a couple of other proposals.

Proposal #49: To allow hunters over age 60 to hunt with crossbows. I **OPPOSE** this. Alaska already has provisions for disabled hunters to get a permit to hunt with crossbows so anyone too old or weak to pull a conventional bow could get a disabled permit. I am 74 years of age and still hunt with a 55 pound compound bow. Statistics from states, such as



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Wisconsin, clearly show the increased effectiveness of crossbows. The major area affected by passage of this proposal would be the bowhunting only area of the Dalton Highway. I am concerned that the ability to shoot a crossbow from inside a vehicle would add an element of illegal road hunting to this valuable area.

Proposal #63: to repeal 5AAC92.530(7) I **OPPOSE** . Currently this is the largest area in the United States and possibly the world set aside for conventional hunting by bow and arrow only. Completely repealing this would allow crossbow hunting in this area because the state statutes AS 16.05.789 only prohibits hunting with firearms. However after carefully reading both the regulations and the statutes, I would **SUPPORT** Proposal #64 by ADF&G to clarify the actual regulations pertaining to this area. In the course of soliciting public input for clarification of these regulations, as requested by ADF&G please include the Alaskan Bowhunters Association because this area is hugely important to them.

Proposal #50 I SUPPORT This simply increases opportunity to hunt, while minimally increasing the Harvest. Moose are better hunted in cooler weather for meat salvage.

Thank you for your time and consideration of my comments.

Sincerely,

John D. "Jack" Frost

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Submitted By
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2/18/2020 7:48:21 PM
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Comment in Support of Proposal 152

This proposal requests partial hunting and trapping closures just outside Denali National Park.

I support 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.

These closures would allow the wolf packs in these areas to get through breeding season and

hopefully restore visitor viewing to the Park and increase tourism.



12/04/2019 03:34 PM AKST

RE: PROPOSAL 63: Repeal the Dalton Highway Corridor Management Area

The proposal relies heavily on statutory change by the Alaska State legislature and the Governor's concurrence. The likelihood of the State legislature taking this up is slim. The issues that would need to be addressed are: federally qualified subsistence users (Wiseman, Anaktuvuk Pass, Nuiqsut) should be able to access federal public lands within the Dalton Highway Corridor with all-terrain vehicles and should be able to return home.

Gates of the Arctic National Park Subsistence Resource Commission

12/04/2019 03:39 PM AKST

RE: PROPOSAL 64: Clarify the legal use of highway vehicles, snow machines and off-road vehicles in the Dalton Highway Corridor Management Area (DHCMA) for hunting and trapping. Clarify the use of firearms, and transport of furbearers and trapping bait when trapping in the DHCMA

The proposal relies heavily on statutory change by the Alaska State legislature and the Governor's concurrence. The likelihood of the State legislature taking this up is slim. The issues that would need to be addressed are: federally qualified subsistence users (Wiseman, Anaktuvuk Pass, Nuiqsut) should be able to access federal public lands within the Dalton Highway Corridor with all-terrain vehicles and should be able to return home. It was strongly suggested that instead of taking this regulatory route, ADF&G should speak with the North Slope Borough Planning Department so that the oil industry checkpoints are being enforced. Non-North Slope residents should not be egressing certain areas in the oil industry complex to go hunting.

Gates of the Arctic National Park Subsistence Resource Commission

12/04/2019 03:41 PM AKST

RE: PROPOSAL 66: Extend the resident caribou season and reduce the bag limit for Unit 24A Remainder

The Porcupine Caribou herd is healthy and is extending into Unit 24A and it can support the 10 caribou/year harvest limit as reflected in the rest of its range. The harvest within Unit 24A is currently fairly small, so this proposal isn't warranted at this time.

Gates of the Arctic National Park Subsistence Resource Commission

12/04/2019 03:43 PM AKST

RE: PROPOSAL 70: Change the season start date for taking brown bear in Unit 24A to align with Unit 25A

The Subsistence Resource Commission supports the proposal (5 to 0), with the amendment of the season start date of August 1. Justification – There is additional harvest opportunity available for brown bears. Brown bears kill large percentages of moose calves and are a major predation factor. Agree with ADF&G that Unit 24A is easily accessible so they support the season start date of August 1.



RE: PROPOSAL 71: Allow brown bear to be taken over bait in Unit 24A

The brown bear population can support the additional harvest opportunity.

Gates of the Arctic National Park Subsistence Resource Commission

12/04/2019 03:45 PM AKST

RE: PROPOSAL 73: Eliminate the RB601 brown bear registration permit hunt for Units 21D and 24

Under the RB601, the hunter would have to have the permit in hand when they take the bear whereas by eliminating the permit, the hunter would have the opportunity to take the bear and send the skull and hide to ADF&G for sealing. This proposal would make it more advantageous for hunters to take bears when the opportunity arises.

Gates of the Arctic National Park Subsistence Resource Commission

12/04/2019 03:47 PM AKST

RE: PROPOSAL 79: In Unit 26B Remainder, modify the resident season and bag limit for caribou and open a registration permit hunt

The Subsistence Resource Commission opposed the proposal (5 to 0), but would like to include an amendment to eliminate any cow harvest at this time. Justification – The Central Arctic Caribou herd cannot support additional opportunity through the harvesting of cows. The Central Arctic Caribou herd has only been surveyed twice with the new digital photographic equipment. The population appears stable, but an additional survey would provide more information to see where the herd population is going. There are also concerns about the Teshekpuk Caribou herd being at 28 bulls:100 cows and moving through the southern portion of Unit 26B during the fall time and mixing with the Central Arctic herd.

Gates of the Arctic National Park Subsistence Resource Commission

12/04/2019 03:49 PM AKST

RE: PROPOSAL 80: In Unit 26B Remainder, modify the resident season and bag limit for caribou; open a resident registration permit hunt; and change the nonresident general season hunt to a registration permit

The proposal is requesting far too much bull harvest and allowing any cow harvest for the Central Arctic Caribou Herd is unwarranted since the herd is still in recovery. Also, when the Central Arctic herd exceeds a certain level, it starts to migrate onto the south slope and it starts to feed into areas near Anaktuvuk Pass and herd growth supports more subsistence harvest. The population objective is set fairly low for this herd at 28,000 to 32,000. This herd should be maintained at 50,000 to 60,000 at least so that it encourages migration. The bigger the herd, the more distance they're going to travel.



12/04/2019 03:50 PM AKST

RE: PROPOSAL 81: Increase the nonresident bag limit for caribou in Unit 26

The Central Arctic Caribou Herd is still in recovery even though the bull:cow ratio is over the management objective. The herd needs more time to recover before allowing an increase for non-resident harvest. The herd cannot biologically support additional large bull harvest at this time. Also, air taxis cause interference with local hunts that happen in the late summer and fall and it creates a food security hardship on local communities.

Gates of the Arctic National Park Subsistence Resource Commission

12/04/2019 03:52 PM AKST

RE: PROPOSAL 84: Extend the sheep season in the Dalton Highway Corridor Management Area within Units 24A, 25A, and 26B

The population status is an unknown factor. ADF&G was not able to do a sheep survey in 2019 and last year was a deep snow year and this winter is starting off with a lot of snow. There is concern about the breeding ram component and the deep snow years where older rams break trail for the other sheep including the ewes and yearlings. With additional harvest opportunity for rams and a population that is in decline on the south slope, this proposal is not warranted at this time.

Gates of the Arctic National Park Subsistence Resource Commission

12/04/2019 03:53 PM AKST

RE: PROPOSAL 85: Open an archery only registration sheep hunt in the Dalton Highway Corridor Management Area in Units 24A, 25A, and 26B

ADF&G was not able to do a sheep survey in 2019 and last year was a deep snow year and this winter is starting off with a lot of snow. There is concern about the breeding ram component and the deep snow years where older rams break trail for the other sheep including the ewes and yearlings. With additional harvest opportunity for rams and a population that is in decline on the south slope, this proposal is not warranted at this time.



Submitted By
ISABEL GAWEL
Submitted On
2/21/2020 9:18:18 AM
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MY FAMILY AND I ARE VERY CONCERNED ABOUT THE PROPOSAL 152 ON REGULATING WOLF HUNTING IN ALASKA. WE SUPPORT THE LARGER AREA CLOSURE 1, REGARDING MANAGING HUNTING OF WOLVES.

WE PURCHASED OUR PROPERTY IN THE STAMPEDE AREA ADJACENT TO DENALI NATIONAL PARK AND PRESERVE WITH INTENTION TO PREVENT HUNTING THERE OF THE ANIMALS PROTECTED IN THE ADJACENT PARK AND PRESERVE LANDS. MY HUSBAND HAS BEEN A LONG TIME MANAGER OF NATURAL RESOURCES IN NATIONAL PARKS. HE AND ALL OUR FAMILY ARE DISTURBED BY ALLOWANC OF WOLF AND BEAR HUNTING IN THIS AREA.

THE NATIONAL PARK SERVICE HAS THE RESPONSIBILITY TO MANAGE WILDLIFE ON ITS LANDS ACCORDING TO ITS ENABLING LEGISLATION, ANILCA AND THE NATIONAL PARK SERVICE ORGANIC ACT, WHICH REQUIRE MANAGING FOR DIVERSE AND NATURAL ANIMAL AND PLANT POPULATIONS WITHOUT FOCUSING ON REDUCTION OF PREDATORS. WE OPPOSE THE IDEA THAT THE WOLVES PROTECTED BY THE NATIONAL PARK SERVICE AT DENALI ARE SUBJECT TO HUNTING AS THEY RANGE THROUGH OUR PROPERTY AND OUTSIDE THE PARK BOUNDARIES.

PLEASE ACCEPT AND RECORD OUR COMMENTS.

THANK YOU, ISABEL GAWEL AND FAMILY.



Dear Board of Game,

I am writing in support of the proposed amendments, as listed below from Alaskans FOR Wildlife and Dr. Rick Steiner, to the NPS Proposal 152, which would create a buffer zone for Denali wolves for half of the year.

Half of the year is like putting up half a fence! Ridiculous and ineffective.

The following amendments make, what is to me, an unreasonable proposal, reasonable.

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

In addition, all of the outcomes are what will benefit humans. Who is most important? The 1-3 trappers that feel the need to trap a wolf or the 400,000 visitors that want to see wolves?

What about the wolves? Where is the cost/benefit analysis for the wolves themselves~their pups, their pack, their famously tight social structure? It is not considered - and never has been.

We share this planet with them.

Thank you for considering this emotional appeal~

Sincerely,

Ann Ghicadus
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Submitted By
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2/13/2020 12:44:58 PM
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Regarding McGrath proposal 112 to make the stated portion of GMU 19C a registration hunt:

The ADFG states their reasoning is merely to ensure more accurate harvest reporting. I am incredulous as this simply cannot be true. I have always reported on my hunts. Those I hunt with also report their hunts. I know most of the hunters who utilize that area and know they are conscientious and diligent hunters as well.

If the State wants to make a proposal, the least they can do is be honest about the reason. So...because ADFG feels they aren't obtaining accurate harvest reporting, their response is to punish all hunters who use an area? Preposterous!

It is rather apparent to myself and many others who frequently hunt that area, this is an effort to prevent hunters' access to the area because of success rates. When there is something too good to be true, the ADFG is always there to put a lid on it, and prevent the average Alaskan resident from enjoying the resource.

It is true, very good numbers of game are taken in this portion of GMU 19C; especially moose. As amazing as it is...this has been sustained over the last two decades! Therefore, I and many others believe this is an effort by ADFG to "protect their pearl" so to speak. They've had success in this unit with antler restrictions and now want a "foot in the door" to limit or restrict access of the average hunter down the road. Eventually, they will also give deference to guides and outfitters in this area, as they've done in other areas of Alaska, further diminishing the ability of the average hunter to access the area.

My friends and I have been hunting this GMU area annually for the last 15 years. I know many others who've hunted there with regularity, much longer than I. This area is unique in that it is actually like a community! Most of us know each other, we share information, we know each other's phone numbers, and we converse throughout the year, and meet up again each year to enjoy the successes of this hunt unit. Many other groups and hunters have made their way out to enjoy this area. As it stands, all of these hunters, this "community", provides much revenue to the state through hunting licenses, hunt permits, and application fees for draw hunts. We also greatly support local commerce. All of us spend tens of thousands of dollars each year in transportation expenses just to get to this area. I also foresee transportation services and commerce being negatively affected if this proposal passes.

Additionally, a number of us have gone through the added trouble and expense of allocating property in this area. Are these residents now going to be impacted simply for a harvest report problem ADFG can't figure any other method to correct?

Bottom line, if ADFG wants to make this portion of GMU 19C a registration hunt simply to improve harvest reporting, then this proposal should be OPPOSED! They have other methods to improve reporting without directly affecting this "community of hunters" and others who would be inclined to join us. Preventing hunters from applying for draw or subsistence permits if they don't submit harvest reports is only one method already in their employ. The ADFG needs to accept more public comment, and must reconsider how they approach this and other hunt related matters. The "shotgun" or "shoot from the hip" approach needlessly hurts Alaskan residents.

As a 29 year Alaskan resident, I OPPOSE this proposal!

V/R

John Goetz
Eagle River, AK



Submitted By
Brock Graziadei
Submitted On
2/6/2020 11:09:52 AM
Affiliation

I oppose Proposal 71 to allow baiting of Grizzly/Brown Bears in Unit 24A. Unit 24A is road accessible via the Dalton Highway and provides a pristine environment to hunt both Brown/Grizzly Bears and Black Bears with archery equipment. There are many Grizzly bears in this unit and allowing hunters to bait them would congregate them into prime moose calving grounds when they are most vulnerable.

Additionally, this area receives little pressure from hunters in the spring and if baiting is allowed for grizzly bears there stands to be a significant increase in activity, hunter conflict, etc. There are many units that allow Brown/Grizzly Bear baiting but none of them are nearly as accessible or pristine as the DHCMA portion of Unit 24A. If the Department feels the need for an increased harvest in this particular area, there are other means to achieve that, such as allowing for a 2 bear harvest, same day airborne harvest, or an extended season. I oppose proposal 71.



Submitted By
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2/6/2020 10:49:38 AM
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I strongly oppose Proposal **71** to allow baiting of Grizzly/Brown Bears in Unit 24A. Unit 24A is road accessible via the Dalton Highway and provides a pristine environment to hunt both Brown/Grizzly Bears and Black Bears with archery equipment. Allowing hunters (& Guides) to bait Grizzly bears in this unit would congregate them into prime moose calving grounds when they are most vulnerable and will be detrimental to the local area mooses population. With moose hunting already under a permit system and local subsistence hunters competing for moose a increased **local** grizzly bear popualtion would hurt the moose popualtion. Additionally, this area receives moderate pressure from hunters in the spring and if baiting is allowed for grizzly bears there stands to be a significant increase in people/traffic activity, hunter/Local resident conflicts, and I also believe in just a short time a over harvest of bears would exist. This area already has several guides and resident hunters hunting these bears., i worry this would cause a over harvest in a short time and eliminate the long standing spot & stalk hunting oppurtunities that already exist. There are many units that allow Brown/Grizzly Bear baiting but none of them are nearly as accessible or pristine as the DHCMA portion of Unit 24A. This area currently allows one of the few areas in the state that offer a traditional spot and stalk method for grizzley bears. If the Department feels the need for an increased harvest in this particular area, there are other means to achieve that, such as allowing for a 2 bear harvest or an extended season etc. I strongly oppose this proposal.



Submitted By
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2/19/2020 1:51:07 PM
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I am in favour of Proposal 152 for partial hunting and trapping closures in Uniform Coding Units 0607, 0605, and 0502 which are bounded on three sides by Denali National Park. The negative affects of wolf harvest in this area to wildlife viewing opportunities in DNP are way out of proportion when compared to the positive effects if this area is partially closed. This is detrimental to Alaska's image and its appeal to our massive and locrative tourist industry - statewide jobs in tourism depend on a positive image of Alaska. Harming DNP viewing naturally causes a harmful trickle-down effect throughout Alaska's tourism industry. Alaska can't afford such negativity. The selfishness exhibited by trapping and hunting interests in this small area, which is bounded on three sides like a peninsula sticking into DNP, is astounding and very discouraging to those who care about Alaska and its future. The regulation of this DNP buffer/intrusion has been the topic of documented proposals and requests to the BOG for years - all proposals and requests have been sumilarly ignored by game officials. Please, BOG allow yourselves some some considerate thoughts and logical calculations of the benefits of this matter and vote in favour of this Proposal 152. Thank you, Ken Green - Cooper Landing



Submitted By
Jenna Hamm
Submitted On
2/21/2020 9:45:00 AM
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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. I and my husband own and operate two wilderness lodges inside Denali National Park, Camp Denali and North Face Lodge. Each summer we host about 2000 park visitors. Camp Denali has been in business inside the park for 68 years, since 1952. During our guests' three-to-seven-day stays with us, chief among their goals for visiting this incredible national park is to have the opportunity to observe wildlife such as wolves in the wild, interacting in a place where nature not humans dominate the landscape. These opportunities exists in Denali National Park, but are vulnerable to conflicting wildlife management practices outside the park boundaries. We know first hand the importance of tourism to our family's, our community's and state's economy. Let us please, as Alaskans, be mindful of this and take reasonable measures to preserve such opportunities for Alaska's visitors. I support Closure 1, which would protect the larger area in the corridor. Thank you for the opportunity to comment. --Jenna Hamm



Submitted By
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2/20/2020 10:21:13 PM
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As an Alaskan resident hunter, I have a strong interest in what takes place in the Interior and Eastern Arctic regions as well as other regions throughout the state. I am very passionate about expanding and protecting hunting opportunities while still maintaining our amazing resources. Outlined below are my thoughts regarding **Proposals 49, 50, 53, and 84**. These opinions are based on fact with data collected by the Alaska Department of Fish and Game (ADF&G). My hope is that Alaska will remain rich in natural resources, and be able to continue its heritage of outdoor opportunity for generations to come.

Proposal 49

I strongly **OPPOSE** *Proposal 49*. *Proposal 49* only applies to 3 of the 8 Game Management Units outlined. Methods and Means Exemptions are already in place to include physically disabled individuals in Bow and Arrow only hunts, and hunter opportunity could be lost over time due to overharvest if *Proposal 49* is passed.

Affected GMU's

GMU's 12, 19, 21, 26B & 26C do not even have seasons that would be affected by passing this proposal. There are **334** total big game hunting opportunities for all GMU's mentioned in *Proposal 49*, of which, Only **14 DO NOT** allow the use of crossbows. Only **11** of the **334** big game hunting opportunities are for **Certified Bowhunters Only** and are **ALREADY OPEN** to **Certified Crossbow Hunters who possess a Method and Means Exemption**. **320** of the **334** big game hunting opportunities for all GMU's mentioned are **ALREADY open to the use of crossbows as legal hunting weapons**.

Method and Means Exemption

The purpose of *Proposal 49* is to allow resident hunters who possess a Senior Alaska Resident Card to use a crossbow as a legal hunting weapon during Bow and Arrow Only hunts in the Game Management Units mentioned. The age requirement to possess the Senior Alaska Resident Card is 60 years old.

The state of Alaska requires **40 pounds** peak draw weight when hunting black-tailed deer, wolf, wolverine, black bear, Dall sheep, and caribou; and **50 pounds** peak draw weight when hunting mountain goat, moose, elk, brown/grizzly bear, muskox, and bison.

It is common for most compound bows to have a let off of 85% at their maximum draw length. An individual using a 40-pound compound bow with 85% let off would only be holding **6 pounds**. An individual using a 50-pound compound bow with 85% let off would only be holding **7.5 pounds**. Most individuals over the age of 60 will have **NO PROBLEM** handling these let off weights.

Longbows and recurve bows have no let off and the full weight of the bow is held at the marked maximum draw length. Many individuals **over** the age of 60 **CAN** shoot longbows and recurve bows in weights up to 90 pounds with no let off, and compound bows with very little let off. There are also many individuals **under** the age of 60 that, due to **physical disabilities**, **CANNOT** normally hold a compound bow, longbow or recurve bow of 40-50 pounds at full draw. The State of Alaska **ALREADY** offers the opportunity for individuals with disabilities, **regardless of age**, to apply for a Method and Means Exemption **allowing them** to use a crossbow during Bow and Arrow Only hunts.



There is no need for an individual over the age of 60 to use a crossbow during Bow and Arrow Only hunts unless they have an actual physically limiting condition that can already be addressed by applying for a Method and Means Exemption.

Limiting Hunting Opportunity

Bowhunting has, in the past, always been about **limiting** one's self, therefore creating more of a **challenge**, which contributes to a lower impact on wildlife populations. These lower impacts on wildlife allow for longer, more liberal seasons, which can be made available to more hunters in a given area without a negative impact.

Allowing the crossbow as a legal method of harvest for resident bowhunters age 60 and older in the Interior and Eastern Arctic Region could have a higher effect on wildlife populations, therefore **limiting hunting opportunity** in the future. This could also eventually spread throughout the rest of the state and may even become legal in every Bow and Arrow Only hunt regardless of age.

Allowing *Proposal 49* could unnecessarily affect game populations and hunting opportunity which with time, could spread throughout the rest of the state. Bowhunting should be kept to archery equipment designed to limit the hunter, therefore creating a more challenging hunt with less chance of success.

Proposal Summary:

In Summary, Proposal 49 is a weak proposal only covering a select few hunts in the region. Proposal 49 would act as a redundancy to the already established Method and Means Exemptions, and could negatively impact game populations resulting in limited hunting opportunities. I strongly urge the board of game to **OPPOSE Proposal 49.**

Proposal 50

I strongly agree with and **SUPPORT Proposal 50.** If approved, *Proposal 50* could create more hunting opportunity **without** having a negative impact on moose populations, result in less meat loss due to cooler temperatures that are not experienced in the earlier seasons, and create more revenue for the state by hunters who utilize guide services, lodging, transportation, etc. Creating a registration hunt as outlined in this proposal would allow the ADF&G to closely monitor participation and harvest rates.

Hunting Opportunities:

Hunting with bow and arrow has a very low impact on game populations as compared to other means of take. These low harvest rates mean that potentially more people can enjoy the pursuit of game for longer periods of time, **without any danger of overharvest.**

There are currently only 11 moose hunting opportunities in the Interior and Eastern Arctic Regions that are limited exclusively to Certified Bowhunters Only. Only 4 of these Bow and Arrow only hunts are general season hunts that do not require an individual to be drawn. Game Management Units 12, 19, 21, 26B and 26C **do not** currently have any archery specific opportunities. Opening up an archery registration hunt for moose in these GMU's would immensely increase hunter opportunity with **no negative effect.** Antler restrictions from general seasons would remain in place during the archery registration hunt ensuring even less harvest of immature animals.

There is currently **only one** Bow and Arrow Only registration hunt for moose in Alaska. This registration hunt is in the Eklutna Management Area (RM445) and is open to the take of Any Bull. According to data I have gathered from the ADF&G, 1639 hunters participated in RM445 from 2009–2018. Out of those 1639 hunters, only 38 animals were harvested (**2.3% success rate**). Seven of those moose did not have recorded antler data, 14 moose had either a spike, fork, 3 brow tines or were at least 50 inches wide (**1.1% success**), and 17 moose did not meet what would be legal requirements in surrounding areas. Of these moose, 47.3% were taken prior to September 26 (Season extends until October 20 unless closed by emergency order). This shows that **only 1%** of all 1639 hunters harvested moose between September 26 and the close of the season.



GMU 14A has had a general early archery season (August 10-17) for some time. According to data I have gathered from an area biologist, from 2009-2018, **only 8.7%** of moose harvested in GMU 14A's general season were taken in the early Bow and Arrow Only portion. During the general any weapon season in the same time period, **only 2.7%** of moose harvested were taken with archery equipment. The general season in 14A does have antler restrictions of spike, fork, 3 brow tines, or 50 inches.

The above data shows the low impact bowhunters would have on moose leading to more hunting opportunity without over use of the resource.

Potential for less waste:

Cooler temperatures in late September and early October would be a **major benefit** to having a registration archery moose hunt directly after the general season. There would be much less percentage of meat lost after any unexpected delayed trips out of the field, or the occasional animal recovered the morning following the shot. Cooler temperatures would also lend well to deboning meat, allowing hunters in more remote areas to more efficiently get game out of the field without danger of spoilage.

More revenue and jobs:

An additional 10 days of moose hunting would be a huge benefit to many guides and outfitters looking to book an additional archery moose hunt each season. Many lodges, air services, water taxis, meat processors, and taxidermists would also benefit from additional clients. This would employ many Alaskans and bring in additional revenue to the state.

Close Monitoring by ADF&G:

Creating an additional moose season as a registration hunt rather than an additional general season would allow ADF&G to closely monitor hunter participation and harvest rates in each area. This close monitoring of hunts would ensure additional protection against any potential overharvest, as well as hunter participation in the region.

Proposal Summary:

In Summary, allowing for a later season registration Bow and Arrow Only hunt would benefit hunters and businesses throughout Alaska. Hunters would have more opportunity **without impacting game populations**, the state would generate **more revenue**, and cooler temperatures would result in **better meat care**. This proposal is in keeping with the best interest of hunters, businesses and conservation of resources.

Proposal 53

I strongly agree with and **SUPPORT Proposal 53**. If approved, *Proposal 53* could create more hunting opportunity **without** having a negative impact on Dall sheep populations, and create more revenue for the state by hunters who utilize guide services, lodging, transportation, etc. Creating a registration hunt as outlined in this proposal would allow ADF&G to closely monitor participation and harvest rates.

Hunting Opportunities:

Hunting with bow and arrow has a very low impact on game populations as compared to other means of take. These low harvest rates mean that potentially more people can enjoy the pursuit of game for longer periods of time, **without any danger of over harvest**.

There are currently no sheep hunting opportunities in the Interior and Eastern Arctic Regions that are limited exclusively to Certified Bowhunters Only. Opening up an archery registration hunt for sheep in these GMU's would immensely increase hunter opportunity with **no**

negative effect. Size and age restrictions in general seasons would remain in place during the archery season, ensuring even less harvest of immature animals.



According to data collected from ADF&G biologists, 6948 sheep were harvested in state wide general seasons from 2009-2018. **Only 89 (less than 1%)** of these sheep were taken with archery equipment.

There are currently **only four** Dall sheep hunts in the entire state that are specific to Certified Bowhunters Only. All of these are drawing permit hunts (DS140, DS141, DS240, and DS241) and are open to the take of **any ram**. From 2009-2018, 516 bowhunters participated in these drawing permit hunts. During this time, only **44** sheep were harvested (**12.3%**). Out of the 44 sheep harvested, **only 10** were full curl and **6** were 8 years old or older. This shows that in 10 years, bowhunters **only had a 3% chance of harvesting a mature ram that would fall under normal legal requirements.**

From 2009-2018, 239 Dall sheep were taken in GMU 13A during the general season. **Only 3 (1.2%) were taken with archery equipment.**

The above data shows the low impact that bowhunters would have on Dall sheep leading to more hunting opportunity without over use of the resource.

More revenue and jobs:

An additional 9 days of sheep hunting would be a huge benefit to many guides and outfitters looking to book an additional archery Dall sheep hunt each season. Many lodges, air services, water taxis, meat processors, and taxidermists would also benefit from additional clients. This would employ many Alaskans and bring in additional revenue to the state.

Close Monitoring by ADF&G:

Creating an additional sheep season as a registration hunt rather than an additional general season would allow ADF&G to closely monitor hunter participation and harvest rates in each area. This close monitoring of hunts would ensure additional protection against any potential overharvest, as well as hunter participation in the region.

Proposal Summary:

In Summary, allowing for an early season registration archery hunt for Dall sheep would benefit hunters and businesses throughout Alaska. Hunters would have more opportunity **without impacting game populations**, and the state would generate **more revenue**. This proposal is in keeping with the best interest of hunters, businesses and conservation of resources.

Proposal 84

I strongly **SUPPORT Proposal 84**. If approved, *Proposal 84* could create more hunting opportunity **without** having a negative impact on Dall sheep populations, and create more revenue for the state by hunters who utilize guide services, lodging, transportation, etc.

Hunting Opportunities:

The Dalton Highway Corridor is already limited to the use of archery equipment which lends itself to a very low impact on game populations. These low harvest rates mean that potentially more people can enjoy the pursuit of game for longer periods of time, **without any danger of overharvest.**



According to data collected from ADF&G biologists, 6948 sheep were harvested in state wide general seasons from 2009-2018. **Only 89 (less than 1%)** of these sheep were taken with archery equipment.

There are currently **only four** Dall sheep hunts in the entire state that are specific to Certified Bowhunters Only. All of these are drawing permit hunts (DS140, DS141, DS240, and DS241) and are open to the take of **any ram**. From 2009-2018, 516 bowhunters participated in these drawing permit hunts. During this time, only **44** sheep were harvested (**12.3%**). Out of the 44 sheep harvested, **only 10** were full curl and **6** were 8 years old or older. This shows that in 10 years, bowhunters **only had a 3% chance of harvesting a mature ram that would fall under normal legal requirements.**

From 2009-20018, 239 Dall sheep were taken in GMU 13A during the general season. **Only 3 (1.2%) were taken with archery equipment.**

The above data shows the low impact that bowhunters would have on Dall sheep leading to more hunting opportunity without over use of the resource.

More revenue and jobs:

An additional 15 days of sheep hunting would be a huge benefit to many guides and outfitters looking to book an additional archery Dall sheep hunt each season. Many lodges, air services, water taxis, meat processors, and taxidermists would also benefit from additional clients. This would employ many Alaskans and bring in additional revenue to the state.

Proposal Summary:

In Summary, allowing for an extended season in the archery only corridor for Dall sheep would benefit hunters and businesses throughout Alaska. Hunters would have more opportunity **without impacting game populations**, and the state would generate **more revenue**. This proposal is in keeping with the best interest of hunters, businesses and conservation of resources.



Submitted By
Sara Harris
Submitted On
2/20/2020 10:55:25 PM
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I would like to share my thoughts regarding **Proposals 49, 50, 53, and 84.**

Proposal 49

I strongly **oppose** proposal 49. The Method and Means Exemption already allows an individual to use a crossbow if they are unable to bow hunt any other way, no matter what their age is. This proposal would benefit only a few and would ultimately hurt many more. Crossbows have a much greater range than most archery equipment and could possibly begin to increase hunt success rates which would lead to less opportunities for those seeking the challenge of a true archery hunt. Crossbows are welcome to be used by anyone who wishes in the General Season but **do not** belong in a Bow and Arrow Only hunt unless a Method and Means Exemption has been granted.

Proposal 50, 53 and 84

I would like to share my **support** of these three proposals. All three proposals seek to create Bow and Arrow only hunts that precede/extend moose or sheep seasons. I believe all of these would greatly benefit hunters and the state without hurting the game populations. Archery only hunts are proven to not have high success rates, meaning that the number of legal animals harvested each year would not be likely to get much higher, **but** with the extra time for archery hunts more hunters will have the opportunity to be using Alaskan businesses (guides, lodges, air taxis, etc.) to get out on hunts. The more hunts that hunters have to choose from the more hunters will be drawn to the interior of our great state to pursue opportunities they may not otherwise get to experience.



Submitted By
John
Submitted On
2/19/2020 2:11:41 PM
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Havard

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I lived in Alaska from 1977 through 1991. During that time I hunted all across the State and came to love Alaska as "home". Life and work has taken me away from Alaska but I still hunt at least once each year in my former home. I am 66 years old and hunt almost entirely with a recurve bow. As a member of the Professional Bowhunters Society and an annual visitor/hunter to Alaska I wanted my comments on Proposal 50, Proposal 53, and Proposal 49. I am strongly in favor of Proposal 50 for a variety of reasons, not the least of which is it will provide greater hunter access across Alaska, will provide more income to the state from hunters (both residents and non-residents), while at the same time not materially increasing the moose harvest. I am strongly in favor of Proposal 53 for many of the same reasons. Increased access to hunters, increased revenue to the State, and minimal increase in sheep harvest. Finally I am strongly opposed to Proposal 49, enabling residents over 60 years of age to use a crossbow. Crossbows are merely guns that shoot bolts (short arrows) instead of bullets. Using one with deadly effect requires zero practice or physical capability. Use of crossbows will result in harvests and hunter success rates similar to those seen in firearms seasons. Archery hunting is supposed to be hard and difficult. It is not supposed to be easy. Having to stalk within 10-50 yards to take an ethical shot on a game animal is difficult and that's why harvests per hunter-days are much lower than when firearms are allowed. For this reason Proposal 50 and 53 should be approved by the Board and for the same reason Proposal 49 should be denied. Thank you for allowing me to comment. John Havard



Submitted By
Melanie Heacox
Submitted On
2/20/2020 10:27:54 AM
Affiliation

~~I support Closure 1 of Proposal 152 to provide enhanced protection for wolves that leave Denali National Park in late winter and spring for the Stampede Townships and then return for denning, pupping and summer activities. It's effectively a partial year buffer zone. Management for conservation makes sense in this area, where more than 40 years of research has revealed detailed information on the life habits of wolves. Additionally a large constituency of Alaskans support conservation of wolves - for science, for viewing, and for their value to the ecosystem.

Proposal 152 retains hunter-trapper opportunity between Aug 10th and Feb 1st, and removes it between Feb 1st and August 10th. It splits the year between the interests of hunter-trappers and the interests of non-consumptive users. 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 they are consolidating their family groups, mating, and establishing territories. This is a time of year when the death of a breeding wolf is most damaging to the integrity of the pack.

This proposal is balanced: it protects wolves at their most vulnerable time, it provides for hunting and trapping, and enhances viewing opportunities. The State of Alaska wildlife management includes mandates for non-consumptive uses such as wildlife viewing. In 2011 alone, 2.7 billion dollars were generated from wildlife viewing statewide. Please enact Proposal 152 because it makes sense and cents. Thank you.



Submitted By
jerry herrod
Submitted On
2/19/2020 8:54:06 PM
Affiliation

Proposal 50

Many residents find it ludicrous that ADFG has always placed the archery hunter on the back burner and only offered them drippings in the form of less than ideal hunting season.

Current early season archery moose hunts occur in weather much too warm to allow for proper outdoor meat handling, meat stands a chance to ruin before getting out of the field, foliage is too thick to stalk moose in most circumstances.

Late season archery hunting just makes more sense all around.

As the regulations stand, the archer is at an extreme disadvantage now from the season it occurs, on top of the already extreme disadvantage by archery hunting.

Submitted By
Jerry Herrod
Submitted On
2/19/2020 8:43:11 PM
Affiliation

Proposal 53

I agree with a special registration season for bowhunting dall sheep, however;

Guides already have a huge share, and monopoly, on public lands for sheep hunting. Many areas are "corked off" by guides who have "silent agreements" with transporters that will not drop off anyone else except the guides/clients into those hunting areas for sheep. The only other way to get into those areas is by flying your own plane.

This should be a special use area for residents only. While I agree that guides must make money, guided hunting is becoming an archaic and antiquated career field. If you need to book more trips to make more money to survive, you're not managing your money well enough, or should change job fields. And to add another note, most guides aren't even residents (including the assistant guides).

Residents should come first and foremost in these decisions.

This proposed archery hunt should be for residents only.



Submitted By
Robert Hodge
Submitted On
2/20/2020 5:39:16 PM
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I am in full support of proposal 152. The Alaska Board of Game too often uses short term thinking when it comes to woldlife conservation decisions. The Board of Game should have the long term health of the game in its mind but too often caters to the short term thinking of hunters. I am sure everyone on the board is familiar with the benefits of the reintroduction of woves to the Yellowstone ecosystem years ago. I urge the Board of Game to pass proposal 152.



Submitted By
Jeffrey Holchin
Submitted On
2/21/2020 1:40:58 PM
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Professional Bowhunters Association

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Hello I am a NR bowhunter who has hunted in your great state in the past for deer and caribou, and plan hunting trips in the future. I am opposed to proposal 49 and for proposals 50 and 53. I am opposed to proposal 49 because there already is a procedure in place for hunters with medical issue to get a permit to hunt with a crossbow with a note from a doctor - why change this procedure? I am for proposals 50 and 53 because they will increase hunting opportunities for bowhunters with very minimal impact on the game populations, which should also generate more \$ for the game and fish department.



Submitted By
Lori Horvath
Submitted On
2/19/2020 5:48:02 PM
Affiliation

Lori Horvath Fairbanks, AK

Proposal 147 and Proposal 148 5 AAC 85.020 Hunting seasons and bag limits for brown bear.

Brown/grizzly bear hunting season extended – Sept 1 – June 30.

I fully agree with extending the season for brown bears to June 30. We have hunted black bears for over 20 years in 20B Remainder and find that we have a lot of brown bears moving into our bait stations, and in turn they are chasing off the black bears. We set game cameras on both of our bait stations and see assorted brown bears, but the date stamp will show them during the second half of the season... very rarely before May 30. The black bears don't show up before or after the brown bears, and only occasionally will see one black bear during the entire bait season. We used to have pictures showing seven or eight black bears all at the same time, in the same photo, but are lucky to see one now. We would like to be able to hunt the brown bears since they've chased off our black bears.



Submitted By
Caleb Johnson
Submitted On
2/21/2020 4:17:35 PM
Affiliation

I support proposal 152. The wolf packs that need protection part of the year are a rare opportunity to study wild wolfs and thier relationship to ungulates, they are mostly protected by the National Park. Plus those wolfs in the Park bring in a lot of tourist.



Submitted By
Jeremiah Johnson
Submitted On
2/14/2020 8:08:55 AM
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Passing Proposal 50 & 53 would be a major value add to Alaska as well as resident/non-resident hunters seeking adventure within its borders...this is a win for the following reasons:

Proposal 50

- 1. Cooler temperatures to minimize waste of game meat harvested in a later season.
- 2. More opportunities for hunters to stay in the field longer without having a significant impact on moose populations.
- 3. Potential for more state revenue created by non-resident hunters booking additional archery moose hunts through outfitters.
- 4. Registration hunt allows for close monitoring of participation and success rates by the Alaska Department of Fish and Game.
- 5. Bowhunters would still be limited to the same antler restrictions outlined in the general season.

Proposal 53

- 1. More opportunities for hunters to stay in the field longer while having almost no impact on sheep populations.
- 2. Registration hunt allows for close monitoring of participation and success rates by the Alaska Department of Fish and Game.
- 3. Bowhunters would still be limited to the same legal animals as outlined in the general season hunts.
- 4. Potential for more state revenue created by non-resident hunters booking additional archery sheep hunts through outfitters.

Proposal 49, on the other hand, is not one I endorse for the following reasons:

- 1. 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.
- 2. The average person age 60 and older have no problem handling a 50-pound compound bow with 85% let-off (7.5 lbs).
- 3. Allowing a mass of crossbows could have a significant impact on wildlife population creating more restrictions and less opportunity for bowhunters.
- 4. 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.
- 5. This proposal is obviously meant for non-bowhunters to take advantage of special areas including the Dalton Highway Corridor.
- 6. Allowing less restricted crossbow use in this region could eventually affect our bowhunting opportunities across the state.

Thank you,
Jeremiah Johnson



Submitted By

Donna Jones

Submitted On

2/21/2020 9:07:19 AM

Affiliation

I write in support of Proposal 152 regarding the closing of the Stampede Townships to wolf hunting and trapping between Feb. 1 and Aug. 10 to protect wolves during the critical breeding and denning seasons. The proposed Closure 1, the largest area proposed for closing, makes the most sense from both preservation and administrative standpoints. I recognize that the buffer zone along Denali National Park and Preserve has long been controversial. Proposal 152 represents a compromise that provides a measure of protection for wolves, a invaluable part of the Denali ecosystem, while also taking into account the wishes of both trappers, of whom there are few, and the hundreds of thousands of tourists who visit Denali in hopes of seeing wildlife and most especially wolves. The proposal also would allow for additional research on the impact of the closing and/or hunting of wolves in the townships.



Submitted By
G Merrill Jones
Submitted On
2/13/2020 9:14:15 AM
Affiliation
non-resident bowhunter

To the Board of Game meeting in Fairbanks from 6 to 14 March 2020:

As a non-resident bowhunter from Alabama who has recently hunted in Alaska, and who is considering future hunts, I wish to express my opinions regarding proposals to be considered at the meeting. I strongly support proposals 50 and 53, and I am strongly opposed to proposal 49.

Proposals 50/53: 1) allow more opportunity for bowhunters to stay in the field longer without having a significant impact on populations of game hunted; 2) creates the potential for more state revenue created by non-resident hunters booking additional archery hunts through outfitters; 3) registration hunts allow for close monitoring of participation and success rates by the Department of Fish and Game; 4) bowhunters would still be limited to the same legal animals as applicable to general season hunts; and 5) expected cooler temperatures in the proposed special archery moose hunt would minimize meat waste

Proposal 49: 1) is totally unnecessary because 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; 2) the average person age 60+ has no problem handling a legal compound bow allowed for bowhunting (I'm in my late 70s and have no problem with current regulations); 3) allowing a mass of crossbows could have a significant impact on wildlife population creating more restrictions and less opportunity for bowhunters; 4) 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; 5) is obviously meant for non-bowhunters to take advantage of special areas including the Dalton Highway Corridor; and 6) allowing less restricted crossbow use in this region could eventually effect bowhunting opportunities across the state, with resultant loss of revenue from non-resident bowhunters like myself



Submitted By
Matt Kandrick
Submitted On
2/18/2020 12:50:18 PM
Affiliation

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I am writing to express my opinion on some recent proposals that I was made aware of through my affiliation with the Northwest Archers Association. I would like to state that I am an Alaskan resident a bow hunter and a rifle hunter. The proposals that I am writing about are proposals 49, 50, and 53.

Proposal 49 is not a good idea. I hunted the brooks range last year for Dall Sheep and I believe that the area should stay as it is. The state should not change its current rules on the use of crossbows within the 5 mile corridor of the dalton hwy.

Proposal 50 is not a good idea. I am for having a extension to bull moose season for archers but only for alaskan residents not for nonresidents.

Proposal 53 is a bad idea. I am a sheep hunter and a bow hunter. I think if this proposal were to pass then there would to many guides trying to get non residents on sheep with a bow. I see this as a problem. Sheep hunting in alaska is a privelage and one that I do not want to see taken advantage of. Perhaps if proposal 53 were for residents only but opening it up to non residents will just put more guides flying all over and dropping nonresident hunters on sheep earlier in the season. This is bad for sheep population and for resident dall sheep huters



Submitted By
GERY KATALINICH
Submitted On
2/20/2020 3:01:34 PM
Affiliation

I support proposals 50 and 53. Expands resource enjoyment without severely negatively impacting wildlife.

I oppose proposal 49, a route for disabled to use crossbow is in place,



Submitted By
Toni M Kaufman
Submitted On
2/20/2020 10:26:55 AM
Affiliation

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Fairbanks, Alaska 99709

I support Proposal 152 as a seasonal closure and also support Closure 1, the larger map. I feel that this proposal is fair and a compromise on the endangerment of the wolves in Denali National Park and their northern boundaries. I hope my thoughts and statement will be included in your assessment of Proposal 152. Thank you, Toni Kaufman



ATTENTION:

ADF&G Boards Support Section

ATTN: Board of Game Comments

P.O. Box 115526

Juneau, AK 99811-5526



KAWERAK, INC.

REPRESENTING

Brevig Mission

Sitaisaq

Council

Diomede

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Elim

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Gambell

Sivuqaq

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Chinik

King Island

Ugiuvak

Koyuk

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Nome Eskimo

Sitnasuak Inuit

Savoonga

Sivungaq

Shaktolik

Saktuliq

Shishmaref

Qikiqtaq

Solomon

Anuutaq

St. Michael

Taciq

Stebbins

Tapraq

Teller

Tala

Unalakleet

Unalaqtiq

Wales

Kinigin

White Mountain

Igaluik /

Nutchirviq

January 3, 2020

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

Kawerak, Inc. is the regional non-profit tribal consortium of the Bering Strait Region. Kawerak's Board of Directors is comprised of the Presidents of the 20 tribes of the Bering Strait Region. Kawerak offers numerous programs and services to the 16 communities in the region. We offer the following recommendations to the Board of Game regarding proposals up for review in January 2020.

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

Proposal 1 - 5 AAC 85.025 & 5 AAC 85.045 Hunting seasons and bag limits for caribou & moose. Prohibit nonresident hunting of moose or caribou under intensive management in the Western Arctic/Western Region until harvest of population objectives are met. Kawerak supports this proposal because the intent is to prioritize people living in the Region and gives local residents an opportunity to hunt caribou or moose allowing food on the table and in the freezer, when bag limits are in place.

Proposal 3 - 5 AAC 92.015 Brown Bear tag fee exemptions, Reauthorize the current resident tag fee exemptions for Brown Bear in Units 18, 22, 23 and 26A. Kawerak supports this proposal; current bear population estimates show the population has grown and the hunt has been sustainable.

Proposal 30 - 5 AAC 92.001(k) Taking of game by proxy. This proposal allows a proxy hunt for Musk Oxen. Kawerak supports this proposal because individuals may be elderly, injured, had a family emergency and other situations that may not allow them to hunt. Allowing a proxy hunt could help that family obtain food resources.

Proposal 33 - 5 AAC 85.045 Hunting seasons and bag limits for moose. This proposal modifies hunting seasons and requires a registration permit for moose hunting in Unit 22D Remainder. Kawerak supports this proposal because the moose population in this area has declined. In the essence of conservation a registration and quota moose hunt would put a max limit on how many bulls could be taken out of this Game Management Unit.

KAWERAK, INC.

PO Box 948 • Nome Alaska 99762 • 907.443.5231 • www.kawerak.org

Advancing the capacity of our people and tribes for the benefit of the region.



Proposal 35 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Change the availability of GMU 22 registration permits for moose hunting with an option to require a registration permit for the Unit 22D Remainder hunt as follows. Registration permits be available July 15-31, in Nome or Seward Peninsula/Norton Sound villages. We support this proposal so that local people on the Seward Peninsula & Eastern Norton Sound villages have the highest opportunity to receive available permits. Moose populations in several Units within 22 have declined in recent years.

Proposal 37 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Kawerak is in support of closing non-resident moose hunt in Unit 22C. Non-residents should have less opportunity since the moose population is in decline and the quota is so small. In recent years the hunt is only a couple days long.

Proposal 38 – 5 AAC 85.045 Hunting seasons and bag limits for moose. A proposal to modify the hunting season and bag limit for moose in Unit 22A. Kawerak supports this proposal because the change would allow for people living in Eastern Norton Sound more days to hunt without ADF&G having to do an emergency order opening.

Proposal 39 – 5 AAC 85.020 Hunting seasons and bag limits for brown bear & 5 AAC 92.132 Bag limit for brown bear. A proposal to extend the hunting season for brown bear in Unit 22D and 22E and increase the resident bag limit. We support the proposal with the following friendly amendment: We are neutral on the portion of this proposal to extend the season date into June due to the bears having poor hide quality as spring turns into summer. We support the portion of the proposal to harvest two (2) bear a year. The most recent bear population study has shown an increase in the bear population, current harvest is low and is sustainable.

Proposal 42 – 5 AAC 92.080 (4)(B)(i). Allow the use of snowmobiles to position brown bears for harvest in Unit 22. Kawerak supports this proposal; Snowmobiles have a long standing history in rural Alaska not only to position hunters to take game of all kinds but also necessary for day to day travel between villages.

Proposal 43 – 5 ACC 85.065 Hunting seasons and bag limits for small game. Kawerak support the change in hunt time, which allows for a better eating quality while recognizing a count of Alaska hares and sees a need to save them. Alaska Hares are generally twice as large as Snowshoe Hares and until hares can be quantified more accurately, it's better to reduce the Arctic Hare take.

Proposal 169 – 5 AAC 92.012 Licenses and Tags & 5 AAC 92.990. Clarify that big game tags be paid for and issued prior to hunters taking big game that requires tags. In the essence of fairness, specific hunts that require a locking tag should be mandatory for everyone not just Alaska residents. We support the proposal as written.

Kawerak, Inc. **DOES NOT SUPPORT** the following proposals and offers comments following each proposal, for the Board of Game's consideration.



Proposal 31 – 5 AAC 85.050 Hunting seasons and bag limits for muskoxen. Establish a registration permit hunt for muskoxen in Units 21D, 22A and 24D. Kawerak does not support the proposal as written. The last experience we had with a registration hunt for muskoxen was disastrous. It resulted in numerous hunters lining up on opening season and shooting all the bulls. There is no need to return back to a bad process. Keep the hunt in a controlled manner through Tier II.

Proposal 32 – 5 AAC 85.025 Hunting seasons and bag limits for caribou. This proposal allows caribou to be taken east of and including the Nuluk River drainage in Unit 22E. Kawerak does not support this proposal, as there is still an active Reindeer Herd in Unit 22E so there is a very high probability that privately owned reindeer will be shot by hunters mistaking them for caribou. Opening Unit 22E east of and including the Nuluk River drainage may also diminish the Alaska State Troopers ability to enforce illegal take of reindeer due to the area being opened to caribou.

Proposal 34 – 5 AAC 85.045 Hunting seasons and bag limits for moose. This proposal opens a non-resident drawing hung in Unit 22D Remainder. We oppose this proposal as written. The recent moose population data shows this Unit has a declining moose population and it has been in decline for some time. Generally, registered outside hunters are going after bigger bulls; bigger bulls add tremendously to the breeding stock which in turn help increase the moose population.

Proposal 40 – 5 AAC 85.020 Hunting seasons and bag limits for brown bear. This proposal, requires a registration permit for brown bear in Unit 22C. We do not support this proposal as written. Current population data for bears on the Seward Peninsula including Unit 22C show an increase in the population. Bear harvest at the current rate is sustainable. ADF&G staff have indicated bear harvest reporting within Unit 22 is not an issue. If there is no problems with reporting of bears taken in a timely manner, changing to a registered hunt won't increase reporting.

Kawerak, Inc. **IS NEUTRAL** on the following proposals and offers comments following each proposal, for the Board of Game's consideration.

Proposal 2 – 5 AAC 92.115 Control of predation by bears. Establish intensive management programs for bear across the Western Arctic/Western Region.

Proposal 36 – 5 AAC 85.045 Hunting seasons and bag limits for moose. Change the availability of Unit 22 registration permits for moose hunting.

Proposal 41 – Hunting seasons and bag limits for brown bear. This proposal extends the season dates for brown bear in Unit 22B and 22C. We are neutral on lengthening the season dates for brown bear in either of these Units.

Sincerely,


Melanie Bahnke, President



Submitted By
Frank Keim (and Steven)
Submitted On
2/20/2020 10:58:37 AM
Affiliation
individuals

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Alaska Board of Game
Re Wolf Predator Control in Stampede Trail sector
of Denali National Park

To: All members of the Board of Game:

I have lived in Alaska for almost 60 years and, with my son, jointly own a five-acre parcel next to the border of Denali National Park on the Teklanika River.

In light of the serious decline of wolves in Denali National Park, please include my/our testimony in your deliberations.

I/we strongly urge that you amend Proposal 152, which proposes to set aside a wolf-killing buffer zone to protect Denali's wolves. As it is currently written, Proposal 152 will have little effect in achieving its stated goal of significantly increasing the numbers of these wolves so that both residents and tourists may observe them in the wild.

I/we support amending the above proposal so that it includes the following concepts and language:

1. Enlargement of the Buffer Zone to align with the one passed in 2017 by the Alaska House of Representatives as a part of HB 105;
2. A YEAR-ROUND CLOSURE;
3. Prohibition of killing of all charismatic predator species, including wolves, brown and black bears, lynx, wolverines, etc.

There is a nation-wide, even world-wide, interest in observing predator species such as wolves in the wild everywhere, and, in Alaska, especially in Denali National Park. But the current situation where a handful of trappers and hunters can target and kill and consequently subvert the protection of wolves in the most visited parts of Denali National Park has had a serious negative impact on our collective viewing opportunities of these fascinating wild animals.

Thank you.

Frank (and Steven) Keim
2220 Penrose Lane
Fairbanks, Alaska 99709



Submitted By
Sharon Knight
Submitted On
2/21/2020 1:04:02 PM
Affiliation

This comment is about Proposal #56.

I love Alaska and the history it is built on. Just like Montana, both these unique states hold a lot in common, the stuff of legends and hardy outdoorsmen.

In Montana there are very successful trappers who operate well here, even near populated areas.

I would hope that the industry that holds preservation of the environment and renewable resources in the highest esteem, who are trappers and hunters, are seen as the vital elements they have always been throughout history, to preserve the way of life of these remarkable, free people.

According to trappers in Alaska, Proposal #56 would ban trapping inclusive of such expansive perimeters as to take up unreasonable amounts of land. Montana has been dealing with this influence as well, and trappers here do their jobs in supreme efficiency.

No wildlife game departments want dogs running loose, killing and stressing wildlife anyway, and the laws should strictly point to controlling them, not the ones who work seamlessly in wildlife habitat, to preserve it as well. Please do not allow this beautiful free state to become another "anti everything natural" state, bowing to alien views of plastic petroleum fur, instead of the renewable resource, the real thing.

Montana and Alaska in many similar ways are indeed, the last free western states that are proud preservers of the natural world, and its history.

Thank you for your consideration.



Submitted By
Wayne Kubat
Submitted On
2/21/2020 7:17:49 PM
Affiliation
Self

Board of Game, Thank you for your service and for your consideration of my testimony.

I'm Wayne Kubat. I have lived in Alaska permanently since 1976. I received my assistant guide license in 1981, my registered license in 1986 and my master guide license in 2004. I started my own guide business – Alaska Remote Guide Service, based out of Wasilla, in 1987. I average about 8-10 full service hunts per year. I served 9 years on the Mat-Su AC, and 4 as the chairman (1998-2007). I have been a professional member of Alaska Professional Hunter's Association since 1986 and am the current Vice President. I'm writing on my own behalf.

I think by now all of you have seen the McDowell Report - Alaska's Guided Hunting Industry 2015, which was commissioned by Alaska Professional Hunters Association (APHA) and Safari Club International. Roughly 13% NR effort pays for about 75% of our wildlife management. NR pay 20 - 30 times more for licenses and tags than do residents. Because this minor portion pays so much, Thousands and thousands of Alaskans can afford to hunt that might not be able to otherwise, and thousands of senior Alaskans get free licenses. To keep game management funding level, you'd have to replace each NR that you kick out with 20 - 30 residents. How do you think that would work?

RHAK has been in existence for about 4 years now, and because of their attacks on NR Hunters, the Guide Industry, and the BOG, division amongst hunters is higher than ever.

I oppose Proposal 47

I oppose Proposal 52.

Both are RHAK proposals, and are similar to many others they have submitted over the years and keep submitting. Please vote them down for the same reasons you have in the past.

Thank you!



Submitted By
Philip Latteier
Submitted On
2/18/2020 12:33:50 PM
Affiliation
AK Bowhunters

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970-712-9383
Email
wildwilderness@gmail.com
Address
20427 Philadelphia Way
Eagle River, Alaska 99577

I support the proposals by the Alaska Bowhunters Association, I support Proposal 50 and 53 which will create new opportunities for everyone.

Thanks

Philip Latteier



Submitted By
Doug & Karen Lenier
Submitted On
2/18/2020 5:04:52 PM
Affiliation

Phone
8189010975

Email
dlpmusic@roadrunner.com

Address
5720 Costello Ave
Valley Glen, California 91401-4328

We are writing to comment on Proposal 152.

1. Proposal 152 is NOT an attempt to expand the park and this is NOT an issue of federal overreach. We are asking, as Alaskan citizens, that the Board of Game honor its mandates to manage for all Alaskans, including non-consumptive users. This 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 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. Approving this proposal is well within the interests and mandates of the Board of Game
 1. 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
 2. 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. In Alaska, wolves are among the most desired species for viewing, and state wildlife management includes mandates to provide for multiple uses, including non-consumptive uses such as wildlife viewing. More than anywhere else in Alaska, wolves in the eastern region of Denali National Park (Denali), provide significant wolf viewing opportunities as visitors travel along the Park Road. Denali is recognized as one of the best places in the world for people to see wolves in the wild and several thousand park visitors may see wolves in a given year. In addition, viewing large carnivores, particularly wolves and grizzly bears, is a main indicator of a satisfying visitor experience in Denali National Park.
5. From 2000 to 2010, the Alaska Board of Game (BOG) approved the closure of certain areas adjacent in the Stampede Corridor to the park boundary to wolf hunting and trapping year-round in order to protect wolf viewing opportunities in the park. In 2010, members of the BOG removed the buffer protections and requested more information and research into the relationship between hunting of wolves in the Stampede corridor and wolf sightings within Denali National Park Service and Preserve (DNPP) (“Unit 20C Wolf Closure Proposals” 2010). In September 2010, the National Park Service, with collaboration from the Alaska Department of Fish and Game embarked on a 5-year study of the relationship of wolf harvest adjacent to the park boundaries on wolf population and pack dynamics and on wolf viewing opportunities (Borg 2015).

Based on this research, Denali National Park found that the presence of the no-trapping and hunting buffer zone during 2000-2010 was associated with increased wolf sightings in Denali National Park compared to 2011-2013 and 1997-2000 (Borg et al 2016). Both the wolf population size and an index measuring the number of wolves denning near the park road, which were strongly associated with increased wolf sightings, were also greater during the period when the buffer zone was in place. Thus, the presence of the buffer may have increased local population size and the likelihood that wolves would den near the park road.
6. Non-consumptive users are 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).
7. 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 surro this would not preclude people from trapping anywhere else outside this small area during the breeding seas trappers is extremely minimal. Annually, well over 400,000 people visit DNPP (Fix, Ackerman & Fay 2012).



8. When it existed, the old 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 zone, hunting and trapping of wolves adjacent to DNPP was on average greater than during the period without the presence of the buffer zone. Simultaneously, the buffer was associated with substantially increased wolf sightings (Borg et al 2016).
9. 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.
10. 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.
11. We have long hoped for a day when the State of Alaska and the National Park Service could engage in meaningful, cooperative management strategies. Opportunity for both consumptive and non-consumptive users is provided within this proposal.

Thank you for considering our opinion.



Submitted By
Tom Lessard
Submitted On
2/21/2020 9:51:26 AM
Affiliation

Proposal 56 No trapping within one mile of house/cabin/dwelling/mailbox.

Opposed

A one mile circle is roughly 22 million square feet/ 500 acres/ 4+ square miles. Private land may be posted by the landowner and pets should be controlled on public lands and not allowed to roam private land belonging to others.

Proposal 119 Align lynx and wolverine seasons McGrath area.

Support.

Streamlined regulations/aligned seasons are best. Whether to lengthen lynx season or shorten wolverine season is the question.

Proposal 153 Align lynx and wolverine season GMU 12, 20E, 20F

Streamlined regulations/aligned seasons are best. Whether to lengthen lynx season or shorten wolverine season is the question.



Submitted By
John Lisowski
Submitted On
2/19/2020 8:05:13 PM
Affiliation

Phone
907-723-7756
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alaskalynx@yahoo.com
Address
PO Box 1065
Haines, Alaska 99827

To: Alaska Board of Game,

1. Proposal 152 is NOT an attempt to expand the park and this is NOT an issue of federal overreach. We are asking, as Alaskan citizens, that the Board of Game honor its mandates to manage for all Alaskans, including non-consumptive users. This 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 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. **Approving this proposal is well within the interests and mandates of the Board of Game**
 1. **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
 2. 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. In Alaska, wolves are among the most desired species for viewing, and state wildlife management includes mandates to provide for multiple uses, including non-consumptive uses such as wildlife viewing. More than anywhere else in Alaska, wolves in the eastern region of Denali National Park (Denali), provide significant wolf viewing opportunities as visitors travel along the Park Road. Denali is recognized as one of the best places in the world for people to see wolves in the wild and several thousand park visitors may see wolves in a given year. In addition, viewing large carnivores, particularly wolves and grizzly bears, is a main indicator of a satisfying visitor experience in Denali National Park.
5. From 2000 to 2010, the Alaska Board of Game (BOG) approved the closure of certain areas adjacent in the Stampede Corridor to the park boundary to wolf hunting and trapping year-round in order to protect wolf viewing opportunities in the park. In 2010, members of the BOG **removed the buffer** protections and requested more information and research into the relationship between hunting of wolves in the Stampede corridor and wolf sightings within Denali National Park Service and Preserve (DNPP) (“Unit 20C Wolf Closure Proposals” 2010). In September 2010, the National Park Service, with collaboration from the Alaska Department of Fish and Game embarked on a 5-year study of the relationship of wolf harvest adjacent to the park boundaries on wolf population and pack dynamics and on wolf viewing opportunities (Borg 2015).

Based on this research, Denali National Park found that **the presence of the no-trapping and hunting buffer zone during 2000-2010 was associated with increased wolf sightings in Denali National Park** compared to 2011-2013 and 1997-2000 (Borg et al 2016). Both the wolf population size and an index measuring the number of wolves denning near the park road, which were strongly associated with increased wolf sightings, were also greater during the period when the buffer zone was in place. Thus, the presence of the buffer may have increased local population size and the likelihood that wolves would den near the park road.
6. **Non-consumptive users are 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).



7. The average number of people hunting and trapping wolves in the proposed closure **is less than two people last 20 years**. Those average two individuals would only lose 29% of their access to wolf hunting and 50% of 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 is extremely minimal. Annually, well **over 400,000 people visit DNPP** (Fix, Ackerman & Fay 2012).
8. When it existed, the old 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 zone, hunting and trapping of wolves adjacent to DNPP was on average greater than during the period without the presence of the buffer zone. Simultaneously, the buffer was associated with substantially increased wolf sightings (Borg et al 2016).
9. 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**.
10. 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.
11. **We have long hoped for a day when the State of Alaska and the National Park Service could engage in meaningful, cooperative management strategies. Opportunity for both consumptive and non-consumptive users is provided within this proposal.**

Sincerely,

John Lisowski
Haines, Alaska



Submitted By
Michael Litzen
Submitted On
2/12/2020 1:31:06 PM
Affiliation
none

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907 776-5868
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michael@litzenguideservice.com
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50715 maranatha lane
Kenai, Alaska 99611

My Name is Michael Litzen, owner and operator of Litzen Guide and Flying Service, master guide #129 and transporter #647. I own 5 acres and a lodge in the NE corner of 19-C. I have also been flying game surveys, including sheep, for F&G since 1986. This season will mark my 39th consecutive year flying and guiding sheep hunters in GMU 19-C. Throughout my career I have had a perfect record of aviation safety and I have never had any Fish and Game violations against me. When I first started my flying and guiding career back in 1981 guiding sheep hunters for Rick Halford in the Windy Fork, it was never my intention to make a career of this business but one year lead to another and now all of these years later I feel truly blessed and proud to have the job that I do and be able to have served the hunting public in this way. For the last 25 years I have taken the exact same, relatively small number of guided sheep hunters and drop off sheep clients. I have always resisted any temptation to take more sheep hunters than I felt, along with the resident hunting in the area, the sheep population could handle.

This written testimony is to oppose Proposal #52. I would have much preferred to come to the meeting and deliver my testimony in person, but as a matter of fact, I will be assisting F&G with sheep, wolf and moose captures as a spotter pilot the week of the Fairbanks March meeting. I see that RHAK is at it again with yet another self-serving proposal. With this proposal, as with many from this group in the recent past, they attempt to paint guides as somehow the root of their perceived problems with Fish and Game management and hunting success of residents. Their solution seems to be to simply eliminate other competition.

RHAK hated and fought hard against the board generated proposal #207 that prohibits flying to scout for sheep during sheep season for the purpose of hunting. One evening last sheep season me and several of my guides and clients witnessed a pilot in a Super Cub clearly scouting sheep and then landed at a nearby airstrip. I jumped in my Cub and went to have a conversation with the pilot who was in the process of putting up a tent when I landed. As it turned out, the pilot was a founding board member of RHAK. Needless to say this individual was not happy to have me inquiring about what obviously looked like a violation of regulations. He argued that it was none of my business, I didn't own the land and that this is why residents hate guides. I told him he was correct, that I didn't own the land but as a resident and a nearby property owner that it was my business and that I didn't realize I was hated for my chosen profession. I reported the incident to my local Wildlife Trooper and I believe this individual was later contacted by the Trooper. It seems like at least one of the RHAK members will just violate regulations that he doesn't agree with.

There is no justification to pass proposal #52. There is no biological concern for a move to put non-residents on a drawing system. Whereas it is true that GMU 19-C is a heavily hunted sheep area, the population has remained relatively stable and has continued to produce a healthy sheep population. It has been long understood that 19-C has some of the best sheep habitat in the State. I have been guiding in a particular part of 19-C for the last 25 years, and as I mentioned, I have taken the exact same number of hunters in the area every year. I did not pick a number of hunters to take out of a hat; rather I keep a close eye on the game population in this area and take hunters to harvest the available surplus. With my background in guiding and particularly the game surveys that I have done for F&G, I feel that I have the knowledge and skill set to accurately evaluate game populations. If and when the sheep population in this or any part of the State is at low numbers and reducing hunting pressure is needed, I will be one of the first to support a drawing system for all hunters. I will not however, support any management system that tries to give one user group some sort of arbitrary advantage over another without biological justification. I strongly encourage you to reject proposition #52. Thank you for taking time to read my testimony, and thank you for your service to the State of Alaska and its game resources.



Submitted By
David Lorring
Submitted On
2/14/2020 9:54:21 AM
Affiliation
Self

My Name is David Lorring, I live in Fairbanks Alaska. I would like to make the following comments in opposition to changes to the Wood River Controlled Use Area. Re: proposals #127 & #128.

The Wood River Controlled Use Area is the first controlled use area implemented by the Board of Game in the State of Alaska. This CUA has been in existence for decades with very minor changes to the original boundaries and no changes to the intent of the regulation. Boundary changes made a decade ago in response to requests by the Middle Nenana AC were reversed by the Board at the request of this same AC. Those boundary changes did not have the effect the AC wanted, and in fact by their own testimony actually had a counter effect and made user issues worse.

The Wood River Controlled use area has been functioning well for many years. DFG has tailored specific moose hunting regulations for this area. User groups harvest appropriate numbers of moose in accordance with DFG's management goals. This area has been tailored to stay away from motorized vehicles except aircraft during the month of September. It is heavily used by non motorized access users using aircraft, horses, rafts, and by walk in hunters. The CUA affords multiple motorized hunt opportunities after September 30. These opportunities include late season cow moose hunts and winter trophy bull moose hunts by muzzleloader rifles. ADFG, Law Enforcement, and multiple user groups have all meshed well with the intended Board of Game uses for this CUA. The reasons not to change this CUA are numerous. The Wood River Controlled Use Area should be maintained in its current form.

Thank You for allowing me to comment.

Dave Lorring



Submitted By
Matthew Lyczynski
Submitted On
2/19/2020 5:21:11 PM
Affiliation

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Address
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APT 609
Goshen, Indiana 46526

Matthew Lyczynski of Goshen, IN 46526 Proposal 49 Dear members of the board, My name is Matthew Lyczynski, I am from Goshen Indiana. It has long been a dream of mine to bow hunt Alaska and that dream is coming to fruition. I very strongly oppose proposal 49. Hunters who would truly need to use a crossbow to hunt, already have a method of gaining permission to do so. Yes, they may have to fill out more paperwork and have to put forth a little effort to do so. Crossbows are a very effective tool for hunting and allowing them to be used in archery only units will completely compromise the ideology of such units. The use of such an effective tool, will increase harvest numbers, and that increase in harvests will result in either fewer tags allowed or shorter seasons. As bowhunters, whether compound or traditional, we are required to be "students of the woods". We are required to know our target species and the terrain in which we hunt, in order to close the distance and make ethical shots. For many of us the hunt doesn't really begin until we are within 100 yards, that distance is easily obtainable for rifle and crossbow hunters alike.



Submitted By
Amy Mackinaw
Submitted On
2/21/2020 8:43:32 PM
Affiliation

Board of Game members: On behalf of myself and many Alaskans who value wildlife viewing and whose right to have that opportunity is part of AK Dept of Fish and Game policy, I respectfully request approval of Option 1 in Proposal 152, which could, over time, increase wolf populations in part of DNP and the chance for viewing to increase. It is a small change that affects a tiny number of Alaskan trappers that could be a large meaningful gain for an ever increasing number of people who appreciate the value of wildlife viewing. Thank you.



Submitted By
Steve MacLean
Submitted On
2/19/2020 9:52:44 AM
Affiliation
Self

Phone
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ahgeak@gmail.com
Address
11027 Retreat Circle
Anchorage, Alaska 99515

I am writing in opposition to Proposal 49, which would allow any resident 60 years or older to hunt with a crossbow during archery-only hunts in units 12, 19, 20, 21, 24, 25, 26B, and 26C. I encourage the Board of Game to reject this proposal, because this proposal will have a significant negative effect on bowhunting opportunities in the Interior and Eastern Arctic region. The Dalton Highway corridor is one of the only archery only opportunities for bowhunters to pursue caribou without direct competition from more efficient weapons, including rifles and crossbows. The State of Alaska already allows individuals with disabilities, who may not be able to draw a compound or traditional bow, to apply for a Method and Means Exemption allowing the use of crossbows during the archery only seasons. This proposal is clearly intended to allow anyone to use a weapon not intended for archery only hunts in any archery only area. Allowing an influx of crossbows would significantly hinder opportunities for bowhunters, effectively extended the general season hunts into archery only areas. This could also have significant impacts on local wildlife populations in the archery only areas. For those hunters who choose to hunt with a crossbow, 320 of the 344 general, registration, and draw hunts in the affected region are not weapon restricted, and already allow the use of crossbows. In summary, there is no need for this change to regulations, the proposal would severely affect archery hunting opportunities, and could affect local wildlife populations. For these clear reasons, I encourage the Board of Game to reject this proposal.

Submitted By
Steve MacLean
Submitted On
2/19/2020 9:32:15 AM
Affiliation
Self

Phone
907-632-3060
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ahgeak@gmail.com
Address
11027 Retreat Circle
Anchorage, Alaska 99515

I am submitting comment regarding Proposal 50, to establish a 10-day archery only registration hunt for bull moose after the general bull moose season in units 12, 19, 20, 21, 24, 25, 26B, and 26C. This is a proposal that has all upside and no downside. Because this hunt would occur after the general season bull moose hunt, there is no additional competition for general-season hunters. Instead, Alaskan hunters would have additional opportunities to harvest their moose, and because the additional season is archery only this opportunity comes at little risk to moose populations. The registration allows for close monitoring of the number of hunters participating, and their success rates, providing additional data to the ADF&G. There is also the potential for additional revenue to ADF&G and to outfitters and guides in Alaska from out of state or resident hunters booking guided moose hunts. Allowing this hunt at the end of the general season could also minimize waste of game as hunters process meat in the cooler temperatures.

In summary, this proposal presents a positive opportunity for all hunters, by allowing archery hunters the opportunity to harvest their moose without direct competition from general season hunters, provides additional revenue and data to ADF&G, potential for additional revenue to hunting outfitters and guides, all with minimal risk to moose populations in Alaska. All upside, no downside.



Submitted By
Steve MacLean
Submitted On
2/19/2020 9:40:07 AM
Affiliation
self

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Address
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Anchorage, Alaska 99515

I am submitting comment in reference to Proposal 53 to add an archery only registration hunt for Dall sheep preceeding the general season in units 12, 19, 20, 21, 24, 25, 26B, and 26C. Archery hunts, particiularly for Dall sheep are extraordinarily difficult. This makes these hunts "bucket-list" hunts for archers around the world. Archers are at significant disadvantage compared to rifle hunters who, if capable, can take their sheep from 500 yards or more. An archer must approach to within 50 yards to contemplate a shot. Allowing an archer-only hunt before the general season will allow more opportunity for hunters to complete this potentially once-in-a-lifetime hunt. The registration would allow for close monitoring of the numer of hunters, and their success rates, providing additional data to ADF&G. Because archery hunts are much less successful, and this proposal would limit archery hunters to the same legal animals as outlined in the general season hunts, this comes at almost no impact on sheep populations. This is a proposal that presents all upside and no downside.





Submitted By
Cory L. Maddux
Submitted On
2/18/2020 9:00:14 AM
Affiliation

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907-240-7624
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Address
5613 Yukon Charlie Loop
Anchorage, Alaska 99502

Dear Board Members,

In regards to proposal 112, this proposal seems to be presented on a presumption. I have hunted this area for the last 3 years. This is yearly trip that I take with my teenage son and i cannot imagine us or any others that i have met hunting in the area not reporting accurately on our harvests. We spend a large majority of the year between hunting seasons coordinating transportation and the cost of said transportation into the field and out again, this cost is signiifcant and many of the goups out in this area work together to arange transportation and split the costs. We also hold each other accounbtable to be ethical and report any unethical behavior if witnessed. With the amount of the cost it take to access and hunt this area of alaska i cannot imagine inaccurate reporting and would ask that this proposal reasoning be looked at more thouroghly. My interactions with the wildlife troppers patrolling this area have all been positive and thoroughly completed by the officers. In the fall of 2019 I had my son and his friend with us (both 14 years of age) unfortunately there was a death in the family of my sons friend, when the troppers found out about the situation they made a special trip to my camp to see if there was anything they could do to help with the situation. I found this to be above and beyond the call of duty and greatly appreciated the effort put in by the AK state troopers, to patrol the area and dedicate time to make sure this child was ok and to ensure I was able to get him out of the field and back with his family ASAP.

Again, I oppose proposal 112.

Sincerely,

Cory L. Maddux



Submitted By
Michael Makar
Submitted On
2/13/2020 7:10:29 AM
Affiliation
Alaska Resident

As a 46 year resident of this state I would like to make my voice heard as it pertains to the game regulation proposals of interest. My opinions are as follows. S=support O=oppose

Proposal

47 -Support 73-support 81- oppose

52- Support 77- Oppose 82-Support

62- Support 79- Support 83- support

64- Support 80- Support 129- Support



Submitted By
Austin Manelick
Submitted On
2/19/2020 12:41:03 PM
Affiliation
Personal - MatSu AC

Proposal 84 - Proposal 85

Austin Manelick:

More opportunity for a resource, guides, and economic benefit. Area of interest Dalton Highway Corridor Management Area.

General Open Areas for Dall Sheep Hunting:

As per ADFG data provided by ADFG Staff (two separate biologist cross referenced) in Palmer - Over the last 10 years in general season over the counter hunts - approximately 6948 total hunters took sheep – 89 successful in take of sheep with a bow. Approximately 700 sheep harvested per year - 8-12 harvested per year with archery equipment. That is less than 1% success rate with archery equipment in the open areas - Over the Counter Game Management Units.

-DS140-141 DS240-241(Archery Only Draw Tags) in the last 10 years in the archery only draw tags 516 archers participated – 44 were successful = 12.3% Success Rate were. These are any ram/sheep success these are not full curl requirements. 2009-2018(not including 2019 as data is still coming in) of those sheep harvested 10 sheep were legal by full curl - 6 legal by age as far as “trophy size” is concerned. 28 of those taken were rams or any sheep lesser than full curl.

All Draw tags for Sheep including rifle hunts:

-In all draw tags for sheep including all weapon forms over the last 10 (2009-2019) years 3946 hunters participated – 1411 sheep were harvest which is about 27.9% success with any weapon requirements.

Second Data Set from Separate Biologist

-In the past 2009-2018 10 years 124 sheep across the state have been taken with archery equipment. That includes all hunts.

13A - 1893 hunters participated in sheep hunting for 10 years. - 239 killed sheep - 3 with a bow. - 0 other weapons took sheep - two of those were blank. (2009-2018)

Understanding how the reporting works and combing through data is difficult in a short amount of time. Could be slight variances in data due to reporting, years, and data subsets accounting for long periods of time. ADFG would have to spend time fully developing the data behind the questions I asked via Palmer ADFG.

2009-2018 - 23,750 hunters participated in all hunts across the state for Approximately 30% success rate - 7626 sheep harvested. - Approximately 124 of those taken with a bow.

Approximately 5 of Alaska's top resident bow hunters account for 28 of these sheep harvest in the last 10 years. These are the less than 1% of archers in the state.



Submitted By
Deborah Martin
Submitted On
2/21/2020 10:59:59 PM
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Proposal 112 would negatively affect my family's ability to subsistence hunt for moose. We go every year and depend on being able to go out there and hunt. The population seems like it continues to be strong with plenty of legal 50" bull moose.



Submitted By
Frank Maxwell
Submitted On
2/21/2020 4:43:52 PM
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Alaskans For Wildlife

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Comments to Board of Game from

Frank Maxwell
POB 84862
Fairbanks, AK 99708

Re: Proposal 152

These comments support a request to amend this proposal as follows:

1. Align the closed area with that proposed in HB 105
2. Close the area to take year-round
3. Prohibit the take of all predator species to include wolves, brown and black bears, lynx, wolverine and coyote.

A quick look at a map makes it evident why there is a continuing issue in the Stampede area. The Wolf Townships protrude deeply into the park, an obvious source of conflict. This park is the gemstone of all our Alaska conservation units and the largest visitation at 400,000. It is thus a very valuable asset to Alaskans, to the nation and to international visitors. Its contribution to our economy and quality of life are indisputable. A recent article about Southeast wolves in the Fairbanks News-Miner (Mary Catherine Martin, Outdoors, Feb. 21, 2020) underscores this, quoting guide Bjorn Dihle. Dihle points out the growing importance of experiences (with a wolf) and wildlife films to Alaska's economy. "Wildlife and wild places are going to be a way bigger resource in the future as the world becomes more industrialized, and I think we need to have way more of an emphasis on preserving these wild places"

Since the previous buffer was vacated, wolf viewership has declined for park visitors from 40% to nearly zero. Wolves are obviously not the sole draw for park visitors, they are a significant aspect of the attraction and a sighting is very rewarding. I can personally vouch for the reward in observing these wolves during my visits and in bringing friends and relatives to the park.

Allowing these habituated wolves and bears to be taken along the park boundaries violates the tenets and ethics of fair chase and exposes Alaska hunters and trappers to public rebuke and disgust.

The Alaska constitution requires that its resources be managed for the benefit of all Alaskans and decisions regarding the disposal of state resources by state agencies be "in the state's best interest".

We are asking that 1-3 wolf packs be protected from harvest for the enjoyment of the majority of Alaskans and the 100s of thousands of visitors. This request is for protecting between 0.3% and 0.0019% of our state's wolf packs. Hardly a big ask. I am requesting that you, in the interest of fairness and equity, make the amendments requested for a small share of our wildlife, to reserve a minuscule share of our wildlife for the benefit of a very large segment of our public.

Thank you.



Submitted By
Chad McCaffrey
Submitted On
2/21/2020 6:11:03 AM
Affiliation

iProposal 112 19C Farewell Moose

Have been going to Farewell with my family for many years . I harvested my first Bull with my Mom and Dad. This has been a great Alaskan Family Tradition. What I have observed is the large influx of out of state hunters in this area. I would estimate that 25-35 percent of the hunters are non-residents.

If anything, make this a registration hunt for non residents with limited opportunities. Most non-residents I have observed in 19C are there for a Rack and not Moose Meat like most Alaskans. Do not penalize Alaskans at the cost of Non- Residents invading our area. The Alaska Constitution States that we are to manage our resources for the maximum benefits of Alaska Residents. Keep this a harvest area for Alaskans and a limited registration for Non-residents!!
thank you



Submitted By
Lori Mccaffrey
Submitted On
2/20/2020 7:11:29 PM
Affiliation

#112 proposal

I am totally against making this area(Farewell) into a registration hunt area for Alaskan Residents. My family has been hunting there for over 20 years! If anything, make this a limited non- resident registration area with limited tags. I have seen more and more non-residents Hunt this area over the years. Most camps have several non -residents in their camp! Alaskans love their Moose Meat and most non-residents just want a rack to hang on the wall.

By limiting non -residents the area would be relieved of pressure. As a long time resident I can assure you that my family always reports accuratly on what we harvest at the Farewell Burn. So please do not penalize us Alaskan's!

Keep it a harvest area for My children and grandchildren.



Submitted By
Paige Mccaffrey
Submitted On
2/21/2020 6:53:35 AM
Affiliation
Concerned hunter

112 proposal for 19C Farewell Area

The Alaska Constitution States that we, (you) are to manage the resources for the maximum benefit of Alaska Residents! My family has invested thousands of dollars over the years hunting in this area. If a change is warranted for the Moose carrying capacity . Make the non-Residents do a registration hunt! Follow the Constitution! Every year their are more and more Non-Residents Hunting this area with no regard for long time Alaskan hunters ! Non -Resdents are overrunning this beautiful area. I have seen first hand the dramatic increase in my families hunting stands from Non- Residents. They are rude and do not care for the land and it's resources . I would estimate that 35 percent of the hunters in this area are non - residents . Keep it a harvest area for Residents and limit non-residents.

Years ago you never ran into Non-Residents, now with Social Media Non -Residents are over running the area. Make the Non-Residents who cannot pronounce "Kenai" and do not know what the "Iditarod" is register to hunt with Limited numbers, not ALASKANS!



Submitted By
Robert J McCaffrey
Submitted On
2/20/2020 11:26:52 AM
Affiliation

It is with great sadness that I am writing this correspondence in regards to Proposal #112. To eliminate the general Moose season and make it a registration Hunt!

My family have been going to the Farewell Moose area for over "20" years, as many other families do. We have faithfully reported on our harvest tags the results of our hunts. Not real clear as to why a

registration hunt is needed. We spend thousands of dollars to just get to farewell. The revenue that we as pump into the economy is huge. We spend \$\$ in Anchorage, Mcgrath that fuels our state. Farewell is the kind of Hunt where you need several people in your group to just put your feet oin the groud. It is not like hunting on the road system. Thus hunt has been a family tradition for my family and people from my church. It is Gods country and should not be dictated as a registration hunt. It should be for all "ALASKANS"! Farewell us to be an any Bull Area, it was changed to a 50 inch or 4 brow tine area. This was a great move by the Biologists. The Moose population has grown with nice bulls being taken. Our camp is selective on the Moose we harvest. We do not harvest the first Legal Bull we see.

I just hope this idea is not driven by Guide/Transporter pressure on the game Board as i have seen more guides working this area in the past years. I am confident this has nothign to do with the good folks of Mcgrath as they can harvest any Bull in their area.

Another point is that every year we see many Bulls, so this cannot be from a carrying capacity standpoint that you want a registration hunt. This is so, so upsetting to me and my family, you cannot imagine how we are all feeling. Like I toled my wife , might be time to sell all of my outdoor gear and take up knitting.

I am absolutely opposed to making this a registration hunt, ladies and gentlemen, put yourselves in my shoes.

Respectfully,

Robert McCaffrey



Submitted By
Diane McDonald
Submitted On
2/19/2020 12:39:08 PM
Affiliation

Hi. I support proposal 152 to help protect the Denali Park wolves. I respectfully request that you put in place the "wolf-buffer" in the Stampede area, Denali Borough. I have seen the wolf population plummet in recent years, negatively affecting Park visitors who come to our National Parks to see wolves and other wildlife. It looks bad for the Park and therefore on the State that this "buffer" is not in place to protect the wolves that remain in the area. If a few hunters and trappers get what they want over the much bigger interest of thousands of Visitors and other local residents, I believe it will decimate the wolf population in Denali and adversely affect Tourism. I ask that you please, please consider re-implementing the wolf protectionbuffer in the Stampede area. Thank you, Diane McDonald



Submitted By
Margaret McGinnis
Submitted On
2/20/2020 5:22:01 AM
Affiliation

1. Proposal 152 is NOT an attempt to expand the park and this is NOT an issue of federal overreach. We are asking, as Alaskan citizens, that the Board of Game honor its mandates to manage for all Alaskans, including non-consumptive users. This 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 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. **Approving this proposal is well within the interests and mandates of the Board of Game**
 1. **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
 2. 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. In Alaska, wolves are among the most desired species for viewing, and state wildlife management includes mandates to provide for multiple uses, including non-consumptive uses such as wildlife viewing. More than anywhere else in Alaska, wolves in the eastern region of Denali National Park (Denali), provide significant wolf viewing opportunities as visitors travel along the Park Road. Denali is recognized as one of the best places in the world for people to see wolves in the wild and several thousand park visitors may see wolves in a given year. In addition, viewing large carnivores, particularly wolves and grizzly bears, is a main indicator of a satisfying visitor experience in Denali National Park.
5. From 2000 to 2010, the Alaska Board of Game (BOG) approved the closure of certain areas adjacent in the Stampede Corridor to the park boundary to wolf hunting and trapping year-round in order to protect wolf viewing opportunities in the park. In 2010, members of the BOG **removed the buffer** protections and requested more information and research into the relationship between hunting of wolves in the Stampede corridor and wolf sightings within Denali National Park Service and Preserve (DNPP) (“Unit 20C Wolf Closure Proposals” 2010). In September 2010, the National Park Service, with collaboration from the Alaska Department of Fish and Game embarked on a 5-year study of the relationship of wolf harvest adjacent to the park boundaries on wolf population and pack dynamics and on wolf viewing opportunities (Borg 2015).

Based on this research, Denali National Park found that **the presence of the no-trapping and hunting buffer zone during 2000-2010 was associated with increased wolf sightings in Denali National Park** compared to 2011-2013 and 1997-2000 (Borg et al 2016). Both the wolf population size and an index measuring the number of wolves denning near the park road, which were strongly associated with increased wolf sightings, were also greater during the period when the buffer zone was in place. Thus, the presence of the buffer may have increased local population size and the likelihood that wolves would den near the park road.

6. **Non-consumptive users are 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).
7. 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 is extremely minimal. Annually, well **over 400,000 people visit DNPP** (Fix, Ackerman & Fay 2012).
8. When it existed, the old 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 zone, hunting and trapping of wolves adjacent to DNPP was on average greater than during the period without the presence of the buffer zone. Simultaneously, the buffer was associated with substantially increased wolf sightings (Borg et al 2016).



9. We recognize that this proposal does not remove all risks to wolves. However, given the almost unlimited tak current Fish and Game hunting/trapping regulations, those local wolves that are most viewed and studied **re disruption and possible complete loss of the pack.**
10. 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.
11. We have long hoped for a day when the State of Alaska and the National Park Service could engage in meaningful, cooperative management strategies. Opportunity for both consumptive and non-consumptive users is provided within this proposal.



Submitted By
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Submitted On
2/21/2020 4:49:58 PM
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I am disgusted that the Board of Game has sat there for 10 years and allowed the Denali wolves to be decimated by a handfull of hunters and trappers. These wolves are a world class resource. When the buffer zone was in place 50% of visitors saw wolves. And since they opened the Stampede Corridor to hunting and trapping, viewership has steadily declined and is now at 1% of visitors who get to see wolves. Even with 100s of letters to the editor, dozens of editorials, Fairbanks Northstar Borough resolution urging protection, a bill passed the state house giving protection to Denali wolves, and what is arguably one of the paramount disgraces in Alaska, the Board of Game has sat there and done nothing.

There used to be two places in North America you had a good chance to see wild wolves, Denali and Yellowstone. Now its just Yellostone.

I am requesting an ammendment to NPS proposal #125.

A year round closure of the area outlined in House Bill 105 to prohibit take of all predators, wolves, black and brown bears, lynx, wolverine, and coyote.