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ALASKA BOARD OF GAME

Interior and Eastern Arctic Region Meeting

Fairbanks, AK | March 6-14, 2020

On-Time Public Comment Index

Wood, Ruth PC185

Yuknis, Birch PC186

Zalar, Mary PC187

Comments not providing proposal numbers, complete names, or community of residence:

..... PC188-243

(These comments are posted on the meeting information webpage at:

<http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=03-14-2019&meeting=anchorage>)



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

Interior and Eastern Arctic Region Proposals

Regionwide & Multiple Units

PROPOSAL 44

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

Comments:

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

PROPOSAL 45

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

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

Comments:

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

PROPOSAL 46

5 AAC 92.115. Control of predation by bears.

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

Comments:

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



PROPOSAL 47

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

Comments:

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

PROPOSAL 48

5 AAC 85.056. Hunting seasons and bag limits for wolf

Comments:

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

PROPOSAL 49

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

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

Comments:

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

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



PROPOSAL 50

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

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

Comments:

We oppose Proposal 50, see comments under Proposal 49.

PROPOSAL 51

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

Comments:

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

PROPOSAL 53

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

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

Comments:

We oppose Proposal 53, see comments under Proposal 49.

PROPOSAL 54

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

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



Comments:

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

PROPOSAL 55

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

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

Comments:

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

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

PROPOSAL 56

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

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

Comments:

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



Tok Area Proposals – Units 12 and 20E

PROPOSAL 86

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

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

Comments:

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

PROPOSAL 87

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

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

Comments:

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

PROPOSAL 88

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

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

Comments:

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



PROPOSAL 122

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

Comments:

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

Generalized Statement:

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

PROPOSAL 123

5 AAC 92.530 (13). Management areas.

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

Comments:

See comments under Proposal 49.



PROPOSAL 124

Comments:

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

PROPOSAL 125

5 AAC 92.530(13). Management areas.

Comments:

See comments under Proposal 124.

PROPOSAL 126

5 AAC 92.530(13). Management areas.

Comments:

See comments under Proposal 124.

PROPOSAL 127

Comments:

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

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



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

PROPOSAL 128

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

Comments:

See comments under Proposal 127.

PROPOSAL 129

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

Comments:

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

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

PROPOSAL 130

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

Comments:

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



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

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

PROPOSAL 131

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

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

Comments:

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

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

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

PROPOSAL 132

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

Comments:

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



PROPOSAL 133

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

Comments:

See comments under Proposal 49.

PROPOSAL 134

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

Comments:

See comments under Proposal 49.

PROPOSAL 144

5 AAC 85.045 Hunting seasons and bag limits for moose.

Comments:

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

PROPOSAL 147

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

Comments:

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

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



PROPOSAL 151

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

Comments:

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

PROPOSAL 152

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

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

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

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

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

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

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

PROPOSAL 158

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

Reauthorize the antlerless moose seasons in Unit 13 as follows:



Comments:

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

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

PROPOSAL 166

5 AAC 92.015. Brown bear tag fee exemption.

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

Comments:

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

Submitted by Ahtna Tene Nene



Submitted By
Thor Stacey
Submitted On
2/21/2020 9:32:26 PM
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February 21st, 2020

Dear Alaska Board of Game Members,

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

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

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

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

Significance to Alaskans & Meat Sharing



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

Individual Proposal Comments

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

Proposal #47- OPPOSE:

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

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

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

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

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

Intensive Management Population Thresholds Change:

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



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

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

Non-residents Pay the Intensive Management Surcharge:

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

Proposal #48: SUPPORT

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

Proposals 51: SUPPORT- Amend to Statewide

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

Proposal #52: OPPOSE

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

Proposal #62: OPPOSE

Back Ground:

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



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

Legal Concerns

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

DM810- A Constitutionally Sound and Statutorily Defensible Hunt Structure-

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

Section 1: Statement of Policy

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

Section 2: General Authority

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

Section 4: Sustained Yield

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

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

Geographic, Economic and Social Concerns



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

Traplines, Wolves and Resident Hunting Opportunity

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

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

Guides are Alaska Residents

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

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

Mixed Cash Subsistence Economy- Shared Meat

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

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



Conclusion

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

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

Proposals 68&69: SUPPORT

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

Proposal 70: SUPPORT

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

Proposal 80: OPPOSE

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

Proposal 82: SUPPORT

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

Proposal 83: SUPPORT



APHA supports this proposal based on the given merits.

Proposal 86: SUPPORT

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

Proposal 90: SUPPORT

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

Proposal 131: OPPOSE

APHA opposes prop 131.

Proposal 146: OPPOSE

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

Proposal 151: SUPPORT

APHA supports Prop 151 based on the given merits.

Proposal 152: OPPOSE

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





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Proposal 46: Oppose

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

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

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

None of these concerns are addressed in the proposal.

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

However,

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

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



Proposal 55: Oppose

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

Proposal 56: Support

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

Proposal 57: Oppose

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

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

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

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

Proposal 63: Oppose

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

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

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

Proposal 64: Oppose

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

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

Proposal 75: Oppose

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

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

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

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



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

Proposal 105: Oppose

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

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

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

Proposal 150: Oppose

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

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



outcome of increasing recreational harvests of moose and caribou;

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

Proposal 151: Oppose

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

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

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

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

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

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

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

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



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

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

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

Proposal 152: Support

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

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

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



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

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

Thank you for your consideration.



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

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

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

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

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

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



ABA PAGE 2

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

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

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



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

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

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

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

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



ABA Page 4

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

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

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

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

Thank you for your consideration of our opinions.

Sincerely,

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





Comments to Alaska Board of Game on Proposal #152

By Alaskans For Wildlife

POBox 81957 Fairbanks, Ak. 99708

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

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

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

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

Thank you,

Jim Kowalsky, Chair
jimkowalsky@yahoo.com





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

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

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

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



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

Phone
9074145452
Email
searcheryak@gmail.com

Address
210 E. Park Avenue
Wasilla, Alaska 99654

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



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



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

Chairman Ted Spraker and Board Members:

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

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

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

The Hunting Regulations Booklet would read:

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

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

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

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

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

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

The area has a good road and trail network throughout;

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

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



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

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

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

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

Sincerely,

Tim Gallagher, President Arctic Bird Dog Association



United States Department of the Interior

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



PC009
1 of 2



In Reply Refer To:

February 4, 2020

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

Re: Comments for Board of Game Proposal 82

Dear Chairman Spraker:

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

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



Chairman Ted Spraker

2

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

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

Thank you for the opportunity to share the Arctic NWR's comments on this proposal. If there are questions, please contact me at 907-456-0253 or Steve_Berendzen@fws.gov.

Sincerely,

Arctic National Wildlife Refuge Manager

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



Submitted By

Anthony Asher

Submitted On

2/21/2020 11:15:31 AM

Affiliation

I oppose Anti-trapping proposal 56!



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

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



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

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

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

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

Sincerely,

Adam Babcock



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

Phone
309-635-6586
Email
kevinbahr1234@gmail.com
Address
224 Ossami Lake Drive
Morton, Illinois 61550

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

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

Thank you.



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

Phone
7656988012

Email
Bakerg2006@gmail.com

Address
3441 Hoover Rd
North Pole, Alaska 99705

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



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

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

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



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

Phone
907-488-3205
Email
alanbatten@acsalaska.net
Address
946 Smallwood Trail
Fairbanks, Alaska 99712

Dear Board of Game,

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

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

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

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

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

Thank you.



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

Thank you allowing public comment.

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

I support **Proposal 152**.

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



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

Phone
3067011
Email
emilyandzeke@yahoo.com

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

Board of Game:

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



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

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



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

Phone
9077238961

Email
joelbennett222@gmail.com

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

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

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



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

To AK Board of Game:

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

Susan and Victor Borko



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

Phone
906-687-0176
Email
Juliettemboselli@yahoo.com
Address
PO Box 106
Denali, Alaska 99755

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

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

Phone
907-687-0176
Email
Juliettemboselli@yahoo.com
Address
P.O. Box 106
Denali, Alaska 99755

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



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

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

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

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

Thank you for your time and consideration.



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

In reference to Proposal 49:

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

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

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

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

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

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

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

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

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

Thank you.

R. J. Burke



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

To the Board of Game:

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

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

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

Christine Byl, Healy AK



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

Phone
9073013222
Email
dcanale777@gmail.com
Address
PO Box 171
Cantwell, Alaska 99729

To Whom it May Concern,

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

Thank You,

Dominic Canale



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

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



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

Robert Cassell, February 16, 2020

I support Proposal 62

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

Note: I also support proposal 52.



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

Ms. Tibbles,

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

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

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

Thank you, Roy Catalano

Colorado Srrings, CO

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

Phone
7193317221
Email
roycatalano@gmx.com
Address
6065 Twin Rock Court
Colorado Springs, Colorado 80918

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

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CHUGACH STATE PARK CITIZENS' ADVISORY BOARD

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

November 11, 2019

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

Subject: 2019/2020 Board of Game Proposals

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

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

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

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

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

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

Amendment(s) Discussed: None

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

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



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

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

Sincerely,

Rosa Meehan
Chair

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



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

Proposal 44 Customary and traditional use of game populations.

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

Shayne Coisman, Wasilla AK

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

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

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

Shayne Coisman, Wasilla AK



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

Dear Board Of Game Officials,

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

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

*** I support proposal 152**

*** I support closure 1**

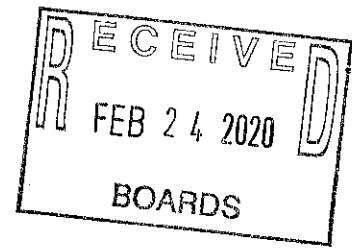
Thank You for Your Time,

Ruth Colianni



Miki & Julie Collins

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



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

February 17, 2020

Hi,

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

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

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

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

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

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

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



Collins p. 2

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

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

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

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

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

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

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

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

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

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

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

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

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

Thanks for taking my views into consideration.

Misti Collins



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

Re: Proposal 152 - Closure Option 1

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

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

Thank you.



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

Phone
4045452320
Email
ldalry@gmail.com
Address
203 E Lincoln Ave
Wheaton, Illinois 60187

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

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



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

Phone
907-831-1505

Email
Jesse-deaton@hotmail.com

Address
P.O. Box 2916
Valdez, Alaska 99686

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



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

Phone
9078885225
Email
linda.defoliart@gmail.com
Address
1743 Coyote Trail
Fairbanks, Alaska 99709

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

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

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

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



Home of the Delta Rifles Juniors Shooting Pro

Delta Sportsman's Association, Inc

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

P.O. Box 1309

Delta Junction, Alaska 99737



PC038
1 of 1

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

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

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

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

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

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

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

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

We appreciate your support for our ruffed grouse!

Vern Aiton
President



February 21, 2020

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

Chairman Spraker and Board of Game members;

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

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

Region wide and Multiple Units

- **Proposal 47 - *No nonresident hunting of moose or caribou currently under an Intensive Management predation control program until harvest objective has been met.***

DCC Supports – We agree with Resident Hunters of Alaska that "Intensive Management when necessary is first and foremost about putting food on the table for Alaskans." Limiting the application of Intensive Management predation control efforts according to this Proposal is consistent with the intent of the Intensive Management Law and will prevent overly zealous use of that tool.

- **Proposal 48 – *Extend season for taking wolves in multiple units to start Aug 1, not Aug 10***

DCC opposes – We oppose this extension on many grounds, but most importantly, we think that applying such a change to multiple areas, where different relationships between predator and prey exist, is unscientific and extends an already unnecessarily long wolf season.

- **Proposal 51 – *Remove bag limit restriction of one Dall sheep every four years for nonresident hunters 60+ years old.***

DCC opposes – Given recent changes and threats to sheep populations, and the lack of any scientific data in this proposal we feel it is premature at best to change existing policy.



- **Proposal 54 – Reauthorize brown bear tag fee exemptions.**

DCC opposes – Given the nominal cost of this tag and ongoing budget challenges in the state, we feel it is not prudent to continue the exemptions.

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

- **Proposal 122 – Reauthorize antlerless moose hunt in Unit 20A**

DCC supports in principle - However, given the stresses of winter on all moose, we oppose any general hunt that ends later than November 15th.

- **Proposals 127 and 128 – Change the boundary of the Wood River CUA to increase motorized access**

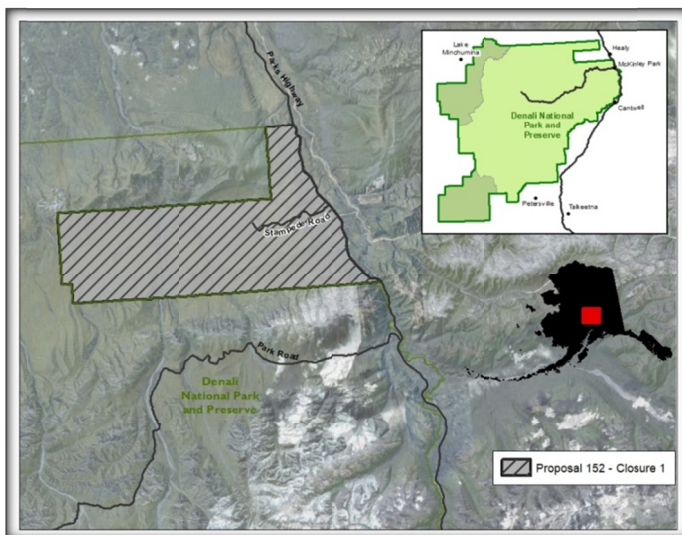
DCC opposes – DCC feels that the Wood River and Yanert non-motorized CUAs are well-designed and popular areas where hunters can enjoy a more traditional experience. We join the Middle Nenana AC in opposing both of these proposals.

- **Proposal 129 – Change dates of closure in Yanert CUA to align with Wood River CUA**

DCC opposes – We believe this will lead to a damaging level of ATV use during snow-free months in the Yanert Valley, a relatively narrow valley with one major trail. We doubt that very many folks will haul feed in winter by snowmachine, the less damaging option. Already, the existing trail is experiencing degradation. We do not want to see a repeat of Rex Trail impacts in the Yanert.

- **Proposal 152 - Areas closed to the taking of wolves near Denali National Park in Unit 20C.**

Proposed by the National Park Service, Denali National Park.



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

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

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

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



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

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

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

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

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

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

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

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

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



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

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

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

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

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



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

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

A recent study indicated that the death of a breeding wolf, once pair bonding and breeding have occurred (a process that begins in early February and extends to birth of pups in May) can cause dissolution of the entire pack, with potential loss of productivity for the entire year. The study is available at <https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2656.12256>. In a review described in this study, breeder loss preceded 77% of cases of pack dissolution. Hunting and trapping can be highly significant during the late winter and spring months. After all, in the lands concerned, bag limit is 10 per hunter, and trappers have no bag limit for wolf take.

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

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



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

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

Sincerely,

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

*Nancy Bale
Steve Carwile
Nan Eagleson
Charlie Loeb
Hannah Ragland*



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

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Fairbanks, Alaska 99775

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



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

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

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

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

Suggest you make it a resident only hunt.



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

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P.O. Box 421
South Salem, New York 10590

Dear Board of Game members:

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

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

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

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

Thank you for the opportunity to comment.

Regan Downey



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

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19901 Cohen Dr
Juneau, Alaska 99801

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



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

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P.O. Box 2994
Homer, Alaska 99603

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

Dear Board Members:

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

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

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

Please pass Proposal 152, Option 1. Thank you.

Sincerely,

Nina Faust
907-235-6262



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

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



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

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Anchorage, Alaska 99507-1547

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

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

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

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



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

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



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

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

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

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



Submitted By
Paul Forward
Submitted On
2/17/2020 7:25:58 PM
Affiliation

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Girdwood, Alaska 99587

To whom it may concern,

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

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

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

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

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

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

Proposal 49:

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

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



PC049
2 of 2

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

Sincerely,

Paul A Forward

Girdwood, AK

907-854-2959



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

Background:

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

Proposition 50 and 53

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

Proposition 49

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

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

Sincerely,

Adam Foss



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 consensus 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:



JDF Page 2

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”



JDF Page 3

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



JDF Page 4

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

jackfrost@gci.net

907-360-1301 FAX 907-562-5742





Submitted By
Caro Fuller
Submitted On
2/18/2020 7:48:21 PM
Affiliation
Ak. Wildlife Alliance member

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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.

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.

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.

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 ALLOWANCE 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

PO Box 511

Seward, AK 99664



Submitted By
John Goetz
Submitted On
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 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
Troy Graziadei
Submitted On
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
Ken Green
Submitted On
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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Submitted On
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
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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
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2/19/2020 2:11:41 PM
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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
Affiliation

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Anchorage, Alaska 99516

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
Affiliation
Professional Bowhunters Association

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Jeffreyholchin@gmail.com

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Taylorsville , North Carolina 28681

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
Affiliation

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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 an 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 be too many guides trying to get non residents on sheep with a bow. I see this as a problem. Sheep hunting in Alaska is a privilege 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 hunters.



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

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Council

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Gambell

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King Island

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Sivungaq

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Saktuliq

Shishmaref

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Solomon

Anuutaq

St. Michael

Taciq

Stebbins

Tapraq

Teller

Tala

Unalakleet

Unalaqtig

Wales

Kinigin

White Mountain

Igaluk /

Nutchirvig

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 AAC 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 hunt 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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2220 Penrose Lane
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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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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

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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
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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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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 it's 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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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
907-632-3060
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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

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Address
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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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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, particiulary 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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madduxcl@gmail.com
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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 thouroughly. 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
Affiliation

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Wasilla, Alaska 99654

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
Affiliation
Alaskans For Wildlife

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POB 848672
Fairbanks, Alaska 99708

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 grouud. 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 tolod 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 **rer** **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
Sean McGuire
Submitted On
2/21/2020 4:49:58 PM
Affiliation

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159 Kniffen Rd
Fairbanks, Alaska 99712

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.



Submitted By
Sierra McLane
Submitted On
2/13/2020 9:35:54 PM
Affiliation

Dear Board of Game,

I live just outside of Denali National Park and I encourage you to support proposal 152. There is a time and a place for hunting and trapping in Alaska, but the Stampede corridor during breeding season is not one of them. The NPS has done good research and their proposal is as scientifically sound and socially reasonable as I expect anyone could formulate. Please support this proposal.

Thank you for your consideration,

Sierra McLane



Submitted By
Thomas E. Meacham
Submitted On
2/21/2020 1:57:03 PM
Affiliation
none

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9500 Prospect Drive
Anchorage, Alaska 99507

On behalf of my wife and myself, I wish to indicate our support for Board Proposal No. 152 involving establishment of a limited wolf buffer zone on state land east of Denali National Park — but with an amendment that would extend it year-round instead of just a seasonally-limited period, and an amendment that would extend it to protect from hunting and trapping bears and all fur-bearers, not just wolves.

With Proposal No. 152 as amended, the “trapping opportunities lost” are infinitesimally small when compared to the anticipated enhancement of wildlife viewing opportunities within the Park, and particularly from the Park Road. This proposal will have the long-term benefit of raising public awareness of wildlife viewing opportunities within the Park, and will have a very positive effect on both in-state tourism and visitor numbers from Outside — and consequently, on the Alaskan economy.

The amended proposal that we are supporting coincides with that put forward by environmental consultant Richard Steiner, and others. This amended proposal should remain in place for a period of at least five years, to enable the objective quantification of its positive and negative effects, and a conclusion reached as to whether it has achieved its intended purposes.

Thank you for including this letter in support of Proposal No. 152, as amended, in the compilation of public comments on this proposal.

Sincerely,

Thomas E. Meacham and Jane C. Meacham
Anchorage, Alaska



Submitted By
William Meyerhoff
Submitted On
2/21/2020 11:19:15 PM
Affiliation
ATA

I am in opposition to Proposal 56 which bans the setting of traps within one mile of a house, dwelling, etc.

This proposal is unnecessary due to the fact that many organized municipalities have leash laws and it is pet owners responsibility to make sure that domestic pets are not free roaming harassing birds and wildlife during the time of year when they are most vulnerable to exhaustion and possible starvation due to exhaustion or injury. Responsible pet owners do not let pets roam free.



Submitted By
Nathan Miller
Submitted On
2/21/2020 1:31:33 PM
Affiliation

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DELTA JUNCTION, Alaska 99737-0000

In regards to proposal 56 which would ban trapping within a mile of a house or mailbox. As a person living in rural Alaska, I don't see this as a good option. I trap within 1/2 mile of my house and don't want to stop doing that. This would potentially tie up thousands of acres of public land and make it off limits for harvest. I disagree with continued government meddling in law abiding citizen's affairs.

Nate



Submitted By
Kevin Morford
Submitted On
2/21/2020 3:33:28 PM
Affiliation
Alaska Resident

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P. O. Box 672263
Chugiak, Alaska 99567

I strongly urge the Board of Game to enact Proposal 152, and to adopt the Closure 1, option. While 1 to 3 trappers might be stopped from trapping for a part of the year as a result of this proposal, they would still have the ability to trap wolves for the remaining part of the year. On the other side of the equation, over 400,000 people visit Denali National Park each year, and many of them look forward to seeing wolves as a vital part of that experience. This tourism is a vital economic engine for Alaska, and produces hundreds of jobs for local residents. Studies have shown that trapping in the Stampede corridor is a major factor that reduces the prevalence of wolves in Denali National Park. Please help protect this vital economic resource by adopting Closure 1 as proposed in Proposal 152 at your upcoming meeting.



Submitted By
Lenore J Morford
Submitted On
2/21/2020 2:32:36 PM
Affiliation

Phone
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P.O.Box 672263
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I support Prop 152 and Closure 1. I drove a shuttle bus through the park for 4 years in the 1980s. Tourists were very excited and grateful to see a wolf in the wild, living its life. This was a once in a lifetime experience for them that they would repeatedly tell me again and again. And many would say they would never forget seeing that wolf. Never forget their Denali Park visit because of the wildlife they saw.

This is not a solely biological issue. Wolves that will tolerate bus noises are extremely important to the tourists and their experience. This is important to visitor satisfaction and to Alaska's tourist economic engine.

As Alaskans we need to share our valuable wildlife with others. These wolves need to be protected. They are too important to too many people.

Sincerely,

Lenora Morford



Submitted By
Nicholas Muche
Submitted On
2/20/2020 5:54:34 PM
Affiliation

I'm in opposition to Proposal 49.

The process to obtain a crossbow permit in Alaska for those that are unable to draw a bow is not very difficult. Those that would like to use a crossbow because they cannot use a bow are able to go through the process very easily and obtain that permit. Just because someone is 60 years old does not mean that they are unable to shoot a bow and must use a crossbow. As stated, there is a process and those that need to use a crossbow have a way of making that happen, regardless of age.

Submitted By
Nicholas Muche
Submitted On
2/6/2020 9:13:46 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, reduction in NR Tag prices, same day airborne harvest or an extended season. I strongly oppose this proposal.



Submitted By
Jere & Sandy Murray
Submitted On
1/31/2020 4:35:02 PM
Affiliation

We whole heartedly support Proposal 91 (below).

We have visited the area in question for several weeks in nearly all falls since late 1990s and since 2015 both spring and fall for a month to six weeks each. We have hunted and/or observed the upland birds of the area extensively during each visit. We have observed the behavior of visiting and local hunters as well.

During this time period we have observed a definite pronounced decrease in the overall population of all three grouse populations in the area.

There are so many roads in the area access is significantly different than most areas in Alaska. Birds are available along roads morning and evening as they gather gravel. Hunters take advantage of this behavior and the impact on population is, in my opinion, significant. The harvest limits should be set lower than the general levels in wilder areas of the state in recognition of the different nature of area 20D. Spruce grouse should also be included in the harvest limit reductions but Proposal 91 is a good start.

Thank you for this opportunity to comment.

Jere & Sandy Murray

Interior and Eastern Arctic Region

Meeting dates: March 6-14, 2020

In Fairbanks (9 days) at Pike's Waterfront Lodge Comments due: February 21, 2020 Game Management Units 12, 19, 20, 21, 24, 25, 26B, and 26C

Delta Area Proposals – Unit 20D

PROPOSAL 91

5 AAC 85.065. Hunting seasons and bag limits for small game.

Reduce the bag and possession limits for grouse in a portion of Unit 20D as follows:

The Hunting Regulations Booklet would read:

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

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

By falconry only, five per day, ten in possession, provided that not more than two per day

and two in possession may be ruffed grouse or sharp-tailed grouse.....Aug 10 - Aug 24 Change 5 AAC 85.065 to read:

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

5 [10] per day, of which not more than Aug. 10 - Aug. 24 Aug. 10 - Aug. 24

2 may be ruffed grouse or sharp



tailed grouse, by falconry only;

10 in possession, of which not

more than 2 may be ruffed grouse or

sharp-tailed grouse, by falconry only

5 [15] per day, 15 in possession,

of which not more than 10 [5] may be

Aug. 25 - Mar. 31 Aug. 25 - Mar. 31

ruffed grouse or sharp-tailed grouse

[30 IN POSSESSION, OF WHICH NOT

MORE THAN 10 MAY BE SHARP-TAILED

GROUSE;] however, a season may be

announced by emergency order during

which the bag limit is less than 5 [15] grouse per day, 15 [30] in possession, and less than 10 [5] ruffed grouse or sharp-tailed grouse [PER DAY, 10] in possession What is the issue you would like the board to address and why? Grouse hunting opportunity and harvest allocation in Unit 20D. Grouse populations, while naturally cyclic, are notoriously slow to recover from greater than normal population declines caused by weather, habitat loss, and over harvest. Unit 20D enjoys a reputation as the epicenter of quality grouse hunting in Alaska, due to huntable populations of all three species of grouse found in interior Alaska, and a road and trail network that provides easy access to large areas of prime grouse habitat. That reputation, buoyed by outdoor TV show coverage, articles in hunting periodicals, and books on grouse hunting in Alaska, draws many hunters from around the state, as well as nonresidents. Hunters from Alaska urban centers and nonresidents far outnumber local hunters and are more likely to continue to harvest birds up to the limit, even when populations are noticeably down. This is natural since they have invested time and money to get to Unit 20D and want to maximize their return. Because of the consistently increasing pressure from these hunters, local hunters often choose to forego hunting and harvesting grouse when populations are down.

In addition, with the increasing number of hunters, more each year come earlier in the season to try and beat other hunters and take advantage of higher grouse numbers early on, before grouse numbers have been substantially reduced. This has resulted in a disproportionate share of available grouse being harvested during the first two weeks of the fall season, leaving few grouse for hunters choosing to wait until the later part of the fall season (mid-September and later) when grouse are more mature, cooler/drier conditions are available for working dogs, and hunters can enjoy a more traditional mid to late fall upland hunting experience. Another factor contributing to the high early pressure is the "two-fer" opportunity that allows hunters to get in a week of grouse hunting in August, then switch to hunting waterfowl and/or moose - two other hunting opportunities for which the area is well-known, and which draw non-local hunters.

To more equitably allocate the pre-season grouse population to hunters throughout the fall season, harvest during the early part of the season needs to be reduced by lowering the daily bag and possession limits. This will more equally allocate the portion of the grouse population available for harvest annually to all grouse hunters regardless of when they decide to hunt in the fall. Thus, rather than incentivizing grouse hunters to concentrate their efforts earlier and earlier, they can have similar harvest opportunities longer in the season. As the trend toward high pressure early in the season increases, and the accessible areas become crowded, the quality of the hunting experience is degraded.

A daily bag limit that matches species limits also removes potential for accidentally exceeding a species limit. A very common grouse hunting technique, especially for hunters without dogs, is to shoot sitting grouse from the ground or from trees. Especially with a rim fire rifle, it is possible to harvest all or most of the birds in a flock, since they often don't spook and fly at the shot, or go very far when they do. These hunters are more likely to shoot birds before the species is identified, as identification is more difficult when the tail is not readily visible prior to the decision to shoot.

In these situations, with a daily limit of 15, it is easily possible that a hunter could exceed a species specific limit of five birds without even realizing it.

The Delta Advisory Committee originally conceived a proposal to limit ruffed grouse to five per day, to match the current sharp-tailed grouse limit, and leave the total daily bag (15) and possession



(30) limits unchanged. We decided to modify that into a five bird per day total limit to increase opportunity, maintain sustainable harvest levels for all species, simplify the regulation, and to reduce the complexity of shoot/don't shoot decisions in the field.

In addition to helping stabilize populations of our various grouse to normal cyclic variations, the five-bird daily limit will maximize opportunity for all hunters throughout the season and eliminate the possibility of accidentally exceeding a species specific limit. While this proposal reduces the daily bag limit by two thirds, it only reduces the possession limit by one half, to reduce the overall impact of the new bag limit on hunters who have limited time in the area.

PROPOSED BY: Delta Fish & Game Advisory Committee (EG-F19-067)

Interior and Eastern Arctic Region Proposals



Submitted By

Bill Nash

Submitted On

2/19/2020 1:50:12 PM

Affiliation

I am in favor of Proposals #50 and #53. I ask that you please approve. These proposals provide for more opportunity while having almost no impact on wildlife populations. I am **not** in favor of Proposal #49. Alaska already allows individuals with disabilities to apply for using a crossbow. Allowing the mass use of crossbows has shown to have a significant impact on wildlife populations creating more restrictions and less opportunity. Crossbows have no place in an archery season.



United States Department of the Interior

NATIONAL PARK SERVICE

Interior Region 11 • Alaska
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

IN REPLY REFER TO:
I.B (AKRO-NR) 20200206

FEB 21 2020

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

Dear Chairman Spraker,

The National Park Service (NPS) appreciates the opportunity to comment on proposals for the Interior and Eastern Arctic Region being considered by the Alaska Board of Game (BOG). Below are our recommendations on proposals that affect or have the potential to affect NPS areas. We recognize and support the State's primary stewardship role in wildlife management and appreciate the recognition of federal laws and regulations applicable to the NPS.

Proposal 45: NPS Recommendation: Support

This proposal was submitted by the Grayling, Anvik, Shageluk, Holy Cross Fish and Game Advisory Committee. NPS supports this proposal to restrict the use of moose, caribou and reindeer urine as scent lures in Units 12, 19, 20, 21, 24, 25, 26B and 26C to reduce the risk of introducing Chronic Wasting Disease (CWD). The use of deer and elk urine is currently prohibited in State regulations for CWD prevention. CWD has not yet been found in Alaska, and this is a positive step to keep Alaska CWD-free.

Proposal 46 & 75: NPS Recommendation: Oppose

These proposals seek to establish an intensive management program for brown and black bears in Units 12, 19, 20, 21, 24, 25, 26B, 26C and for wolves in Units 21D and 24. Because Intensive management programs are authorized under non-hunting regulations, they require NPS approval on national preserves. If the Board adopts either of these proposals, NPS lands should be excluded from predator control efforts, as is reflected in ADG&G proposals 86 and 96.

Proposal 48: NPS Recommendation: Oppose

This proposal would extend the wolf hunting season by ten days in Units 19, 20, 21, 24, 25, 26B and 26C with a stated purpose of reducing wolves to enhance populations of Dall's sheep and



caribou. This proposal, if implemented in units proximate to Denali National Park and Preserve, could exacerbate reduced wolf viewing opportunities in the park. Since 2010, seeing a wolf during a Denali bus tour has gone from common to quite rare. If the Board adopts this proposal, we recommend limiting any increase adjacent to Denali National Park and Preserve, consistent with the NPS recommendation for Proposal 152.

Proposal 79 & 80: NPS Recommendation: Oppose

These proposals were submitted by the Fairbanks AC and Resident Hunters of Alaska. They would lengthen the hunting season by 30 days, double the bag limit for caribou bulls and significantly increase the bag limit for cows of the Central Arctic Caribou herd (CAH), and establish a limited registration-permit hunt for cows. The current regulations were put in place in 2017 in response to a dramatic population decline of the herd. Considering the short time since the regulation change, evidence of a recovery from the dramatic decline has not been established to warrant an increase in harvest.

Proposal 81: NPS Recommendation: Oppose

This proposal would increase the nonresident bag limit from one to two bull caribou for the Central and Western Arctic Caribou Herds. Recent research suggests that the Central Arctic Herd has not recovered following a dramatic decline (approximately stable at 20,000 from 2016 to 2019). Similarly, the Western Arctic Herd (WAH) declined significantly beginning in 2003 and has yet to recover. This proposal is also inconsistent with the Western Arctic Caribou Working Group's recommendations for harvest.

Proposal 149: NPS Recommendation: Neutral

This proposal would allow brown/grizzly bears to be taken over bait in Unit 25C. NPS is currently considering a regulatory change that would allow the harvest of bears over bait in certain National Preserves. However, this practice is currently prohibited on NPS lands. If the Board adopts this proposal, NPS lands may need to be excluded.

Proposal 151: NPS Recommendation: Oppose

This proposal was submitted by the group, Hunter & Gatherers Lives Matter. It would change the wolf season in a small portion of 20C to realign with the rest of the Unit. Adopting this proposal would reverse a previous (2017) change to eliminate the overlap between spring bear hunting over bait and wolf hunting and trapping. Prior to the 2017 regulatory change, several wolves were harvested at bear bait stations. This proposal could exacerbate established problems with Denali National Park and Preserve's reduced wolf viewing opportunities. Since 2010, seeing a wolf during a Denali bus tour has gone from common to quite rare. We recommend limiting any harvest increase adjacent to Denali National Park and Preserve, consistent with our recommendation for Proposal 152.

Proposal 152: NPS Recommendation: Support

This proposal was submitted by Denali National Park & Preserve staff. Recent research suggests that limiting harvest of wolves along the boundaries of protected areas is associated with



increased wolf-sighting opportunities for visitors to these areas. This in turn can increase economic benefits of wolf viewing in adjacent communities.

Thank you for this opportunity to provide comments on these important wildlife regulatory matters. Should you or your staff have any questions, please feel free to contact me or Mary Hake, Wildlife Biologist and liaison to the Board of Game, at 907-644-3576.

Sincerely,

Joel Hard
Deputy Regional Director
National Park Service

cc:

Doug Vincent-Lang, Commissioner, ADF&G
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
Eddie Grasser, Director, Division of Wildlife Conservation, ADF&G
Steve Wackowski, Special Assistant to the Secretary for Alaska
Don Striker, Acting Regional Director, NPS
Greg Siekaniec, Regional Director, USFWS
Tom Doolittle, Deputy Assistant Regional Director, USFWS-Office of Subsistence Management
Ben Bobowski, Superintendent, Wrangell-St. Elias National Park and Preserve
Susanne Fleek-Green, Superintendent, Lake Clark National Park and Preserve
Greg Dudgeon, Superintendent, Gates of the Arctic National Park and Preserve and Yukon-Charley Rivers National Preserve
Denice Swanke, Acting Superintendent, Denali National Park and Preserve
Grant Hilderbrand, Regional Chief of Natural Resources, NPS-Alaska Regional Office
Andee Sears, Regional Law Enforcement Specialist, NPS-Alaska Regional Office



Submitted By
Tim Nelson
Submitted On
1/31/2020 11:10:33 AM
Affiliation

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po box 110
Chitina, Alaska 99566

Proposal 70

My name is Tim Nelson and I oppose proposal 70

I have guided in units 24A and 25A since 2004. In this time I have spent thousands of hours surveying game in the area. The grizzly bears in this area rarely have prime fur before September. Since the grizzlies this far north tend to be smaller than in other parts of the state it is their long thick fur with its wide range of color variance that is the real trophy. In my opinion, harvesting a grizzly before September 1st is wasteful and unethical.

In 2004 the season for Brown/Grizzly Bear in both 24A and 25A opened on September 1st and has since become earlier and earlier. I understand guides and outfitters wanting to book more hunts but it has to stop somewhere. We shouldn't let greed override good judgment and ethical hunting practices. **Just because there is a bear in the woods doesn't mean that you have to shoot it!**



Submitted By
John Nichols
Submitted On
2/21/2020 10:19:06 PM
Affiliation

I do not support Proposal 56. Having a one mile no trapping zone around all homes, mailboxes, etc will be extremely hard to determine and enforce. Trapping is a big part of what made Alaska a state, and to do away with trapping so pets can be allowed to run feral is the wrong approach.



Submitted By

Dominic Nickles

Submitted On

2/20/2020 10:07:42 AM

Affiliation

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Address

380 e diamond wood way

Wasilla, Alaska 99654

I Support Proposals 50, 53, 84, 85



Submitted By
Jon Nierenberg
Submitted On
2/21/2020 3:58:56 AM
Affiliation
Owner, EarthSong Lodge and Denali Dog Sled Expeditions

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Healy, Alaska 99743

Dear Alaska Department of Fish and Game,

This comment submitted is to show full support for Proposal 152, the seasonal closure to wolf hunting and trapping for the Stampede Trail corridor. EarthSong Lodge and Denali Dog Sled Expeditions are year-round businesses located on Stampede Road, and are geared towards the tourism industry both in-state and out-of-state visitors. We agree with the science that supports this proposal, but this comment will be based on the economics that support the closure in specific. The presence of a healthy wolf population both inside and immediately outside the Denali National Park boundary greatly enhances our guests' experience. Our summer guests are traveling into Denali National Park and observation of a wolf in addition to other wildlife is the highlight of their visit. Our winter guests traveling by sled dog team have a significantly better mushing experience if they observe wolves or their signs/tracks while sledding the Stampede Corridor. EarthSong Lodge has been in operation since 1997, and Denali Dog Sled Expeditions and its guiding operation has been in operation since 1985. We are the longest continually operated business on Stampede Road and in the Wolf Townships. We hope the Department adopts this proposal based upon economics and science.

Sincerely,

Jon Nierenberg

Owner, EarthSong Lodge and Denali Dog Sled Expeditions



Submitted By
Patrick Nolde
Submitted On
2/20/2020 8:42:08 PM
Affiliation

Re: Proposal 112 Unit 19C

I have hunted the unit discribed above for several years now and look forward to it every year with my hunting partners. It has become somewhat of a tradition that we talk about all year and look forward to. Every year we have seen several moose and it continues to be a good quality hunt. I would like to see it stay as is with a Harvest ticket for residents and with no changes for residents of Alaska. I really don't believe any new changes need to be done. However, if something is to be changed I urge you to first consider the changes to affect non-residents before affecting others. The Alaska state constitution states we are to manage the resources for the maximum benefit of Alaska residents. There is a sense of pride, respect and courtesy that exists amongst the residents of Alaska that hunt this unit yearly. So, much so that we have picked up trash and litter from others in which we haul out to be disposed of at our own expense. Residents have also helped in the past, clear out brush from the local landing strip. In the last couple of years, the proportion of non-resident hunters appears to be increasing. The residents that hunt this area yearly - have a valued interest in keeping the moose population healthy so we can return year after year. Non-residents may treat it as a one and done scenario, with little of no conservation motives for future hunting excursions. I suggest speaking to the Alaska State Trooper that was out there in 2019 as he worked very hard at getting data from each camp on hunt success and following the laws. His information is a must for the local biologist to see to get some hard data.

In closing I hope you consider no changes - but if the hard evidence and supported facts show some provable trend, then I suggest thinking about our Alaska Culture first and non-residents second.

North Slope Borough

OFFICE OF THE MAYOR

P.O. Box 69
Barrow, Alaska 99723
Phone: 907 852-2611 or 0200
Fax: 907 852-0337 or 2595

Harry K. Brower, Jr., Mayor



PC116
1 of 2

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

Submitted Via Email: dfg.bog.comments@alaska.gov

The North Slope Borough appreciates this opportunity to submit the following comments on Board of Game Proposals 63 and 64 as presented in the Proposal Book published in August 2019.

Proposal 63 would repeal Alaska Administrative Code Section 5 AAC 92.530(7) in total, thereby eliminating the Dalton Highway Corridor Management Area (DHCMA). Proposal 64 has been presented as a placeholder to solicit public and agency input regarding the interpretation of state statutes and regulations pertaining to the DHCMA. Proposal 64 states that clarification is needed to resolve confusion within state government and the public regarding which activities and methods of access are legal within the DHCMA and what changes to 5 AAC 92.530(7) the Board of Game could legally undertake.

Proposal 63 is misleadingly presented as a simple and reasonable action to remove provisions that are duplicative, unnecessary, and confusing to the public and to law enforcement. Our attempts to discuss the proposals with state representatives in recent months have made it clear that adopting these measures as proposed is more complex than presented. In fact, there is much confusion around these proposals. In several responses to Borough staff seeking clarity regarding the intent and potential implications of these proposals, Alaska Department of Fish and Game and Department of Law representatives have acknowledged that the measures raise a concerning level of underlying complexity involving the authorities and responsibilities of multiple departments, including the Alaska Wildlife Troopers, Department of Fish and Game, Department of Law, Department of Natural Resources, and Department of Transportation. We were informed in November 2019 that those departments were undertaking independent reviews and analyses intended to inform ultimate decision making, and that the work would be concluded by early January. We have repeatedly asked to be afforded the opportunity to review those analyses prior to formulating final comments on the proposals. We have yet to see any.

Perhaps more important than the failure to share completed analyses, it appears that the proponents of the Proposals and no State department has reached out to the Borough or any other potentially affected stakeholder to discuss specific concerns and participate in the formulation of the Proposals or the analyses. Of particular concern is the potential for unintended consequences that may result from adoption of the proposals. Foremost among these is the likelihood that adoption of the proposals would result in increased recreational use of the Highway, the corridor, and adjacent lands.


Any significant increase would require heightened attention, and likely funding, across management systems, including those dealing with public safety, wildlife e transportation safety, communication, emergency response, sanitation, waste disposal, search and rescue, subsistence use, and security of the Highway, Trans-Alaska Oil Pipeline, and other infrastructure of national importance. Any required expansion of responsibility or increased workload within any state department would also likely have budgetary implications which have yet to be considered. Furthermore, it is likely that the Proposal would have substantial financial and resource impacts to the North Slope Borough for law enforcement, public safety, and search and rescue. Consultation between the multiple affected state departments, the municipalities within which the Highway and corridor are located, and with other concerned stakeholders would certainly contribute to the identification of any such consequences. Publication of Proposal 64 seeking written comment or testimony is no substitute for the kind of multiple party consultation that must take place prior to Board of Game's consideration of a proposal acknowledged to raise issues as far ranging and complex as Proposal 63.



Accordingly, it is the strong recommendation of the Borough that the State, led by the Department of Fish and Game, initiate outreach to potentially affected communities and stakeholders and convene a multi-departmental meeting, the North Slope Borough, and stakeholder representatives to clarify and arrive at a common understanding of the current legal issues at play. In order for all parties to submit informed comments and testimony, and for the Board to make a responsible decision, there must be prior clarification of the definition and legal use of highway vehicles, snow machines and off-road vehicles in the DHCMA for hunting and trapping, of firearms, and of the transport of furbearers and trapping bait when trapping in the DHCMA, as well as consideration of the intended and potential unintended consequences of eliminating the DHCMA within the context of that common understanding. Proposal 63 should not be considered or acted upon by the Board of Game until that consultation has been conducted, some consensus has been reached, and its resulting conclusions made available. The North Slope Borough has great concerns regarding the lack of clarity by any department regarding the intent of Proposal 63, the lack of outreach to affected stakeholders, and the lack of consideration of unintended consequences passage may have.

Thank you for considering these comments.

Sincerely,


Harry K. Brower, Jr.
Mayor

Cc: Governor Mike Dunleavy
Commissioner Doug Vincent-Lang, Alaska Department of Fish and Game
Senator Donald Olson
Representative John Lincoln
Taquilik Hepa, NSB Director of Wildlife Management
Gordon Brower, NSB Director of Planning

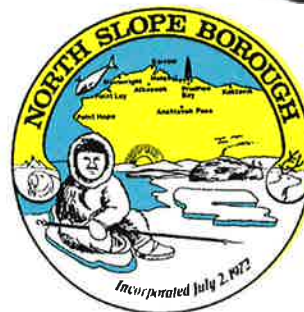


NORTH SLOPE BOROUGH

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RAYNITA "TAQULIK" HEPA, DIRECTOR

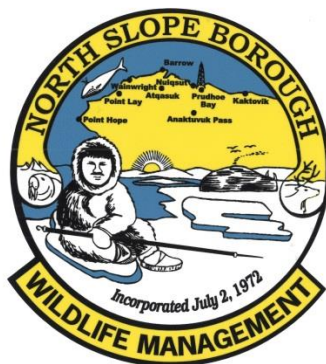
20 November, 2019

Dear Chairman Spraker and Members of the Alaska Board of Game:

Please find attached a copy of "Subsistence harvest of caribou in eight North Slope villages, Alaska: 2014-2018". I am submitting this as support documentation for Proposal 28 and 78 submitted by the North Slope Advisory Committee to be discussed at the 2020 Arctic / Western Region meeting in Nome and the Interior / Northeast Arctic region BOG meeting in Fairbanks, respectively. As you may be aware our Department traveled to all communities on the North Slope to discuss registration permit and harvest ticket requirements for North Slope communities. At those meetings we listened to testimony that opposed those requirements and they overwhelmingly supported our Department's collection of that harvest information to be used to make informed management decisions. It is our hope that this document will help to demonstrate our commitment to collecting this important information. I look forward to testifying in the upcoming Board of Game meetings in January and March 2020.

Respectfully,

Brian Person
Senior Wildlife Biologist
NSB Department of Wildlife management
Brian.Person@north-slope.org



Subsistence Harvest of Caribou in Eight North Slope Villages, Alaska: 2014-2018

Brian T. Person, Carla Kayotuk, and Frances (JackyLou) Olemaun

North Slope Borough Department of Wildlife Management

P.O. Box 69, Barrow, AK 99723



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Subsistence harvest of caribou in eight North Slope villages, Alaska: 2014-2018

Overview:

The North Slope Borough Department of Wildlife Management (DWM) has collected subsistence harvest data on fish, birds, marine and terrestrial mammals, and plants utilized by residents of the North Slope beginning in the early 1990's. In some years this program has struggled to consistently collect and analyze these data in all communities due to various staffing, logistic, and financial set-backs. Beginning in 2014, the DWM has made a concerted effort to improve the consistent collection of caribou harvest data due to the decline of caribou populations on the North Slope. This report provides information on the methods used to collect and analyze caribou harvest data, discusses ways that we have tried to improve this program, and presents caribou harvest estimates for each North Slope community.

Methods:

The DWM attempted to conduct household caribou harvest surveys in all communities between 2014 and 2018 using the same survey instrument (Appendix A). In 2016 we slightly modified the survey instrument by adding 8 activity codes to facilitate data management. In 2015 the North Slope Borough Planning & Community Services Department collected data for an Economic Profile and Census Report in all North Slope communities. To avoid *survey fatigue* we requested that they include our survey instrument as part of the Census rather than having DWM staff conduct an independent survey. Similarly, in 2015 there were 3 independent surveys scheduled in most North Slope communities and we requested that Stephen R. Braund & Associates (SRB&A) collect household caribou harvest data on the DWM's behalf so as to avoid a 4th survey. Finally, as part of a stipulation to Conoco Phillips AK Alpine Satellite Development Project SRB&A was contracted to collect subsistence harvest data from the village of Nuiqsut. They agreed and collected household caribou harvest data using the DWM instrument between 2015 and 2018. DWM staff collected household harvest data from 2016 through 2018.

Caribou harvest data was collected at the household level for all surveys (*i.e.* if multiple hunters lived in the same household their harvest was combined into the reported household harvest). In most years data were collected using a one year recall- two exceptions to this exist. The 2017 data was collected using a two year recall for all communities except for Nuiqsut (NUI), Wainwright (AIN), and Kaktovik (KAK); and in 2015 through 2017 the communities of AIN and KAK data was collected using two six month recall surveys in each year.

In all communities other than Barrow (BRW) we attempted to conduct a census. Despite this, we worked off of a randomized household list because some of our visits to villages were only for a few days and we recognized that we might not be able to complete the census. We wanted to ensure that our choice of households to be interviewed was unbiased and therefore worked down the list of random households. In Barrow we also generated a random household list annually and we attempted to survey the first 300 households on that list (~ one-quarter of the total households).



Metrics:

Reported household harvest is the sum of male, female, and unknown sex (some respondents could not remember the number of bull or cows harvested) harvested caribou and reported during the interview. We estimated *community harvest* to be the ratio of the sum of reported household harvest divided by the number of households surveyed in each community multiplied by the total number of households in that community. We estimated the variation surrounding that estimate using methods by Cochran (1977) which are presented in Appendix B. We estimated the 95 % confidence interval (95 % CI) by multiplying the standard error by 1.96. We did not have the databases from the North Slope Borough Planning & Community Services Department's contractor or SRB&A therefore we cannot present 95% CI for those estimates. We estimated the *average household caribou harvest* to be the ratio of community harvest divided by the total number of households in that community. Our estimates of the *sex ratio* of the harvest are derived from the total number of males or females reported harvested divided by the sum of male and females reported harvested multiplied by 100. It is assumed that caribou reported with unknown sex were harvested at a similar ratio as the reported harvest.

We also collected information on the health of caribou harvested using standardized methods developed by CARMA, the general harvest location, and the month in which harvest occurred. We have yet to summarize that information.

Results and Discussion:

Community caribou harvest varied by community and year (Table 1). All communities harvest a fairly substantial number of caribou and its importance to the diet and culture of these largely Inupiat communities has been documented (Fuller and George 1997, Bacon et al. 2011, Braem 2017). Community caribou harvest was consistently highest in Barrow and Wainwright. Community harvest estimates for Point Lay in 2014 and 2015 were much higher than in 2016 through 2018 which could be attributed to the distribution of caribou being closer to the community in those years. Similarly, our 2017 estimate for Point Hope is high when compared to other years included in this report and reflects a favorable distribution of caribou near that community. Average household caribou harvest was consistently highest for the communities of Wainwright and Anaktuvuk Pass which underscores the importance of caribou to these communities (Table 2). Point Hope and Kaktovik tended to have the lowest average household harvest. Both of these communities have limited access to caribou when they are near the community. Kaktovik's best access is via snow machine in winter and caribou typically don't overwinter on the Coastal Plain in large numbers. Similarly, their access in the summer is limited via boat to coastal regions when caribou use the coast as insect relief for brief periods of the summer before moving back towards the mountains.

Our estimates of the sex ratio of caribou harvest are presented in Table 3. Bull caribou are the preferred harvest (Fuller and George 1997, Bacon et al. 2011). Our bull : cow harvest estimates don't necessarily reflect that preference. Atqasuk usually has caribou near the community year round and their bull : cow ratio reflects that they typically have the option to harvest bulls. Cow harvest is usually higher when caribou are only accessible during rut or in the few months post rut. Anaktuvuk Pass prefers to harvest



caribou in August and September if caribou migrate through their valley. Over the past decade caribou have only been accessible in large numbers in late October and November and in those months they have to rely on cow caribou. Our bull:cow ratios may reflect a change in caribou preference towards the harvest of cows, the lack of accessibility to bull caribou during the fall and early winter months, a decrease in the bull:cow ratio in the population, or a combination of these factors.

Moving Forward with our Harvest Documentation Program:

We have made a concerted effort to census caribou harvest in all 8 North Slope communities (Table 4). We are very grateful to SRB&A for their efforts to collect harvest information in Nuiqsut and in the coastal communities in 2015 for our Department. It is unfortunate that we failed to collect caribou harvest information in Anaktuvuk Pass in 2015 and 2018 and we intend to improve these efforts by hiring a Subsistence Research Assistant (see below) from that community and by traveling to AKP more often. We recognize that we surveyed a fairly low percentage of households in Barrow. Barrow is a large and culturally diverse community that has posed challenges to researchers in the past. One problem we encountered was that household participants were working when we attempted to interview them. Shifting our schedule to evenings and weekends helped somewhat but in the future we will try to interview participants at their work place.

We have made several improvements to our harvest documentation project and we will continue to find new ways to improve it while maintaining consistent data collection. We listened to suggestions from participants and have begun to provide communities with calendars which an increasing number of hunters use to document their harvest. This helps to improve harvest recall, thus data quality. We have created a database and continue to update it to facilitate data management, data quality, and data storage. We have changed the structure of the subsistence section of our Department and are attempting to fill Subsistence Research Assistant positions in more communities. We have not yet summarized harvest location data. This data exists in the format of Inupiat place names. Our plan is to work with focal hunters in each community to document those place names on maps (some already exist) and to translate those areas into a GIS format. Similarly, we have yet to summarize the data on the health and body condition of harvested caribou and intend to work on that in the near future. Finally, we are in the early stages of developing a program for our database that will summarize harvest data by sex and month.

**Table 1.** Estimated annual caribou harvest by community.

Estimated community harvest of caribou ($\pm 95\%$ CI)								
Year	AIN	AKP	ATQ	BRW	KAK	NUI ²	PHO	PIZ
2014 ¹	951	1042	173	2860	248	358 ¹	212	951
2015 ²	756	----	----	3000	303	621 \pm 82	422	756
2016 ³	914 \pm 372	859 \pm 474	269 \pm 55	3246 \pm 1033	133 \pm 37	481 \pm 108	242 \pm 22	215 \pm 43
2017 ³	806 \pm 188	548 \pm 133	145 \pm 70	2636 \pm 1397	119 \pm 202	635 \pm 104	1282 \pm 243	290 \pm 74
2018 ³	1012 \pm 453	----	380 \pm 127	3829 \pm 1866	108 \pm 122	497	294 \pm 241	191 \pm 24

Villages are abbreviated as follows: AIN=Wainwright, AKP = Anaktuvuk Pass, ATQ = Atqasuk, BRW = Barrow, KAK = Kaktovik, NUI = Nuiqsut, PHO = Point Hope, and PIZ = Point Lay.

¹Survey was conducted during the NSB 2015 Economic Profile & Census

²Survey was conducted by Stephan R. Braund & Associates (SRB&A)

³Survey completed by the NSB DWM

**Table 2.** Average annual household caribou harvest by community.

Average household caribou harvest								
Year	AIN	AKP	ATQ	BRW	KAK	NUI ²	PHO	PIZ
2014 ¹	6.2	9.7	2.7	2.4	3.1	2.9	1	12.7
2015 ²	4.9	----	----	2.5	3.8	5	2	10.1
2016 ³	5.9	8	4.1	2.7	1.7	1.7	1.1	2.9
2017 ³	5.2	5.1	2.2	2.2	1.5	5	6	3.9
2018 ³	6.6	----	5.8	3.2	1.4	4	1.4	2.5

Villages are abbreviated as follows: AIN=Wainwright, AKP = Anaktuvuk Pass, ATQ = Atqasuk, BRW = Barrow, KAK = Kaktovik, NUI = Nuiqsut, PHO = Point Hope, and PIZ = Point Lay.

¹Survey was conducted during the NSB 2015 Economic Profile & Census

²Survey was conducted by Stephan R. Braund & Associates (SRB&A)

³Survey completed by the NSB DWM

**Table 3.** Sex ratio of reported caribou harvest by community and year.

Sex ratio of reported harvest (% Bull : % Cow)								
Year	AIN	AKP	ATQ	BRW	KAK	NUI ²	PHO	PIZ
2014 ¹	24 : 76	44 : 56	70 : 30	62 : 38	75 : 25	¹ 84 : 16	65 : 35	52 : 48
2015 ²	52 : 48	----	----	65 : 35	22 : 78	14 : 86	37 : 63	52 : 48
2016 ³	61 : 39	77 : 23	76 : 24	57 : 43	55 : 45	----	69 : 31	72 : 28
2017 ³	55 : 45	56 : 44	74 : 26	76 : 24	51 : 49	----	94 : 6	71 : 29
2018 ³	57 : 43	----	83 : 17	77 : 23	71 : 29	----	100 : 0	78 : 22

Villages are abbreviated as follows: AIN=Wainwright, AKP = Anaktuvuk Pass, ATQ = Atqasuk, BRW = Barrow, KAK = Kaktovik, NUI = Nuiqsut, PHO = Point Hope, and PIZ = Point Lay.

¹Survey was completed during the NSB 2015 NSB 2015 Economic Profile & Census

²survey was conducted by Stephan R. Braund & Associates (SRB&A).

³Survey completed by the NSB DWM

**Table 4.** Percent of total households surveyed in each community by year.

Percent of total households surveyed								
Year	AIN	AKP	ATQ	BRW	KAK	NUI ²	PHO	PIZ
2014 ¹	50 %	48 %	42 %	15 %	26 %	¹ 45 %	22 %	75 %
2015 ²	59 %	----	----	65 %	67 %	81 %	76 %	82 %
2016 ³	47 %	36 %	68 %	21 %	76 %	83 %	88 %	79 %
2017 ³	79 %	58 %	52 %	10 %	83 %	79 %	39 %	63 %
2018 ³	52 %	0 %	52 %	8 %	64 %	----	35 %	88 %

Villages are abbreviated as follows: AIN=Wainwright, AKP = Anaktuvuk Pass, ATQ = Atqasuk, BRW = Barrow, KAK = Kaktovik, NUI = Nuiqsut, PHO = Point Hope, and PIZ = Point Lay.

¹Survey was completed during the NSB 2015 Economic Profile & Census

²Survey was conducted by Stephan R. Braund & Associates (SRB&A)

³Survey completed by the NSB DWM

**NSB DWM caribou harvest questions for JAN-DEC 20XX:**

Village _____ Household ID _____ Interviewer _____

Date of Interview _____

1. Did you hunt caribou from January to December in 20XX? Yes _____ No _____

Activity Code _____ 1) Harvested 2) Attempted but no harvest 3) Did not attempt harvest
 4) Out hunting 5) Out of town 6) Could not contact 7) Did not want
 to be interviewed 8) Other

If Yes:

2. What month/s did you harvest them? Please write the number harvested and sex in each month:

Month	Bull	Cow	UNK	Month	Bull	Cow	UNK
Jan				Feb			
Mar				Apr			
May				Jun			
Jul				Aug			
Sep				Oct			
Nov				Dec			

3. How many did you harvest? Male _____ Female _____ UNK _____ Total _____

4. In general how would you assess the health of the caribou you harvested? _____

1. **Skinny** (no back fat, little or no gut or kidney fat).
2. **Not Bad** (little back fat, some gut or kidney fat).
3. **Fat** (nice layer back fat, plenty of gut or kidney fat).
4. **Very Fat** (thick layer back fat all the way up the back & fat inside).

5. General hunt location (kill site/s)

Appendix B.

Computing a total annual harvest estimate for a species and its standard error

Let y_{hi} represent the total number harvested by the i th sampled household in Stratum h . Then the sample mean number \bar{y}_h harvested in stratum h is given by Equation (1):

Equation (1)

$$\bar{y}_h = \frac{1}{n_h} \sum_{i=1}^{n_h} y_{hi} ,$$

and total annual harvest T is given by Equation (2):

Equation (2)

$$T = \sum_{h=1}^6 N_h \bar{y}_h .$$

with estimated variance $V(T)$ given by Equation (3):

Equation (3)

$$V(T) = \sum_{h=1}^6 N_h (N_h - n_h) s_h^2 / n_h$$

where s_h^2 , the sample variance in Stratum h , is given by Equation (4):

Equation (4)

$$s_h^2 = \frac{1}{n_h - 1} \sum_{i=1}^{n_h} (y_{hi} - \bar{y}_h)^2$$

so s_h is the sample standard deviation in the stratum. Note that s_h^2 cannot be computed if $n_h = 1$, i.e. only a single household in the stratum harvested the species.

The standard error SE of T is given by Equation (5):

Equation (5)

$$SE = \sqrt{V(T)}$$

with $V(T)$ given by Equation (3).



Literature Cited

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Bream, N.M. 2017. Revised options for amounts reasonably necessary for subsistence uses of the Teshekpuk caribou herd. Alaska Department of Fish and Game Division of Subsistence, Special Publication No. BOG 2017-02, Fairbanks.



Submitted By
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2/20/2020 3:08:26 PM
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Proposal 49

I am against Porposal 49. Crossbows are not anything like hand held bows. They should not be included in any regular archery season. I have nothing again crossbows, I just feel they need to hunt in regular seasons, since the crossbow has nothing in common with the primitive weapon hand held bow. Archery seasons were never meant to allow crossbows. Frank Noska

Submitted By
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Proposal 50

I am in favor of Proposal 50. Having a 10 day archery moose season following the regular moose season will have a MINIMAL impact or affect on the species. It would allow a few archery hunters a chance to stay in the field 10 days longer to try and fill their bag limit. Archery hunting is considerably more difficult and has a much lower success that regular rifle hunting. This extra 10 days would give archery hunters more time to hunt. Even with this 10 day extention, archery hunters will always have a much lower percentage of success than their rifle hunting partners. I think this proposal is a great idea and makes a lot of sense. Thank you. Frank Noska

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2/20/2020 3:32:58 PM
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Proposal 53

I am in favor of Proposal 53. Having an Archery registration sheep season 9 days before the regular sheep season will have a MINIMAL impact and effect on the sheep population. The archery sheep hunting success is always extremely low. Allowing archery hunters to hunt a few days before the regular sheep season would give them a chance to hunt undisturbed sheep, which a bowhunter needs to raise his chance of success. There is so little archery sheep hunting to begin with, adopting this proposal would have little or no effect on the sheep population. It would however, allow the few archery hunters that hunt sheep a small advantage by getting in the field before the rifle hunters. Nearly all western states in the lower 48 have archery seasons that begin before the regular and general seasons for these obvious reasons. I think Alaska should adopt the same principal. And also, with this being a registration hunt, ADF&G will be able to closely monitor the participation and success percentage of this hunt. Thank you for your time and consideration. Frank Noska



Submitted By
Patricia OBrien
Submitted On
2/19/2020 7:08:31 AM
Affiliation
Alaska citizen

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As an Alaskan since 1968 I have been watching this issue for a long time. Tourism is critical to our economy and wolf sightings are high value. It is time for you to support this repeated proposal in variations for decades. It is the wshl of the majority of Alaskans.

Support Proposal 152, Closure option 1.

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



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 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.**



IN REPLY REFER TO:

United States Department of the Interior

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

OSM 19096.PM

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

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet January 17-20, 2020 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Western Arctic/Western Region. We have reviewed the 43 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our recommendations are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Thomas Doolittle,
Acting Assistant Regional Director

Enclosure



Chairman Spraker

2

cc: Anthony Christianson, Chair, Federal Subsistence Board
Greg Risdahl, Acting Deputy Assistant Regional Director, Office of Subsistence Management
Suzanne Worker, Acting Policy Coordinator, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management
Eva Patton, Council Coordinator, Office of Subsistence Management
Karen Deatherage, Council Coordinator, Office of Subsistence Management
Zachary Stevenson, Office of Subsistence Management
Chair, Yukon Kuskokwim Delta Subsistence Regional Advisory Council
Chair, Seward Peninsula Subsistence Regional Advisory Council
Chair, Northwest Arctic Subsistence Regional Advisory Council
Chair, North Slope Subsistence Regional Advisory Council
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,
Alaska Department of Fish and Game
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Western Arctic/Western Region

January 17-20, 2020

Nome, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 7 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the opening date for the registration moose hunt, RM615 in Unit 18.

Current Federal Regulations:

Unit 18—Moose

Unit 18 – that portion east of a line running from the mouth of the Ishkowik River to the closest point of Dall Lake, then to the east bank of the Johnson River at its entrance into Nunavakanukakslak Lake (N 60°59.41' Latitude; W162°22.14' Longitude), continuing upriver along a line 1/2 mile south and east of, and paralleling a line along the southerly bank of the Johnson River to the confluence of the east bank of Crooked Creek, then continuing upriver to the outlet at Arhymot Lake, then following the south bank east of the Unit 18 border and then north of and including the Eek River drainage—I antlered bull by State registration permit; quotas will be announced annually by the Yukon Delta National Wildlife Refuge Manager

Federal public lands are closed to the taking of moose except by residents of Tuntutuliak, Eek, Napakiak, Napaskiak, Kasigluk, Nunapitchuk, Atmautlauk, Oscarville, Bethel, Kwethluk, Akiachak, Akiak, Tuluksak, Lower Kalskag, and Kalskag

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Proposal WP20-35 requests establishing a may-be-announced season between Dec. 1-Jan. 31. Wildlife Closure Review WCR20-38 analyzes the current closure to non-Federally qualified users and some Federally qualified subsistence users in the lower Kuskokwim hunt area.

Impact to Federal subsistence users/wildlife: As this hunt has a quota, which is usually met, no impact on the moose population is expected from this proposal. Federally qualified subsistence users could benefit from the season opening later in Zone 1 as cooler temperatures would facilitate proper meat care. They could still hunt on Federal public lands beginning Sept. 1. Desire for a later moose hunt due to warm weather in early September inhibiting proper meat care has been expressed at Yukon-Kuskokwim Delta Subsistence Regional Advisory Council meetings.

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

Rationale: No conservation concerns exist for this proposal. It will increase harvest opportunity for Federally qualified subsistence users by providing a season when conditions better facilitate proper meat care.



PROPOSAL 8 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Extend resident season for moose hunting in Unit 18 Remainder.

Current Federal Regulations:

Unit 18—Moose

*Unit 18, remainder - 2 moose, only one of which may be antlered. Aug. 1-Apr. 30.
Antlered bulls may not be harvested from Oct. 1 through Nov. 30*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Extending the State season would likely result in additional harvest of moose. Given the high density of moose in this hunt area and the targeted harvest of cows, this population can withstand additional harvest. Additional harvest may help slow population growth and benefit long-term harvest and the moose population, which may be limited by density-dependent factors such as habitat.

Extending the State season to April 30 would align Federal and State regulations, decreasing regulatory complexity and user confusion. It would also increase harvest opportunity for Federally qualified subsistence users, who would no longer need to distinguish between State and Federal lands while hunting moose in Unit 18, remainder.

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

Rationale: No conservation concerns exist given the high moose densities in this hunt area. Extending the season increases opportunity for Federally qualified subsistence users and aligns State and Federal seasons.

PROPOSAL 9 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Modify the hunting season and bag limit for moose in Unit 18.

Current Federal Regulations:

Unit 18—Moose

*Unit 18--Goodnews River drainage and south to the Unit 18 boundary—1 Sep. 1 – 30
antlered bull by State registration permit*

Or



1 moose by State registration permit

*A season may
be announced
between Dec. 1
and the last
day of Feb.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: As this hunt has a quota, which is usually not met, minimal impact on the moose population is expected from this proposal. Lengthening the may-be-announced season to increase access may result in harvest meeting the quota, which would still be within sustainable levels. Lengthening the season to facilitate access due to inconsistent snow and weather conditions would increase harvest opportunity and likely harvest success for Federally qualified subsistence users. The proposed State season is a month longer than the current Federal season, precluding a Federal subsistence priority.

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

Rationale: No conservation concerns exist and harvest opportunity for Federally qualified subsistence users would increase.

PROPOSAL 10 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Reauthorize the antlerless moose season in Unit 18.

Current Federal Regulations:

Unit 18—Moose

*Unit 18—Goodnews River drainage and south to the Unit 18
boundary—1 antlered bull by State registration permit*

Sep. 1 – 30

Or

1 moose by State registration permit

*A season may be
announced between
Dec. 1 and the last
day of Feb.*

*Unit 18, remainder—2 moose, only one of which may be antlered.
Antlered bulls may not be harvested from Oct. 1 through Nov. 30*

Aug. 1 – Apr. 30

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal subsistence users/wildlife: Cow moose harvest is warranted in Unit 18 remainder due to high population density and signs that the population may be reaching carrying capacity and limited by density dependent factors such as habitat. A quota system prevents overharvest in the Goodnews River hunt area, although harvest during the winter season has historically been low. Allowance of cow moose harvest increases harvest opportunity for Federally qualified subsistence users and maintains alignment between State and Federal harvest limits. Changing the harvest limit to *Up to 2* moose provides management flexibility. However, if the Alaska Department of Fish and Game (ADF&G) changes the State harvest limit in-season, Federally qualified subsistence users would still be able to harvest two moose on Federal public lands under Federal regulations.

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

Rationale: No conservation concerns exist due to high moose densities and historically low harvests. Additionally, harvest is managed via a quota and delegated authority, which protects against overharvest. Reauthorizing antlerless moose harvest increases harvest opportunity for Federally qualified subsistence users.

PROPOSAL 14 – 5 AAC 85.065. Hunting seasons and bag limits for small game. Modify the bag limit for ptarmigan in Unit 18.

Current Federal Regulation:

Unit 18 – Ptarmigan (Rock and Willow)

15 per day, 30 in possession

Aug. 10–May 30

Is a similar issue being addressed by the Federal Subsistence Board? No

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in alignment of State and Federal regulations, which will decrease regulatory complexity, user confusion, and law enforcement concerns.

There are no current population surveys being conducted for ptarmigan in Unit 18. However, ADF&G staff observations near Bethel and Dillingham suggest that ptarmigan populations in this area may be much lower than in the past. Part of this decline is thought to be caused by warmer weather in the area and little or no snow in recent years, which would help to camouflage these birds and provide cover.

It is unknown what effect current harvest is having on the ptarmigan population in Unit 18. Although the general consensus of biologists in Unit 18 is that the ptarmigan population is declining due to climatic changes, it is uncertain what the cumulative effects caused by additional mortality due to harvest may be. It is possible that more than a 15% harvest may have additive impacts to the population. Without an estimate of ptarmigan populations in Unit 18, it is not possible to predict the impacts caused by current harvest levels.



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

Rationale for comment: Local residents indicate that willow ptarmigan numbers are declining in Unit 18. Although it is expected that this decrease is likely caused by climatic changes impacting levels of natural predation over the last few years, human harvest could have an additive effect on the already declining population. It may be important to limit harvest until ptarmigan numbers rebound to maintain this resource for local users.

PROPOSAL 15 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Address customary and traditional use findings for Alaska hares in Unit 18 and modify the season and bag limits.

Current Federal Regulations:

Unit 18 – Hare

No limit.

July 1–June 30

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Although Proposal WP20-20 addresses Unit 9, the request is similar and the conservation concern for Arctic hare populations is the same throughout their range, which includes Units 18 and 22. Proposal WP20-30 requests that the hare season be shortened from year-round to Nov. 1-Jan. 31 and the harvest limit be reduced from no limit to 1 per day and 4 annually for Unit 9. OSM’s preliminary conclusion is replace the term “tundra” hare with “Arctic hare” and to support the shortened season and lower harvest limit. This change, if adopted by the Federal Subsistence Board (Board), would reduce regulatory complexity by aligning Federal regulation with the recently changed State regulation.

Impact to Federal subsistence users/wildlife: If this proposal is adopted, there would be little to no impact on Federal qualified subsistence users but it would reduce hunting pressure on declining populations of Arctic hare (*Lepus othus*) in Unit 18. For the proposed changes to the State regulations to be more effective, similar regulations would be needed for Federal Subsistence regulations in Units 9, Unit 18, and Unit 22. Since Federal regulations currently do not distinguish between the two species of hares that occur in Alaska (snowshoe hare (*Lepus americanus*) and the Arctic hare (*Lepus othus*)), new regulations, specifically for the Arctic hare, would need to be developed.

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

Rationale: Arctic hares were once abundant in Unit 18 and now occur at low densities. Although little is known about the Arctic hare populations in the Alaska Peninsula, the decrease may be related to habitat changes and/or predation. Reducing hunting pressure by lowering the harvest limits and shortening the harvest season will help address some conservation concerns for local populations of Arctic hares in Unit 18.



PROPOSAL 16 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Extend the hunting season for brown bear from May 30 to June 30 in Unit 18.

Current Federal Regulation

Unit 18— Brown Bear

One bear by a State registration permit

Sep. 1 – May 31

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: These changes may benefit Federally qualified subsistence users, who would be able to harvest a brown bear during an extended season under State regulations. However, this change would result in State regulations being more liberal than Federal regulations.

From 2012 to 2018 participation and success by local subsistence hunters was low. The harvest rate from 2012 to 2014 was approximately 6% of the estimated population, which is near the upper limit for brown bears. The harvest ratio was 70% male and 30% female, which is considered sustainable.

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

Rationale: The proponent's request includes the addition of a month to the end of the brown bear season. Brown bears are attracted to black bear bait stations, which close on June 30, and they could become more vulnerable if the brown bear season coincides with the end of the black bear baiting season. The current harvest rate is sustainable but near the upper limit for the species.

PROPOSAL 18 – 5 AAC 92.210. Game as animal food or bait. Allow the use of game bird wings and backs to be used for trapping bait in Unit 18 as follows:

Current Federal Regulations:

§ 100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations

(j)(1) You may not use wildlife as food for a dog or furbearer, or as bait, except as allowed or in §100.26, §100.27, or §100.28, or except for the following:

(i) The hide, skin, viscera, head, or bones of wildlife;

(ii) The skinned carcass of a furbearer;



(iii) *Squirrels, hares (rabbits), grouse, or ptarmigan; however, you may not use the breast meat of grouse and ptarmigan as animal food or bait;*

(iv) *Unclassified wildlife.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: While the Board does not have authority over edible meat requirements for migratory birds, including swans, geese, and cranes, it does have authority over what can be used as trapping bait. Currently, Federal and State regulations do not permit using animal parts that are required for human consumption as bait. This proposal would result in misalignment of State and Federal regulations, which could result in user confusion and regulatory complexity. While using wing and back meat as bait may benefit some Federally qualified subsistence users by providing additional options for bait, others may view it as wasteful. No effects to wildlife populations are expected from this proposal.

Additionally, the edible meat salvage requirement under Federal migratory bird regulations recently changed to include the meat from the breast, back, thighs, legs, wings, gizzard, and heart of all migratory birds. While this requirement is more restrictive than State regulations, subsistence users supported restricting themselves to better align with traditional subsistence uses of migratory birds. Most subsistence users desire to utilize more of the bird for human consumption.

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

Rationale: This proposal requests allowing meat required to be salvaged for human consumption to be used as trapping bait. It would also misalign Federal and State regulations, creating user confusion and regulatory complexity.

PROPOSAL 19 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Open a year-round, resident season for caribou bull harvest in Unit 23.

Current Federal Regulations:

Unit 23—Caribou

Unit 23—that portion which includes all drainages north and west of, and including, the Singoalik River drainage

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 14

Feb. 1–June 30



Cows may be harvested. However, cows accompanied by calves may not be taken July 15–Oct. 14. July 15–Apr. 30

Unit 23, remainder

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 31

Feb. 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 31–Oct. 14. July 31–Mar. 31

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed to caribou hunting except by federally qualified subsistence users hunting under these regulations

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Proposals WP20-43, WP20-45, and WP20-46 request the same changes as State Proposals 19 and 20.

Impact to Federal subsistence users/wildlife: Eliminating the bull closure would allow harvest of young bulls, which could reduce harvest pressure on cows, helping to grow the herd and increase harvest opportunity for Federally qualified subsistence users. As the timing of the fall caribou migration has changed in recent years, it would also provide more harvest flexibility by alleviating pressure on Federally qualified subsistence users to harvest caribou during a particular timeframe. While the risk of harvesting a bull in rut exists, Federally qualified subsistence users have been selectively harvesting bulls before the closure was adopted in 2016.

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

Rationale: Adopting Proposal 19 increases harvest opportunity for Federally qualified subsistence users. Eliminating the bull closure may help grow the Western Arctic Caribou herd by reducing harvest pressure on cows.

PROPOSAL 20 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Open a year-round, resident season for caribou bull harvest in Unit 23.

See comments for Proposal 19.



PROPOSAL 21 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Reduce the bag limit for caribou in Unit 23.

Current Federal Regulations:

Unit 23—Caribou

Unit 23—that portion which includes all drainages north and west of, and including, the Singoalik River drainage

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 14

Feb. 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 15–Oct. 14.

July 15–Apr. 30

Unit 23, remainder

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 31

Feb. 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 31–Oct. 14.

July 31–Mar. 31

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed to caribou hunting except by federally qualified subsistence users hunting under these regulations

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: While reducing cow caribou harvest could aid in the recovery of the Western Arctic herd, it is unclear how much effect this proposal would have on cow caribou conservation and herd recovery. Enforcement of this regulation would also be difficult.

Fall caribou harvest is critical in fulfilling subsistence needs in Unit 23. Currently, there is a bull closure from Oct. 15-Jan. 31. As caribou are migrating later in the year, subsistence users are shifting fall harvest



to coincide with when caribou are accessible from major rivers. Adopting Proposal 21 could result in subsistence users being unable to meet their needs if they are limited to only five caribou during the cow-only season when caribou are migrating through accessible areas.

The RC907 registration permit requirement was recently adopted in State and Federal regulations. Federally qualified subsistence users should have time to adjust to this permit requirement before additional permit restrictions are implemented.

Adopting this proposal would misalign Federal and State harvest limits for caribou in Unit 23. Federally qualified subsistence users would be able to harvest more than 25 caribou, including five cows on Federal public lands in Unit 23. However, a similar situation already exists in Unit 22. While State regulations limit caribou harvest to 20 caribou total in Unit 22, Federal regulations do not have an annual limit, so Federally qualified subsistence users could harvest more than 20 caribou on Federal public lands in Unit 22.

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

Rationale: This proposal would have limited conservation benefits to the Western Arctic herd and would burden Federally qualified subsistence users with additional regulatory requirements. State and Federal harvest limits would be misaligned if this proposal is adopted.

PROPOSAL 22 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Extend the season for taking cow caribou in Unit 23 Remainder.

Current Federal Regulations:

Unit 23—Caribou

Unit 23, remainder

5 caribou per day by State registration permit as follows:

Calves may not be taken.

Bulls may be harvested

July 1–Oct. 31

Feb. 1–June 30

Cows may be harvested. However, cows accompanied by calves may not be taken July 31–Oct. 14.

July 31–Mar. 31

Federal public lands within a 10-mile-wide corridor (5 miles either side) along the Noatak River from the western boundary of Noatak National Preserve upstream to the confluence with the Cutler River; within the northern and southern boundaries of the Eli and Agashashok River drainages, respectively; and within the Squirrel River drainage are closed



to caribou hunting except by federally qualified subsistence users hunting under these regulations

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal would increase cow harvest when pregnant cows are migrating to their calving grounds, potentially decreasing calf production and recruitment, as well as adult cow survival. While the herd may have stabilized or even increased, conservative management is still warranted, especially of cow caribou, whose survival has the biggest impact on herd trajectory and recovery. The bull caribou season is open during this time period, providing harvest opportunity.

This proposal would also result in Federal regulations being more restrictive than State regulations, precluding a Federal subsistence priority. While an extended State season would provide more harvest opportunity for Federally qualified subsistence users, misalignment of State and Federal caribou seasons could result in user confusion, especially in National Parks and the Federal public lands closure around Noatak where only Federal regulations apply.

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

Rationale: Conservative management of the Western Arctic herd is warranted given its recent decline and lack of recent population estimates. Cow caribou survival has the greatest impact on herd conservation and trajectory. While this proposal would increase harvest opportunity for Federally qualified subsistence users, the bull season is currently open during this time period. Adopting this proposal would also misalign State and Federal seasons.

PROPOSAL 25 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Remove the restriction on caribou calf harvest in Unit 23.

See comments for Proposal 24.

PROPOSAL 28 – 5 AAC 85.025(g). Hunting seasons and bag limits for caribou. Eliminate the registration caribou permit RC907 and general season caribou harvest ticket requirement for North Slope resident hunters.

Current Federal Regulation:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports



(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: According to the proponent, the Department of Wildlife Management (DWM) travelled to all the North Slope communities and the residents overwhelmingly supported the collection of harvest data by DWM rather than by the use of State harvest ticket or registration permits. In addition, the information collected from RC907 duplicates information required by the North Slope Borough Department of Wildlife Management.

To assess the impact of harvest on Western Arctic, Teshekpuk, and Central Arctic caribou populations, accurate harvest information on location, date of harvest, and sex is needed. Detailed harvest information has not been readily available from the DWM in recent years. Accurate harvest information is critical to the proper management of caribou populations in this region.

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

Rationale: Harvest reports are an important management tool that provides valuable information to aid caribou population management decisions. To address the effects of hunting pressure and changes to State and Federal regulations on North Slope caribou populations, accurate harvest information on location, number, date of harvest, and sex is needed. To date, detailed harvest data has not been available.

PROPOSAL 29 – 5 AAC 85.045(11). Hunting seasons and bag limits for brown bear.

5 AAC 92.132. Bag limit for brown bears. Increase the resident bag limit for brown bears in Unit 26A.

Current Federal Regulations:

Unit 13—Brown Bear

Unit 26A—1 bear by State subsistence registration permit only.

July 1-June 20.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal will increase harvest opportunity for Federally qualified subsistence users.

In 2014, the brown bear population in Unit 26A appeared to be stable to increasing. However, there have been no density estimates or information on brown bear population trends since 2014. From 2000-2013, an average of 23-30 brown bears were taken annually in Unit 26A. This includes an estimated 6-12 bears



that are not reported each year. As of 2014, ADF&G believes that this level of harvest was sustainable based on density estimates.

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

Rationale: This proposal would allow additional opportunity for Federally qualified subsistence users to harvest brown bear in Unit 26A. However, updated population information on this species is recommended before the harvest limit is increased to two bears every regulatory year.

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.

Current Federal Regulation:

Unit 21D – Muskox

*No Federal
Open Season*

Unit 22A – Muskox

*No Federal
Open Season*

Unit 24D – Muskox

*No Federal
Open Season*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in misalignment of State and Federal regulations, which will increase regulatory complexity, user confusion, and law enforcement concerns.

Muskox were reintroduced to Units 22C and 22D of the Seward Peninsula in 1970, and have since expanded their range to the north and east. Currently, muskox occupy suitable habitat in Units 22A, 22B West, 22C, 22D, 22E, and 23-Southwest. Limited harvest of this population is permitted in Units 22B, 22C, 22D, 22E, and 23 under either State or Federal regulations. A majority of the Federal public lands in these areas are closed to the taking of muskox except by Federally qualified subsistence users, due to the low muskox population in the region.

Although the muskox population experienced periods of growth between 1970 and 2010, the Seward Peninsula muskox population began to decline in 2010. Between 2010 and 2012 the muskox population declined 12.5% annually throughout the Seward Peninsula. Recent research suggested that selective harvest of mature bulls on the Seward Peninsula could be a driver of reduced population growth and that



annual harvest be restricted to less than 10% of the estimated number of mature bulls. Following this change in harvest strategy, the Seward Peninsula muskox population remained stable through 2017, but populations still remain lower than in the past. Increasing harvest of this population could lead to another decline in the overall population of muskox in this region.

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

Rationale for comment: In addition to direct mortality due to harvest, muskox survival could be susceptible to herd disturbances during winter months if caloric expenditures are too high. Harvest on the Seward Peninsula was reevaluated and reduced in 2012 due to a declining muskox population. Recently, some localized populations have experienced a slight increase or have remained stable, but they still remain at much lower numbers than in the past. Current harvest strategies should remain in place to ensure that these muskox populations have the opportunity to reach healthy levels.

PROPOSAL 32 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Allow caribou to be taken east of and including the Nuluk River drainage in Unit 22E.

Current Federal Regulations:

Unit 22E—Caribou

<i>Units 22A—that portion north of the Golsovia River drainage, 22B remainder, that portion of Unit 22D in the Kuzitrin River drainage (excluding the Pilgrim River drainage), and the Agiapuk River drainages, including the tributaries, and Unit 22E—that portion east of and including the Tin Creek drainage—5 caribou per day by State registration permit. Calves may not be taken</i>	<i>July 1 – June 30</i>
<i>Units 22C, 22D remainder, 22E remainder—5 caribou per day by State registration permit. Calves may not be taken</i>	<i>July 1 – June 30, season may be announced</i>

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase harvest opportunity for Federally qualified subsistence users hunting between the Sanaguich and Nuluk River drainages. Federal and State hunt areas in Unit 22E are currently misaligned and would remain misaligned if this proposal is adopted. Federal regulations would become slightly more restrictive than State regulations since the season for the area between the Tin Creek and Nuluk River drainages would still be may-be-announced under Federal regulations. However, Federally qualified subsistence users would still be able to harvest caribou on Federal public lands in this area under State regulations. No conservation concerns exist for this proposal as the primary reason western Unit 22E has a may-be-announced caribou season is to protect reindeer.



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

Rationale: There are no conservation concerns for this proposal, and it would increase harvest opportunity for Federally qualified subsistence users. State and Federal hunt area boundaries are currently misaligned and would remain misaligned if this proposal is adopted.

PROPOSAL 33 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Modify hunting seasons and require a registration permit for moose hunting in Unit 22D Remainder.

Current Federal Regulation:

Unit 22D – Moose

<i>Unit 22D remainder—1 bull</i>	<i>Aug. 10–Sept. 14</i>
	<i>Oct. 1–Nov. 30</i>
<i>Unit 22D remainder—1 moose; however, no person may take a calf or a cow accompanied by a calf</i>	<i>Dec. 1–31</i>
<i>Unit 22D remainder—1 antlered bull</i>	<i>Jan. 1–31</i>

Is a similar issue being addressed by the Federal Subsistence Board? Yes

Impact to Federal subsistence users/wildlife: This proposal would mostly align with Proposal WP20-38 that was submitted to the Board and will be considered at the Board’s April 2020 meeting.

The moose population in Unit 22D remainder is currently below State management goals and has been declining at a rate of 14% annually since 2011. The current estimated annual harvest may be above sustainable levels. Due to the declining population, the State removed antlerless hunts from their regulations in Unit 22 and eliminated non-resident harvest opportunity in the area. Requiring a registration permit will help to obtain more accurate harvest data, which is necessary to properly manage the species.

Fall composition surveys indicate a negative change in the composition within Unit 22D remainder. Results from 2016 and 2018 surveys showed a bull:cow ratio of 23 and 18 bulls:100 cows, respectively, both of which are below the State management objective of 30 bulls: 100 cows. Due to the vulnerability of rutting bulls, the removal of the October and November season may be beneficial to the stabilization of this moose population.

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

Rationale for comment: If this proposal is adopted, it would limit subsistence opportunity for Federally qualified subsistence users in Unit 22D remainder, but it would also help to ensure that users have the



moose resource available for future generations. Requiring a registration permit would put more of a burden on users, but it would provide more accurate tracking of moose harvest in the hunt area.

PROPOSAL 35 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the availability of Unit 22 registration permits for moose hunting with an option to require a registration permit for the Unit 22D Remainder hunt.

Current Federal Regulation:

Unit 22 – Moose

Unit 22A—that portion north of and including the Tagoomenik and Shaktolik River drainages—1 bull. Federal public lands are closed to hunting except by federally qualified users hunting under these regulations Aug. 1–Sep. 30.

Unit 22A—that portion in the Unalakleet drainage and all drainages flowing into Norton Sound north of the Golsovia River drainage and south of the Tagoomenik and Shaktolik River drainages—Federal public lands are closed to the taking of moose, except that residents of Unalakleet, hunting under these regulations, may take 1 bull by Federal registration permit, administered by the BLM Anchorage Field Office with the authority to close the season in consultation with ADF&G Aug. 15–Sep. 14.

Unit 22A, remainder—1 bull. However, during the period Jan. 1–Feb. 15, only an antlered bull may be taken. Federal public lands are closed to the taking of moose except by federally qualified subsistence users Aug. 1–Sep. 30.
Jan. 1–Feb. 15.

Unit 22B—west of the Darby Mountains—1 bull by State registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G. Federal public lands are closed to the taking of moose except by federally qualified subsistence users hunting under these regulations Sep. 1–14.

Unit 22B—west of the Darby Mountains—1 bull by either Federal or State registration permit. Quotas and any needed season closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS, and ADF&G. Federal public lands are closed to the taking of moose except by residents of White Mountain and Golovin hunting under these regulations Jan. 1–31.

Unit 22B, remainder—1 bull Aug. 1–Jan. 31.



<i>Unit 22C—1 antlered bull</i>	<i>Sep. 1–14.</i>
<i>Unit 22D—that portion within the Kougarok, Kuzitrin, and Pilgrim River drainages—1 bull by State registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G. Federal public lands are closed to the taking of moose except by residents of Units 22D and 22C hunting under these regulations</i>	<i>Sep. 1–14.</i>
<i>Unit 22D—that portion west of the Tisuk River drainage and Canyon Creek—1 bull by State registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G</i>	<i>Sep. 1–14.</i>
<i>Unit 22D—that portion west of the Tisuk River drainage and Canyon Creek—1 bull by Federal registration permit. Quotas and any needed closures will be announced by the Anchorage Field Office Manager of the BLM, in consultation with NPS and ADF&G. Federal public lands are closed to the taking of moose except by residents of Units 22D and 22C hunting under these regulations</i>	<i>Dec. 1–31.</i>
<i>Unit 22D, remainder—1 bull</i>	<i>Aug. 10–Sep. 14. Oct. 1–Nov. 30.</i>
<i>Unit 22D, remainder—1 moose; however, no person may take a calf or a cow accompanied by a calf</i>	<i>Dec. 1–31.</i>
<i>Unit 22D, remainder—1 antlered bull</i>	<i>Jan. 1–31.</i>
<i>Unit 22E—1 antlered bull. Federal public lands are closed to the taking of moose except by federally qualified subsistence users hunting under these regulations</i>	<i>Aug. 1–Mar. 15.</i>

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in local priority for users residing within Unit 22, by making nonlocal users travel to the region in July to obtain their permits.

Federal public lands in many portions of Unit 22 are currently closed to the harvest of moose except by Federally qualified subsistence users, due to low moose populations throughout the region. This proposal would increase opportunity for local users, by limiting competition near villages. This proposal may also decrease overall harvest, thus allowing the moose populations to increase and protecting this important resource into the future.



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

Rationale for comment: Moose populations are low in many portions of Unit 22. This proposal would provide increased opportunity for local Federally qualified subsistence users throughout Unit 22 by limiting competition with non-local users.

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

See comments for Proposal 35.

PROPOSAL 41 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Extend the season dates for brown bear hunting in Unit 22B and 22C.

Current Federal Regulation:

Unit 22 – Brown Bear

Unit 22B—2 bears by State registration permit only. Aug. 1–May 31

*Unit 22C—1 bear by State registration permit only. Aug. 1–Oct. 31
Apr. 1–May 31*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in misalignment of State and Federal regulations and registration permit seasons, which will increase regulatory complexity, user confusion, and law enforcement concerns.

Although there are no current population estimates for the area, the current brown bear population appears to be healthy and productive. Current harvest levels within Units 22C and 22B are currently within State management goals.

Although harvest in Unit 22C increased by 87% from 2014 to 2015 with a previous liberalization of regulations, the population appears to be healthy throughout the unit. Federal public lands make up a negligible fraction of the total land area of Unit 22C, so the proposed regulation is unlikely to impact Federally qualified subsistence users hunting on Federal public lands. This proposal could, however, provide local users with an increased opportunity to harvest brown bear on State managed lands under State regulations.

This proposal would allow for harvest of brown bear during the time of year when these animals have used the majority of their winter fat reserves. Brown bears are rarely hunted by locals during this time of year when the bears are considered lean and their hides are of lesser quality. Therefore, this would not be a time of year when brown bears are typically harvested for subsistence purposes.



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

Rationale for comment: If this proposal is adopted, it would misalign State and Federal regulations which could lead to user confusion in the area. This proposal would also extend the harvest season into a time of year when Federally qualified subsistence users do not typically harvest brown bear for subsistence uses, however it could still provide additional opportunity for users if needed.

PROPOSAL 43 – 5 AAC 85.065. Hunting seasons and bag limits for small game.

Address customary and traditional use findings for Alaska hares in Unit 22 and modify the season and bag limits.

See Proposal 15.



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503



PC120
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In Reply Refer to:
FWS/IR11/20008

FEB 21 2020

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

Dear Chairman Spraker:

The Alaska Board of Game (Board) is scheduled to meet March 6-14, 2020 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Interior and Eastern Arctic Regions. We have reviewed the 123 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our recommendations are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Thomas Doolittle
Acting Assistant Regional Director

Enclosure



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Interior and Eastern Arctic Region

March 6-14, 2020

Fairbanks, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 45 – 5 AAC 92.080(15). Unlawful methods of taking game; exceptions. Prohibit the use of moose, caribou and reindeer urine as scent lures in the Interior and Eastern Arctic Region.

Current Federal Regulations:

§__.25(a) Definitions. The following definitions apply to all regulations contained in this part:

Scent lure (in reference to bear baiting) means any biodegradable material to which biodegradable scent is applied or infused.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: This proposal could benefit wildlife populations by preventing the infection and spread of chronic wasting disease (CWD). While CWD has not been detected in Alaska, preventing disease is much easier than mitigating its spread once detected. This proposal could burden subsistence users who would no longer be able to use moose, caribou, or reindeer urine as a scent lure.

Of note, the definition for scent lure under Federal regulations pertains only to bear baiting and contains no prohibition on any cervid urine. As such, cervid urine can be used as a scent lure under Federal regulations.

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

Rationale: OSM supports preventing the transmission of disease to maintain healthy wildlife populations. However, to be truly effective, a similar proposal needs to be submitted to the Federal Subsistence Board.

PROPOSAL 58 – 5 AAC 92.540(x). Controlled use areas. Establish a Controlled Use Area for the Kaiyuh Flats area in Unit 21D.

Current Federal Regulations: None.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: It is unclear in the proposal whether or not the proponent intends for the controlled use area (CUA) to apply only to the RM831 hunt as suggested by the submitted map or to apply to all hunts within the Kaiyuh Flats hunt area of Unit 21D. (The proposal also refers to RM833, which is in Unit 24). If the CUA applies only to the RM831 winter hunt, no effects to the moose population are expected because the RM831 hunt has a quota. If the CUA applies to both fall and winter hunts, the CUA could benefit the moose population by decreasing bull harvest during the fall hunt in the



northern portion of the hunt area where bull:cow ratios are very low. However, as most users access this area by boat, the benefits to the moose population would likely be minimal.

Decreased competition from non-local users accessing the hunt area by aircraft would benefit Federally qualified subsistence users. Additionally, if non-local hunters using aircraft are harvesting moose during the RM831 hunt, excluding them from this hunt would make more moose available to Federally qualified subsistence users before the quota is met. However, as the RM831 hunt only began in 2019, patterns of use such as who (local v. non-local) is primarily harvesting and what their form of access is (boat v. plane) are likely not yet established. Therefore, this CUA might be premature. If this proposal is adopted, Federally qualified subsistence users would still be able to access Federal public lands within the hunt area by aircraft under Federal regulations.

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

Rationale: It is unclear to which hunts the CUA would apply. The RM831 is a very new hunt. More time may be needed to establish harvest patterns. OSM is not aware of how quickly the 2019 quotas was met. If quotas are not being met, OSM does not support the CUA since it could be detrimental to the sustainable growth of the moose population. If quotas are being met, OSM supports establishment of the CUA to provide more opportunity for Federally qualified subsistence users.

PROPOSAL 59 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the winter, any-moose season for residents in Unit 21D.

Current Federal Regulations:

Unit 21D—Moose

Unit 21D, remainder—1 moose; however, antlerless moose may be taken only during Aug. 22-31. Sep. 21-25 and the Mar. 1-5 season if authorized jointly by the Koyukuk/Nowitna Sep. 5-25. National Wildlife Refuge Manager and the Central Yukon Field Office Manager, Mar. 1-5 Bureau of Land Management. Harvest of cow moose accompanied by calves is season to be prohibited. During the Aug. 22-31 and Sep. 5-25 seasons, a State registration permit announced. is required. During the Mar. 1-5 season, a Federal registration permit is required. Announcement for the antlerless moose seasons and cow quotas will be made after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Proposal WP20-36 requests establishing a 15-day March moose season in a portion of Unit 21D, resulting in the creation of a new hunt area (identical to the State's new Kala Slough hunt area), eliminating the March to be announced moose season in Unit 21D remainder, requiring a State registration permit in the Koyukuk



Controlled Use Area (Koyukuk CUA), and eliminating the March and April to be announced moose seasons in the Koyukuk CUA.

WP20-37 requests establishing a 15-day to-be-announced moose season between Dec. 1-31 and a 15-day may-be-announced season between Mar. 1-31 in a portion of Unit 21D, resulting in the creation of a new hunt area (identical to the State's new Kala Slough hunt area). The March season would be announced if the harvest quota is not met during the December hunt.

Impact to Federal subsistence users/wildlife: Bull:cow ratios in the northern portion of the hunt area are only 10 bulls:100 cows. The intent of the March hunt was to target cows, not bulls. Establishing a hunt in December before all bulls have dropped their antlers could encourage additional bull harvest, creating a conservation concern.

Providing a hunt in December rather than March provides Federally qualified subsistence users with an opportunity to harvest a moose to provide meat over the winter. However, due to warmer falls in recent years, travel conditions (adequate snow for snowmachine travel, freeze-up of rivers/lakes) during December are uncertain.

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

Rationale: OSM opposes this proposal as submitted due to conservation concerns over harvesting additional bulls in the northern portion of the hunt area where bull:cow ratios are very low. At their 2019 fall meeting, the Western Interior Alaska Subsistence Regional Advisory Council amended their Federal proposal, WP20-37 to exclude the area with very low bull:cow ratios during the December season. Given the complexity and interspersed of Federal and non-Federal lands in Unit 21D, OSM supports alignment of State and Federal regulations in this subunit, if possible, to alleviate user confusion and law enforcement concerns.

PROPOSAL 60 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose. Reauthorize a winter any-moose season during March in a portion of Unit 21D.

Current Federal Regulations:

Unit 21D—Moose

<i>Unit 21D, remainder—1 moose; however, antlerless moose may be taken only during</i>	<i>Aug. 22-31.</i>
<i>Sep. 21-25 and the Mar. 1-5 season if authorized jointly by the Koyukuk/Nowitna</i>	<i>Sep. 5-25.</i>
<i>National Wildlife Refuge Manager and the Central Yukon Field Office Manager,</i>	<i>Mar. 1-5</i>
<i>Bureau of Land Management. Harvest of cow moose accompanied by calves is</i>	<i>season to be</i>
<i>prohibited. During the Aug. 22-31 and Sep. 5-25 seasons, a State registration permit</i>	<i>announced.</i>
<i>is required. During the Mar. 1-5 season, a Federal registration permit is required.</i>	



Announcement for the antlerless moose seasons and cow quotas will be made after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Proposal WP20-36 requests establishing a 15-day March moose season in a portion of Unit 21D, resulting in the creation of a new hunt area (identical to the State's new Kala Slough hunt area), eliminating the March to be announced moose season in Unit 21D remainder, requiring a State registration permit in the Koyukuk Controlled Use Area (Koyukuk CUA), and eliminating the March and April to be announced moose seasons in the Koyukuk CUA.

WP20-37 requests establishing a 15-day to-be-announced moose season between Dec. 1-31 and a 15-day may-be-announced season between Mar. 1-31 in a portion of Unit 21D, resulting in the creation of a new hunt area (identical to the State's new Kala Slough hunt area). The March season would be announced if the harvest quota is not met during the December hunt.

Impact to Federal subsistence users/wildlife: Given the rapid increase of the moose population in the Kaiyuh Flats area of Unit 21D, OSM supports the harvest of cow moose to provide additional harvest opportunity and to slow population growth to be more sustainable. Given very low bull:cow ratios (10 bulls:100 cows) in the northern part of the hunt area between Koyukuk and Galena, OSM supports targeting cows for this winter hunt.

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

Rationale: There are no conservation concerns. Federally qualified subsistence users would benefit from additional harvest opportunity.

PROPOSAL 61 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Extend the resident moose season within the Kanuti Controlled Use Area of Unit 24B.

Current Federal Regulations:

Unit 24–Moose

Unit 24B, remainder—1 bull by State harvest ticket

Aug. 25-Oct. 1.

OR

1 antlered bull by State registration permit

Dec. 15-Apr. 15.

Federal public lands in the Kanuti Controlled Use Area, as described in Federal regulations, are closed to taking of moose, except by Federally



qualified subsistence users of Unit 24, Koyukuk, and Galena hunting under these regulations

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Closure Review WCR20-20 analyzes the current closure to moose hunting in the Kanuti Controlled Use Area (Kanuti CUA) of Unit 24B, except by Federally qualified subsistence users.

Impact to Federal subsistence users/wildlife: Bull:cow ratios within the Kanuti CUA are high (75 bulls:100 cows in 2017) and can support additional harvest, indicating no conservation concerns for this proposal. Extending the resident fall season would benefit Federally qualified subsistence users by providing additional harvest opportunity on State managed lands. It would also reduce regulatory complexity and user confusion by aligning State and Federal fall seasons. Therefore, Federally qualified subsistence users would no longer need to differentiate between State and Federal lands, which can be difficult.

Due to aircraft restrictions and the Federal lands closure, moose harvest within the CUA is primarily by Federally qualified subsistence users. The Western Interior Alaska Subsistence Regional Advisory Council stated moose harvest has not met the subsistence needs of local communities in recent years. This proposal could help local communities meet their subsistence needs.

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

Rationale: There are no conservation concerns due to high bull:cow ratios and low harvest pressure. Federally qualified subsistence users would benefit from increased harvest opportunity.

PROPOSAL 63 – 5 AAC 92.530(7). Management Areas. Repeal the Dalton Highway Corridor Management Area.

Current Federal Regulations:

§ Unit 24. Special Provisions

(ii)(A) You may not use firearms, snowmobiles, licensed highway vehicles, or motorized vehicles, except aircraft and boats, in the Dalton Highway Corridor Management Area, which consists of those portions Units 20, 24, 25, and 26 extending five miles from each side of the Dalton Highway from the Yukon River to milepost 300 of the Dalton Highway, except as follows: Residents living within the Dalton Highway Corridor Management Area may use snowmobiles only for the subsistence taking of wildlife. You may use licensed highway vehicles only on designated roads within the Dalton Highway Corridor Management Area. The residents of Alatna, Allakaket, Analtuvuk pass, Bettles, Evansville, and Stevens Village, and residents living within the Corridor may use firearms within the Corridor only for subsistence taking of wildlife.



Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: A repeal of the Dalton Highway Corridor Management Area (DHCMA) would have a significant impact on subsistence users living within the DHCMA and residents of Alatna, Allakeaket, Analtuvuk Pass, Bettles, Evansville, and Stevens Village, as they currently can use snowmobiles and firearms to take wildlife within the DHCMA. If this proposal is adopted, competition with other Alaska residents would increase and would likely result in lower success rates and decreased opportunity for local subsistence users.

Caribou populations from the Teshekpuk Caribou Herd (TCH), Western Arctic Caribou Herd (WCH), and the Central Arctic Caribou Herd (CACH) have ranges that overlap the DHCMA. Although the population dynamics differ between the three caribou populations, they all currently appear to be stable. Repeal of the DHCMA is not recommended as this would increase the disturbance from hunting pressure on caribou and other wildlife populations.

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

Rationale: Repealing the DHCMA may create a conservation concern for caribou and other wildlife due to increased access and disturbance from snowmachines and firearms. Retaining the DHMCA allows caribou to move more freely with less disturbance during migration. Additionally, such a closure would have a limited impact as the DCMHA would still exist under Federal regulations.

PROPOSAL 66 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Extend the resident caribou season and reduce the bag limit for Unit 24A remainder.

Current Federal Regulations:

Unit 24—Caribou

*Units 24A remainder, 24B remainder—5 caribou per day as follows:
Calves may not be taken.*

Bulls may be harvested

*July 1-Oct. 10
Feb. 1-June 30*

Cows may be harvested

Oct. 1 – Feb. 1

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Caribou harvest in Unit 24A is dependent upon the migration patterns of the Central Arctic Caribou Herd (CACH), Western Arctic Caribou Herd (WACH), Porcupine Caribou Herd (PCH) and the Teshekpuk Caribou Herd (TCH). Harvests in the summer and



early fall in Unit 24A occur primarily from the PCH, TCH, or WACH and during fall and winter, near Wiseman and Coldfoot, from the CACH. Extending the season to May 15 is likely to have little impact on Federally qualified subsistence users since the calving areas for the four caribou herds do not occur in Unit 24A remainder. Reducing the limit from 10 caribou to 5 caribou in Unit 24A remainder may reduce opportunity for Federally qualified subsistence users to harvest enough caribou if caribou move through the area quickly during migration.

There would be no impact to caribou if this proposal was adopted.

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

Rationale: The calving areas of the four caribou herds mentioned previously do not occur in Unit 24A remainder, so extending the season to May 15 is likely to have little effect on the caribou populations. Reducing the caribou limit from 10 to 5 per day is not likely to have much impact on Federally qualified subsistence users as hunting, processing, and packing 5 caribou a day per hunter is time intensive.

PROPOSAL 68 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. Open a fall bear baiting season in Unit 21C.

Current Federal Regulations:

Unit 21 – Brown Bear

Unit 21C – 1 bear

Aug. 10–June 30.

*hunting over bait is not permitted for brown bear in this unit.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal could allow more opportunity for Federally qualified subsistence users to harvest brown bear.

Hunting brown bear over bait is currently permitted under State regulations in Unit 21C during a spring season. This spring season was adopted into State regulations via Proposal 92 in 2018. When the Board of Game considered Proposal 92, it was expressed by biologists that current harvest levels fall below the State management objective for minimum annual reported harvest in this unit and it is unlikely that allowing the use of bait would increase harvest to unsustainable levels. In neighboring units where bait sites are permitted (21D, 24C, and 24D), only two brown bear were reported harvested over bait between 2012 and 2016.

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

Rationale for comment: While this proposal may increase opportunity for subsistence users, it would misalign Federal and State regulations which may lead to user confusion. This proposal is not expected



to substantially increase harvest, and therefore would not negatively impact the brown bear population in the area. Due to the isolated nature of Unit 21C and the lack of communities within the boundary, it is unlikely that fall bear baiting in this subunit would habituate brown bears to human use areas.

PROPOSAL 69 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures. Allow brown bears to be taken over bait in Unit 21C.

See comments for Proposal 68.

PROPOSAL 70 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Change the season start date for taking brown bear in Unit 24A to align with Unit 25A.

Current Federal Regulations:

Unit 24 – Brown Bear

1 bear by State registration permit

Aug. 10–June 30.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would misalign State and Federal regulations that use the same registration permit. This could cause user confusion and difficulty for law enforcement. Unit 25A only constitutes a very small portion of the Dalton Highway corridor, with the majority of the unit being isolated and far from the road system. This makes Unit 25A very different from Unit 24A, which is primarily characterized by the Dalton Highway corridor. Other surrounding units along the corridor (Units 26B and 20F) have brown bear harvest seasons that align with the current harvest season start date in Unit 24, which is August 10.

According to the ADF&G 2012–2014 Brown Bear Management Report, current harvest of brown bear in Unit 24 is below the minimum annual sustainable harvest. A majority of the harvest that takes place in Unit 24 is from the northern portion of the unit (sub-units 24A and 24B), with very few bears being harvested in the southern portion of the unit. This discrepancy in hunting pressure could lead to localized over-harvesting in Unit 24. Due to hunting restrictions within Gates of the Arctic National Park, a large area of brown bear habitat is protected that can support a high density of brown bears; this limits the possibility of over-harvest of the brown bear population in the northern section of Unit 24.

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

Rationale for comment: Although the current reported harvest of brown bear in Unit 24 is below the minimum annual sustainable harvest, modifying the opening season date would misalign Federal and State regulations that use the same registration permit and would misalign brown bear harvest seasons along the Dalton Highway corridor. The portion of Unit 25A located within the Dalton Highway corridor region is minor compared to the rest of the corridor and is also not representative of the rest of Unit 25A,



which is much more isolated. Unit 24A is a highly trafficked area due to its vicinity to the Dalton Highway. Lengthening the season in 24A could lead to increased use of this area, which is characteristically much different than Unit 25A. However, it could be worth considering modifying the regulations for the Dalton Highway corridor section of 25A to match season dates in Unit 24A, 26B, and 20F.

PROPOSAL 73 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. 5 AAC 92.165. Sealing of bear skins and skulls. 5AAC 92.220. Salvage of game meat, furs, and hides. Eliminate the RB601 brown bear subsistence registration permit for Unit 21D and Unit 24A, B, C, & D.

Current Federal Regulations:

Unit 21 – Brown Bear

Unit 21D – 1 bear by State registration permit only

Aug. 10–June 30.

Unit 24 – Brown Bear

1 bear by State registration permit

Aug. 10–June 30.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would remove the option for subsistence users to harvest brown bear without a sealing requirement under State regulations. Removal of the registration permit would cause discrepancies with Federal regulations that also require this permit.

According to the ADF&G registration hunt statistics, there are no current records available for this hunt. This may show that users are not currently hunting under these regulations or that harvest is minimal.

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

Rationale for comment: If this proposal is adopted, it would remove an opportunity for subsistence users to harvest brown bear for human consumption without the need for sealing. Although the season and harvest limits are the same for the general hunt, we are not certain how many users prefer to use the registration permit subsistence hunt. If this permit hunt is eliminated, then a new Federal permit will need to be established in the Federal regulations.

PROPOSAL 78 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Eliminate the registration caribou permit RC907 and general season caribou harvest ticket requirement for North Slope residents.

Current Federal Regulations:



§ 100.6 Licenses, permits, harvest tickets, tags, and reports

(a) (3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Requiring Federally qualified subsistence users residing north of the Yukon River to obtain a registration permit and submit reports when hunting caribou could be burdensome, especially for those residents living in very remote areas. According to the proponent, the North Slope Department of Wildlife Management (DWM) travelled to all the North Slope communities and the residents overwhelmingly supported the collection of harvest data by DWM rather than by the use of State harvest ticket or registration permits. In addition, the information collected from RC907 duplicates information required by the North Slope Borough Department of Wildlife Management.

However, to assess the impact of harvest on Western Arctic, Tespkpuk, and Central Arctic caribou populations, accurate harvest information on location, date of harvest, and sex is needed. Detailed harvest information has not been readily available from the DWM in recent years. Accurate harvest information is critical to the proper management of caribou populations in this region.

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

Rationale: Accurate harvest information provides valuable information for the Federal and State biologists and managers to assess population trends and composition of North Slope caribou populations. To address the effects of hunting pressure and changes to State and Federal regulations on North Slope caribou populations, accurate harvest information on location, number, date of harvest and sex is needed. To date, detailed harvest data for these populations has not been available.

PROPOSAL 83 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep. Modify the bag limit for sheep in the RS595 hunt in Unit 26C.

Current Federal Regulations:

Unit 26—Sheep

Unit 26C — 3 sheep per regulatory year; the Aug. 10-Sept. 20 season is restricted to 1 ram with 7/8 curl horn or larger. A Federal registration permit (FS2603) is required for the Oct. 1-Apr. 30 season.

Aug. 1-Sept. 20
Oct. 1-Apr. 30

Is a similar issue being addressed by the Federal Subsistence Board? No.

**Impact to Federal subsistence users/wildlife:**

The opportunity for Federally qualified subsistence users to harvest a sheep may increase slightly from a change in hunt stipulations of RS595 to match RS380. However the proposed change in management may not be compatible with the State's full-curl management strategy.

The Eastern Brooks Range Sheep population includes a portion of Unit 24A within and east of Dalton Highway Management Corridor, Unit 25A, Unit 26B, and Unit 26C. Most of the Dall sheep habitat in Unit 26C is within the Arctic National Wildlife Refuge. Information from limited survey data and reports from hunters and guides suggest that there was a complete failure in lamb recruitment in 2013 and 2014 across the entire Eastern Brooks Range. In 2016 and 2017, staff from the Arctic National Wildlife Refuge estimated that the sheep population in the eastern two-thirds of the refuge in Unit 26C was 5,321 sheep. Although the results from these surveys are not directly comparable to previous surveys, the numbers appeared low compared to numbers seen during 2000-2010 (ANWR 2019). However, the abundance of lambs seen during the 2016 and 2017 surveys was good, suggesting that the population may be in recovery. Results from the 2018 surveys are still being analyzed.

The State has no management objective for population size or composition as their management strategy is based on the assumption that a full-curl harvest strategy allows for sustained hunter opportunity and harvest regardless of sheep abundance. This is based on the premise that success rate would decline when the abundance of legal rams declines. Participation and harvest by hunters using RS595 has been low from 2011/2012 to 2015/2016 with an annual harvest of 3 sheep (range 0-7). This harvest is very small compared to the annual reported sheep harvest of 70 sheep under the general hunt in Unit 26C.

Given the most recent sheep population and harvest data and the low participation and harvest in RS595 hunt, it is unlikely that the changes would have a significant negative effect on the sheep populations in Unit 26C.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** because there is no way to determine what the potential for increased participation and harvest would be if the current stipulations for RS595 were changed similar to those for RS380.

Rationale: Although the sheep population may be currently in the process of recovery, a potential increase in harvest is not recommended until the Eastern Brooks Range sheep population has fully recovered.

Literature Cited

Arctic National Wildlife Refuge (ANWR) 2019. Summary of activities on the Arctic National Wildlife Refuge – Report for the Eastern Interior and North Slope Regional Advisory Councils, October 2019. 20 pp.

PROPOSAL 95 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Establish a resident winter moose hunt in Unit 19D East.



Current Federal Regulations:

Unit 19D–Moose

Unit 19D—that portion of the Upper Kuskokwim Controlled Use Area within the North Fork drainage upstream from the confluence of the South Fork to the mouth of the Swift Fork—1 antlered bull Sep. 1-30.

Unit 19D-remainder of the Upper Kuskokwim Controlled Use Area—1 bull Sep. 1-30.
Dec. 1-Feb. 28.

Unit 19D, remainder—1 antlered bull Sep. 1-30.
Dec. 1-15.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: The proponent refers to Unit 19D East, which is an intensive management area, but not a specific hunt area. Unit 19D East includes all of the Upper Kuskokwim Controlled Use Area (CUA) and portions of Unit 19D, remainder. For this proposal, OSM assumes the proponent intended the winter moose hunt to apply to both the Unit 19D, Upper Kuskokwim CUA and the Unit 19D, remainder hunt areas.

This proposal would provide additional harvest opportunity, benefiting Federally qualified subsistence users. Aircraft restrictions would alleviate potential competition from non-local hunters. The quota would ensure sustainable harvests. A proposal would need to be submitted to the Federal Subsistence Board to establish a similar hunt under Federal regulations.

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

Rationale: There are no conservation concerns as the moose population Unit 19D has increased in recent years, meeting State management objectives. A quota would ensure sustainable harvests. A winter any-moose season would benefit Federally qualified subsistence users by providing additional harvest opportunity.

PROPOSAL 97 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the Tier II permit hunt for moose in Unit 19A to a registration permit hunt.

Current Federal Regulations:



Unit 19A—Moose

Unit 19A, remainder—1 antlered bull by Federal drawing permit or a State permit.

Sept. 1-20.

Federal public lands are closed to the taking of moose except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under these regulations. The Refuge Manager of the Yukon Delta NWR, in cooperation with the BLM Field Office Manager, will annually establish the harvest quota and number of permits to be issued in coordination with the State Tier I hunt. If the allowable harvest level is reached before the regular season closing date, the Refuge Manager, in consultation with the BLM Field Office Manager, will announce an early closure of Federal public lands to all moose hunting

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Closure Review WCR20-43 analyzes the current closure to moose hunting in the western portion of Unit 19A, except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under Federal regulations.

Impact to Federal subsistence users/wildlife: Currently, reported harvest (~150 moose/year; 100 from Tier II permits and 50 from Federal permits) approximates the harvestable surplus (~160 moose/year) for this moose population. Additionally, low bull:cow ratios in 2016 and 2017 indicate few surplus bulls are available for harvest. If unlimited permits are distributed through a registration hunt, OSM supports establishing a quota to ensure sustainable harvests.

A registration permit would allow any Federally qualified subsistence user to obtain a permit and hunt on State managed lands. However, a registration permit could also increase competition from non-local hunters.

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

Rationale: While OSM does not have a preference on how permits are distributed for this hunt, OSM is concerned about the potential for overharvesting this moose population.

PROPOSAL 98 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the Tier II permit hunt for moose in Unit 19A to a registration permit hunt.

See comments for Proposal 97.

PROPOSAL 99 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Change the Tier II moose permit hunt (TM680) in Unit 19A to a household permit.



Current Federal Regulations:

Unit 19A—Moose

Unit 19A, remainder—1 antlered bull by Federal drawing permit or a State permit. Sept. 1-20.

Federal public lands are closed to the taking of moose except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under these regulations. The Refuge Manager of the Yukon Delta NWR, in cooperation with the BLM Field Office Manager, will annually establish the harvest quota and number of permits to be issued in coordination with the State Tier I hunt. If the allowable harvest level is reached before the regular season closing date, the Refuge Manager, in consultation with the BLM Field Office Manager, will announce an early closure of Federal public lands to all moose hunting

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Closure Review WCR20-43 analyzes the current closure to moose hunting in the western portion of Unit 19A, except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under Federal regulations.

Impact to Federal subsistence users/wildlife: Household permits would support traditional hunting practices and mentoring of the younger generation, which would benefit Federally qualified subsistence users. Hunting as a group would also increase safety. As the number of permits and harvest limit would remain the same, minimal increases in harvest are expected.

OSM suggests establishing a household permit hunt in addition to (rather instead of) a Tier II permit hunt may better accommodate all Federally qualified subsistence users. The number of permits would be the same, but divided between the two permitted hunts.

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

Rationale: There are no conservation concerns, and this proposal would benefit Federally qualified subsistence users.

PROPOSAL 100 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Extend the resident season dates for moose hunting in Unit 19A Remainder.

Current Federal Regulations:



Unit 19A—Moose

Unit 19A, north of the Kuskokwim River, upstream from (but excluding) the George River drainage, and south of the Kuskokwim River upstream from (and including) the Downey Creek drainage, not including the Lime Village Management Area. No Federal open season

Federal public lands are closed to the harvest of moose.

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Closure Review WCR20-39 analyzes the current closure to moose hunting in the eastern portion of Unit 19A to all users.

Impact to Federal subsistence users/wildlife: This is a very new and conservative hunt. Federal lands are currently closed to all moose hunting because of conservation concerns. The State hunt is limited by the number of permits distributed, but does not have a quota. If a longer season is established, the number of available permits would likely decrease because more hunters would be successful. The shorter season allows more permits to be distributed, but decreases individual hunters' success. No effects to the moose population are expected due to the various safeguards associated with this hunt.

A potential modification could be shifting the season later in the fall to correspond with cooler temperatures that facilitate proper meat care. More time may be needed to assess the success rates and impacts of this hunt. Currently, up to 75 permits can be distributed. If the harvestable surplus exceeds 75 moose, then OSM supports extending the season to increase success rates and opportunity. However, only 30 permits were issued for the 2019/20 regulatory year and, while conservative, indicates the moose population cannot currently withstand much more harvest.

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

Rationale: This proposal may benefit some Federally qualified subsistence users by providing a longer season, while being detrimental to other users who would not receive a permit.

PROPOSAL 102 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Shift the season dates for the Tier II moose permit hunt in Unit 19A.

Current Federal Regulations:

Unit 19A—Moose

Unit 19A, remainder—1 antlered bull by Federal drawing permit or a State permit. Sept. 1-20.

Federal public lands are closed to the taking of moose except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked



Creek hunting under these regulations. The Refuge Manager of the Yukon Delta NWR, in cooperation with the BLM Field Office Manager, will annually establish the harvest quota and number of permits to be issued in coordination with the State Tier I hunt. If the allowable harvest level is reached before the regular season closing date, the Refuge Manager, in consultation with the BLM Field Office Manager, will announce an early closure of Federal public lands to all moose hunting

Is a similar issue being addressed by the Federal Subsistence Board? Yes. Wildlife Closure Review WCR20-43 analyzes the current closure to moose hunting in the western portion of Unit 19A, except by residents of Tuluksak, Lower Kalskag, Upper Kalskag, Aniak, Chuathbaluk, and Crooked Creek hunting under Federal regulations.

Impact to Federal subsistence users/wildlife: No impacts to the moose population are expected from this proposal as season length would remain the same and ends before the height of rut, avoiding breeding disruptions. This proposal could benefit Federally qualified subsistence users by providing a season during better weather conditions, which would facilitate proper meat care.

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

Rationale: This proposal would benefit Federally qualified subsistence users by easing meat care in the field. There are no conservation concerns.

PROPOSAL 107 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Establish a resident winter moose hunt in Unit 21E.

Current Federal Regulations:

Unit 21 – Moose

<i>Unit 21E—1 moose; however, only bulls may be taken from Aug. 25-Sep. 30. During the Feb. 15—Mar. 15 season, a Federal registration permit is required. The permit conditions and any needed closures for the winter season will be announced by the Innoko NWR manager after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee as stipulated in a letter of delegation. Moose may not be taken within one-half mile of the Innoko or Yukon River during the winter season</i>	<i>Aug. 25–Sep. 30. Feb. 15–Mar. 15</i>
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Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal subsistence users/wildlife: In 2016, moose population surveys showed that the population in 21E had increased since the 2012 surveys were conducted. This placed the population within the State management objectives for the unit. Bull:cow ratios also fell within management goals for the unit. Although Unit 21E is an intensive management area, as of 2017 no wolf or bear control had been conducted.

Currently, there is a winter registration hunt for moose under Federal subsistence regulations. If this proposal is adopted, it may be worth considering the use of a joint State/Federal registration permit to decrease regulatory complexity due to the checkerboard land status in this unit.

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

Rationale for comment: There is currently no biological concern for this moose population. If this proposal is adopted, it could provide more opportunity to Federally qualified subsistence users by permitting a winter harvest on State managed lands that border many of the communities.

PROPOSAL 109 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Replace the moose general season hunt for residents and nonresidents in Unit 21A with registration permit hunts.

Current Federal Regulations:

Unit 21 – Moose

Units 21A—1 bull

Aug. 20–Sep. 25.

Nov. 1–30

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would increase the burden on Federally qualified subsistence users by requiring a registration permit to hunt under State regulations. However, Federally qualified subsistence users could still harvest moose under Federal regulations with a harvest ticket.

Moose populations in Unit 21A appear to be stable, but populations are only monitored opportunistically in this area. Better harvest reporting would help managers to better understand the dynamics of this population.

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

Rationale for comment: If this proposal is adopted, it could improve harvest reporting in the unit.



PROPOSAL 112 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Open a registration permit hunt for moose in a portion of Unit 19C and eliminate the general season hunt.

Current Federal Regulations:

Unit 19 – Moose

Units 19C—1 antlered bull

Sep. 1–20.

1 bull by State registration permit

Jan. 15–Feb. 15.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal would increase the burden on Federally qualified subsistence users by requiring a registration permit to hunt under State regulations. However, Federally qualified subsistence users could still harvest moose on Federal public lands under Federal regulations with a harvest ticket.

There have been no reported moose surveys conducted in 19C since 2010; at this time the bull:cow ratio was recorded as 29 bulls:100 cows, which is slightly below the management goal of 30 bulls:100 cows. Since that time, there have been complaints of crowded hunting conditions in Unit 19C. Very little of the reported harvest in 19C has been by residents of Unit 19.

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

Rationale for comment: If this proposal is adopted, it could improve harvest reporting in this small portion of the unit, but it would also increase the burden on Federally qualified subsistence users. The area in which the registration permit is requested is a small corridor. A registration permit for the entirety of Unit 19C may be more useful if the goal is to increase reporting and to better understand moose harvest in the area. It may also be warranted to conduct composition surveys in the area to better understand trends in moose population dynamics.

PROPOSAL 115 - 5 AAC 92.220. Salvage of game meat, furs, and hides. Require meat to be left on the bone for caribou, moose, and bison in Units 19, 21A, and 21E.

Current Federal Regulations:

36 CFR Part 242.25(a) and 50 CFR Part 100.25(a) Definitions

Salvage means to transport the edible meat, skull, or hide, as required by regulation, of a regulated fish, wildlife, or shellfish to the location where the edible meat will be consumed by humans or processed for human consumption in a manner which saves or prevents the edible meat from waste, and preserves the skull or hide for human use.



Edible meat means the breast meat of ptarmigan and grouse, and those parts of caribou, deer, elk, mountain goat, moose, muskox, and Dall sheep that are typically used for human consumption. This includes the meat of the ribs, neck, brisket, front quarters as far as the distal joint (bottom) of the radius-ulna (knee), hindquarters as far as the distal joint (bottom) of the tibia-fibula (hock), and that portion of the animal between the front and hindquarters; for black, brown and grizzly bear, it is the meat of the front and hindquarter and meat along the backbone (backstrap); however, edible meat of species listed above does not include meat of the head; meat that has been damaged and made inedible by the method of taking; bones; sinew; viscera; and incidental meat reasonably lost as a result of boning or close trimming if the bones, or viscera.

§ ____ .25(j) Utilization of fish, wildlife, or shellfish.

(3) You must salvage the edible meat of ungulates, bear, grouse, and ptarmigan

(5) Failure to salvage the edible meat may not be a violation if such failure is caused by circumstances beyond the control of a person, including theft of the harvested fish, wildlife, or shellfish, unanticipated weather conditions, or unavoidable loss to another animal.

100.26(h) Removing harvest from the field

You must leave all edible meat on the bones of the front quarters and hind quarters of caribou and moose harvested in Units 9, 17, 18, and 19B prior to October 1 until you remove the meat from the field or process it for human consumption. You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of moose harvested in Unit 21 prior to October 1 until you remove the meat from the field or process it for human consumption. You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of caribou and moose harvested in Unit 24 prior to October 1 until you remove the meat from the field or process it for human consumption. Meat of the front quarters, hind quarters, or ribs from a harvested moose or caribou may be processed for human consumption and consumed in the field; however, meat may not be removed from the bones for purposes of transport out of the field.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: It may take longer for Federally qualified subsistence users to pack out game from the field due to heavier loads. There would be no impact on the caribou, moose, or bison in Units 19, 21A and 21E as the animals will have already been harvested.

Federal Position /Recommended Action: The OSM recommendation is to **support** this proposal **with modification** to apply the regulation only to the period prior to October 1.

Rationale: If this proposal is adopted, it would require that the edible meat of the front quarters, hind quarters, and the ribs remain naturally attached to the bone until the meat has been transported from the field or is processed for human consumption. These regulations would be in effect prior to Oct. 1 for caribou, moose, and bison in Units 19, 21A, and 21E. Warmer temperatures prior to Oct. 1 contribute to



meat spoilage. Keeping the meat on the bone reduces spoilage and would make State regulations throughout the McGrath Management Area consistent. Colder temperatures after Oct. 1 reduce the chance of meat spoilage.

PROPOSAL 132 – 5 AAC 85.045. Hunting seasons and bag limits for moose. Shorten the moose hunting season in Units 20A and 20C.

Current Federal Regulations:

Unit 20 – Moose

Unit 20A—1 antlered bull *Sep. 1-20.*

Unit 20C—that portion within Denali National Park and Preserve west of the Toklat River, excluding lands within Mount McKinley National Park as it existed prior to December 2, 1980—1 antlered bull; however, white-phased or partial albino (more than 50 percent white) moose may not be taken *Sep. 1-30.*
Nov. 15-Dec. 15.

Unit 20C, remainder—1 antlered bull; however, white-phased or partial albino (more than 50 percent white) moose may not be taken *Sep. 1-30.*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Although adoption of this proposal would align some State and Federal seasons, there are multiple seasons in Unit 20A and 20C under State regulations. If the September 1–25 season is shortened by five days to provide moose time to become settled prior to the rut, this would still leave other seasons open to moose harvest in Unit 20A during the specified time period.

The moose population in Unit 20A is within State population objectives and research suggests that moose production in this subunit is limited by habitat condition. Due to this factor, shortening the harvest season may not have the intended outcome of increasing production.

Moose densities in Unit 20C are low and have been for multiple years. Since the September 1–25 season is the only open season for Unit 20C, this request could be suitable and have the intended effect for this subunit. However, it may be worth mentioning that the BOG extended the season to the current end date in 2012 to increase moose harvest to meet the intensive management harvest objective.

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

Rationale for comment: If this proposal is adopted, it will most likely not have the intended results in Unit 20A due to the habitat being a limiting factor for moose production in the area and the availability of other open seasons during that time-frame. There is the possibility that this proposal could have the



intended effect in Unit 20C, but Federally qualified subsistence users would still be able to harvest moose through September 30th.

PROPOSAL 153 – 5 AAC 84.270. Fur bearer trapping. Extend the trapping season for wolverine in Unit 20F.

Current Federal Regulations:

Trapping

Unit 20— Wolverine

No limit

Nov. 1–Feb.28.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users would be provided more opportunity to harvest wolverine under the proposed hunting regulations. In addition, it would allow trappers to keep wolverines incidentally caught in a lynx set. However, this would also misalign Federal and State regulations, which could lead to user confusion.

Wolverines, which occur at low densities throughout Alaska, have large home ranges ranging from 39 mi² to 386 mi². The breeding season extends from May through August. Following implantation which generally occurs from November through March, and a gestation period of 30-40 days, 1-2 young are born between February and April. Adoption of this proposal would extend the harvest into the denning period. While females likely only leave the dens for short periods of time to access food, the risk of litter loss would increase.

The wolverine population is listed as scarce in every region throughout the state, according to the 2017 Alaska trapper report, and the biological impact of extending the harvest season is unknown. The Alaska Department of Fish and Game reported in their 2009–2011 Furbearer Management Report that male wolverine made up 40% of the wolverine harvested in Unit 20F in 2010 and 25% in 2011. It was reported that long-term trends of male wolverine harvest below 50% could indicate unsustainable harvest rates.

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

Rationale: The proposed change to extend the hunting season to mid-March would overlap with the wolverine denning period. This proposed change would also result in misalignment of Federal and State wolverine hunting seasons for Unit 20. The most recent published furbearer management report indicated that wolverine harvest in 20F may be unsustainable. It will be important to monitor this trend and see what the upcoming furbearer management report states before extending the trapping season in this area. Maintaining the current harvest season from Nov. 1 – end of February is recommended.



PROPOSAL 155 - 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the western portion of Unit 1C.

Current Federal Regulations:

Unit 1—Moose

Unit 1C—that portion south of Point Hobart including all of the Port Houghton drainages—1 antlered bull with spike-fork or 50-inch antlers or 3 or more brow tines on one side, or antlers with 2 brow tines on both sides, by State registration permit only. Sept. 15 – Oct. 15

Unit 1C, remainder, excluding drainages of Berners Bay—1 bull by State registration permit only. Sept. 15 – Oct. 15

Unit 1C—Berners Bay—1 bull by drawing permit. Sept. 15 – Oct. 15 (will be announced starting in December 2019)

Only one moose permit per household. A household receiving a State permit for Berners Bay drainages moose may not receive a Federal permit. The annual harvest quota will be announced by the USDA Forest Service, Juneau office, in consultation with ADF&G. The Federal harvest allocation will be 25% (rounded up the next whole number) of bull moose permits.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: Reauthorizing the antlerless moose season in Unit 1C would provide potential additional opportunity for Federally qualified subsistence users.

There are four management areas in Unit 1C, the Taku River drainage, Berners Bay, Chilkat Range, and the Gustavus Forelands.

Taku River: Only two moose surveys (2000, 2007) have been conducted in the Taku River area. Thirty seven and 21 moose were seen in 2000 and 2007, respectively. The annual moose harvest has averaged approximately 15 moose from 2010-2014.

Berners Bay: Due to the small closed population of moose in Berners Bay, this population is monitored by ADF&G to ensure declines in survival and reproduction are detected in time to make effective management decisions. The area is subject to severe winters and has limited moose habitat along the river corridor. The total number of moose seen in Berners Bay from 2010-2014 ranged from 73 to 105, which is within the range of the State management objective of 80-90 moose. Five moose were reported harvested annually from Berners Bay drainage from 2014-2019, which is approximately 3.5% of the 2019 population estimate of 137±23.



Gustavus Forelands: In the 1990s the population grew rapidly and accounted for over half the moose harvest in Unit 1C. In 2000, ADF&G instituted an antlerless hunt to reduce the population over concern that the available moose habitat was being over browsed. The total number of moose seen during aerial surveys from 2010-2014 ranged from 91-274 and the population estimate was 244 ± 98 . In 2018, the population estimate was 218 ± 22 , so despite the yearly fluctuations, the population currently is relatively stable to slightly increasing. From 2002-2008, hunters harvested between 11 and 67 antlerless moose annually. There was no hunt during fall 2007 due to high moose mortality during the severe winter of 2006/2007. There have been no antlerless hunts since 2009. From 2010-2014, an average of 10 bulls were harvested annually. The antlerless hunt was closed from 2010-2014.

Chilkat Range: The status of the moose population in the Chilkat Range is unknown because no recent surveys have been conducted due to the limited snow cover and a dense forest canopy. An annual harvest of 13 bull moose occurred in the Chilkat Range from 2010-2014.

Antlerless moose harvest under State regulations is limited primarily through the use of quotas combined with drawing or limited registration hunts. Antlerless moose hunts have been conducted in both Berners Bay and Gustavus Forelands to prevent overpopulation within the limited habitat. Reauthorizing the antlerless season is not anticipated to have a negative impact on the moose populations in Unit 1C because it is intensively managed by ADF&G, there is a limited season from July 1 to September 14, and relatively low rates of participation.

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

Rationale: Reauthorizing the antlerless moose season will retain management flexibility in Unit 1C and allows Federally qualified subsistence users additional opportunity to harvest a moose if implemented.

PROPOSAL 156 - 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the western portion of Unit 5A, Nunatak Bench.

Current Federal Regulations:

Unit 5A—Moose

Unit 5A— Nunatak Bench—1 bull by State registration permit only.

Nov. 15 - Feb. 15

The season will be closed when 5 moose have been taken from Nunatak Bench.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: Nunatak Bench contains a small isolated moose population of approximately 50 animals. This population undergoes extreme fluctuations due to severe winters and limited habitat. The moose population declined from 52 in 2001 to less than 20 from 2005-2012. In 2015, only 14 moose were seen and a series of severe winters from 2006-2012 may have



prevented or slowed down the recovery. Much of the hunt occurs after bulls have lost their antlers so both bulls and cows may be harvested. An average of two moose per year were harvested between 1997 and 2004. No permits have been issued since 2004.

Due to low population numbers, there has been no opportunity for Federally qualified subsistence users to harvest moose from the Unit 5A-Nunatak Bench population since 2004. There are better areas within Unit 5A that provide more opportunity for Federally qualified subsistence users to harvest moose.

Antlerless moose harvest under State regulations is limited primarily through the use of quotas combined with drawing or limited registration hunts. The State would like to retain the ability to implement an antlerless hunt to prevent habitat loss due to overpopulation if needed.

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

Rationale: Reauthorizing the antlerless moose season will retain management flexibility in Unit 5A-Nunatak Bench.

PROPOSAL 157 - 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the western portion of Unit 6C.

Current Federal Regulations:

Unit 6C—Moose

1 antlerless moose by Federal drawing permit only.

Sept. 1 – Oct. 31

Permits for the portion of the antlerless moose quota not harvested in the Sept. 1-Oct. 31 hunt may be available for redistribution for a Nov. 1-Dec. 31 hunt.

1 bull by Federal drawing permit only.

Sept. 1 – Dec. 31

In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose permit may not receive a Federal permit. The annual harvest quota will be announced by the U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits. Federal public lands are



closed to the harvest of moose except by Federally qualified users with a Federal permit for Unit 6C moose, Nov. 1-Dec.31.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: In 2018, the moose population estimate was 677, which is within State management objectives of 600-800 moose in Unit 6C. Federal public lands in Unit 6C, which have some of the best moose habitat in the unit, are currently closed to the harvest of moose except by Federally qualified subsistence users. Thus, support for this proposal is not likely to negatively affect the moose population or restrict opportunity for Federally qualified subsistence users to harvest moose in Unit 6C.

The State has not held an antlerless moose season in unit 6C since 1999/2000, since the available antlerless harvest quota has been managed by the U.S. Forest Service under Federal Subsistence regulations. Antlerless moose harvest under State regulations is limited primarily through the use of quotas combined with drawing or limited registration hunts. The State would like to retain the ability to implement an antlerless moose hunt to prevent overpopulation overgrazing on prime habitat areas if needed.

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

Rationale: Reauthorizing the antlerless season will retain management flexibility in Unit 6C. Adoption of this proposal is unlikely to have a significant negative population level effect or adversely affect Federallly qualified subsistence users.

PROPOSAL 158 - 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the western portion of Unit 13.

Current Federal Regulations:

Unit 13—Moose

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

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

Is a similar issue being addressed by the Federal Subsistence Board? No.



Impact to Federal Subsistence users/wildlife: Reauthorizing the antlerless moose season in Unit 13 would provide additional opportunity for Federally qualified subsistence users.

Moose populations in Unit 13 have grown since 2001, due to a combination of mild winters, predator control, and more conservative hunting regulations. In 2018, the population estimate was 18,863, which is within the State management objective of 17,600-21,900 moose.

Antlerless moose harvest under State regulations is limited primarily through the use of quotas and drawing or limited registration permits. The State would like to retain the ability to implement an antlerless hunt to regulate moose populations if needed.

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

Rationale: The current regulation allows hunters to take a limited number of cows in specific areas to keep the population within management objectives. Reauthorizing the antlerless season will retain management flexibility in Unit 13. Adoption of this proposal is not likely to have a negative effect on the local moose populations or restrict opportunity for Federally qualified subsistence users.

PROPOSAL 160 - 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the Twentymile/Portage/Placer hunt areas Units 7 and 14C.

Current Federal Regulations:

Unit 7—Moose

Unit 7 – that portion draining into Kings Bay

No open season

Federal Public lands are closed to the taking of moose except by residents of Chenega Bay and Tatitlek.

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

Aug. 10-Sept. 20

Unit 14—Moose

Unit 14

No open season



Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: Reauthorizing the antlerless moose season in Units 7 would provide additional opportunity for Federally qualified subsistence users.

Moose populations in the Twentymile/Portage/Placer area fluctuate widely, with rapid increases during mild winters and declines due to over-browsing limited winter habitat, severe winters, and moose-vehicle collisions. In 2016, the moose population in this area was 153, with a bull:cow ratio of 30 bulls:100 cows and a calf cow ratio of 18 calves:100 cows. The antlerless moose season has been used in the past to reduce the population to prevent over-browsing of winter habitat, reduce moose-vehicle collisions, and to reduce stress associated with winter food shortages.

The State would like to retain the ability to implement an antlerless hunt to regulate moose populations if needed.

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

Rationale: The current regulation allows hunters to take a limited number of cows in specific areas to keep the population within management objectives. Reauthorizing the State antlerless season will retain management flexibility in Units 7 and Unit 14. Adoption of this proposal is not likely to have a negative effect on moose populations in the Twenty Mile/Portage/Placer area or restrict opportunity for Federally qualified subsistence users.

PROPOSAL 163- 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the western portion of Unit 15C.

Current Federal Regulations:

Unit 15—Moose

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

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



Unit 15C—1 cow by Federal registration permit only

Aug. 10-Sept. 20

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: Reauthorizing the antlerless moose season in Unit 15C would provide additional opportunity for Federally qualified subsistence users.

Federally qualified subsistence users hunting moose under Federal regulations have an earlier and longer season than the State season, a cow hunt, and less restrictive antler conditions. However, refuge lands make up only a small portion of Unit 15C and available habitat can be a limiting factor during winters with deep snow accumulations. Since 2004, fires have burned over 87,000 acres and thus there is good potential for increased moose browse. A State antlerless hunt was established in Unit 15C to limit winter loss on the Homer Bench, prevent habitat destruction, and reduce moose-human conflicts.

In 2001, the moose population estimate for the area north of Kachemak Bay was 3,529 (95% CI:2,769-4,289), which is within the State intensive management objectives of 2,500-3,500 moose for Unit 15C. Population estimates and bull:cow ratios above 20 bulls:100 cows suggest that the moose population is on a positive trend.

Antlerless moose harvest under State regulations is limited primarily through the use of quotas and drawing or limited registration permits. The State would like to retain the ability to implement an antlerless hunt to for the Homer Bench hunt (DM549), targeted hunt along the Sterling Highway (AM550) for the 2020-2021 season.

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

Rationale: The current regulation allows hunters to take a limited number of cows in specific areas to keep the population within management objectives. Reauthorizing the State antlerless season will retain management flexibility in Unit 15C. Adoption of this proposal is not likely to have a negative effect on moose populations or restrict opportunity for Federally qualified subsistence users.

PROPOSAL 165- 5 AAC 85.045(24). Hunting seasons and bag limits for moose. Reauthorize the antlerless moose hunting season in the western portion of Unit 17A.

Current Federal Regulations:

Unit 17—Moose

Unit 17A—1 bull by State registration permit only.

Aug 25–Sept 20

Unit 17A—up to 2 moose; one antlered bull by State registration permit, one antlerless moose by State registration permit.

Up to a 31-day season may be announced between Dec. 1-last



day of Feb.

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal Subsistence users/wildlife: Reauthorizing the antlerless moose season in Unit 17A would provide additional opportunity for Federally qualified subsistence users.

An antlerless season was opened in December 2013 in support of the Unit 17A Moose Management Plan. Under the plan, an antlerless moose hunt can be offered when the moose population is increasing and the population reaches a minimum of 600 moose. In March 2017, the Unit 17A moose population estimate was 2,369±564 and growing. Due to the high moose population, the Board of Game adopted a fall antlerless hunt in 2018 with an increase in the harvest limit to two moose. The antlerless hunt in the fall and winter allows ADF&G to limit the population growth and allows hunters to harvest surplus animals.

Antlerless moose harvest under State regulations is limited primarily through the use of quotas and drawing or limited registration permits. The State would like to retain the ability to implement an antlerless hunt during the spring and fall in Unit 17A if needed.

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

Rationale: Current regulations allow hunters to take a limited number of cows in specific areas to keep the population within management objectives. Reauthorizing the State antlerless season will retain management flexibility in Unit 15C. Adoption of this proposal will allow for control of local moose populations and will provide additional opportunity for Federally qualified subsistence users.



IN REPLY REFER TO:

United States Department of the Interior

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

OSM 19096.PM

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

Dear Chairman Spraker:

The Alaska Board of Game is scheduled to meet January 17-20, 2020 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Western Arctic/Western Region. We have reviewed the 43 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our recommendations are enclosed.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822, with any questions you may have concerning this material.

Sincerely,

Thomas Doolittle,
Acting Assistant Regional Director

Enclosure



Chairman Spraker

2

cc: Anthony Christianson, Chair, Federal Subsistence Board
Greg Risdahl, Acting Deputy Assistant Regional Director, Office of Subsistence Management
Suzanne Worker, Acting Policy Coordinator, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management
Eva Patton, Council Coordinator, Office of Subsistence Management
Karen Deatherage, Council Coordinator, Office of Subsistence Management
Zachary Stevenson, Office of Subsistence Management
Chair, Yukon Kuskokwim Delta Subsistence Regional Advisory Council
Chair, Seward Peninsula Subsistence Regional Advisory Council
Chair, Northwest Arctic Subsistence Regional Advisory Council
Chair, North Slope Subsistence Regional Advisory Council
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,
Alaska Department of Fish and Game
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Interagency Staff Committee
Administrative Record



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Western Arctic/Western Region

January 17-20, 2020

Nome, Alaska

Office of Subsistence Management (OSM)



that are not reported each year. As of 2014, ADF&G believes that this level of harvest was sustainable based on density estimates.

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

Rationale: This proposal would allow additional opportunity for Federally qualified subsistence users to harvest brown bear in Unit 26A. However, updated population information on this species is recommended before the harvest limit is increased to two bears every regulatory year.

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.

Current Federal Regulation:

Unit 21D – Muskox

*No Federal
Open Season*

Unit 22A – Muskox

*No Federal
Open Season*

Unit 24D – Muskox

*No Federal
Open Season*

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adoption of this proposal will result in misalignment of State and Federal regulations, which will increase regulatory complexity, user confusion, and law enforcement concerns.

Muskox were reintroduced to Units 22C and 22D of the Seward Peninsula in 1970, and have since expanded their range to the north and east. Currently, muskox occupy suitable habitat in Units 22A, 22B West, 22C, 22D, 22E, and 23-Southwest. Limited harvest of this population is permitted in Units 22B, 22C, 22D, 22E, and 23 under either State or Federal regulations. A majority of the Federal public lands in these areas are closed to the taking of muskox except by Federally qualified subsistence users, due to the low muskox population in the region.

Although the muskox population experienced periods of growth between 1970 and 2010, the Seward Peninsula muskox population began to decline in 2010. Between 2010 and 2012 the muskox population declined 12.5% annually throughout the Seward Peninsula. Recent research suggested that selective harvest of mature bulls on the Seward Peninsula could be a driver of reduced population growth and that



annual harvest be restricted to less than 10% of the estimated number of mature bulls. Following this change in harvest strategy, the Seward Peninsula muskox population remained stable through 2017, but populations still remain lower than in the past. Increasing harvest of this population could lead to another decline in the overall population of muskox in this region.

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

Rationale for comment: In addition to direct mortality due to harvest, muskox survival could be susceptible to herd disturbances during winter months if caloric expenditures are too high. Harvest on the Seward Peninsula was reevaluated and reduced in 2012 due to a declining muskox population. Recently, some localized populations have experienced a slight increase or have remained stable, but they still remain at much lower numbers than in the past. Current harvest strategies should remain in place to ensure that these muskox populations have the opportunity to reach healthy levels.

PROPOSAL 32 – 5 AAC 85.025. Hunting seasons and bag limits for caribou. Allow caribou to be taken east of and including the Nuluk River drainage in Unit 22E.

Current Federal Regulations:

Unit 22E—Caribou

<i>Units 22A—that portion north of the Golsovia River drainage, 22B remainder, that portion of Unit 22D in the Kuzitrin River drainage (excluding the Pilgrim River drainage), and the Agiapuk River drainages, including the tributaries, and Unit 22E—that portion east of and including the Tin Creek drainage—5 caribou per day by State registration permit. Calves may not be taken</i>	<i>July 1 – June 30</i>
<i>Units 22C, 22D remainder, 22E remainder—5 caribou per day by State registration permit. Calves may not be taken</i>	<i>July 1 – June 30, season may be announced</i>

Is a similar issue being addressed by the Federal Subsistence Board? No.

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase harvest opportunity for Federally qualified subsistence users hunting between the Sanaguich and Nuluk River drainages. Federal and State hunt areas in Unit 22E are currently misaligned and would remain misaligned if this proposal is adopted. Federal regulations would become slightly more restrictive than State regulations since the season for the area between the Tin Creek and Nuluk River drainages would still be may-be-announced under Federal regulations. However, Federally qualified subsistence users would still be able to harvest caribou on Federal public lands in this area under State regulations. No conservation concerns exist for this proposal as the primary reason western Unit 22E has a may-be-announced caribou season is to protect reindeer.



Submitted By
Adam Owen
Submitted On
2/13/2020 2:24:55 PM
Affiliation

~~To: Alaska Board of Game

Re: Withdrawal Request Proposal #71

Dear Chairman Spraker and Board members,

I am the author of Proposal #71 which is before the Board at the 2020 Region III meeting. After further consideration and in talks with other hunters, it is my desire to withdraw my proposal #71 which is written to allow brown bear to be taken over bait in Unit 24A. The rationale of this withdrawal request is because the DHCMA is one of the last areas in the state where bow hunters can drive to spot and stalk grizzly bears without the pressure of bear baiting stations influencing the movement of grizzly bears. This unique hunting opportunity should be preserved and given priority over baiting. Hunters have many areas across the state of Alaska to hunt grizzly bears over bait, but very few, if any, areas on the road system where they can spot and stalk grizzly bears without the pressure and influence of bait stations.

Should the Board decide to deny this request to withdraw my proposal #71, I therefore request that Proposal #71 be amended to allow a compromise such that hunting grizzly bears over bait stations be allowed south of Slate Creek only. This would still provide bow hunters spot and stalk opportunities from Slate Creek north without the influence of bait stations affecting grizzly bear behavior.

Thank you for your consideration,
Adam Owen



Submitted By
Matt Palmquist
Submitted On
2/13/2020 8:00:14 AM
Affiliation

Phone
7858260995
Email
matthewp@ruraltel.net

Address
PO Box 218
Grainfield, Kansas 67737

I am in favor of proposal 50 and proposal 53. I do not support proposal 49. Thank you, Matt Palmquist



Submitted By
Sylvia & Marius Panzarella
Submitted On
2/21/2020 1:30:57 PM
Affiliation
Self

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Address
7022 Tanaina Dr.
Anchorage , Alaska 99502

We support Proposal 152. Surely you can agree on this proposal which shortens the hunting and trapping season in this area. It allows for more breeding wolves and pups to live longer which supports the tourism industry. If you understand nothing about fairness for all users, perhaps you can understand \$\$\$\$ which is growing by leaps and bounds with the tourist industry. Please support this proposal. People in Alaska and the world are watching the decisions you make. Thank you.

Sylvia & Marius Panzarella



Submitted By
Stan Parkerson
Submitted On
2/19/2020 8:00:40 PM
Affiliation
Guide

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9073787977
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stan@denalihunts.com

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1441 Ivan's Alley
Fairbanks, Alaska 99709

I would like to go on record as opposeing Proposal # 71. I have NO issues with baiting of Grizzlies and in some areas the likely hood of harvesting a bear without bait is very unlikely. However, this is not one of those areas, quite the contrary, this is an Ideal area for glassing and spot and stalk hunting.

I further understand that the person that submitted this proposal has asked that it be withdrawn and not passed. Please honor his wishes and not pass Proposal 71



Submitted By
Rob Patuto
Submitted On
2/17/2020 5:35:41 AM
Affiliation

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2086103795
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Address
821 W. Shingle Mill Rd.
Sandpoint, Idaho 83864

Re; Propsal #49

I ask that you look at the negative impact that allowing widespread use of the crossbow in archery seasons across the country has resulted in. It has been proposed in all of these state under the guise of a solution, generally to problems that did not exist. A 50 lb bow at 85% letoff is not an unattainable goal for someone who wants to bowhunt. This has been a can of worms that many states wish had never been open. The increased harvest being one of the most impactful consequences.

Thank You, Rob

Submitted By
Rob Patuto
Submitted On
2/17/2020 5:13:57 AM
Affiliation

Phone
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Address
821 W. Shingle Mill Rd.
Sandpoint, Alabama 83864

Proposal #50

I hope the board would consider ruling in favor of proposal #50 regarding extending the Moose season. The limited impact, the tight regulation, and increased hunter days seems like a great deal for everyone. Doesn't exclude anyone.

Thank You, Rob

Submitted By
Rob Patuto
Submitted On
2/17/2020 5:21:20 AM
Affiliation

Phone
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Address
821 W. Shingle Mill Rd.
Sandpoint, Idaho 83864

Re; Proposal #53

I am writing in support of this proposal. It does not take any opportunity away, it increases days afield with very low impact. As a registered hunt it keeps a close eye on statistics and would increase revenue for the state.

Thank You, Rob



Submitted By
steven Perrins
Submitted On
2/21/2020 10:25:12 PM
Affiliation
rainy pass lodge

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Address
PO Box 221267
Anchorage, Alaska 99522

Proposal 47

RHAK is at it again, and they won't be happy until they can kill the Guiding industry. This is just another tactic to start the non-resident hunter in a total drawing permit scheme in the state of Alaska. The board has a responsibility to all Alaskans, including those of us that make our living in the hunting business, We are the ones that spend hundreds of thousands of dollars promoting tourism to Alaska. We donate tens of thousands of pounds of meat a year to Alaskans. We report game findings to our fish & game biologists annually to protect the species for our future generations of Alaskans and non-residents. It's the non-resident hunter that provides the line share of income to the state to manage the game for all Alaskans. IM programs have been used as a tool to help manage ungulate populations, and it is not unusual to have those in place for many years at a time and they tend to stay in place because they are effective. In Unit 16 the IM program has been ongoing and now even with a 1000 surplus moose it stays in place. This new regulation would have put the oldest hunting lodge in Alaska (Rainy Pass Lodge) out of business. The fact that as professionals we spend more time and money in the field, it stands to reason guides success rate would be proportionately above the resident hunter. In proposal 52 RHAK wants sheep on a permit, on Kodiak they want bears on permit and only 10% allotment. RHAK does not represent the average Resident hunter in Alaska, they don't even represent the majority of its own membership. Drawing permits are the death of the industry for guides, and are not liked even by residents themselves in most areas. There is enough to go around and moose and Caribou in unit 19 is not suffering because of the non-resident hunter, in fact it brings in needed commerce for all those areas, and the conservation model has always been best supported by the non-resident guided hunts. I strongly oppose this proposal. I have hunted and guided in unit 19c for over 42 years and the only real problem we had was when a terrible governor closed aerial wolf hunting which caused the greatest damage to our ungulate populations. Now the game are on the grow and IM programs are working well along side the Non-resident hunter as well as the resident hunter.

Steven H. Perrins

Master Guide #123



Submitted By
steven Perrins
Submitted On
2/21/2020 10:27:05 PM
Affiliation
Rainy Pass Lodge

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Anchorage, Alaska 99522

Proposal 52

Again RHAK is at it to eliminate guides and guiding businesses. They know we can't survive and make a living on drawing hunt areas. we will become a state of part time guide operators and the Alaska reputaion of professionalism in the hunting and guiding world will be done. This is not a subsistence issue or a put meat on the table for Alaskans issue. This is RHAK wanting it all for a few wealthy resident hunters, not the majority of Alaskan hunters. If it's about the resource, I say close the sheep season for 3-4 years and give the animlas a break. However we know that the full curl law is taking care of the conservation of sheep. Is it a crowding issue, or is it RHAK just wants it all for themselves. If you really want to please them, Tell them to come to the table with APHA or myself as a liason to what residnet hunters really want or need, But I have offered that and there answer is they don't want to compromise, they want it all there way. I have a suggestion you may consider. Allow non-resident hunts on even years and resident hunts on odd years and therefore the residents can have it all one year and the non-residents can have it the next year. That may cause a little imbalance on license and tag finances for the state, but not a total flop. I'm sure that won't make them happy either. However it may show there true colors, again. It would stop their crying about guides over crowding them, and we won't have to put up with their un-ethical behavior in the field on the odd years. Oh but maybe a few of us guides will get out and hunt as residents for sheep too. Let's think outside the box, and maybe they would except an invite to sit at the table, before they bring their bias proposals to the board next time. I suggest we can still hunt together as I hunt alongside resident hunters every year and have for 42 years in our area.

Sincerely,

Steven H. Perrins

Master Guide #123

The Perrins' Rainy Pass Lodge LLC



Submitted By
Jon Marc Petersen
Submitted On
2/18/2020 2:37:28 PM
Affiliation

Phone
907-715-8467
Email
jmp@denalilaw.com
Address
360 North Main Street
Wasilla, Alaska 99654

Regarding Proposal 112, and 5AAC 85.045

I have hunted this area since 2015. I have not harvested a moose on every hunt and have reported the moose I have taken. I would say that most of the hunters I hunt with and have come to know who hunt this area are also reporting the game they harvest. What is the evidence that there is an under-reporting of harvested moose? No supporting data or evidence is mentioned to substantiate this assertion that hunters are not reporting. The proposal for a registration hunt would seem an extreme reaction to a problem that should have empirical evidence to back it up.

Farewell is a remote hunt and requires a great deal of logistical coordination and financial resources, frequently commencing right after one hunt's conclusion. There are freight and passenger flights that are booked and scheduled a year in advance. Being a remote hunt provides a unique opportunity to unplug and get away to rejuvenate and recharge. As an attorney, this time is treasured and valued. This hunt has been meaningful not only from a meat harvesting stance (I have six children, so moose in the freezer is very important) but also as enrichment for my personal and business life. Those who routinely hunt this area have become close friends who I see once a year in Farewell, and this is a unique opportunity that I don't want to lose.

Making this a registration hunt seems to be a reach given the information provided to the board, and I would request the board make decisions based on facts and not speculation regarding underreporting of harvest. The Troopers have a very active presence and visited our camp, which is 13 miles from the airstrip, so they are actively patrolling and monitoring the hunters and game in this unit going into and out of the strip. A registration hunt is not warranted for this region.

Jon-Marc Petersen



Submitted By

William Pettett

Submitted On

2/13/2020 12:20:05 PM

Affiliation

Phone

3035706017

Email

bill_pettett@hotmail.com

Address

PO Box 965

Kremmling, Colorado 80459

Proposal 50 - SUPPORT

Proposal 53 - SUPPORT

Proposal 49 - DO NOT SUPPORT



Submitted By
James Pfitzer
Submitted On
2/21/2020 12:08:06 PM
Affiliation

Phone
4239870003
Email
jim@jimpfitzer.com
Address
7303 N. Douglas Highway
Juneau, Alaska 99801

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.

As a professional guide and wildlife photographer in Alaska, I recognize the world class wildlife viewing opportunities found in Denali National Park. Those opportunities are a big part of why well over a half million people visit to the park every year, and why countless more visit the surrounding area. And, of course, there is hardly a more desired wildlife encounter than a chance to see—and for many, to photograph—a wild wolf.

Unfortunately, wolves that roam Denali are not bound by park boundaries and are therefore vulnerable to management practices outside the park proper. So, in order to have a healthy and sustainable wolf population in the park, there must be some protections around the park as well.

But beyond the important tourism dollars that come from people visiting Denali in hopes of seeing a wolf, it is important to look at the intrinsic value of wolves in the ecosystem. In his famous essay *Thinking Like a Mountain*, Aldo Leopold very eloquently spelled out what a landscape that has been robbed of its wolves looks like. He wrote:

"I have lived to see state after state extirpate its wolves. I have watched the face of many a newly wolfless mountain, and seen the south-facing slopes wrinkle with a maze of new deer trails. I have seen every edible bush and seedling browsed, first to anaemic desuetude, and then to death. I have seen every edible tree defoliated to the height of a saddlehorn..."

Leopold went on to say, "I now suspect that just as the deer herd lives in mortal fear of its wolves, so does a mountain live in mortal fear of its deer. And perhaps with better cause, for while a buck pulled down by wolves can be replaced in two or three years, a range pulled down by too many deer may fail of replacement in as many decades."

To put it bluntly, where wolves have evolved to roam, the health of the land is dependent upon their presence, and no place is more emblematic of wolf country than Denali National Park.

If the economic impact and the health of the land are not enough, consider a few more of Leopold's lines in the opening of *Thinking Like a Mountain*:

"A deep chesty bawl echoes from rimrock to rimrock, rolls down the mountain, and fades into the far blackness of the night. It is an outburst of wild, defiant sorrow, and of contempt for all the adversities of the world. Every living thing (and perhaps many a dead one as well) pays heed to that call... Those unable to decipher the meaning know nevertheless that it is there, for it is felt in all wolf country, and distinguishes that country from all other land. It tingles in the spine of all who hear wolves by night, or who scan their tracks by day."

As Leopold suggests, simply knowing one is in wolf country is to experience a little bit of wild magic, and for most park visitors who don't actually lay eyes on a wolf, that knowledge is worth the trip. That knowledge is reason enough to be there, and in order for them to have that knowledge, in order to ensure Denali remains wolf country, we must do what we can to protect the wolves in this important corridor outside the park boundary.

So, for economic reasons, for the health of the land, and quite simply to keep Denali the wild and magical place it is, please take the responsible path and adopt Closure 1, which would protect the larger area in the corridor.

Thank you for the opportunity to weigh in on this important issue.

Sincerely,

James M Pfitzer



Submitted By
Shannon Polson
Submitted On
2/21/2020 12:37:05 PM
Affiliation
resident

Dear Alaska Board of Game, I am writing to support Proposal 152, which would implement a seasonal closure on hunting and trapping of wolves within the Stampede Corridor of the Denali Borough. My family owns a cabin just outside of the park. We are grateful for the time we have in true wild places, and the highlight of all of our trips has been the opportunity to observe wildlife such as wolves in the wild, interacting in a place where nature, not humans, dominate the landscape. These opportunities exist in Denali National Park, but are vulnerable to conflicting wildlife management practices outside park boundaries. Tourism is critical to our community's and state's economy. Let us 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.



Submitted By
Richard A. Price
Submitted On
2/9/2020 11:16:50 AM
Affiliation

PROPOSAL 120 – 5AAC 85.045:

Shorten the season for the any-Bull Moose drawing permit hunt in Unit 20A.

WHAT WOULD THE PROPOSAL DO? Change/shorten the hunting season length in **Unit 20A**, for the any-Bull Moose drawing permit hunting season **from Sept. 1 – Sept. 25 (current regulations), To Sept.1 – Sept. 10 (new proposal).**

COMMENTS (Richard A. Price) : I – **OPPOSE** the requested modification to the existing closure dates for the any-Bull Moose drawing permit season in **Unit 20A** from **Sept. 1 – Sept. 25 To Sept. 1 – Sept 10.**

The Alaska Department of Fish and Game (the Department) instituted the any-Bull Moose permit hunts in Unit 20A in 2006. Presently the Department has established that the **management objective** for a **healthy bull: cow ratio** is **30 bulls per 100 cows**. When Department **surveys** indicate, that the **bull: cow ratios** in Unit 20A are presently **at or above their objectives**, they issue any bull permits to take the additional harvestable portion of the bulls.

Subsequently, there is **NO BIOLOGICAL BASIS** for modifying the current opening and closure dates of the any-Bull Moose drawing permit hunt in Unit 20A. The **Department** has established that the **bull: cow ratios meet their present management objectives** under the existing harvest strategy.



Submitted By
Richard A. Price
Submitted On
2/9/2020 11:22:11 AM
Affiliation

PROPOSAL 129 5 AAC 92.540(3)(H)(ii):

Change the closure dates for the Yanert River Controlled Use Area (CUA) in Unit 20A to **align** with the Wood River CUA.

Clarify whether horse feed is considered "**hunting gear**".

WHAT WOULD THE PROPOSAL DO? Change/designate specific motorized closure dates in the Yanert River CUA, from **year-round** to **2 months**.

In addition, clarify whether horse feed is considered "**hunting gear**." Currently, there is **NO** available information explicitly identifying whether horse feed is considered "**hunting gear**."

WHAT WOULD BE THE EFFECT IF THE PROPOSAL WERE ADOPTED?

The closure dates for the Yanert River CUA in Unit 20A would **align** with the Wood River CUA **allowing motorized vehicles access during October through July**. As a result, allowing motorized usage throughout this period would permit hauling big game hunting gear to camps prior to August and hauling gear out of camps after September.

Horse feed would be recognized/documented as **hunting gear**, or recognized/documented as **not hunting gear**.

COMMENTS (Richard A. Price): – I **SUPPORT** the alignment of Yanert River CUA with the Wood River CUA, designating specific closure dates for hunting with motorized vehicles, from **Aug. 1 – Sept. 30**.

The Alaska Department of Fish and Game (the Department) established by regulation a winter caribou hunt in the Yanert River drainage; possibly sometime around statehood.

Ultimately, the **last winter caribou hunt** allowed in the Yanert River CUA was during the **1982-1983 seasons**; (from Dec. 1-March 31).

- During the early 1980s, the Department recognized that a small group of caribou in the Yanert River drainage, the Yanert caribou herd, eventually mixed with the Delta caribou herd, and after 1986, the Yanert caribou herd melded with and adopted the movement patterns of the larger Delta herd (Valkenburg et al. 1988).

With that said, as the winter caribou movement patterns in the Yanert River drainage changed; the Department management objectives changed leading to the cancellation of the winter caribou hunt in the Yanert River CUA.

Subsequently, there is **NO biological basis** for not implementing a closure date of Aug. 1 – Sept. 30 for motorized vehicle usage in the Yanert River drainage and allow motorized vehicles access during October through July as is allowed in the Wood River CUA.

Please note, the proposed change is not likely to notably alter current harvest levels as the August and September access restrictions for hunter for motorized access would still be in place.

Also, I **SUPPORT** the clarification on a statewide basis of identifying whether horse feed is considered **hunting gear** as this would clearly define for **Alaska hunters** and **State of Alaska (SOA) Peace Officers** what is considered **hunting gear**.

Presently, a great deal of confusion exist; some SOA Peace Officers interpret that horse feed be defined as hunting gear, and yet other SOA Peace Officers contend that horse feed should not be defined as hunting gear (horse feed **is not** defined as such in the Departments Hunting Regulation Booklet).



Submitted By

Mark Reinhardt

Submitted On

2/20/2020 1:25:56 PM

Affiliation

No to Proposal # 49



unapologetically FOR ALASKAN RESIDENTS

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**Comments to Alaska Board of Game
Region III Interior/Northeast Arctic
March 6 – 14, 2020**

Proposals we support: 47, 48, 51, 52, 54, 62, 65, 79, 80, 82, 129, 134, 145, 146

Proposals we oppose: 77, 78, 81, 87, 90, 152

**Proposal 47 - 5AAC 85.025 Hunting seasons and bag limits for caribou
5AAC 85.045 Hunting seasons and bag limits for moose**

Nonresident hunting shall not be allowed in Region III (Interior/Northeast Arctic) for any moose or caribou population under a current active Intensive Management (IM) Predation Control Program designed to help feed Alaskans until the minimum IM population or harvest objective for that population has been reached.

SUPPORT

This is a RHAK proposal we believe is consistent with the intent of Intensive Management (IM) Law and consistent with the board's past opinions.

Case in point: the board passed a proposal to allow limited nonresident hunting of the Nelchina caribou herd, which is an IM listed caribou population thousands of Alaskans depend upon for food, stating that nonresident hunting will only be allowed when the herd is within IM objectives. Every moose and caribou herd in the state listed as an IM population with specific objectives should fall under this same guideline, regardless if there is an Active IM predation control program in place.

According to our Intensive Management law, the highest and best use of certain prey populations is for human consumption by Alaskans, and Alaskans are given a priority to these populations. When those populations are under the population or IM objective, no nonresident hunting should be allowed.

Proposal 51 – 5AAC 85.055 Hunting seasons and bag limits for sheep

Remove the bag limit restriction of one sheep every four years for nonresidents over the age of 60

SUPPORT as AMENDED – no age class restriction



This one-every-four-year restriction on nonresident sheep hunters was the result of proposal #30 from the Alaska Professional Hunters Association (APHA) that the board passed at the 2016 Statewide meeting.

The intent of the proposal was to *"save some sheep each year, thus this helps to conserve our resource."*

RHAK continues to ask the Board to limit all nonresident sheep hunters to draw only permits with a limited allocation in certain areas. Certainly, that would "save some sheep every year." This one-every-four year restriction does nothing overall in that regard and hurts 2DK nonresidents who want to hunt with a relative as their guide more so than the typical guided hunter.

The Department reported that only 4.5 percent of nonresident sheep hunters return to hunt again within a 4-year period, and because the demand to hunt Dall sheep was high among nonresident hunters overall it would likely have zero effect on sheep conservation.

The Department also stated, as they do now, that they have no conservation concerns for Dall sheep; the full-curl management strategy is sustainable.

It should be noted that RHAK **opposed** proposal 30 based on the same opinion of the Department in their presentation to the board, and because we felt it was a backhanded attempt to go after second-degree-of-kindred (2DK) nonresident hunters who come to Alaska to hunt with a resident relative acting as their guide.

Ironically, after Proposal 30 passed, the Wild Sheep Foundation accused RHAK of proposing it, and negatively affecting the 93 percent of their members that did not live in Alaska. Somehow the organization that advocates for a resident hunting priority got falsely smeared for something the guide industry pressed for. Even more ironic considering that the Wild Sheep Foundation has donated hundreds of thousands of dollars to APHA and partners with them on many issues.

Some guides have repeat clients, which is a good thing. Some resident Alaskans may want to hunt sheep with their nonresident brother every year while they are able, also a good thing whenever the opportunity (draw or general hunt) is available and the Department has no conservation concerns.

We do not support the age-class restriction in this proposal; it is not necessary. We support as amended to remove the age class restriction.

Proposal 52 – 5AAC 85.055 Hunting seasons and bag limits for sheep

Put all nonresidents on draw permits for Units 20 Remainder and 19C, with a limited allocation of up to 50 permits for each subunit



This is a RHAK proposal asking to limit nonresident sheep hunters in Subunits 20A Remainder and 19C.

We urge and remind board members and the public to read through our proposal and recognize that the problems Chairman Spraker outlined back in 2013 in his testimony to the legislature are ongoing today, seven years later. Chairman Spraker and the Board of Game have long recognized the problems of unlimited nonresident guided sheep hunting opportunity, but have been reluctant to use their authority to place limits on that user group, blaming the problem on “too many guides,” rather than too many nonresident sheep hunters who are required to hire a guide being given unlimited sheep hunting opportunity.

Yes, even guides agree there are too many guides but that’s the purview of their professional licensing board to deal with; it’s the Board of Game’s job and duty to protect and conserve our wildlife populations, but also to deal with conflicts afield, competition between nonresident guided hunters and resident hunters, and opportunities for residents to be successful. The way the board deals with those issues revolves around allocation.

The bottom line: the Board of Game for over a decade has stated that we have problems afield in certain areas during sheep season related to nonresident sheep hunter numbers. One of those areas is 20A Remainder we include in our proposal. The problems remain, and while they may not at this time be related to conservation concerns, they are real and greatly impact resident and nonresident hunter alike and it’s time to correct them via limits on nonresident sheep hunters.

Proposal 62 – 5AAC 92.069 Special provisions for moose drawing hunts

**Change the 50 percent allocation of permits to nonresidents to 10 percent.
Allocate any nonresident permits not applied for to the resident pool.**

SUPPORT

This is a RHAK proposal and we’ve extensively outlined the rationale for it within the proposal.

In 2008 the Board of Game passed Proposal #55 from a guide with exclusive guiding rights within the Nowitna National Wildlife Refuge, to change the allocation format of an already existing moose draw hunt with 20 available permits. Prior to that, the draw hunt was open to both residents and nonresidents to equally apply for and receive one of the 20 permits. The guide complained that too many residents were putting in for and winning that permit, many didn’t show up for the hunt, and he was losing business as a guide who catered to mostly nonresident hunters.

The Board voted to allocate half of the 20 permits to nonresidents.



But that didn't necessarily help the guide because moose are not a required must-be-guided species. So the guide had also argued to make moose a must-be-guide species for nonresidents for that individual draw hunt.

(Please note: RHAK opposes the creation of any new must-be-guided species hunts for any species not listed in AS 16.05.407/408. It is outside the Board's authority and is only used to benefit guides.)

The Board voted that 10 of the available draw permits would be awarded to nonresidents and out of those 10 permits, 7 would be awarded to those who must contract with a licensed guide. That licensed guide, of course, was the guide who had submitted the proposal.

So we have what is essentially a subsidy to an individual guide at the expense of resident hunting opportunity. A guarantee that in this coveted area with "trophy" moose he will have 7 clients willing to pay his fee of \$17,000 per hunt.

If that weren't bad enough, it turns out that for this hunt, for the 7 nonresident must-be-guided permits, the nonresidents wanting to put in for that hunt don't have to actually apply for a permit during the application period. Since this hunt is within a federal Refuge where the guide has exclusive guiding rights, any must-be-guided permits are essentially awarded to the guide. It's up to the guide who gets to hunt.

In 2017 there were zero applicants during the Nov/Dec application period for the 7 DM 811 nonresident must-be-guided permits. We originally requested within our proposal to allocate any permits not applied for during the application permit period, be transferred back to the resident pool. But come to find out from the Department all of those 7 unapplied-for permits in 2017 were actually hunted in 2018 via an over-the-counter tag and signed guide-client agreement. During the 2018 application period 3 DM 811 permits were applied for and the other 4 "were picked up by hunters."

How can it be that residents are absolutely required to go through the lottery permit process, yet nonresident guided hunters are allowed to bypass it completely? Think of what could be going on under this type of scenario where guides have exclusive guiding rights on Refuge lands and the permits are actually allocated to them. Guides pick and choose their clients rather than all nonresidents having the opportunity to equally draw. Rates go up as preference is given.

There is no better example of Board of Game malfeasance than the original passage of proposal 55 in 2008 to allocate **50 percent of the moose draw permits to nonresidents** to benefit a particular guide at the expense of resident hunters, and the Board's continued refusal to change the allocation back to where it clearly favors residents.

Proposal 80 – 5AAC 85.025 Hunting seasons and bag limits for caribou



Extend the resident season and increase bag limits for residents only in Unit 26B Remainder

SUPPORT AS AMENDED – Remove the quota and registration requirement restrictions on nonresident hunters; leave nonresident season and bag limit the same

This is a RHAK proposal. Since its submission last May, the Department has done survey and inventory flights and new data is available that show the herd may be nearing 30,000 animals, which is within the population objective of 28,000 – 32,000 animals, and that allowable harvest is not being met.

We have amended our proposal so that there be no changes to nonresident opportunity. But we certainly do not support increasing nonresident opportunity at this time.

When the Board in 2017 placed new restrictions on resident and nonresident caribou hunters of the Central Arctic Herd (CAH), the restrictions to residents were too severe. 25% of resident harvest opportunity was lost when the Board placed a 2-caribou bag limit on residents. Removing cow harvests and shortening the season ended up being another near-25 percent of the harvest opportunity residents had enjoyed in the past.

Since the new restrictions in 2017, resident hunter numbers have dropped because these restrictions made it less economical to hunt and herd migration patterns have changed. Nonresidents now take half the harvest annually, yet there is now an allowable harvest that isn't being met. The ANS is also not being met.

Let's increase resident opportunity back to near the way it was and see if residents can take up that allowable harvest. Leave nonresident opportunity the same.

Proposal 81 – 5AAC 85.025 Hunting seasons and bag limits for caribou

Increase nonresident bag limit for caribou in Unit 26

OPPOSE

In 2017 the Board of Game drastically reduced seasons and bag limits for the Central Arctic herd (which is an identified Intensive Management population) for both residents and nonresidents, due to a sudden decline in the herd from ~50,000 animals to ~22,000 animals, putting it well below the IM population objective of 28,000 – 32,000 animals.

The action the board took was based on Department analysis that there was now a harvestable surplus of 680 caribou and projections that the reduced seasons and bag limits needed to sustain and regrow the herd would result in nonresident hunters taking 43 percent of the harvest, and resident hunters taking 57 percent of the harvest.

Right there and then, the board was not adhering to the guidelines, much less the intent, of our Intensive Management law (AS 16.05.255(f)) that states:



"The Board of Game may not significantly reduce the taking of an identified big game prey population by adopting regulations relating to restrictions on harvest or access to the population, by customary adjustments in seasons, bag limits, open and closed areas, methods and means, or by other customary means authorized under (a) of this section, unless the board has adopted regulations, or has scheduled for adoption at the next regularly scheduled meeting of the board regulations, that provide for intensive management to increase the take of the population for human harvest consistent with (e) of this section."

The board did not adopt regulations that would provide for Intensive Management and neither did the board schedule for adoption at the next meeting regulations that would provide for Intensive Management of the Central Arctic herd.

What is unconscionable here is that with the sudden decline of the CAH below the IM population objective the board would even consider severely restricting resident hunters who depend on this herd to feed their families and at the same time allocate nearly half the harvest to nonresident hunters. As it turned out, the first year (2017) under the new restrictions to seasons and bag limits, nonresident hunters took 52 percent of the harvest of the CAH and the year after (2018) nonresidents took 46 percent of the harvest.

Total hunter numbers, especially resident hunter numbers, have declined after the imposition of these new restrictions, and for the past three years the total harvest in Unit 26B has only been about half of the 680 animals the Department has determined is the harvestable surplus.

Being as the harvestable surplus is not being met, the author of Proposal 27 seeks to double the nonresident bag limit from one to two bulls, keeping the season the same, based it seems on an economic argument that this would help his air-taxi business and bring in more revenues to the Division of Wildlife Conservation.

Allocating more caribou to nonresident hunters under these conditions is the exact opposite of what the board should do.

The Central Arctic herd, again, is a designated IM population and under 5AAC 99.025 has a positive Customary and Traditional use finding and an Amount Necessary for Subsistence (ANS) for all of Unit 26B of 250-400 animals. We are currently ***not meeting*** ANS requirements.

The federal subsistence Regional Advisor Councils (RAC) have also been concerned about the decline of the Central Arctic herd and for the past two cycles the North Slope RAC has submitted Wildlife Special Action requests to the Federal Subsistence Board (FSB) to ban the hunting of the CAH by non-federally qualified subsistence users on federal lands. Much of the hunting of the CAH by non-federally qualified subsistence users has traditionally been in the Arctic National Wildlife Refuge.

RHAK has testified at the FSB meetings in opposition to these closure requests and each time the vote was tied, meaning the requests did not pass. If the board chooses to allocate more harvest to nonresidents we expect these Wildlife Special Action requests to continue.



The real reason for the decline in resident hunters and resident harvest is because opportunity has been severely curtailed, especially with the complete elimination of cow harvests and a later season start date. The reduction from 5 caribou to 2 bulls also took away 25 percent of resident harvest opportunity according to F&G data. On top of that, the herd has not been following what in the past was considered their "normal" migration pattern along the haul road. They are more spread out, often to the northwest.

As we all know, you can't predict what caribou will do, and perhaps the CAH will return to its "normal" migration route and become more accessible off the haul road.

**Proposal 82 – 5AAC 85.055 Hunting seasons and bag limits for Dall sheep
5AAC 92.530 (X) Management Areas**

Establish the Arctic Village Sheep Management Area and open a new resident and nonresident drawing hunt for sheep

SUPPORT AS AMENDED

We have long supported opening up this area again to sheep hunting. If the Board passes this proposal we request that no more than 10 percent of the permits go to nonresidents.

Proposal 129 - 5AAC 92.540(3)(H)(ii) Controlled Use Areas

Change the closure dates for the Yanert Controlled Use Area (CUA) and clarify whether horse feed is considered "hunting gear"

SUPPORT

This is a RHAK proposal stemming from a member request. The Board should review the original reasons for not applying a certain timeframe to the Yanert CUA closure period, as they do with other CUAs, particularly the Wood River CUA. We believe there is no longer a reason for a year-round closure to all motorized land vehicles.

Beyond that, with the closure in place year round, those with moose camps in the Yanert CUA who use horses to hunt have been told by wildlife troopers that they can't even haul in hay via snowmachine in winter to feed horses because hay falls under "hunting gear" according to the regulation. We ask the Board to clarify whether hay is actually "hunting gear."

Proposal 146 – 5AAC 85.025 Hunting seasons and bag limits for caribou

Allocate up to 10 percent of DC 827 permits to nonresidents

It came to our attention that the number of permit applications for the DC 827 caribou hunt has dramatically increased since the Board changed the regs to allow for 6 applications per person. Hunt bookers are flooding the system with nonresident applicants to where



nonresident applications are four times that of resident applications, giving residents much less a chance of drawing.

Something should be done so that residents have a draw permit preference to hunt this herd.

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

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



Submitted By
Janet Rhodes
Submitted On
2/18/2020 9:28:38 PM
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 **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.**



Submitted By
Tyler Riberio
Submitted On
2/20/2020 9:31:10 AM
Affiliation

Proposal 49: Strongly Oppose

This proposal will have a negative impact on bowhunting opportunity in the Interior and Eastern Arctic region, and ultimately the entire state. The State of Alaska already allows individuals with disabilities to apply for "Methods and Means Exemptions" to use crossbows during archery seasons. This proposal is simply a way to circumvent that process.

Further, an elderly individual is able to draw a 50-pound compound bow to full draw. Once at full draw, most modern compound bows employ at least 80% let-off. This equates to the individual holding approximately 10 pounds of draw weight. This is well within the ability of most seniors. If it isn't, these individuals have the ability to apply for the Methods and Means Exemptions described above.

The State already has a plethora of any-weapon hunts available for crossbow use. This proposal is meant to incrementally free the use of crossbows in archery only hunts across the State. This will negatively impact the opportunity of true archers to harvest animals, and I recommend that you disapprove this proposal.

Proposal 50: Strongly Support

This proposal is in the best interest of the State. Bowhunting in Alaska has shown relatively low harvest success. This fact, coupled with the employment of already existing antler restrictions, will result in a *de minimis* impact on moose populations in the region. It will, however, provide increased revenue to the state and local business through increased hunter participation. This proposal will particularly increase non-resident interest in Alaska. I recommend that you approve this proposal.

Proposal 53: Strongly Support

This proposal will increase hunter interest in Alaska sheep hunting, thereby increasing revenue for the State and local outfitters. The proposal will have little impact on wildlife due to the low success of archery hunting, particularly on sheep. This proposal, in conjunction with Proposal 50, will increase Alaska's competitive edge on other states for non-resident hunter interest and revenue, and I recommend that you approve this proposal.



Submitted By
Kristopher Richard
Submitted On
2/21/2020 6:55:29 PM
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I oppose prop 56. To ban trapping in such a manner would detrimental to my self and many other folks in my community. It would hinder trappers from helping others with wildlife related issues, such as and not limited to beaver damage to private property, roads, and driveways, also coyote and lynx breaking into chicken coops. These are just two examples of how myself and other trappers help folks in my community. Resolving these issues has helped everyone involved understand the importance of trapping, and having people around with the skills and knowledge to have a positive outcome.

Thank for your time. Kristopher Richard, Kasilof AK



Submitted By
Micahel Ritter Jr.
Submitted On
2/18/2020 12:01:46 PM
Affiliation

Phone
574-229-6545
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customcreationsstudio@yahoo.com
Address
66615 Walnut Road
Walkerton , Indiana 46574

As an avid archery hunter that has been blessed to visit your state on a number of hunts I want to thank you for your great stewardship. It is evident that past decisions have had the wildlife and it's conservation as the forefront. I acknowledge each of you have greater knowledge in that area than myself and will continue to respect your decisions going forward as they have been fruitful thus far. Thank you for considering my input on some issues you are soon to be making decisions on that, hopefully, will continue the legacy before you of stewardship and wise managment.

As a bowhunter, Proposal 49 concerns me. I am an aging bowhunter and I certainly will want to continue to hunt when I am no longer able to do so strictly with a bow so this is not a slight towards other weapons as I belive all weapons are excellent ways to manage wildlife and safely enjoy this creation. Alaska, however already has numerous areas and the VAST majority of tags going towards the use of any weapon including crossbows. My understanding is we are really only talking about 14 tags set aside for archery only AND my understanding is if someone is disabled in such a way they are not able to use a bow they can already apply for an exemption and use a crossbow in lieu of a regular bow. Therefore there really is no reason to add or change this. Doing so will open the door for future hunters that are fully able to hunt with a bow but not willing to put in the practice time to be proficient to flood archery seasons and have a larger impact on wildlife while also reducing the solitude and opportunities for genuine archers. The kill rate of a crossbow is greater than that of standard archery. This will mean an eventual reduction in tags or a drop in quality and quantity of game further reducing the opportunities for all hunters. I understand the temptation to allow this may come from the increased revenue from license sales and hunts to the state. That, however would be short term as the impacts it has on wildlife and the experience lessen.

Proposal 50 on the other hand is one that will bring in, a slight amount more, license sales and booked hunts in the state. Doing so while having a relatively minimum impact, if any, on wildlife and the quality of the hunt. It will occur when temps are cooler does allow for more people to spend more time in the field, which equates to more time in your state spending more money. Most bowhunters including myself are perfectly ok with the same restricitions given during the general seasons even though it would be a harder hunt for a few reasons including having to get closer for an ethical kill and hunting animals that may have already been "educated" during the general season.

Proposal 53 is also a terrific proposal and the same general season restrictions should still apply. Again this provides the same increase in opportunity for hunters with more income to the state and little if any impact on the wildlife. I don't see any downside to these last 2 proposals. In addition, as mentioned in my comments about Proposal 49, if someone is truly disabled they too cuold, if they apply and are granted permission, hunt with a crossbow during these seasons.

I want to close as I opened, by thanking you for reading this and for your excellent past managment. I have been blessed to see and experience the fruits of that stewardship and trust you will continue in that wonderful example.

Respectfully submitted,

Michael L. Ritter Jr.



Submitted By
Doug Robbins
Submitted On
2/18/2020 10:47:36 PM
Affiliation
None

I am submitting a comment in support of Proposal 152 for seasonal closure of units 502, 605 and 607 bounding Denali National Park to wolf hunting and trapping. Seasonal closure of these units will protect wolves during the breeding season, promoting a healthy population of wolves within and outside the National Park.

Hunting and trapping of wolves near the park significantly impacts wolf populations within the park. Little economic value is realized from the hunting. On the other hand, nearly a half-million people visit the park every year with the goal of seeing Alaskan wildlife, and wolves in particular. The economic value of park visitors vastly outweighs the value of dead wolves to a few hunters & trappers.

Alaska's constitution requires the state to manage natural resources for the maximum benefit of Alaskans. Wildlife resources are included in resources that should be managed for maximum benefit of all Alaskans, not a handful of hunters & trappers. Maintaining wolf populations in their natural state is the best way to provide that benefit, through the jobs and revenue of Alaska's tourism industry.



Submitted By
Hope Roberts
Submitted On
2/6/2020 6:59:45 PM
Affiliation

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9073225439

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Address
P.O. Box 3461
Valdez, Alaska 99686

Proposal 143- I support that the ceremonial hunts should be prioritized over any other permitted hunting, by law. Proposal 142- I support that the permit hunt be eliminated. To help sustain the harvest for future generations. Proposal 141- I support the local residents concern for this proposal.



Submitted By
Ron Roper
Submitted On
2/21/2020 9:32:48 PM
Affiliation
n/a

Dear Board Members, Please do not approve Proposal 56 seeking to ban trapping within 1 mile of a house, cabin, dwelling, or mailbox. Approval of this proposal as written would trample on private property owners' rights by prohibiting them from trapping on their own property. This would preclude anyone from using traps or snares to prevent or end depredations on pets or livestock, or from simply exercising their rightful choice to legally trap on their own property. Thank you for considering my opinion.



Submitted By
David K Rush
Submitted On
2/18/2020 7:09:28 AM
Affiliation
Hunter

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907-355-1770

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ak_fishin@yahoo.com

Address
13333 S old Knik Harbor Drive
Wasilla , Alaska 99623

Dear Board Members,

Regarding Proposal 112, and 5AAC 85.045. Hunting seasons and bag limits for Moose in Unit 19C. I Oppose this Proposal. This area is very remote and cost my Hunting partners and I thousands of dollars to access this area I can't imagine that anyone paying that kind of money to access this area would be unethical and not report it on there harvest report as this is a very special place to hunt. Currently there are about 10 groups of hunters (50 to 60 people) that hunt this area and due to the logistics to access this area we all know each other and work well together on sharing freight, and passenger flights to the area. We also hold each other accountable for cleaning up waste, maintaining the Farewell Airstrip and making sure everyone reports any unethical behaviors, within those groups are current and retired State Troopers, Anchorage APD Officers, Oilfield workers, Business owners, etc. Some of these folks are serious hunters, while for others it's just a chance to get away from the hustle and bussell of everyday life and really don't care if they harvest an animal or not. the Alaska State wildlife Troopers in this area do a good job of patrolling the area and are always checking the camps and hunters for license, tags to insure everyone is reporting properly. To me and my group of hunting partners we feel proposal 112 is just an Assumption on someone's behalf and has no merit.

Kind Regards David K Rush



Submitted By

Nick Rusnak

Submitted On

2/19/2020 7:50:34 PM

Affiliation

Phone

808-579-6058

Email

cissyfuss@hotmail.com

Address

PO Box 462

Talkeetna, Alaska 99676

I support Prop 152, please give the wolves a buffer.



Submitted By
william schaffer
Submitted On
2/20/2020 7:15:27 AM
Affiliation
AK resident

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585-671-2323

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Address
PO box 1749
Homer, Alaska 99603

I strongly support Proposal 152 to ensure protections of and for Denali's wolves. It's limitations on hunting and trapping of wolves near the park boundaries are minimal in comparison to the benefits for sustaining the wolf populations within the parks boundaries! This would sustain wolf viewing and support educational opportunities for the visitors to the park as well as maintaining a balanced eco system!



Submitted By

Laurie Schlueb

Submitted On

2/21/2020 4:31:19 AM

Affiliation

My livelihood depends on tourism dollars. One of the primary reasons tourists visit Denali is to see wolves. It's one of the last places in the world. One of two that are easily accessible. I support Proposal 152. Please protect this sustainable sector of our economy- tourism- by supporting Proposal 152, as well.



Submitted By
Scott Schueller
Submitted On
2/19/2020 6:01:15 PM
Affiliation

Phone
906-455-6923
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Address
PO Box 83798
Fairbanks, Alaska 99708

Scott Schueller Fairbanks, AK Proposal 147 & 148 I would also like to see the brown/grizzly bear hunting season extended to June 30. I agree with both proposals, #147 and #148, and really would like to see a longer brown bear season in the spring. My friends and I have hunted in the same bait stations in 20B for maybe 25 years now and there used to be a lot of black bears. They are all gone now because of all the brown bears moving in. I have all kinds of game cam pictures of brown boars and sows and big cubs and don't see any blackies anymore. There are way too many grizz and they always seem to show up in May. I'm getting sorta tired of feeding them without being able to hunt them.



Submitted By
Christopher Seaman
Submitted On
2/14/2020 11:51:39 AM
Affiliation

I am writing in support of proposal #52 to change nonresident sheep hunting in units 19c and 20a to draw permit only. I am a life long AK resident and hunter. I have hunted unit 19c for sheep the last several years and everywhere you go in the unit there is way too much sheep hunting pressure. Every year I have hunted I have run into several groups of hunters, most of them guided groups and many of them non-residents. Most residents don't have the resources to fly all over the mountains all summer and fall looking for sheep. They do their research from home the best they can, pick a spot and get dropped off to hunt for a week. After waiting to the next day to start hunting they strike out only to find that there are guided hunters in every valley and half of the ridge tops. They don't that the ability to move and end up spending the whole week trying to fine groups of rams that don't have hunters on them. I've run into 3 groups of hunters in a single day before. I have a friend who was hunting with his young son, they spent several days locating a legal ram then waited several hours for the ram to move into a location for a safe shot. His son took a shot at the ram, missed the first shot and was reloading to take another shot when a guided hunter shot the ram from out underneath them. This is completely unacceptable, unsafe and very unprofessional behavior. Requiring non-residents to have a draw tag would also eliminate the ridiculous practice of non-resident guides "guiding" their non-resident guide buddies to a sheep. This practice is just cheating the system and should not be allowed! The bottom line is that 19c is too crowded and at times unsafe. Requiring non-residents to have a draw tag will lower pressure and make 19c huntable again.

Thank you for your time,

Chris Seaman



Submitted By

Alan Seegert

Submitted On

2/20/2020 12:19:49 AM

Affiliation

Hey. Just wanted to support Proposal 152. Last summer was the first year I saw no wolves in Denali. I have been driving there since 1978. I think the available data suggest that ending the taking of wolves from Feb on is likely to benefit the wolves most visible along the road corridor. I'd rather see the Stampede closed to wolf hunting and trapping, as it was in the past, but 152 is a lot better than nothing. Peace out, Alan Seegert



Submitted By
John Shaubach
Submitted On
2/21/2020 10:22:45 AM
Affiliation

In reference to Proposal #56.

This proposal does nothing to reduce user conflict.

This propoasal takes away from law abiding trappers and property owners.

This propasal is nothing more then a feel good proposal for those that do not abide by the law and allow their pets to roam free destroying and harassing our states resources.



Submitted By
Bill Sherwonit
Submitted On
2/20/2020 1:02:21 PM
Affiliation
self

PROPOSAL 152, Closure Option 1

I am writing in SUPPORT of PROPOSAL 152, Closure Option 1, which proposes partial hunting and trapping closures on state lands just outside Denali National Park, in an area that once was part of a protective "buffer" area set aside by the Alaska Board of Game (BOG) to protect wolves that venture outside the national park in pursuit of prey.

While I would prefer a full protective buffer, I understand the chances of that happening right now are minimal. I'm among those who believe that a partial closure as proposed will at least protect wolves during their breeding and post-breeding season, a crucial time of year.

I'm among the Alaskans who believe that the BOG should honor its mandate to manage wildlife for ALL Alaskans. And many of us believe that this proposal is a reasonable request to protect wolves that leave the national park in winter during their search for food, and it will protect them during the critical time (from February until summer) when the wolves are breeding, forming family groups, and establishing territories, and the loss of a breeding wolf is most harmful to a family group/pack.

As the board is well aware, its mandate is to provide for both consumptive and non-consumptive "uses" of wildlife, including wildlife viewing, photography, and the enjoyment and appreciation of living animals in their natural habitat. There's abundant evidence that over the years, many of the wolves killed by hunters and trappers on state lands adjacent to Denali National Park are also wolves that are highly valued for their presence inside the national park, and that the killing of breeding wolves on those state lands has greatly harmed the families of wolves (or packs) that spend most of their lives inside the park and which are greatly valued by park visitors, including many Alaskans.

Members of the BOG are also well aware of the issues here, so I won't repeat the many arguments in support of Proposal 152 that other Alaskans are presenting to you. I simply ask the board to take an action that is a more-than-reasonable compromise, one that would help to prevent the death of breeding wolves and disruption of families/packs in late winter and spring.

I thank you for considering my comments, and those of many other Alaskans who are asking the BOG to take a reasonable action that is long overdue and recognize the value of wolves not only to a small number of trappers and hunters, but to others who prefer to experience them alive.

Bill Sherwonit

Anchorage, Alaska



Submitted By
Jim Shine
Submitted On
2/13/2020 1:33:59 PM
Affiliation

Board of Game,

I am writing to voice my support for BOG Proposal #52, which would change the nonresident general season sheep hunts in Units 20 and 19C to draw permits only for nonresident hunters. This proposal is one that resident hunters have advocated that the BOG adopt for years, and provides resident hunters an opportunity to pursue hunting sheep during the general season without the increased pressure and competition from far too many guides in these areas.

Thank you.



Submitted By
Jonathan Shurtz
Submitted On
2/6/2020 12:30:34 PM
Affiliation

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907-371-7046

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Copperwild@gmail.com

Address
1536 Richardson highway
North Pole , Alaska 99712

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, reduction in NR Tag prices, same day airborne harvest or an extended season. I strongly oppose this proposal.



Submitted By
Dougless Skinner
Submitted On
2/21/2020 1:20:34 PM
Affiliation

Phone
4062397370
Email
dskinner1211@gmail.com
Address
1781 Whippoorwill LN
Fairbanks, Alaska 99702

This comment is in support of Proposal Number 56, to establish a minimum trapping distance. My name is Dougless Skinner, I moved to Fairbanks in 2016, and currently reside in the Goldstream Valley. Alaska is home to me and I am working on my anthropology PhD degree at the University of Alaska Fairbanks.

On Monday February 17th, I took my two dogs to the top of Murphy Dome to run in the parking lot. I often take them to Murphey Dome because I feel it is an adequate distance from town to let them run off-leash (although I recognize the leash laws still apply there). I have been hiking on Murphey Dome for the past three winters, in fact, last year I did a University project on top of the Dome and was there literally every week in February. Then in 2018, while taking a small hike along a snowmobile trail with my dog, I was told by a trapper that he had a trap-line some miles out. I heartily thanked him for the knowledge and turned around immediately. On Monday the 17th, 2020 I wanted to let my two dogs run off-leash around the lot, but I no longer take them out any distance because of what the trapper told me in 2018. The dogs quickly ran down one of the trails where people often go on walks. I walked after them and called them back. Only one of my dogs came back and he had a piece of frozen meat in his mouth. I called for my other dog, because it was unlike her not to listen, and couldn't find her. I began to panic and tried to get my puppy to show me where she was. I came across a post with a blank CD attached to it about 50 m from the parking lot down the well travel snow machine trail, I thought it was maybe a marker for snow machines or for dog mushers who often mush up there because of its reflective quality. I didn't realize until later it was marking the location to the baited wolf snare right next to the snow machine path. When I found my girl she was already foaming and bleeding from her mouth. I tried to unhook the snare, but it was so tight and my hands were already cold and frozen, so I couldn't get it off her. I even tried to cut it from her neck with my knife causing severe damage to my hands. I was unsuccessful at getting the snare off, and I held her in my lap while she wheezed foaming blood from her mouth. I felt so horrible watching her die this painful death, that I wanted to put her out of her misery and used the knife I had, and pushed it quickly into her heart. She made a horrible noise, then died quickly and in a lot of pain. I was able to unhook the snare when all the air left her and she was dead. I then carried her lifeless body back to my car. Challis (my dog) was a husky mix, so she wasn't a small dog, and I am not a super strong women, but I was able to carry her all the way back to my car because it was literally 50 m away. I relive this tragedy in every spare moment, my mind returns to trying to save my best friend and my stark inability to do so. She was my first dog and I loved her like a human, we literally did everything together. She was a good girl and voice commands worked with her. She would have come back if she hadn't have been caught. I did everything I could to save her, but in the end I had to do what I was taught from childhood, and put a dying animal out of its misery, knowing my lack of knowledge is what killed her.

I absolutely 100% respect the rights to trap. Alaska is so awesome with its freedom to subsist. The ability to learn to subsist is one of the reasons (besides for attending UAF) that I wanted to move here. In fact I have been learning to trap and have gone multiple times out with friends. I am not angry that someone had a snare out there. I knew there were snares in the area, which is why I stuck around the parking lot. I wasn't aware however that snares could be that close to a public access point--and when I repeated this story to dog-owning friends they were shocked because they also weren't aware and take their dogs to the dome regularly. In fact, one of my friends had his dog on the dome the week before.

I take responsibility for letting my dog roam in an area where there were traps. However, I was not aware that the Fairbanks Borough allowed traps to be that close to public access points. I don't think many people are, and if the snares are not clearly marked (as this one wasn't) how would anyone with no knowledge of trapping even comprehend that the snares were there. Although, I have gone trapping twice, my lack of knowledge about snares and the proximity of the snare to the parking lot, killed my best friend.

I want people to be able to trap, but I think the location where this trapper set the snare was absolutely negligent. To have a baited wolf snare next to the parking lot where people go on walks all the time is very confusing to me. There are people on top of Murphey Dome all the time! In fact tourists go up there at night, in the dark, to look at the lights, what if that snare had injured one of them. People even take their kids up there...what if something had happened to them. It was literally right next to the parking lot on a well-traveled snow machine trail.

I have been completely traumatized by the events that occurred. I cry myself to sleep every night thinking about holding Challis' (my dogs) head in my lap telling her I love her and it's going to be alright, as I pet her with my bloody, torn hands. I almost had to get stitches on two of my fingers and one cut may have damaged a nerve. I am going to seek out therapy to try and rid myself of this overwhelming guilt I feel for not being able to save my beloved baby, and feeling like all I could do for her was put her out of her misery. I absolutely do not wish this horrible, overwhelming sadness and guilt on anyone else. That's why I am supporting Proposal 56 to establish a minimum distance law for trappers. It will help stop occurrences like this from happening. These types of incidences can be very painful, and I worry about kids and other people innocently walking in the area with no clue about the trapping laws.

Thank you for your time.





Submitted By
Kenneth M Soik
Submitted On
2/20/2020 9:50:09 PM
Affiliation

Proposal 56

I am against this proposal. There are many animals that can be harvested within this area without any problems to anyone. This harvest can be used to control populations, reduce neusance animals and bring in revenue.

Thank you for taking my comment

Kenneth M Soik



Submitted By
Mike Soik
Submitted On
2/20/2020 8:29:15 PM
Affiliation

Proposal 56

Chairman Spraker,

I oppose proposal 56. This proposal would unnecessarily close large areas to trapping. As there are no exceptions in this proposal it would prevent a person from trapping destructive animals like red squirrels around a person's home or cabin. You can trap furbearers like ermine, marten, mink, muskrat, and beaver without a threat to domestic dogs and cats, because the sets are enclosed in a cubby, elevated above the ground, or under the ice. If this proposal were to pass I would anticipate that a similar proposal would appear in each region of the state during subsequent Board of Game meetings and close vast areas of the state to trapping, so I urge you to reject this proposal.

Thank you,

Mike Soik

Submitted By
Mike Soik
Submitted On
2/20/2020 9:35:12 PM
Affiliation

Proposal 152

Chairman Spraker,

I oppose proposal 152. Denali National Park & Preserve contains over 6 million acres and I don't think any additional state land should be closed to the hunting and trapping of wolves. What will happen when the "park" wolves are found to travel outside the proposed buffer area? Will the park service request an expansion to this buffer area? The most recent visitor data (<https://www.nps.gov/dena/learn/management/statistics.htm>) that I could find from the National Park Service shows an annual increase in visitors from 2012 to 2017. I don't think it is the State of Alaska's responsibility to guarantee Denali National Park visitors that they will see wolves or any other animals. I urge you to reject this proposal.

Thank you,

Mike Soik



Submitted By
Matt Sprau
Submitted On
2/21/2020 8:57:50 PM
Affiliation

In reference to Proposal #56.

My wife and I have traveled on trails throughout interior Alaska including creating and hosting the Tanana River Challenge, a multi-sport race that has a mission for encouraging shared trail use. We have shared trails with trappers and have friends that engage in this important Alaska tradition.

We understand the complexities in managing trail use for multiple users. Our own experiences, though, indicate that the current laws and regulations are written to protect the freedom of trappers without considerations given to any other trail user. For example, we were skijoring on the Fairbanks-Circle trail and encountered a conibear trap directly adjacent to a trail marker. As a historic trail, it has value to a number of users including trappers. This does not mean however, that the use of this trail should be governed by one group alone because they engage in behavior that has a high likelihood of harming other users. Even with our dogs in harness, there was a real risk that our dogs could have been easily been trapped.

We appreciate that the Alaska Trappers Association has a code of ethics to guide trapping practices. While this is an important community contribution, in no other fishing or hunting practice does such an organization provide the main source of regulation for other users engaging in that activity for the entire state. As a member of the public, I have essentially no recourse for unethical behavior other than reporting it to the organization and hoping that it will be resolved. In what way does this represent an acceptable modern land management practice?

Every year we have the same conversation. More of our friends and colleagues have dogs that are trapped with either minor or severe consequences. At what point do we continue to let the approximately 3500 registered trappers in the state dictate land-use policy for the rest of us? We support the ability for communities to develop their own land-use policies to manage these issues and revisit them at regular intervals to adjust them as necessary.



Submitted By
Rick Steiner
Submitted On
2/8/2020 6:37:35 AM
Affiliation

I ask that the Board adopt following amendments to NPS (Denali National Park) Proposal #152:

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

The NPS proposal is simply inadequate to achieve the desired result of improving wildlife viewing success in the Park. Consider this a controlled scientific experiment. A small (inadequate) buffer was in place from 2000 - 2010, and wolf viewing success was good; the buffer was removed from 2010 - 2020, and wolf viewing success declined from 45% to only 1% last year; now the state should reinstate a sufficient buffer from 2020 - 2030, and monitor visitor viewing success, visitor numbers, and visitor spending in the Park, to determine effects of the buffer.

Please see further discussion here: <https://www.ustart.org/search/google/redirect.php?url=https%3A//www.adn.com/opinions/2019/10/16/state-ignores-decline-of-denali-national-park-economy/&ref=ADN%20Rick%20Steiner%20Denali>

Thank you.



Submitted By
Bob Stewart
Submitted On
2/13/2020 7:24:28 AM
Affiliation
Pope and Young Club

Phone
7135697525
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docbob@comcast.net
Address
17315 Klee Circle
Spring, Texas 77379

Esteemed Board of game members:

As a hunter from Texas with Alaska on my hunting destination itinerary, I would like to share some thoughts about the upcoming meeting and a couple of proposals. I feel certain that the majority of visiting bow hunters in Alaska would agree on the following.

Proposal 50:

This proposal is being made by the Alaskan Bowhunters Association. The purpose of this proposal is to establish a 10 day archery only registration hunt for bull moose that would begin at the end of all general bull moose seasons in units 12, 19, 20, 21, 24, 25, 26B, & 26C. Passing this proposal would be a win for all bowhunters in Alaska and could eventually be approved in other regions.

Things to consider:

- 1. Cooler temperatures to minimize waste of game meat harvested in later season.
- 2. More opportunity 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:

This proposal is also being made by the Alaskan Bowhunters Association and its purpose is to add an archery only registration hunt for dall sheep. This hunt would begin 9 days immediately preceding all general sheep seasons in units 12, 19, 20, 21, 24, 25, 26B, & 26C. If passed, this registration hunt would afford bowhunters a great opportunity to pursue dall sheep before the masses of rifle hunters hit the mountains.

Thoughts to consider

- 1. More opportunity 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:

This is an individual proposal made by Jim Sacket. The purpose of the proposal is to allow any resident hunter who is 60 years old or older who possesses a Senior Alaska Resident Card, to hunt with a crossbow during any archery only hunt in units 12, 19, 20, 21, 24, 25, 26B, & 26C. This proposal could create a significant negative effect on the Dalton Highway Corridor, as well as other bowhunting opportunities in the region. The Alaskan Bowhunters Association **DOES NOT** endorse or support this proposal. If this proposal is passed, it will have a



Thoughts to consider:

- 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 has 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 effect our bowhunting opportunities across the state.
- 7. I personally feel strongest about this proposal for the above reasons. Please vote to keep any locking device prohibited on all legal archery equipment used for the purpose of hunting.

Thank you so much for your consideration

Dr. Bob Stewart



Submitted By
John Strassenburgh
Submitted On
2/17/2020 3:18:45 PM
Affiliation

February 16, 2020

Public comment in support of Region III BOG (March 2020) Proposal 152.

I write in support of Proposal 152, Closure Proposal 1

I have lived in South-central Alaska for nearly 50 years, the last 22 of which have been in the northern Susitna Valley. I have visited Denali National Park many times over the years. The reason I visit the Park is to view and photograph wildlife in a place of magnificent landscapes.

I have not seen a wolf in Denali National Park in at least a decade.

A significant percentage of the reason for this dearth of viewing opportunity is human caused, specifically because the State allows hunting and trapping of wolves in the Stampede Area. This area is bounded on three sides by Denali National Park.

I support Proposal 152, Closure Proposal 1 because it is the most protective of the two closure options, as the Proposal document states, Proposal Closure 1 is: *"the most effective closure in terms of limiting harvest of wolves that primarily reside within the boundaries of the park and provide the majority of wolf sightings."*

The Proposal 152 document states: *"Over the last 20 years, the average number of individuals harvesting a wolf from this area is less than 2 people per year. This proposed change may impact the lifestyle or livelihood of a few trappers who use the area."*

The Proposal 152 document also explains its benefits, including 400,000 people who visit the Park each year, tourism and wildlife viewing related businesses.

I have never understood the logic of Board of Game, which, year after year, fails consider the many in favor of literally just a handful of hunters/trappers.

It seems obvious that good and appropriate public policy is to prohibit hunting and trapping of wolves, thereby protecting them during a particular sensitive time in their life cycle. Proposal 152, closure proposal 1, would provide such protection.

I think many Alaskans, including the Board of Game members, sometimes fail to appreciate the strong effect that seeing wildlife in a natural setting has on visitors. I have had friends from the lower 48 come to Alaska, visit Denali National Park, and stopping by to see me on their way back home who were so enthusiastic about their experience in the Park that they could barely stop talking about it. It is a really big deal to most visitors (it still is for me after all these years), which they don't soon forget.

The National Park Service has bent over backwards to achieve a compromise with the state. Its Proposal 152 well reasoned and well grounded in sound science. Proposal 152, proposed closure 1 is carefully targeted to a particularly critical time for the wolves, and yet allow hunting and trapping of wolves in the less critical times. This retains hunting/trapping opportunity while better ensuring sustainability of the wolves in this part of the Park. Note that, according to the Proposal Document, Proposal 152 would reduce wolf hunting season by

only 29 percent and reduces wolf trapping season by 50 percent, and this would have a materially helpful effect on of the wolf packs.



The Proposal 152 strikes an appropriate balance between hunting/trapping and non-consumptive uses as wildlife viewing and photography and the various businesses that benefit from that activity.

Please approve Proposal 152, proposed closure 1.

Sincerely,



Submitted By
Suzanne
Submitted On
2/19/2020 9:40:21 AM
Affiliation
Strisik

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I support Proposal 152, Closure Option 1. Partial wolf hunting and trapping closures just outside Denali National Park (Uniform Coding Units 0607, 0605, and 0502 west of George Parks Highway and bounded by Denali National Park) are very important to the survival and welfare of this population. It is vital to have these creatures alive and vibrant, part of the natural life of the landscape, than dead. Thank you.



11/28/2019 04:42 AM AKST

RE: PROPOSAL 55: Allow the use of dogs for hunting for lynx in Units 12 and 20

The proposed season of October 15th to December 31st would limit issues of disturbing young wildlife during the spring when they are most vulnerable. The proposed season also has minimal interference with other big game hunting seasons with the exception of a few draw permits in Unit 20. Due to the lack of people who hunt with hounds in Alaska I don't foresee a large number of lynx being harvested by hound hunters and therefore lynx populations would not be greatly effected by allowing this change. Per the trapping regulations, there is currently no bag limit for lynx in unit 12 and 20. Based off Alaska Fish and Game trapping reports over the last several years (2010-2018, with the exclusion of 2014-2015) there have been anywhere from 2-99 lynx harvested/trapped in unit 12 and 20-450 in unit 20. Based off of these numbers and the unlimited bag limit these units would be able to sustain a few lynx harvested by hounds men. While Alaska is not known for hound hunting or have a large history in this hunting method, the use of hounds for pursuing and harvesting black bears in Alaska has been permitted since 1966. In 1992 policies were created that restricted hound hunting to certain times of the year, limited the number of permits issued during each year, and tracked the number of bears treed and harvested. According to black bear management reports from July 1st, 2004 to June 30th, 2013 there have been very few permits issued for this purpose and approximately 1-4 bears are harvested with dogs each year. This just goes to show that this in not a very popular method of hunting in Alaska and would not cause a dramatic increase in lynx harvests. Hunting lynx with hounds could be managed very similarly to hunting bears in the fact that those who are interested could be required to have permit. Respectfully, Sara Suda Wasilla, Alaska

Sara Suda

11/28/2019 05:02 AM AKST

RE: PROPOSAL 129: Change the closure dates for the Yanert Controlled Use Area (CUA) in Unit 20A to align with the Wood River CUA, and clarify whether horse feed is considered "hunting gear"

I support this proposal and agree that motorized vehicles during the winter months should be allowed. There are several outfitters as well as resident hunters who hunt this area with horses and find it very difficult to provide enough hay/grain for their livestock during the hunting season. Currently the only way is to fly feed into these camp which becomes very costly. I also don't believe hay/grain should be considered as "hunting gear".



Submitted By
Brent Taft
Submitted On
2/14/2020 7:26:09 AM
Affiliation

As a prospective nonresident hunter I do not support Proposal 49 by Jim Sacket. Inclusion of crossbows during archery only hunts is inappropriate for able bodied persons and starts us down a slippery slope. Additionally,

- The State of Alaska already allows individuals with disabilities to apply for a Method and Means Exemption allowing the use of crossbows during archery only seasons.
- The average person age 60 and older has no problem handling a 50 pound compound bow with 85% let off (7.5 lbs).
- Allowing a mass of crossbows could have a significant impact on wildlife population creating more restrictions and less opportunity for bowhunters.
- Out of 334 general, registration, and draw hunts in the affected region, 320 are non weapon restricted and already allow the use of crossbows as a legal method of take.
- This proposal is obviously meant for non-bowhunters to take advantage of special areas including the Dalton Highway Corridor.
- Allowing less restricted crossbow use in this region could eventually effect our bowhunting opportunities across the state.

Thanks,

Brent

LAW OFFICE OF KNEELAND TAYLOR, P.C.

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PC162
1 of 4

February 20, 2019

Alaska Department of Fish and Game
Board Support Section
by email at: dfg.bog.comments@alaska.gov

To the Board of Game:

It is the purpose of this letter to submit comments on proposals to be considered at the Board of Game's Spring Meeting for the Interior and Eastern Arctic Meeting.

I have lived in Alaska for 45 years, raised a family here, and practiced law here for 44 years. I do not hunt or trap, and have advocated for wildlife and non consumptive users for many years. I have served on two Board of Game Subcommittees, and participated in many debates about policy. I am a member of the Board of Directors of the Alaska Wildlife Alliance, but am submitting these comments solely on my own behalf.

My comments are as follows:

Proposal 45. Support. This proposal would prohibit the use of moose, caribou and reindeer scent lures in the Interior and Eastern Arctic Region because of the threat of the importation of Chronic Wasting Disease to Alaska. Wildlife is a treasure that Alaskans should zealously protect, and the threat of disease imported from Outside is real. This proposal should be adopted and a statewide ban enacted as well.

Proposal 46. Oppose. Proposal 46 would arbitrarily impose intensive management of bears throughout the region, and if adopted would violate the statutory framework, and serve no purpose.

Proposal 47. Support. This proposal would prohibit non-resident hunting of moose, caribou, and sheep when intensive management programs are underway to increase their populations. Intensive management should be implemented if at

all in extreme emergency circumstances where moose, caribou, sheep and prey species are literally threatened with elimination. Allowing any hunting, less non-resident hunting, is inappropriate in areas where a prey species is threatened with elimination.



Proposal 48. Oppose. This proposal would extend the season for taking wolves in Units 19, 20, 21, 24, 25, 26B and 26C by having it start on August 1. Wolves are not vermin, and there is no evidence that the increased take of wolves across all of these numerous game management units is appropriate.

Proposal 51. Oppose. This proposal would allow non-resident sheep hunters over 60 take a sheep every year, for the purported reason that hunters 60+ years old don't have many sheep hunts left before they are too feeble to hunt, or die. This is nonsense. I'm 72 and still climbing mountains in Alaska. I'm not hunting sheep or goats, but I'm still getting up into sheep and goat habitat, and carrying a pack. I like to say that 60 is the new 40. Besides, it is the 60+ year olds who have the money to pay the big bucks to employ guides to carry their gear, and assist with carrying out the kill.

Proposal 55. Oppose. This proposal would authorize the hunting of lynx with hounds. Lynx are a very highly valued species for wildlife viewing. The hunting of lynx with hounds is unsportsmanlike and inhumane. The taking of lynx should be reduced and not increased.

Proposal 56. Support. This proposal would prohibit the placing of traps within a mile of residences. It is a good and timely proposal. No trapper should set large traps near residences, but some do notwithstanding the efforts of trapper organizations to encourage trappers to stay away from developed subdivisions and built up areas. The Municipality of Anchorage in May of 2019, enacted an ordinance prohibiting the placing of traps within 1/4 mile of a permanent dwelling. See Anchorage Municipal Code Title 14, Section 70.200. More than twenty other municipalities have passed trapping bans within their borders: for instance Cordova [by initiative], Homer, and Juneau. The 1/4 mile buffer was copied from a Board of Game enacted regulation relating to trapping in Chugach State Park, and that distance is a reasonable. In recent years the trapping of dogs in the highly populated core area of the MatSu Borough, has sparked public outrage, and substantial social media advocacy. See for instance Alaska Safe Trails on Facebook, with 1.5k likes. The Alaska Trappers Association, and other friends of trapping opposed the passage of Anchorage's ordinance. They focused their attention on the assertion that the issue was for the Board of Game. That assertion failed because of the lengthy history of the BOG ignoring the issue, and because



of the perceived bias of the BOG in favor of trappers. This proposal gives the Board of Game the opportunity to make itself relevant. The Board should do the right thing, and adopt a regulation providing buffers around permanent dwellings. This proposal should be amended to provide for a buffer of one quarter mile. A larger buffer is not necessary to keep traps out of build up areas. There should be exceptions for the trapping of nuisance animals by authorized officers of federal, state, and local governments; and tribal authorities.

Proposal 119: Oppose. This proposal would extend the season for trapping lynx so that the end of the wolverine and lynx trapping seasons would coincide. Rather than extend the lynx trapping season, the wolverine trapping season should be shortened.

Proposal 63: Oppose. This proposal would modify the regulations applicable to the Dalton Highway Management Area. It appears the intention is to loosen restrictions on the use of motorized vehicle. Restrictions should not be loosened.

Proposal 64: This proposal is a “placeholder” by the Department in an effort to obtain public comment. I oppose loosening restrictions on use of motorized vehicles used for hunting and trapping. I also oppose trapping with snares, leghold traps, and Connibears in the corridor; and oppose the use of firearms to take game in the corridor. Both recreational and subsistence hunters and trappers should not be permitted to hunt and trap in the corridor.

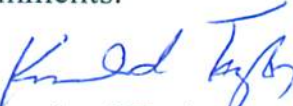
Proposal 152. Support Proposed Closure 1. This proposal would close for some of the year the hunting and trapping of wolves in the Stampede Road corridor west of the Parks Highway. I would prefer closure for the entire year, and this proposal would only close the season from Feb 1 to July 31 for hunting, and from Feb 1 to October 31 for trapping. But I say give it a chance to see if wolf sightings along the Park Road increase to levels seen before the old buffer was repealed. I note that I was on the BOG’s subcommittee on this issue in 2000-2002; and have testified before legislative committees in favor of a much big, full year closure. I think that this issue is the poster child for mismanagement of Alaska’s wildlife and is a powerful symbol of the BOG’s bias, but I am willing to say “give it a try”. I have seen wolves in the Park on back packing trips on several occasions, and I would like to see them again. Further stalemate is not smart.

Proposal 153. Oppose. This proposal would extend the wolverine season to correspond with a shorter lynx trapping season. The lynx season should be shortened instead.

Thank you for considering my comments.



PC162
4 of 4


Kneeland Taylor
2244 Loussac Drive
Anchorage, AK 99517



Submitted By
Don Thomas
Submitted On
2/11/2020 9:14:40 AM
Affiliation
ABA

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Po Box 939
Lewistown, Montana 59457

I am a former Alaska resident, registered assistant guide, and life member of the Alaska Bowhnters Association. I am writing to express my strong oppositin to Propsal 49, to legalize crossbows in certain Alaska Bownhunting-Only areas in the state. A crossbow is not a bow. Those who desire to hunt with one can do so in the general seasons. The ABA already has a proactive program in place to allow legitinately disabled hunters to hunt with modified archery equiment. Age alone is not a criterion. I am 72 years-old and can still draw a longbow ore reucrve adequate to make clean kills on any big game animals in Alaska, as are many of my friends. I am frankly insulted that may age should be equated with disability. In states in which crossbows have been legaized during bow season that has entirely altered the bowhunting eperince and will inevitably to more restriction on bow season. Please say no to this horrible idea. If established , it wil certainly lead to lobbying for more frm the well financed crossbow lobby. Thank your for your consideration. Don Thomas



Submitted By
Peg Tileston
Submitted On
2/19/2020 9:52:58 AM
Affiliation

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907-561-0540

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pegt@gci.net

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4780 Cambridge Way
Anchorage, Alaska 99503-7012

I support Proposal 152 to close the area north, east and west of Denali National Park (Units 0607, 0502, and 0502) to hunting and trapping on the following dates: wolf hunting and trapping from February 1 to July 31 and trapping from February 1 to October 31. Over the years of travel into Denali National Park we have experienced a steep decline in the number of times we have seen wolves. This is very depressing and cause for great concern since we and our visitors have been thrilled to see wolves in times past but no longer do. There is much of Alaska open to hunting and trapping. Closing this area is but a drop in the bucket!



Submitted By
Gabe Travis
Submitted On
2/21/2020 6:53:58 AM
Affiliation

To the Board of Game:

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

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

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

Gabe Travis, Healy AK



Submitted By
Richard C. Sivils
Submitted On
2/20/2020 3:34:56 PM
Affiliation
Usibelli Coal Mine

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100 River Road
Healy, Alaska 99743

Usibelli Coal Mine supports proposal 123 in which the Healy management area would be expanded to include the current mining area adjacent to Jumbo Dome. Limiting rifle hunting to areas outside of the active mining areas will ensure worker safety.



Submitted By
Craig Vanarsdale
Submitted On
2/19/2020 7:53:40 PM
Affiliation

My comment is in opposition to Proposal 49. I do not support the use of crossbows during archery seasons.

Submitted By
Craig Vanarsdale
Submitted On
2/19/2020 7:49:49 PM
Affiliation

My comment is in support of Proposal 50 by the Alaska Bowhunters Association. As a member of ABA and a non resident hunter who has hunted Alaska several times I believe this would be a great opportunity for archery hunters.

Submitted By
Craig Vanarsdale
Submitted On
2/19/2020 7:55:57 PM
Affiliation

My comment is in support of Proposal 53 by the Alaska Bowhunters Association. As a member of ABA and a non resident hunter who has hunted Alaska several times I believe this would be a great opportunity for archery hunters.

Submitted By
Craig Vanarsdale
Submitted On
2/19/2020 7:53:40 PM
Affiliation

My comment is in opposition to Proposal 49. I do not support the use of crossbows during archery seasons.



Submitted By
Tom Vanasche
Submitted On
2/16/2020 8:22:29 AM
Affiliation
Professional Bowhunters Society, Pope and Young Club

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Albany, Oregon 97322

To the Alaska Board of Game: I'm a nonresident who has hunted Alaska a host of times and thank you for that opportunity. I'm on the board of the above mentioned affiliations. In regard to Proposal 50 I encourage a positive response. Weather will be cooler for meat preservation and opportunity will be enhanced for bowhunters, but it can be closely controlled and take can be limited. Proposal 49 should not be allowed. I'm 68 years old and easily use a 62# longbow [took a brown bear recently]. With a 50# compound bow the hunter is only holding 7.5# at full draw. There is already a handicap option in place. Crossbows are effective at 150 yards, shoulder mounted, trigger pulled and affixed with rifle scopes. They are NOT a short range weapon nor are they a bow. They can decimate populations in bow only regions.

Thank you for your attention, Tom Vanasche



Submitted By
Linda Wagner
Submitted On
2/20/2020 3:55:58 PM
Affiliation

~~** NOTE: Resubmitted comment. Earlier Comment did not completely transmit**

My comment is in support of Proposal 152 Closure Option 1 that would close Uniform Coding Units 0607, 0605 and 0502 west of George Parks Highway and bordered on three sides by Denali National Park. These areas would be closed to wolf hunting and trapping from Feb. 1 to July 31 and to trapping from February 1 to October 31. Temporary closings, during the wolf pre-estrus and breeding season, would prevent disruptions or kills to the 2-3 wolf packs Denali tourists view along Park Road. Loss of a pack member can cause a pack to disband. As a visitor to your beautiful state, I most value the wildlife viewing opportunities. As I understand, there are about 2 people a year who have hunted/trapped this area, so close to the park, during the last 20 years. The closure is partial and I hope the BOG recognizes that it will likely prevent a decline in the park wolf population and allow tourists the priceless chance to see a wolf in the wild. Thank you for your consideration.



Submitted By
Mark Wagner
Submitted On
2/21/2020 8:36:44 PM
Affiliation

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Wrangell , Alaska 99929

I am opposed to proposal 56 which would ban trapping within one mile of various structures. This proposal among other things is basically an attempt to make Alaska into a huge off leash dog park. There are already too many dogs running around uncontrolled. For some reason many dog owners think they should be free to let their dogs run at large. Too many people don't realize the damage a dog can do; especially to wintering wildlife.



Submitted By
Trevor Wagoner
Submitted On
2/16/2020 1:51:48 PM
Affiliation

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Kenai, Alaska 99611

I fully support proposal 50 and 53, **while I do not support 49.**

Proposal 50 and 53 introduce more opportunities for bowhunters to spend time in the mountains without having a significant impact on the game populations. Keeping the animal restrictions to the same standards as rifle hunters will only allow bowhunters to make a small impact while still extending their season.

Proposal 50 will introduce a better scenario for meat harvesting with cooler temperatures in the late season.

Proposal 53 will increase the number of hunters (especially non residents) who will purchase tags and continue to support the causes we all hope to contribute to.

Proposal 49 will have a much larger and negative impact on game populations. The majority of hunters who are 60 and older are more than capable of effectively operating a compound bow and if they are not, they can apply for a Method and Means Exemption. The last thing we want is for populations to go down and for more restrictions to be put in place.

We hope for longer seasons in the mountains and more chances to enjoy and support the animals that are out there.

Trevor Wagoner

Kenai, Alaska



Submitted By
Angela Walk
Submitted On
2/17/2020 7:32:00 AM
Affiliation

Proposal 50 & 53- I support the 10 day archery only registration hunt for bull moose and dall sheep which allows bowhunters a greater opportunity to harvest an animal. Bowhunters do not have the long range advantage that rifle hunters do and the additional time added to the current seasons would greatly enhance bowhunters experience in the field. Due to the nature of bowhunting and the lower harvest rates the additional hunt days should not have much impact on total game harvest and game populations. As a non-resident any additional time in the field is greatly appreciated. Non-residents generate additional revenues for the state of Alaska for not only the fish and game department but for resident outfitters and communities visited. Thank you for considering these special extended hunting dates for bow hunters.



Submitted By
Todd Walter
Submitted On
2/21/2020 1:22:45 PM
Affiliation

In regards to Proposal 56.

I Agree that in certain areas trapping should be limited, however this is entirely too encompassing. I understand that to properly address the situation would take time and effort. That does not warrant locking up thousands upon thousands of acres currently being trapped responsibly.

In my opinion this is a knee jerk response to a combination of irresponsible dog owners and what some would label trappers. Understand that making something against the law will not prevent the problem from continuing to occur.

Thank you for your time.



Submitted By
Bill Watkins
Submitted On
2/19/2020 8:24:20 AM
Affiliation

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Anchorage, Alaska 99517

February 19, 2020

Dear Alaska Board of Game Members,

I would ask the Alaska Board of Game to reject Proposal 152 as it is currently written because I believe it will have little to no positive effect on Denali's wolves or on the visitor viewing of them.

What I do support is to amend Proposal 152 with the amendments from Alaskans for Wildlife and Richard Steiner which would enact the following:

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

I have worked in Denali for the past 33 years and drive the Tundra Wilderness Tours into the park and know first hand, the interest and excitement that up to 52 visitors (both Alaskan & out of state) have when wolves are viewed.

There is significant interest in wolves, but the current situation where a handful of trappers and hunters can target and kill and consequently subvert the protections of Denali National Park has had a serious impact on visitor viewing and their overall experience.

Last summer, I conducted two driver's surveys (the first was reported in both the Anchorage Daily News and the Fairbanks Daily News Miner) with the results of the first being:

See:

<https://www.adn.com/alaska-news/science/2019/07/29/looking-to-see-a-wolf-at-denali-a-grassroots-bus-driver-survey-puts-the-odds-at-not-quite-nonexistent/>

http://www.newsminer.com/features/outdoors/battle-over-wolf-hunting-on-denali-boundary-continues/article_25332818-b74c-11e9-9f0a-d71e8965fe25.html

1st Survey Results:

Covering 75 days (April 27 - July 10)

15 Wolf Sightings

20 Wolves

43 reporting drivers/employees

The second survey took place from September 2-8 and was not reported in the press:

Subtotal for End of Season Survey:

63 people responded; 21 Wolf Sightings 25 Wolves

Totals (without any duplication) that includes both End of Season & Mid Season Survey Results

(135 Days):



Total number of people who responded in: 68

Total number of wolf sightings from April 27 through September 8th, 2019: 27

Total number of wolves viewed from April 27 through September 8th, 2019: 32

The drivers that responded to both surveys drive various lengths of the park road including: Front Country (to Mile 14.5), Denali Natural History Tours (to Mile 25) , Tundra Wilderness Tour (to Mile 62), Transportation System (to Miles 53, 66, 87, & 92) and Kantishna Lodge drivers who drive the full length of the park road (92 miles) to Kantishna.

For myself and my passengers, I had zero sightings for the entire summer - which was the first in years; possibly ever that I didn't see a wolf. In fact, I had two wolverine sightings last year (7-8 sightings in 33 years), which are considered the rarest major wildlife sighting in Denali - which makes last year's lack of wolf sightings all the more bizarre.

NPS would later confirm our snapshot driver's surveys and state that wolf sightings had declined to 1% from a high of 44% in 2010 when we had the partial, yet inadequate Buffer in the Wolf Townships.

Ideally, the best way to determine where a Buffer or not, leads to significant increases in wolf sightings and improves the visitor experience is to put in place a large enough Buffer that effectively protects Denali's wolves on a year round basis.

The previous partial Buffer was in place for 10 years from 2000-2010; a Buffer that incorporates all of the Wolf Townships, on a year round basis for at least 10 years should determine whether visitor viewing improves or not.

After 10 years, data collected on visitor viewing/experience, wolf family group natural stability (as stable as wolf family groups can be), the establishment and stability of family group habits/behavior: den & rendezvous sites, hunting/travel habits, territory and their use of the park road can be evaluated and compared to both the partial Buffer from 2000-2010 and the no Buffer from 2010-2020 to determine differences and help in further management decisions.

Only by doing such a full scientific evaluation and comparison of partial Buffer, no Buffer, to full year round Buffer can it be determined the full importance of a protected Buffer (or not) to the wolves and to the visitor viewing experience.

Lastly, two years ago I started a Facebook Group site called: Denali Wolves that covers this issue in detail and will continue to do so. Currently, we have 309 members who are very interested in this issue and wish to see the park wolves protected (year round) within the Wolf Townships and the visitor experience enhanced with wolf viewing opportunities.

I fully realize that wolf viewing can never be guaranteed in even the best of circumstances but the stage can be set for their possibility. Currently, there is little if any possibility of this occurring on a consistent basis for the long term.

Please consider and pass the Amended Proposal 152 - with the amendments from Richard Steiner & Alaskans for Wildlife.

Sincerely,

Bill Watkins



Submitted By
Brian Watkins
Submitted On
2/6/2020 10:05:01 AM
Affiliation

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18131 hidden falls ave
Eagle river, Alaska 99577

I support proposal 48. There is a declining sheep and caribou population in these units. Hunters are afield prior to the current August 10th start date, and often run into wolves during that time. Caribou season starts aug 1 and sheep hunters are getting into the field earlier every year. Extending the date to aug 1 will allow for those hunters to harvest wolves and lower predation on said animals

Submitted By
Brian Watkins
Submitted On
2/6/2020 9:22:21 AM
Affiliation

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18131 hidden falls ave
Eagle river, Alaska 99577

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.





Submitted By
Erica R Watson
Submitted On
2/21/2020 11:00:26 AM
Affiliation
none

My name is Erica Watson, and I've lived near Denali National Park, at mile 230 of the Parks Highway, since 2009, and seasonally for several years prior.

I'm writing in support of Proposal 152, closure 1, as submitted by the National Park Service. This proposal exercises the State's authority to manage for multiple uses, allowing for the continued health of the regional wolf populations, one of the most valuable in the state both economically and ecologically.

Over the years I've worked in and around Denali National Park, in science education, food service, and other sectors, and talked to countless visitors who chose to spend their money here because of the opportunity to see wolves in a place not dominated by human activities. Through decades of research on Denali's wolf populations, we know that their seasonal movements include state and federally managed lands, and management should be based in this extensive research. The scientific value of a healthy wolf population is immeasurable - local research has informed decisions around the continent- and this proposal offers an opportunity for compatible state and federal policies that serve the Park's gateway communities as a scientific and economic resource, while still allowing for hunting and trapping during the fall and winter months.



Submitted By
Robert and Karen Watson
Submitted On
2/12/2020 8:02:23 AM
Affiliation

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25945 New Rd.
North Liberty, Indiana 46554

1. Proposal 152 will provide enhanced protection for those wolves that leave Denali National Park onto state lands in the Stampede townships in late winter and spring, and then return to the park for denning, pupping and summer activities. Proposal 152 is limited to those lands where the greatest amount of data on wolf movements has been gathered over the years. There are two options: We support Closure 1, the larger map, as it is less confusing and easier to administer.

2. Management for conservation of wolves is not practiced on most state lands, but the Alaska Department of Fish and Game and the Board of Game have the authority to manage in this way, authority that is derived from statute and internal policy. Management for conservation makes sense in this area, where more than 40 years of research (the Denali Wolf Program) has revealed detailed information on the life habits of wolves and where a large constituency of Alaskans supports conservation of wolves, for science, for viewing, and for their value to the ecosystem.

3. 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, and when the death of a breeding wolf is most damaging to the integrity of the pack.



Submitted By
Jay Wattenbarger
Submitted On
2/13/2020 8:57:50 AM
Affiliation

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Two Rivers, Alaska 99710

I support the following proposals:

47,48,52,54,55,61,62,63,64,67,68,69,74,75,76,80,82,83,86,88,89,93,96,104,106,129,146,149,151,
153.

I oppose the following proposals: 51,53,56,58,65,81,87,108,115,136,152



Submitted By
Gary Weaver
Submitted On
2/8/2020 2:17:07 PM
Affiliation

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1512 Valarian Street
Anchorage, Alaska 99508

As an Alaskan bowhunter I am in favor of proposals 50 and 53.

If proposal 50 were enacted as a registration hunt with the same antler restrictions there is no reason to assume there would be any more success by archers than in any other archery only season in any other unit. The temperatures in the late fall are much cooler, diminishing the threat of waste from heat. There is a potential increase in revenue from outfitters, guides, air taxis, taxidermists, shipping companies, hotels, and other tourist based businesses because of the extended hunting season for archers.

Proposal 53 should be enacted because of the minimal impact that archers have on the dall sheep population. The efficacy of archery equipment while hunting dall sheep is low, so an archery only season opener would be beneficial in giving archery only hunters a block of time before the mountains are plugged with rifle hunters. Making it a registration hunt would let ADF&G closely monitor the take of mature rams in their respective units. Keeping the same horn restrictions keeps the take of the older age class consistent. Again, there is a potential increase in revenue from outfitters, guides, air taxis, taxidermists, shipping companies, hotels, and other tourist based businesses because of the extended hunting season for archers.

As an archery hunter, I am vehemently against proposal 49. Crossbows are a legal means of take in 320 of the 334 of the hunts/hunting areas in the state. This proposal appears to be an attempt to take away an archery only hunting corridor along the Dalton Highway. Furthermore, the minimum draw weight required to bowhunt in Alaska is 50 pounds. Most bows have an 85% let off, so the person is only holding 7.5 pounds at full draw. This feat is still easy for a senior that is 60 years or older. If a person shows true disability in drawing a bow, there are already statutes in place (Methods and Means of Exemption) that allow them to hunt with a crossbow during archery only seasons. This intrusion to an archery only hunting area will only lead to more intrusion into archery only hunting areas in other parts of the state.



Submitted By
kate weber
Submitted On
2/12/2020 7:15:00 AM
Affiliation

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PO BOX 597
Healy, Alaska 99743

I am writing as a resident in Healy since I bought my land 15 yrs ago. I also lived right outside the Denali Nat Park in the late 70s. At that time things were pristine and nature abounded. Wolves could be seen out in the park. Both Murie and Haber did extensive research.

NOW We have a 3 bears Alaska owned store that sells the AR15. So it is common to hear gunshots by air bnb guest right out on dry creek. This hobby of shooting and killing things.

Now when tourists come from all over the world to see beautiful nature they see that America most loves shooting and killing things and that is what is to do now. KILL THE WOLVES. These are not broke people who need to have 15 wolf pelts in their garage of oil weath anyway.

My own truck gets shot sometimes. But there are no wolves to see by any tourists anymore. Instead they look for mice and varmits left from the endless buses and endless priviledged vehicleless spewing fumes enough to drive any bicycle or cross country ski er or animal.

SO I

SUPPORT Closure 1. proposal 152. I support allowing wolves this closure time because we know the habits and killing is NOT what tourists or me enjoy about a national park at all.

DEC 16 2019



PC181
1 of 6

BOARDS
ANCHORAGE

Alaska Board of Game, Boards Support Section
Comments to: 2019/2020 Proposed Changes
to Regulations Interior and Eastern
Arctic Region.

Submitted by: Brian West
1000 Oceanview Drive
Anchorage, Alaska 99515

Proposal 45. SUPPORT.

Proposal 46. SUPPORT.

Proposal 47. OPPOSE. The stated issue is that some older hunters are too feeble to use traditional archery equipment and should therefore be allowed to use cross bows in archery only hunts. If these people are incapable of using a bow they are likely incapable of performing all the other activities involved in hunting. Additionally, bow hunting is not so much about filling ones freezer as indicated, but, more about the experience as bow hunting is more likely to end in failure compared to using a rifle. A cross bow is significantly different from other archery equipment and should not be allowed in archery only hunts.



Comments to: 2019/2020 Prop. Changes to Reg
Interior and Eastern Arctic Regions.

Submitted by: Brian West

Proposal 50. **OPPOSE.** There is no reason to have a specific archery hunt. Anyone wishing to hunt with a bow can do so during the general season. The hunt area is not so crowded. There is no need for the department of Fish & Game to incur this additional expense.

Proposal 52. **OPPOSE.** In general, I strongly believe Residents should always have priority over non-residents. However, in this instance, there is a general hunt so Alaskans are not being shut out. The issue is that non-residents take a majority of the sheep. The reason is they use guides. If Alaskans want to increase their odds of a successful sheep hunt they should employ guides or outfitters and not complain about those who do.

Proposal 53. **OPPOSE.** The general hunt allows for bow hunting. There is no need to carve out another special interest hunt. Furthermore, allowing this hunt before the general hunt will decrease the ~~odds~~ success rate of hunters during the general season as hunters will have been in the field chasing the sheep around.



Comments to: 2019/2020 Prop. Changes to Regs Interior and Eastern Arctic Regions.

Submitted By: Brian West

Proposal 84. **OPPOSE.** Area is archery only and I see no actual reason for extending the sheep season. It is possible that snow fall will make the sheep easier to hunt, that may be the reason for the proposal.

Proposal 85. **OPPOSE,**

Proposal 87, **OPPOSE.** Changing to a drawing hunt will have no effect on the length of the season. The hunt area has large numbers of animals, easily accessible along highways and very open country making them easy to spot. Because of these factors and that the migration occurs rapidly people congregate in relatively small areas at one time. Because of this the hunt will all most always close early by emergency order. Nothing is worse than having a permit and thinking you can go whenever you want only to have the hunt close. The very fact that the hunt closes quickly limits the number of people willing to hunt. Additionally, a drawing hunt with a longer proposed season will increase the pressure on the moose population. Right now the season ends before the moose season.



Submitted by Brian West
Comments to 2019/2020 Prop Changes to Regs
Interior and Eastern Arctic Regions.

Proposal 90. **OPPOSE.** Non-residents should be able to hunt with family members.

Proposal 92 **OPPOSE.** I am appalled that such an exemption exists. ATV use in a non-motorized area fundamentally alters the very concept of a non-motorized hunt area. It would not be protected by the Americans with Disabilities Act. Additionally, the State makes other accommodations by allowing the use of ATV on millions of acres of State land. The disabled can also make use of horses or bicycles. Allowing the use of ATV in a non-motorized area destroys the hunting experience of every other user. With so many acres available to ATV use their use in non-motorized areas should be eliminated.

Proposal 109. **OPPOSE.** Changing from harvest ticket to registration permit will have no effect. People either care about the animals they hunt and the laws established to provide for continued hunting or they don't. Enforcement with the penalty being the loss of hunting privileges is what is required. Local residents should be assisting the Troopers in this matter.

Proposal 112. **OPPOSE**



Comments to 2019/2020 Prop Changes to Regs Interior and Eastern Arctic Regions

Submitted by: Brian Wleost

Proposal 129. **OPPOSE**. Hay and other feed used to feed animals used for hunting is hunting gear.

Proposal 130. **SUPPORT**. See comments to proposal 92.

Proposal 131. **SUPPORT**.

Proposal 133. **OPPOSE**. I do not agree with the establishment of special hunting privileges. If increased hunting pressure is a problem a more effective solution would be to limit ATV access.

Proposal 134 **OPPOSE**. There is no reason to approve this hunt. Why do special interest groups always want to be allowed to hunt first?

Proposal 136. **OPPOSE**



6 of 6

Comments to 2019/2020 Prop. Changes to Regs Interior and Eastern Arctic Regions

Submitted by Brian West

Proposal 137. SUPPORT

Proposal 138. OPPOSE. There are numerous archery hunts in Unit 20B.

Proposal 146. SUPPORT WITH CHANGES. There should be no permits given to non-residents. If a hunt is restricted so that residents must have a permit then there should be no permits given to non-residents. It is deplorable that residents go wanting yet a non-resident can obtain a permit. The Board does a disservice to Alaskans when they allow this. It is shameful.

Proposal 152. SUPPORT



Western Interior Alaska Subsistence Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

DEC 26 2019

RAC 19051.KD

Ted Spraker
Chair
Alaska Board of Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Re: Proposal #59 Support as Amended

Dear Chairman Spraker:

I am writing to you on behalf of the Western Interior Alaska Subsistence Regional Advisory Council (Council) to provide a modification to Proposal 59 submitted by the Council to the Alaska Board of Game (BOG) for its Interior and Eastern Arctic Region meeting scheduled for March 6-14, 2020 in Fairbanks.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters of the Western Interior Region of Alaska. As you know, the Councils were established by authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA), and chartered under the Federal Advisory Committee Act. Section 805 of ANILCA established the Council's authority to initiate, review, and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside its region that may affect subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

Following its March 26-27, 2019 meeting in Fairbanks, the Council submitted proposals to the Federal Subsistence Board (WP20-37) and BOG (Proposal 59) to add a December to-be-announced moose season in Unit 21D – that portion south of the south bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek.

At its October 8-9, 2019 meeting in McGrath, the Council unanimously voted to modify Federal subsistence proposal WP20-37 and BOG proposal 59 to define the proposed December hunt area for Unit 21D as that area southeast of Kaiyuh Slough and Nine-Mile Camp to Bonanza Creek



Spraker

2

Drainage to the Kaiyuh Mountains, and south to the Unit 21D boundary. The Council discussed the extremely low bull to cow ratio of 10 bulls per 100 cows near the community of Galena, and wanted to ensure that this area was not included in the December hunt. The modified hunt area for both Federal and State regulations would allow for harvest in the high-density moose area with good bull to cow ratio while applying conservation measures where needed on Federal and State lands in the unit. Aligning these regulations would also reduce confusion for local subsistence hunters.

We appreciate the BOG's consideration of this amendment to Proposal 59 and look forward to continuing discussions with the Alaska Department of Fish and Game and the BOG on subsistence matters affecting the region. If you have questions about this letter, please contact me through Karen Deatherage, Subsistence Council Coordinator, with the Office of Subsistence Management, at (907) 474-2270 or Karen_deatherage@fws.gov.

Sincerely,

Jack Reakoff
Chair

cc: Thomas Doolittle, Acting Assistant Regional Director
Office of Subsistence Management
Greg Risdahl, Acting Deputy Assistant Regional Director
Office of Subsistence Management
Suzanne Worker, Acting Policy Coordinator, Office of Subsistence Management
George Pappas, State Subsistence Liaison, Office of Subsistence Management
Theo Matuskowitz, Regulations Specialist, Office of Subsistence Management
Tom Kron, Acting Council Coordination Division Supervisor
Office of Subsistence Management
Karen Deatherage, Council Coordinator, Office of Subsistence Management
Chris McKee, Wildlife Division Supervisor, Office of Subsistence Management
Lisa Maas, Wildlife Biologist, Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Alaska Department of Fish and Game
Administrative Record



Submitted By
Jeffrey Wieber
Submitted On
2/12/2020 9:34:17 PM
Affiliation

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Support [Proposal #47](#) (RHAK) – Prohibit nonresident hunting of any prey species under Intensive Management predation control until the herd reaches population or harvest objectives

Support [Proposal #52](#) (RHAK) - Change general season nonresident sheep hunts in units 20A and 19C to draw permit only with a limited allocation

Support [Proposal #62](#) (RHAK) – Allocate 90 percent of the Upper Nowitna Unit 21B moose draw permits to residents

Support [Proposal #64](#) (ADF&G) - Clarify the legal use of highway vehicles, snowmachines and off-road vehicles in the Dalton Highway Corridor Management Area (DHCMA)

Support Proposals 67- 73 have to do with increasing brown bear bag limits, allowing the take of brown bear over bait, and elimination of a registration hunt for brown bear

Oppose [Proposal #77](#) (Nick Muche) - Open a resident permit hunt for muskox in Unit 26B

Support [Proposal #79](#) (Fairbanks Advisory Committee) - Increase resident hunting opportunity for Central Arctic Herd in Unit 26B Remainder

Support [Proposal #80](#) (RHAK) - Increase resident hunting opportunity for the Central Arctic Herd (CAH) in Unit 26B Remainder

Oppose [Proposal #81](#) (Howard Tieden) Increase nonresident bag limit of the Central Arctic Herd in Unit 26B

Support [Proposal #82](#) (Eastern Interior Regional Advisory Council) - Establish an Arctic Village Sheep Management Area in unit 25A and open a new resident and nonresident drawing hunt

Neutral [Proposal #83](#) (Lenny Jewkes) - Modify the bag limit for sheep in the RS595 subsistence hunt

Support [Proposal #129](#) (RHAK) - Change the closure dates for the Yanert Controlled Use Area (CUA) in unit 20A to align with the Wood River CUA, and clarify whether hay to feed horses is "hunting gear."



Submitted By
Sandy R Williams
Submitted On
2/18/2020 9:24:42 PM
Affiliation

Please support proposal 152 to help the wolves at Denali Nat. Pk. stay alive and have their pups, and so the tourists can see more wolves in the area, this should not impact the hunters and trappers. Thanks Sandy



Submitted By
Ruth Wood
Submitted On
2/17/2020 1:02:46 PM
Affiliation
self

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Gingerandmagic@yahoo.com
Address
15406 E Barge Dr
P. O. Box 766
Talkeetna, Alaska 99676

I am writing in support of Proposal 152, Closure 1.

I am an Alaskan resident who has been fortunate enough to visit Denali National Park (DNP) and observe wolves in the Park. Seeing wolves in the Park is a highlight of any trip there for me and for other visitors. There is no guarantee that one will see a wolf, but if the pack is eliminated, there is no chance.

The map for Closure 1 would close an area surrounded by the Park. Furthermore, the closure would only be for part of the year, and would affect only a handful of wolf hunters/trappers.

Denali National Park did the research that the Board of Game needed, and the results show that this closure would be beneficial to the wolves of Denali National Park.

This proposal is not meant to, and would not, prevent hunting and trapping of wolves in the entire state. It will protect the DNP wolves that venture out of the Park along the Stampede trail and then come back into the Park.

Proposal 152, Closure 1 has the potential for enhancing visitor experience, but it is important to have these wolves for the ongoing scientific research that began decades ago.

I urge you to adopt Proposal 152, Closure 1.



Submitted By
Birch Yuknis
Submitted On
2/20/2020 10:33:45 AM
Affiliation

Alaska Board of Game Members,

02/20/2020

Thank you for taking the time to read my comments today. I am a born (1971) and raised Alaskan. I currently reside in Wasilla where I have operated a small business since 1999. I have hunted all over the State by pretty much all available means of transportation. I do currently serve on the Matanuska Valley Fish and Game Advisory Committee but I write to you today for myself.

Proposal 45 I SUPPORT this proposal. I would ask that the BOG clarify if this will include synthetic urine as well or not.

Proposal 50 I OPPOSE this proposal. There are currently generous opportunities to harvest moose in this area without creating a special hunt for a specific user group. In addition this would allow this special user group to have the opportunity to harvest during the peak of the rut when the bulls can be particularly stupid.

Proposal 53 I OPPOSE this proposal. The current sheep season is already 42 days. How much opportunity does one need? This special hunt would also coincide with the youth hunt and I do not want the youth to have to compete with archers. This and the other bow oriented hunt proposals are not about harvest but opportunity.

Proposal 58 I OPPOSE this proposal. I do not agree with denying a user group access when there is no biological concern. The BOG does not need to be making special locals only hunts.

Proposal 74 I OPPOSE this proposal. This hunt, if implemented should be a drawing hunt available online to all hunters. Preferably resident hunters.

Proposal 77 I OPPOSE this proposal. Please see my comments to proposal 74.

Proposal 83 I OPPOSE this proposal. If you choose to believe Wayne Heimer's beliefs that removing full curl or 8 year or older rams from the population will not hurt said population then the BOG should be changing this proposal to actually increase the ram size not decrease it.

Proposal 84 I OPPOSE this proposal. Again how much opportunity does one need? 42 days is a very long season. This is about opportunity and not harvest. I do not agree with making special hunts for special user groups when there is already a generous opportunity.

Proposal 85 I OPPOSE this proposal. Please see my comments to proposal 84.

Proposal 90 I OPPOSE this proposal. A nonresident is a nonresident. Why would the BOG want to decrease an opportunity for a resident to hunt with a 2DK family member?

Proposal 138 I OPPOSE this proposal. Again a special hunt for a specific user group when there is already plenty of opportunity currently available. The author even states "during the most productive time of the season." This author wants to have a special season during the prime part of the season.

Proposal 152 I OPPOSE this proposal. The Park is big enough.

In closing, at this meeting there are several bow hunting only proposals. The bow hunters will talk allot about how their successful harvest rates are minimal. What we do is called hunting and not called harvesting. These proposals seek to create special opportunities to hunt for a specific user group when there are already very generous opportunities available. I am sure each and everyone of you have a memory of a great hunt that you did not harvest on. It was the opportunity on that hunt that made that hunt so special. This State is very generous already with the seasons in place.

Thank you for your time,

Birch Yuknis



Submitted By
Mary Zalar
Submitted On
2/21/2020 12:45:58 PM
Affiliation
Individual

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Fairbanks, Alaska 99709

I support Closure 1 of Proposal 152 which prohibits the taking of wolves in a portion of Unit 20C at specific times. I do not believe there is a biological imperative to support or reject this proposal, so it is a decision based on values and how to benefit the most users/people. The majority of our residents are wildlife viewers, and a minority are hunters or trappers. VERY few individuals utilize the proposed area for trapping. Tens to hundreds of thousands of individuals visit Denali National Park to view wildlife among other things. I would much rather limit human predation on wolves in this area in order to benefit the many who value wildlife conservation and wildlife viewing opportunities.