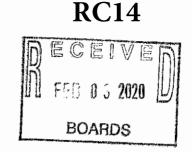
This comment was received on time but inadvertently left out of the on time public comments. It is listed in the on time comment matrix.

Alaska Trapper's Association PO Box 82177 Fairbanks, AK 99708



ADF&G Boards Support Section PO Box 115526 Juneau, AK 99811-5526 ATTN: BOG COMMENTS January 29, 2020

Dear Chairman and Members of the Board

The ATA appreciates the opportunity to offer the following comments on proposals you will be considering at March 2020 Interior and Eastern Arctic meeting in Fairbanks.

PROPOSAL 48 ATA opposes the extension of wolf hunting to August 1st. The pelts would be worthless. Pups may not be ready to be on their own. Intensive management is available as a tool if predation is a problem.

PROPOSAL 55 ATA is not necessarily opposed to the harvest of furbearers by means other than trapping but feels that trapping should be the primary means of harvest. That makes this proposal problematic. October lynx pelts would be of very low quality. Running dogs during trapping season would inevitably lead to conflicts including dogs in traps. Given these factors, ATA opposes hunting lynx with dogs.

PROPOSAL 56 This proposal is mostly impractical, unnecessary and unmanageable. Many cabins, and some houses, exist for the purpose of trapping. Also, some types of trapping are quite innocuous anywhere. While some trapping, and some "so called trappers" may be inappropriate in proximity with civilization, it is unnecessary to impose such a broadly defined trapping ban. It would unnecessarily exclude an enormous amount of safe and legitimate trapping opportunity.

PROPOSAL 63 ATA agrees that the DHCMA regulations are generally redundant, are often confusing, cause undue hardship, are difficult to enforce, and need to be remedied. If there is to be a DHCMA, ATA defers to the knowledge and insight of the Board to determine a suitable solution.

PROPOSAL 64 ATA agrees that much of the DHCMA regulation is conflicting and / or confusing, and is begging remedy. Given the amount of redundancy with other applicable regulation, repeal of the management area may be preferable to revision.

PROPOSAL 119 ATA understands the complexity of, as well as the ubiquitous nature of, this issue. We support the idea of making harvest seasons for different species coincide, both within management units and with adjacent units. We also support regulation which maximizes harvest opportunity within the value season of the fur, and within the viability of the resource. Given the variety of factors that go into such a decision making process, we defer to the knowledge of the Department and to the insight of the Board to determine the appropriate allocation of lynx in these units.

PROPOSAL 152 This proposal is just a rehash of numerous other proposals that have been previously determined to be not warranted. The concept of giving it additional credence by associating it with a vague "viewability" study is irrelevant. Wolves have a remarkable ability to produce offspring to the level which food resources allow, especially with such a large non-harvest area as Denali National Park. There is no need to expand Park management out onto state land.

PROPOSAL 153 As with Proposal 119, ATA defers to the insight, intuition and knowledge of ADF&G and the Board of Game. We naturally support liberal trapping harvest seasons to the extent they are practical. Uniformity of seasons is preferable. We are generally opposed to adjusting season closing dates to coincide with the latest closing date for any species. If taken to the extreme, this approach would lead to longer and longer seasons for all species. The final decision should be predicated on a number of factors including the viability of the resource and the quality of the product. We humbly defer to the judgement of the Board of Game on this proposal.

Thank you for this opportunity to comment.

Sincerely,

Randall L. Zarnke, president

Randall Lounke