



Submitted By
Kelly Dau
Submitted On
1/6/2022 7:06:47 PM
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I support Proposal 199...traps a greater distance from trail. As a lifelong user of trails, I feel the grief of those whose habits must change. Alaska is more populated and we must allow for safe use of our trails by designating trapping legal only at >50 yards from multiuser trails. Additionally, traps should carry the id of the person trapping. This would be an incentive for all trappers to be responsible and ethical in the placement of their traps. Thus, I also support Proposal 228.

Thank you.

Kelly Dau

Submitted By
Andrea DeVore
Submitted On
12/16/2021 7:06:21 PM
Affiliation



PC052
1 of 1

I recently read proposal 199 and as a lifelong Alaskan who recreates weekly on our various trails, I find this to be the reasonable, safe, and logical step to hopefully limit injuries and death due to traps and snares catching unintended people and animals. 50 yard setbacks would give enough space for the users of these multi-use trails (hikers, skiers, runners, bikers, and so forth) to keep their children and pets away from any accidental run-ins with traps and snares. With the vast spaces of Alaska available for hunting, 50 yards from multi-use trails is not much to ask for at all, yet could make the difference in the health and safety of so many Alaskans.



Submitted By
Daniel Donnelly
Submitted On
1/5/2022 1:34:45 PM
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I am writing in support of proposal 228 requiring trap identification tags in Units 14A, 14B, and 16, with the modification that trap identification tags should not be required to be permanently affixed to the trap. I have trapped in several states and requiring identification tags is generally the rule. It is not an undue burden on the trapper to comply with and adds a level of responsibility for the trapper to think of when making sets. ID tags are usually affixed to the trap's chain or cable using thin gauge wire so they can be changed if the trapper's address or license changes, or the trap is sold. Requiring them to be permanently affixed would cause issues if the trapper's personal information changes or the trap changes hands.

Thank you for your consideration of this rule change,

Dan Donnelly



Submitted By
Erika Douglass
Submitted On
1/7/2022 6:47:16 PM
Affiliation

I support Proposals 199 and 228.



Submitted By
Thaddeus Dubois
Submitted On
9/8/2021 7:03:24 AM
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I am writing the Board to express my dislike for Proposal 99. This proposal is another attempt to further restrict trapping in favor of other users. These users fail to take responsibility for their failure to maintain control (voice/leash) of their property (pets). Prop 99 places the burden on the Trapper while other users continue to work to restrict trapping rights. This is a slippery slope.



Submitted By
Faye Ewan
Submitted On
1/7/2022 3:40:28 PM
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To the Alaska Board of Game:

I am very strongly opposed to proposals 210 and 211. I am an Ahtna elder who has been on the land all my life, and have seen the changes that have taken place in the moose and caribou populations, as well as in our ability to practice our subsistence traditions.

The community subsistence hunt accounts for only a small portion of moose and caribou harvests in Unit 13, and is not a threat to wildlife populations. On the other hand, sport hunting accounts for most moose and caribou harvest in unit 13.

Tier I is the big threat to the animal populations. Tier I hunters use motorized vehicles. It is like a rodeo. That is why we are unable to meet our subsistence needs.

Caribou is more than just an animal with four legs—it is my clan (*Udzisyu*).



Submitted By
Harold Faust
Submitted On
1/2/2022 7:00:44 PM
Affiliation
Hikers, Dog owners

I hope you find it reasonable and valuable to consider Proposal #228 for passage.

There is no reason that trapping equipment should be set without a means to identify the owner. It provides security for the equipment owner, and equally important it

provides a way to identify who is responsible for gear that is set in a way that is dangerous to the recreational public.

Thank you for your consideration.



Submitted By
Bill Fikes
Submitted On
12/21/2021 1:47:33 AM
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I fully support the 50 yard trap setback proposal 199 and urge you to impliment it.



Submitted By
Elizabeth Fitzgerald
Submitted On
1/3/2022 5:57:29 AM
Affiliation

I support proposal 199, and any ethical trappers should as well. A 50 yard setback is incredibly reasonable and will limit the outrage over trapping. If lazy trappers keep killing people's dogs, they'll get trapping banned before too long.



Submitted By
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Submitted On
1/6/2022 8:02:54 AM
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As a dog owner that has had a dog caught in snares and a trap just a few feet off a hiking/ski trail, I am writing in support of Proposal 199 and 228. There is a huge population of people that recreate on trails with their dogs. Anytime you set foot on a trail, you will encounter someone with a dog. We should be able to hike and skii on trails without worrying whether our dogs, or even ourselves, would be caught in traps and snares. I fully embrace and support a buffer of 50 yards and tags that identify traps and snares.



Submitted By
Paul Forward
Submitted On
1/6/2022 2:44:29 PM
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Proposals 2, 3, 4, 5 all propose variations of a the addition of an archery season for Dall Sheep in units 9, 11.13, 14A, 14B and 16. As a lifelong Alaskan and avid sheep hunter for most of my life, I am convinced that the addition of an archery season for sheep is critical for a number or reasons.

- 1) Precedent: most US states provide special archery seasons for all general season big game animals. Archery hunting is an excellent way for hunters to spend quality time afield and can generate new opportunities for outfitters/guides. Canmore BC even has an archery only sheep "bow zone" that has produced trophy rams and wonderful hunting opportunities for many years.
- 2) low impact: harvest numbers from the existing archery sheep hunts show consistently low success rates. Such a season would provide new hunting opportunities without significant affect on game populations.
- 3) Safety: I have personally been shot at and over by sheep and caribou hunters while archery hunting in a very remote part of the state. Long range rifle hunters and the popularity of certain sheep hunting creates a dangerous situation for archery hunters relying on stealth and patience to get very close to sheep.
- 4) Mandate to create more opportunities: it's my understanding that BOG's intent is not just to create restrictions but also to create opportunities for hunters. Creating a sheep season would be a big step in that direction with almost no drawback.
- 5) Economics: The prospect of an early season sheep hunt would likely encourage hunters to take up archery and to sheep hunt in general which would lead to new opportunities for local businesses, outfitters and transporters.

Finally, the past it seems that there has been resistance to early archery seasons because of concerns of bowhunters displacing sheep. While personal experience suggests those claims are dubious, even if they are valid, allowing an archery season from 8/1-5 that mirrors the youth hunt would give sheep a 5 day break before the general season begins. This should be more than enough time to allow sheep to return to their normal behavior. I have spoken with multiple biologists about this who agree with this premise. Similarly, I have not been able to find any evidence suggesting that there would be an increase in wounding rates for an archery hunt. Please consider adding a dedicated sheep hunting archery season this year. Many resident hunters and outfitter/guides will ultimately be very grateful for this opportunity just as they have been throughout the country when archery seasons are adopted.

Proposal 89: I am a lifelong traditional bowhunter and use longbows and recurves exclusively for all of my hunting. I have also done a significant amount of sheep hunting with my longbow. Furthermore I have spent extensive time in the Metal Creek drainage, including 40+ days of backcountry skiing and camping plus another 10 days while on helping my wife with her DS170 tag. Based on that experience and my review of harvest data from that area for the past few years I believe that opening up such a hunt would be beneficial for several reasons.

- 1) Success rates would be very low and have essentially no impact on sheep populations. Even with "any ram" rifle hunts, success rates are quite low for DS170 and DS 175 (many years 0-2 rams being killed per hunt according to ADFG statistics) and the likelihood that traditional archery hunters would have any impact on the ram numbers in the area is extremely low. (Based on my inquiries I believe that single digit legal rams have ever been killed in Alaska with traditional archery equipment.) Similarly success rates on the much more easily accessible DS140/240 which allow modern archery equipment, are also quite low despite an any ram designation. To me this suggests that this hunt would have essentially zero downside while providing an exciting opportunity for traditional bowhunters to spend time afield in a beautiful and rugged area visited by few people. The time of year would even further limit success rates with notoriously challenging weather.
- 2) Making it a registration hunt would ensure that ADFG could closely monitor take and shut down the hunt if success rates exceeded projected/desired.
- 3) As discussed above, this would create new financial opportunities for local businesses, transporters and guiding operations.

4) As above, part of the mandate of BOG should be to increase opportunities for hunters when feasible and responsible. I think that this hunt would provide for a wonderful opportunity with zero drawbacks or downsides.



Thank you so much for taking the time to read this comments and for dedicating your time to these important issues!



Tory Fredrickson

Proposal 199 of the 2021-2022 Supplemental Proposal Book

I oppose Proposal 199.

Dear Board of Game,

The proposal submitted by the Alaska Wildlife Alliance will not solve the trapping/dog issue. This regulation will be as effective as the existing and highly contested leash laws. I understand there are exceptions to the leash laws, but each individual's perspective of "control" changes in the field. I have heard numerous times while recreating in the outdoors "My dog doesn't normally act this way". I can understand the perspective of the dog. Something new, smells good, or general curiosity overtakes all of the training they have received. I have pheasant hunted behind world class bird dogs that have randomly chased after a rabbit or coyote. No amount of control through collars, whistles, or voice commands would stop the dog. This same occurrence will continue to occur with a 50-yard setback for traps. A dog off leash will smell the bait/lure 50 yards from the trail, see the trappers trail packed in the snow, and lead the dog directly to the set.

The dog/trap incidents cited by the Alaska Wildlife Alliance is not complete and what they did report does not appear to be a significant issue considering the thousands of domestic dogs in Alaska. Unfortunately, we cannot eliminate 100% of the issues. We have signs warning of high moose crossing areas throughout the state of Alaska. Unfortunately, we incur hundreds of moose deaths by motor vehicles each year. Do we eliminate vehicles? This sounds absurd, but do we put animals before people and their livelihoods? I would say the same thing regarding trapping.

We have a growing "Safety First" mentality in our society. We want others to watch out for our safety. People think that regulations provided by the government will replace their own responsibility. If we created a new regulation after every incident, the regulation book for each outdoor pursuit would grow to be so complex that it would eliminate the enjoyment of the outdoors. We should rely on our own condition and knowledge to ensure we do not put ourselves and pets in harm's way.

My solution to the problem is education for all user groups. Trappers need to be mindful of other user groups in the area. They need to adjust trapping techniques and species targeted in areas where others may be present. Dog owners need to understand their dogs' behaviors and weaknesses and ensure have proper control over their dogs. Dogs' senses are not much different than other K-9s in regard to their curiosity to baits and lures used by trappers. Dog owners should be mindful of the risks of running their dogs off-leash in rural areas in South-Central Alaska without proper control.

Submitted By
Robert Fuller
Submitted On
12/23/2021 11:52:56 AM
Affiliation



PC063
1 of 1

As a trapper who uses and traps along these trails for the last 25 years, and has no negative encounters with other trail users, I recognize no benefit in this proposal 199 for any users. I often trap near multi use trails and find very easy to avoid conflict. The only traps that have made contact with other users are those that were intentionally set off by individuals interfering with legal trapping. A 50-yard setback would not only impact and reduce legal catch of furbearers as they travel trails just like all other users. It would also be impossible to enforce and patrol. These trails paths vary widely from summer to winter, and year to year with no real measurable edges. Furthermore, as I am often the only user in winter of vast sections of these trails my path becomes the multi-use trail as it is maintained/ broken trail. If I maintain a trail 50 yards, or any distance from any of these trails it will become the trail for all users. A 50-yard setback from what line in a trails route is a question with no enforceable or obeyable answer. Not to mention the vastness of this question when you include all the trail on this list.



Submitted By
Denise Gates
Submitted On
1/6/2022 5:55:25 PM
Affiliation

I support proposals 198 and 228.



Submitted By
Decker Goodman
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1/7/2022 2:43:37 PM
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I oppose proposals 210 and 211 introduced at this board meeting.

I oppose proposal 210 to eliminate the community harvest moose hunts in unit 13. I am

Alaska Department of Fish and Game's position is "this hunt structure poses no conservation concerns". However, Claude Bundy's claim for this proposal is that it has impacted his personal access to moose, does not account for access of the communities who participate in the Copper Basin Community harvest.

Alaska Department of Fish and Game makes available data on the moose population in unit 13. In 2020 there were 70 moose harvested by community hunt participants in Unit 13B and 13 E combined along the Denali Highway. Sport hunters in unit 13B and E combined harvested 281 moose. So community hunters harvested ¼ of total quota in the Denali Highway area. So this proposal will not represent a significant reduction of pressure on the moose population if that was the intent.

There is heavy motorized usage in unit 13 does impact the community hunt.

Meat salvage requirements of the community hunt are less wasteful of the resource. Less moose needs to be harvested in order to feed more people.

The hunt creates greater opportunity to share with elders, the differently abled and those who cannot hunt. When one moose is harvested many people learn the process and it goes to multiple households, so again fewer moose, more meals, more people sharing.

This data is from ADFG public harvest record information. <https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvest.lookup>

I am also opposed to Proposal 211 to eliminate the Copper Basin Community harvest. The Alaska Outdoors Council claims the hunt does not benefit those who it was intended for (rural and Ahtna users).

I would also like to present the board with my personal experiences with the community hunt. Our hunt group has participated in the Copper Basin Community Harvest for 9 years. Many of the hunters in our group are non-native and non-rural, so on paper it would appear that our community hunt is not benefiting the above user groups. However, anywhere from 15-50% of meat harvested by our group goes directly towards Ahtna and rural residents. Every hunting party in our group donates 15-50% of their meat to Ahtna Inc offices, Chickaloon Village Traditional Council Elders lunch program, Chickaloon Village YaNeDahAh school, and more recently the Alaska Native Medical Center wild foods program. This year we were able to supply caribou bones and materials to an Ahtna lead traditional hide tanning camp and youth culture camps in Anchorage where students transitioning to urban life with their families can have access to traditional materials harvested on this hunt. Not only that, but we also bring much of that meat into the YaNeDahAh traditional Ahtna Athabascan school so that the kids can process meat, share it with their families, community and Elders. That is partially what this hunt is intended for, to pass this skills and knowledge down to the youth and to share with the community and those who are not themselves able to hunt.

The data doesn't tell the whole story, but the criteria that was written to be followed for this hunt does. If the board of game is not happy with how many non- unit 13 residents are able to participate in the hunt, ADFG should be allowed to enforce the criteria of the hunt, which can be done through the end of season surveys that are required to participate in the hunt.

If there is an imbalance in urban and rural users, it is because in 2009 it was declared unconstitutional to prioritize rural hunters in this hunt. This is when the number of non-rural users began to increase dramatically in unit 13 subsistence hunts. Which only serves to demonstrate that prospective hunters are willing to elevate their hunting criteria to include using all edible parts of the animal and gifting to the traditional stewards of the land, the Ahtna people, including those personal relationships we might have as well as through tribal community organizers, and school.

Getting rid of the Copper Basin Community Harvest would be a devastating blow not only to Ahtna and rural communities, but also to a way of life and traditional value system that is passed down (and mandated) through the very specific criteria of this hunt. If anything, I would encourage the board of game, and ADFG, to come up with more way to integrate Indigenous values of sharing, community, no waste, and teaching youth into more parts of the hunting legislation in our state.



Submitted By
Karen Gordon
Submitted On
1/7/2022 10:11:15 AM
Affiliation

Board of Game Comments on Central Southwest Region

From:
Karen Gordon
Fairbanks

Please vote no on ALL proposals that seek archery-only hunts. We have general seasons already in place. Choice of weapon does not justify discrimination, essentially affirmative action for bow hunters. No special need exists to warrant archery-only hunts no matter the GMU, no matter the species. Please vote them all down.

Proposal 86

Please pass. This area should never have gone to any ram and never gone on permit. Implementing these changes about 15 years ago was a blunder costing the loss of one of the rare road-accessible opportunities to hunt sheep where anyone could take part. The initiation of permits and the biologically unsound take of any ram was perhaps well meaning but ignorant as to the true biology of Dall sheep and the ramifications of taking from all age classes. This was a biological error. This proposal needs to be passed, and I'd also like to see a return of full curl and no permits in 13D.

Proposals 210 and 211

Please pass these proposals.

Thank you very much for the time and effort each of you does to serve Alaskans.

Karen Gordon



Submitted By
Madeleine Grant
Submitted On
12/17/2021 8:38:04 PM
Affiliation

My family lives in Anchorage but recreates regularly in the MatSu, visiting businesses as well as wild areas. Many years ago I helped pull a dog out of a Conibear trap too close to a trail in Turnagain arm. The dog survived, but we sure weren't certain that would happen. Proposal 199 is very reasonable for both trappers & recreational users (who surely outnumber trappers) . Please pass this, and thanks for the work that you do



Submitted By
Lisa Green
Submitted On
1/5/2022 11:38:17 PM
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Hi, I support proposal 228 to make it mandatory that all traps be labeled with the identification of the trapper.
thanks Lisa

Submitted By
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1/5/2022 11:34:51 PM
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Hi,

I support Proposal 199 that would set traps at least 50 yards off of trails. With an increase in population changes need to be made to rules and regulations to keep everybody safe. Right now pets are getting caught in traps what happens when it is children?

Thanks
Lisa



To: The Alaska Board of Game

January 7, 2022

Comments on Proposal 207 – 5 AAC 85.020, Seasons and bag limits for brown bears. Close brown bear season in Unit 9A

Submitted by Wayne Hall, Anchorage

The following response to the December 30, 2021 ADFG Staff Comments submitted to the Board are part of my comments to the Board on Proposal 207.

Response to December 31, 2021 ADFG Staff Comments on Proposal 207 to the Board of Game

ADFG: There is a negative finding for customary and traditional uses of brown bears in Unit 9A.

Response: Please provide data which shows there is any customary and traditional subsistence use relative to the portion of GMU 9A open to hunting. If there is a valid objection on established grounds of subsistence, that could be overcome by closing the GMU 9A season non-resident hunters only.

ADFG: If adopted, there would be an unnecessary loss of hunting opportunity by both residents and nonresidents.

Response: For fully open RYs 2011, 2013, 2015 and 2017 the reported harvest for the small portion of GMU 9A open to hunting represents 10% of the total reported GMU9 harvest. It is unreasonable to assume a total loss of that hunting opportunity. Adequate hunting opportunity exists elsewhere in GMU9 and in other units just as when GMU9 is closed in alternating Regulatory Years. Furthermore, if the ADFG comment is referring to individual bears, it is of course true “there is no way to determine a 9A bear from a 9B or 9C bear”. The same can be said for differentiating a 9A or 9B bear from a 16B bear. But that does not matter. What matters is where that bear is located during the hunting season and that should be evident to the hunter and ADFG.

ADFG: The proposer incorrectly states that the bear population is managed on a subunit basis.

Response: That statement on management on a subunit basis is taken from comments by Region IV Regional Supervisor Gino Del Frate in an email to the proponent dated May 26, 2020 as follows: “As shown above, bear density varies across subunits. The 110 bears/1,000 km² is a general reference to ALL of Unit 9. **Management actions occurs at the subunit level**” (emphasis added). This email was copied to ADFG personnel Eddie Grasser, Ryan Scott and David Crowley. No one corrected Mr. Del



Frate’s statement. Mr. Grasser subsequently replied to Mr. Del Frate’s email “Good job, thank you!” Copies of the email are available on request.

Besides, it is otherwise obvious GMU9 brown bear management is on a subunit basis with different hunts for individual subunits (RB368 and RB369) and with adjustments that have been made over the years to the length of seasons in specific subunits. Several current GMU9 brown bear proposals also differentiate seasons by subunit. What reason is there to have five GMU9 subunits if not to manage them differently?

ADFG: Based on the abundance estimate for Unit 9A by Lake Clark National Park biologists in 2003 (the most recent available), 24.6 bears (about 73% of which were males) represent a harvest rate of approximately 2.9–4.3% for a population ranging from 569 to 837 bears. Even if the subunit was a closed system, this is a sustainable harvest rate for coastal brown bears.

Response: These statements are statistically dishonest and misleading for a number of reasons. Below is a more complete view of the ADFG report, still “in prep.”, upon which they draw their conclusion.

From: Species Management Report & Plan in prep. Crowley 2021

Table 1. Bear abundance and density estimates in Unit 9, 1989 – 2005. Methods include double count distance sampling (DCDS), Bayesian distance sampling (BDS), mark recapture distance sampling (MRDS), capture mark resight (CMR) and visibility correction factor (VCF). Biometricians have reanalyzed several of these data sets using various methods over the years.

Year(s)	GMU	Method	Study areaa	Area km2	Abundance		Density /1000		Sourcec
					estimate	range	km2	range	
2003	9A	DCDS	9A	5,686	693	595-791	122	105-139	Quang 2005
		DCDS	9A	7,380	703	569-837	150	122-178	Olson and Putera (2007)
2003	9A	DCDS	LACL only	3,179	367	244-490	115	76-154	Quang 2005
		DCDS	LACL only	3,846	466	234-698	147	75-219	Olson and Putera (2007)
		BDS	LACL only	4,677	410	-	88	78-100	Schmidt et. al. (2017)

In their comment ADFG has drawn their GMU 9A population estimate from line 2 of the above table. It is the most optimistic estimate of the five relating to GMU 9A. However, the area surveyed, 7,380km², is 33% greater than the 5,566km² ADFG reports as the **total** area of GMU 9A in Table 207-2 of their comments. Why the difference? Not only



is the study area for the estimate they use is larger than the area of GMU 9A. It is also 77% larger than the 4,168km² ADFG has identified in their comments as “All Unit 9A bear habitat area”. Whatever area was being surveyed for the 703 bear estimate, it was a lot bigger than GMU 9A. There is also a mathematical error in the calculation of the Density/1000km² – the estimate of 703 bears divided by the 7,380km² study area yields 95 bears/1,000km² not 150 bears/1,000km².

ADFG uses an average harvest of 27.6 bears and the most optimistic population estimate for an area much larger than GMU 9A to calculate a harvest rate of 2.9-4.3%. This is an example of data manipulation so egregious as to make these numbers meaningless. First, ADFG uses the survey from an area 33% larger than all of GMU 9A. Then they use an “average” of GMU 9A harvests from ten regulatory years beginning with RY2011, eight years after the 2003 survey. The following open RY years 03, 05, 07 and 09 had excessive GMU9 reported harvests, all in excess of 600 bears per open year. Four of the ten years used in their average were closed seasons with no reported harvest. Two other years used in their average are not full regulatory year open seasons – RY2019 had virtually no Spring season due to Covid travel restrictions and RY2020 consists of a Spring season only. To get a comparable one full year harvest, RY2019 and RY2020 must be added together. Eliminating the closed seasons and combining RY2019 and RY2020, the average harvest for an open RY doubles to 55.2 bears. Even using the survey estimate for the area larger than GMU 9A this amounts to a harvest rate of 6.6-9.7% of the total GMU 9A estimated population. But since the population within the 29.8% of GMU 9A bear habitat open to hunting would be a percentage of the total GMU 9A population, the actual harvest rate for 1,242km² of bear habitat open to hunting would be significantly higher.

ADFG: Even if the subunit was a closed system.....

Response: Of course it is not a closed system. Bears move in, out and through the subunit but there are always bears in it, and every other subunit, at any given time. And given the similar habitat throughout GMU 9A it is reasonable to assume bears are present in similar densities throughout the entire subunit at any given time with the exception of where they are hunted. They are not all bunched up in the 29.8% of the subunit’s bear habitat which is open to hunting. But when ADFG calculates harvest rates, that is what they assume – bears killed in the 29.8% of habitat open to hunting divided by the estimated population of the entire subunit. The only way the number of bears in the 29.8% open to hunting can be sustained, if at all, is by immigration from other areas, most likely the GMU 9A closed areas of the McNeil Sanctuary and Refuge, Lake Clark National Park and Katmai National Park. ADFG confirms as much in their



comment “harvest that occurs in Unit 9A is not simply drawn from that narrow, 480 mi² stretch of coastline.”

What is conspicuously absent in the ADFG Staff comments on Proposal 207 is sufficient statistical support for their position that the brown bear population in GMU 9A is conservatively managed. Other than permit and harvest data (which they often report or represent incorrectly), they have little to none. Significantly, their own reported harvest data indicates a declining population in GMU 9A. That is, for the fully open RYs 2011, 2013, 2015 and 2017 for GMU 9A the average reported harvest in the Fall RB368 hunt is 65 bears. With an average of 125 hunters reporting, that represents an average success rate of 52%. And in the ADFG Staff comments, for total Fall and Spring hunts (RB368 and RB370), Table 207-3 shows an average success rate for the six RYs with open seasons of 62.7%. But for the Fall 2021 RB368 season that closed on October 21, 2021, the results are almost complete – 32 hunters reported and 12 bears were harvested in GMU 9A. Both statistics are well below average but the significant drop in the success rate to 37.5% is indicative of a brown bear population in decline. There is no actual population survey data since 2003. Much of the basis for their estimates dates back to the Black Lake studies in the late 1980’s. Their most recent published Brown Bear Management Report for GMU9, though based on no new survey data, dates back to 2014. The Species Management Report & Plan, 2021 is still “in prep.”

My Comments on Proposal 207

Overview

Game Management Unit 9 (GMU9) encompasses most of the Alaska Peninsula. It is divided into five subunits: A, B, C, D and E. The Alaska Department of Fish and Game (ADFG) manages GMU9 brown bears at the subunit level. GMU9 includes Katmai National Park and Preserve, Lake Clark National Park and Preserve and the McNeil River State Game Sanctuary and Refuge. Bear hunting is prohibited in the National Parks and in the McNeil River Sanctuary and Refuge. Most of the Cook Inlet and Gulf Coast drainages, from the northern boundary of Lake Clark National Park to the southern boundary of Katmai National Park and including the McNeil Sanctuary and Refuge, are closed to the hunting of brown bear. Only a small portion of that coastline remains open to brown bear hunting – the Cook Inlet drainages between Lake Clark National Park and the McNeil River State Game Refuge. This is the only portion of GMU 9A open to brown bear hunting, representing 29.8% of total GMU 9A brown bear habitat. As a result of access, proximity to the Anchorage area and Kenai Peninsula, and the guided hunting industry, hunting pressure has been extreme on the area’s brown bear population. This proposal will close this small area to the hunting of brown bears to conserve the remaining brown bear population from continued excessive and



unsustainable harvests, to protect bears in adjoining protected areas when they migrate into or through the vacant habitat created by the excessive and unsustainable harvests, and to complete the protection of brown bears in what has become known as the “Bear Coast”, a coastal brown bear habitat critical to a thriving and economically productive bear-viewing industry.

GMU 9A Brown Bear Population, Harvest Rates and Other Data

To calculate the population and harvest rates in any given area, in this case the portion of GMU 9A that is open to hunting, three things are necessary: 1) the size of the area, 2) the population density and 3) the number of bears harvested. Data on all three components comes directly from ADFG sources.

Size

The area of GMU 9A which is open to hunting is about 480mi², or 1,243km², as calculated by D. Crowley, ADFG Area Wildlife Biologist III (pers. comm. October 20, 2021).

Population Density

The most recent brown bear population surveys in GMU 9A (and Lake Clark National Park) were conducted in 2003, eighteen years ago. Below are results of five surveys in GMU 9A from an as yet unpublished ADFG Species Management Report.

From: Species Management Report & Plan in prep. Crowley 2021

Table 1. Bear abundance and density estimates in Unit 9, 1989 – 2005. Methods include double count distance sampling (DCDS), Bayesian distance sampling (BDS), mark recapture distance sampling (MRDS), capture mark resight (CMR) and visibility correction factor (VCF). Biometricians have reanalyzed several of these data sets using various methods over the years.

Year(s)	GMU	Method	Study area ^a	Area km ²	Abundance		Density		Source ^c
					estimate	range	/1000 km ²	range	
2003	9A	DCDS	9A	5,686	693	595-791	122	105-139	Quang 2005
		DCDS	9A	7,380	703	569-837	95	77-113	Olson and Putera (2007)
2003	9A	DCDS	LACL only	3,179	367	244-490	115	76-154	Quang 2005
		DCDS	LACL only	3,846	466	234-698	121	60-181	Olson and Putera (2007)
		BDS	LACL only	4,677	410	-	88	78-100	Schmidt et. al. (2017)



(Note: There were several apparent math errors in the Density/1,000km² calculations in the above table. The corrected numbers are shown in red.)

Bear habitat in GMU 9A is similar throughout the subunit. Therefore bears can be expected to be spread throughout the subunit at any given time including during open hunting seasons. Just as ADFG estimates populations throughout each of the GMU9 subunits, the same method is applicable to the portion of GMU 9A open to hunting. Using the highest population density estimate in the above table (122/1,000km²) and the area of GMU 9A open to hunting (1,243km²), the highest population estimate for the area of GMU 9A open to hunting is 151 bears. Averaging the five density estimates yields a population estimate of 135 bears for the portion of GMU 9A open to hunting. Using the lowest of the five population density estimates yields a population estimate of 109 bears for GMU 9A open to hunting.

Reported Harvests and Harvest Rates

In RY2017, 63 bears were reported harvested in the Fall and Spring seasons in GMU 9A, presumably all in the area open to hunting. Using the largest population estimate, for the area open to hunting, derived from the largest bear density estimate (151 bears) this represents a two season harvest rate of 42%. Using the average and lowest bear density derived population estimates (135 and 109) it represents harvest rates of 47% and 58% respectively.

In RY2019, the Spring season was effectively cancelled by Covid travel restrictions and only a few resident hunters participated. As a result, the Board of Game approved an additional Spring season in RY2020, a year which would normally be closed in both Fall and Spring. To get comparable statistics, the Fall and Spring RY2019 season must be added to the additional Spring RY2020 season. The result is 65 bears reported harvested in GMU 9A. Using the highest, average and lowest bear population estimates this represents harvest rates of 43%, 48% and 60% respectively.

Reported harvests in open years RY2011, RY2013 and RY2015 steadily increased at 40, 46 and 48 respectively. Using the highest GMU 9A population estimate for the area open to hunting of 151 bears, these represent annual harvest rates of 26%, 30% and 32% respectively.

Though they may be substantial, illegal and unreported kills are not included here. Neither is natural mortality, which ADFG considers largely additive to hunting mortality.

ADFG mathematically reduces reported high GMU9 annual harvest rates by dividing any given RY reported harvest rate by 2 for an “bi-annual” rate, because of the alternating open and closed regulatory year seasons. This is a questionable manipulation of data at best but it falls completely apart at extremes. For example, at



the most extreme, given a 100% harvest rate in an open season year, in other words complete elimination of bears, ADFG would calculate a 50% harvest rate. This is of course a misrepresentation of the real-world impact. It is only moderately less a misrepresentation to consider that a 46% annual harvest rate is really “only” 23% “bi-annually”. Their calculations in effect assume the bears harvested in an open year are completely replaced in the subsequent closed year. But with such excessive harvest rates for a species with a known low reproductive rate, that is clearly unrealistic. Still, to be conservative, the harvest rates calculated here assume a stable population over time.

The annual harvest rates in GMU 9A as calculated above are certainly excessive and unsustainable. But they are no more speculative than any other brown bear population data extrapolated and used by ADFG throughout all subunits of GMU9. All the above rates have been calculated in the manner historically used by ADFG throughout GMU9, using only ADFG data including the most recent, though eighteen year old (2003), GMU 9A population density surveys and harvests as reported to ADFG. Even if averaged over the past ten regulatory open and closed years from RY2011 through RY2020, the so-called “annual” harvest rate (as defined by ADFG) for GMU 9A open to hunting is at least 17%.

Average Age of Harvested Brown Bears

According to an ADFG report, “reliance on sex and age composition of harvest data to indicate trends in bear populations is extremely risky. Such reliance should be done only when managers are willing to accept high risks of missing trends until such trends are very far advanced.” Another ADFG report states “Brown bear age-at-harvest data are widely misinterpreted by division staff. The most common misinterpretation is that lack of change in mean age of harvested bears indicates a stable population.” And “A review of recent S&I reports suggests that the most common current use of bear harvest age data is to infer that bear population numbers are unaffected by harvest because mean age or sex ratio statistics are not changing over time. This is a misuse of harvest age data.”

Even so, ADFG still relies on a stable age of harvested male brown bears to indicate a population that is well managed and not over-hunted. But according to ADFG data, in GMU 9A the average age of harvested male brown has recently been in decline by as much as 25% as follows: RY 2010-11 = 10.5 years, RY 2012-13 = 10.0 years, RY2014-2015 = 10.9 years, RY 2016-17 = 9.1 years and RY 2018-19 = 8.1 years. The average age of harvested female brown bears in GMU 9A has declined even more dramatically: RY 2010-11 = 8.4 years, RY 2012-13 = 8.5 years, RY2014-2015 = 6.3 years, RY 2016-17 = 7.7 years and RY 2018-19 = 4.7 years. Even by a “risky” metric, and with no other



data to indicate otherwise, this indicates a population in decline. (There is no more recent GMU9 age data currently available from ADFG.)

Inadequate and Delayed Data

Timely publication of ADFG data is critical for public review and management decisions. The added GMU9 Spring RY2020 brown bear hunting season closed on May 31, 2021. Final results from that hunt were not available until late October, 2021, almost five months after the close of the season. The regularly scheduled RY2021 Fall brown bear hunting season closed on October 21, 2021. Final detailed results from that hunt will likely not be available for public or Board review until after the Board of Game considers GMU9 brown bear regulatory proposals for RY2022, and beyond, at the January, 2022 meeting. A third consecutive brown bear season is already scheduled to open September 20, 2022. These three consecutive open seasons (Spring RY2020, Fall RY2021 and Spring RY2021) are unprecedented in recent decades and occur at a time when the GMU 9A brown bear population is already under excessive and unsustainable hunting pressure. Given that, the Spring RY2021 season should be closed by emergency order. RY2022 is already closed but future regulatory years should be closed for GMU 9A by action of the Board of Game by approving Proposal 207.

There is embarrassingly little hard data on the GMU 9A brown bear population other than what has been presented here. No population surveys have been conducted since 2003. The ADFG Brown Bear Management Report for the period July 1, 2012 – June 30, 2014, now seven years old, is the most recent one published. As referenced previously, a “Species Management Report & Plan, Crowley 2021” has been “in prep.” since at least April, 2021. In September, 2021 the publication date was estimated to be “late summer” 2021. But as of January, 2022, this report, which should contain information valuable to the public and for management decisions, has yet to be published. In short, not much is known about the GMU 9A brown bear population other than the high harvest rates, declining average age of bears harvested and declining hunter success rates. ADFG has failed to present population and harvest data in a way that clearly reflects the excessive and unsustainable hunting impact. In this case, conservative and reasonable wildlife management practices should be adopted to close GMU 9A to brown bear hunting as contained in Proposal 207, beginning with an emergency order closing the Spring RY2021 season.

Other Pressure on GMU 9A Brown Bears

Layered on top of existing heavy hunting pressure is a proposal by the group Resident Hunters of Alaska to increase the resident bag limit for brown bear throughout GMU9 from one bear every four years to one bear every year, increasing hunting pressure



above what is already excessive and unsustainable. That same group also proposes to add resident-only hunting season dates throughout GMU9.

An additional negative layer for GMU9 brown bears is the stated ADFG management objective of in excess of 60% of the harvests consisting of males. This is contained in Proposal 205 by ADFG, to re-authorize a ten-year intensive management plan for the Southern Alaska Peninsula caribou herd. This 60% minimum has been referenced by ADFG in various reports since 1989 but is not based on any research. The only thing that can be proven is that it has been regularly exceeded with males representing 80% or more of the reported harvests in numerous regulatory years and GMU9 subunits. There has been no examination of the impact of such extreme removal of male bears from the population but the declining age of harvested male bears may be one result. Absent any population and harvest data other than what has already been presented here, there is little evidence it has been effective in any way other than to reduce the number of brown bears.

Valuable Alternatives to Brown Bear Hunting in GMU 9A

Given the demonstrated excessive and unsustainable hunting pressure on brown bears in the portion of GMU 9A open to hunting, the fact there are still bears there to be hunted can only be explained by the immigration or transiting of bears largely from the adjacent closed areas of Lake Clark and Katmai National Parks and the McNeil River State Game Sanctuary and Refuge. Closing the remaining portion of GMU 9A to brown bear hunting will increase the conservation and economic value of these strategic, popular and economically valuable brown bear-viewing areas. Implementing permits and fees for guided bear-viewing on these state lands could offset any minimal loss of state revenue from the hunting closure.

Respectfully submitted:

Wayne Hall, Anchorage



Submitted By
Terra Hanks
Submitted On
1/7/2022 6:19:42 PM
Affiliation

I am opposed to proposal 210 and 211.

I think that the issues with the lack of moose and caribou are far greater reaching than the impacts from a few subscribers to the CBC Subsistence hunt. I believe shutting down this subsistence hunt will have no impact on the overall moose or caribou populations. I think these propositions raise substantial questions with the overall hunting arena and I address some of them below. I am however hopeful they will help to clarify a rather opaque system.

Regarding prop 210 specifically, anecdotal evidence can be contributory to an overall picture but should not be used as the only evidence to end a hunt. Just because the moose are not in Claude Bondy's historical hunting grounds doesn't mean they are not there entirely. Animals learn and move and change. The Subsistence hunters may have experienced the same movement or change in the populations; Has anyone asked? Has anyone looked at the historical population densities throughout unit 13? Does the intense predator control have an impact on the moose population? the caribou population?

Instead of shutting down the CBC Subsistence Program, perhaps a specific unit 13 population distribution and kill rate Ahtna/non-Ahtna/urban/rural/subsistence/non-subsistence hunters to pinpoint decline/no decline, user areas, population densities of moose/caribou. The proposals don't seem to have reason behind them other than lack of animals and this could be due to many outside factors.

I am unclear as to why the Alaska Outdoor Council wants to shut down this hunt. It is not specifically stated in the proposition.

A few more questions to ask: Who does the Subsistence hunt hurt if it is eliminated? Who is affected if it remains? How can hunting data be collected and used so everyone can have a clear picture of hunting use and users? *One thing to keep in mind is that the current numbers collected for the Subsistence Hunts are not the whole picture. For example, one Subsistence hunter living in Anchorage may have family in unit 13 that they provide with meat but this is recorded as an urban hunter because they live in Anchorage.

I believe there are questions to be answered before such eliminatory drastic measures are taken. I urge BOG to look closely at these questions and ask Ahtna leaders as well as professionals (biologists, ecologists, etc...) to see how Subsistence hunts can remain and moose and caribou populations can flourish!

One more note: it is not my intention to disregard the people who have made these proposals, I just would like more information from them on their reasoning. From this viewpoint it seems limited in supporting points and purpose.

Thank you for your time.

Submitted By
Kelsey Hansen
Submitted On
1/6/2022 3:34:44 PM
Affiliation



PC071
1 of 1

I live in Alaska, and I live near the Mat-Su area. My family lives in Palmer, and we all have dogs. Like most Alaskans, we love getting outside and recreating freely via skiing, hiking, and snowshoeing, oftentimes in the Mat-Su Valley. We also bird hunt (waterfowl, ptarmigan, and grouse) with one of our dogs, which allows them to be off-leash.

I am writing in support of Proposal 199, because my family and I worry for our pets when we recreate during the summer months. We do not want Alaska to become like California (clearly, or else we would just be living there) by having no trapping allowed, but we do think having some trap setbacks off of popular multi-use trails is a fair compromise. I understand that trapping is a part of the state's heritage, and I understand folks use it as a means of subsistence and hobby. But, when the commonality of pets and people getting caught in traps continues to increase, I think there needs to be more of a restriction to allow for everyone's safety. The ask is not to eliminate trapping- the ask is to set traps a 2-minute walking distance from popular multi-use trails.

Pets being on leashes on all outdoor trails is, quite frankly, an unrealistic expectation. Not only that, some pets have been caught in traps even when they were within a leash-length from their owner, so a leash would have been obsolete. Physical leashes are not required on many trails, and I don't believe the majority of Alaskans would like all open spaces to require leashes. Voice and sight control is ethically important for the experience of other trail users and wildlife, and critically important to the safety of pets. This proposal would not protect dogs who venture far from their owners or who are uncontrolled, but it would keep traps far enough away that trained, off leash dogs would not be lured by baited "instant-kill" traps like conibears. Heaven forbid, but what will be consequences be when a little kid gets caught in a trap set on or near a trail?

Since most trappers behave ethically and don't place traps in multi-use corridors already, this proposal will not burden ethical trappers at all. This proposal only limits those who set "problem" traps. Having known and spoken to many trappers, I believe most would be understanding of the proposed 50-yard trap setbacks. I've spoken with trappers who have claimed that trapping on or close to trails isn't ethical or prideful, and they think that setbacks wouldn't be an issue for those who are already properly trapping anyway. Part of their trapping heritage includes hard work, grit, and love for the outdoors- and setbacks would only hinder unethical trappers who don't value these qualities.

Thank you for your time in reading my comment in support of Proposal 199 and 50-yard trap setbacks in the Mat-Su.



Submitted By
Holly Hansmeier
Submitted On
1/7/2022 3:43:25 PM
Affiliation

Commenting in **support** of Proposal 199.

Proposal 199 is a fair compromise to trappers and recreators alike. As an avid recreator and a dog owner myself, I worry about the safety of myself, friends, family, and dogs when using the multi-use trails in the Mat-Su Borough. A 50 yard set back is less than a minute on vehicle or 1-3 minutes on foot, which can hardly be considered as even a small inconvenience to trappers when the alternative is the potential of unintentionally harming or killing a life. I know too many families who have lost their dogs to animal traps set only yards away from the trail. It is unfortunate and Proposal 199 offers a simple solution to this problem. I hope the Board takes serious consideration of Proposal 199.



Submitted By
Wayne Heimer
Submitted On
1/7/2022 11:34:25 AM
Affiliation

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I begin with a general statement of position: The Policy of the State is defined in Article VIII Sec. 1 of the Alaska Constitution. It defines overall State Policy as making Alaska's natural resources available for maximum use consistent with the public interest. Alaska Statute 16.05.020 (2) Functions of the Commissioner, charges the Commissioner (via the Department of Fish and Game) to manage, maintain, protect, and improve fish and game in the best interests of the **economy and general well being of the state.**

I observe that most of the proposals for the Central and Southwest Region meeting are NOT consistent with the State's overall policy statement. Most are designed to serve the special interests of the individuals or groups submitting them. This is particularly notable in proposals for special archery hunts for Dall sheep. The rationale beyond special interest gets pretty murky, and I don't think you want me to go into it here.

I am opposed to proposals 2, 3, 4, 5, and 6. Practically, the general Dall sheep season is 42 days long, and most Dall sheep hunting takes place during the first two weeks. It always has. This means there are 28 days of open Dall sheep hunting when few hunters are in the field. Hunters choosing to use archery equipment really don't need a special early season to have the opportunity to hunt in a relatively secluded situation. The hope for an early archery hunt seeks presumed advantages based on equipment choice (no rams killed yet, and presumably less wary quarry). However, these perceived advantages, if the reasoning holds, will disadvantage other hunters who hunt later in the season (because some rams will have been killed, and rams may be spooked by archery hunters as well as others). In truth, these proposals seek advantages which are more cosmetic than realistic. On this same basis, **I oppose special archery privileges for hunters associate with proposals 87-90.**

I support proposal 86 to normalize the bag limit for Dall rams in 14A and 13D at full-curl. I judge it to be true that the basically "experimental" any ram bag limits in a highly restricted permit hunt haven't hurt the populations there. I also stipulate that those very few hunters who drew the limited numbers of permits and selected smaller rams may have enjoyed some benefit. However, I question whether the overall costs (given no conservation concern) resulting from an unnecessary restriction of hunting opportunity (in general violation of State policy) justify these limited benefits to a few.

I also urge the Board to consistently inquire of the Department why, (when it is the Department's duty as an extension of Commissioner's responsibility to manage for the benefit of the economy and general well-being of the state) the Department **predictably comments as "NEUTRAL" on matters of allocation.** I argue that decisions on allocation always advantage some, and disadvantage others. When some are disadvantaged, where there is no conservation concern, the availability of Alaska's resources is not maximized, and the best interests of the State's economy and its residents are similarly compromised. This is inconsistent with both Alaska Constitution Article VIII, Sec. 1 and AS 16.05.020. Having served as a manager, I argue allocation is a basic element of management, and to pretend otherwise represents a sloughing of Departmental responsibility to the Board of Game. Allocation should not be a special-interest "free for all" left up the Board.

In this vein, **I also support proposal 211.** The community hunt programs have never been consistent with the Alaska Constitution's "available for maximum use" Policy or "common use" provisions. As I understand it, common use is subject to preferences among beneficial uses. Subsistence for all Alaskans has been designated a special use, and must be congruent with the overall Constitutional Policy. **I respectfully urge the Board to recalibrate its approach to conform uniformly to the Alaska Constitution, AND to encourage the Department to do the same.**

The best to all as you do a tough job,

Wayne Heimer, Fairbanks



Submitted By

Amy T Henry

Submitted On

12/21/2021 11:09:26 AM

Affiliation

"There is a proposal before the Board of Game this year (proposal 199) to regulate 50 yard no-trap setbacks from multiuse trails in the Mat Su area." I believe traps should be set back from trails. I also believe that there should be no trapping allowed in high-density core areas/communities. Life has changed dramatically in Alaska; it is time the laws changed to reflect this.

Thank you,

Amy Henry



Submitted By
Joshua Hicks
Submitted On
1/7/2022 1:56:26 AM
Affiliation

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Address
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For proposal 198.

I am against this proposal. This proposal will effectively Eliminate all bear hunters from hunting over bait, unless you have an airplane. Hunters that only have access to whats on the road systems would be negatively affected along with the bear population. The bait station provided the means to improving the bear population by ensuring only mature bears male and mature cub less sows are taken. The bait station also help distinguish between male and female bears easier. Banning bait on someone having a suspicion is stupid. There is no evidence that bait station are causing bear activity to increase in the proposers area. I haven't live here for 38 year but I've live here for 5 year and never seen a bear outside of the a bait station. I'm am an avid outdoorsman and spend a lot of time in the woods and never seen a bear. In the only bear I've seen in Alaska was on a my trail cam at a bait station. Bear have a 500 mile range according the the bear bait clinic. If you look at a map with all the cabins in the state, the 50 mile range would effectively Eliminate all bait station between the parks and Richardson hwys and the majority of the state for people who can only access opportunities VIA the road systems of the state. I do agree that the distance should be increased to 5 miles of a cabin, however,50 miles is just ridiculous and unreasonable. Bear baiting is the best way to ensure proper selection, age, sex, and mature of bear being harvested, so the bear populations can increase and to ensure proper conservation of bears is being maintained.



Submitted By
Drew Hilterbrand
Submitted On
1/6/2022 9:51:19 AM
Affiliation

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Ninilchik, Alaska 99639

To Alaska Board of Game,

My name is Drew Hilterbrand. I have been a resident of Alaska for 20yrs and live in the caribou hills outside of Ninilchik,AK. I have spent my time in Alaska as a commercial fisherman in Bristol bay, Charter captain on Cook Inlet, a big game guide and have guided/hunted/trapped in units 7,8,9,15,16,19,21,22,23. Guided photographers/fishermen in Lake Clark National Park (9A).

The following are my positions on the following proposals.

I am OPPOSED to proposal 28. Which would remove the resident bag limit of one bear every four years in unit 9.

The management model for brown bear on the Alaska peninsula has, overall, been very successful and provided ample opportunity to both residents and nonresidents to hunt. Current regulations do not prevent residents from hunting each season if they have been unsuccessful but simply guard against unnecessary pressure. And as the majority of residents only kill one brown bear if any during their time in Alaska I see this proposal as an effort by a small group of individuals to alter regulations for their personal benefit and not benefit this or any other resource. There are opportunities in place already for a resident that wishes to hunt brown bear in Unit 9 under RB525.

I am OPPOSED to proposal 198. Which would prohibit bear baits within 50mi. of cabins.

I believe that this would be ridiculously restrictive. My understanding is that the current limitation that prohibits baits within 1mi. of cabins is to provide a safety margin both to prevent the risk of injury due to a stray projectile and also limit bear/human conflict, and is strictly enforced. Bear baiting has proven to be a very beneficial management tool in many areas and unnecessary restriction could prove to be detrimental to a number of prey species that have benefited from a reduction in bear predation. I believe that current regulation provides an appropriate margin of safety without being excessive.

I am OPPOSED to proposal 206. Which would create a resident only season on the Alaska peninsula Unit 9.

As mentioned previously the management model for Unit 9 has been very successful for brown bear overall. Opening additional seasons which would result in added pressure to the resource and additional costly enforcement requirements seems misguided to me.

I am opposed to proposal 207. Which would close Sub unit 9A to brown bear hunting.

In my opinion this proposal is nothing but a thinly veiled attempt to turn all of 9A into a protected bear viewing area. I have spent a great deal of time in the field in sub Units 9A/B in the last 20yrs (not only working seasonally in various capacities but also lived in 9A year round for several years, and still spend several months a year in 9A/B guiding, hunting, trapping) saying that the bear population is being over harvested or is in decline is preposterous. As you know large portion of 9A is national park, and state game sanctuary. As a result these areas are already closed to hunting and provide ample area for bear viewing activities.

The remaining lands in 9A that are available for hunting have limited access and a good portion are privately owned native lands which limit land use. Because of these factors the brown bear population in 9A is largely untouched. The hunting that does take place is more than sustainable and provides a good deal of revenue for both the state and native corporations.

Submitted By
Clinton Hodges III
Submitted On
1/7/2022 1:39:52 PM
Affiliation



PC077
1 of 1

I'm commenting in support of Proposal 199 to the Alaska Board of Game. I adopted a small village dog that has spent his entire life off leash. He doesn't wonder far from me, but he does have a curious nose and if something is close to the trail he will investigate. I believe that this 50' setback will have little to no effect on the current and future crop of ethical trappers in the state. There has been a small batch of inexperienced trappers placing traps in what could be a negative response to other user groups recreating on public lands. This is just dangerous and childish. We are a land of laws and it appears that some trappers are acting inappropriately. Thank you for your efforts and time.



Submitted By
James Hoehn
Submitted On
12/15/2020 9:24:15 AM
Affiliation

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907-354-1934

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Address
3608 w demaree cir
Wasilla , Alaska 99623

I oppose proposal #8 for coyote snaring. If hunting is open you should be able to snare.



Submitted By
Caleb Holmes
Submitted On
1/6/2022 11:00:24 AM
Affiliation

Phone
4438806423

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ch9191@yahoo.com

Address
50 Wiley Mill rd
New Park, Pennsylvania 17352

Just wanted to say i would like to see proposal 89 about an all traditional season on dall sheep approved.



Submitted By
Jenna Hooley
Submitted On
1/7/2022 7:47:59 PM
Affiliation

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1321 p street #2
Anchorage , Alaska 99501

As a dog owner and outdoor lover, I am in support of proposal 199 to have reasonable set backs for traps. It is devastating that dogs have been lost to traps set too close to public use trails and this should never happen again.



Submitted By
Karen Hopp
Submitted On
1/2/2022 3:01:31 PM
Affiliation

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Address
10128 N Spike Fork Cr
Palmer, Alaska 99645

Living and recreating off Wasilla Creek Moose Range over the past 19 years I have experienced too many irresponsible trapper incidents involving pet deaths and prolonged needless suffering of trapped wildlife. Traps set off recreational trails at least the proposed 50 yards, and signage to warn other trail users would be at least the minimal reasonable requirements in these high multi user areas. The trappers in the Moose Range seem over the years to be young inexperienced users with minimal knowledge of this trail system and worse, unethical trapping practice. Recreational use, particularly non motorized has expanded greatly every year with the explosion of fat bike popularity and local population. Agreement with Proposal 199 is essential at this time as the initial step in managing Moose Range safety for all
Thank You, Karen Hopp



Submitted By
Robert T Hubble
Submitted On
9/7/2021 6:59:59 PM
Affiliation

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1564 DYE AVE
Apt C
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I am opposed to proposal 228 because if pet owners kept the pets on a leash and/or under control thier would be no reason to need to contact the trapper. I actually provided my information to trap in Chugach State Park and the Park Ranger said that I was the only one to register in quite a long time. This proposal is totally not necessary.

Submitted By
Robert Hubble
Submitted On
9/7/2021 6:56:54 PM
Affiliation

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1564 DYE AVE, APT C
APT C
JBER, Alaska 99505

Hello,

I am opposed to Proposal 99. There is no danger to people or pets if pet owners keep their dogs on a leash as required. This proposal is nonsensical and is only trying to abdicate pet owners from their need to keep thier pets restrained and/or controlled.



Submitted By
Josh Ingram
Submitted On
1/7/2022 5:23:22 PM
Affiliation

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Seward, Alaska 99664

I am strongly against proposals 210 and 211 to end the Copper Basin Community Harvest in unit 13.

In regards to Proposal 211, the discontinuaton of this hunt would be the loss of a tradition going back a long time in this state. One of the things I value most about our heritage as Alaskans is our tradition of making the very most of our shared natural resources. Working hard to put up meat for the year and doing it together to support those in our community who need it are values which are strongly supported by the structure of ths hunt. A lot of people depend on it. It poses no threat whatsoever to anyone else or other users of the area.

As for Proposal 210, no one really seems to know who this Bundy guy is, but I guess he must be pretty loud and have too much time on his hands. Anyway, his ideas about the community hunt threatening the moose populaton are way out of left field. I don't think there's any numbers that actually back up his claims.

Submitted By
Jessica Jensen
Submitted On
1/6/2022 7:34:17 PM
Affiliation



PC084
1 of 1

I support reasonable limitations to trapping on popular multi-user trails, eg. proposal 199 and 228. I have several dogs and we use many of the Matsu trails to recreate and are always concerned with traps that some trappers have placed unethically close to popular trails.

Committees:

House Finance Committee

•
Legislative Budget &
Audit

•
Finance Subcommittee
Chair of:

Alaska Court System
Department of Law
Department of Health and
Social Services

ALASKA STATE LEGISLATURE



PC085
1 of 2

*Serving Midtown,
University, and
East Anchorage
neighborhoods*

REPRESENTATIVE ANDY JOSEPHSON

7 January 2022

-Delivered by Electronic Transmission-

Dear Alaska Board of Game Members,

I write today to encourage your support for Proposal 199, put forward by the Alaska Wildlife Alliance (AWA). I have been honored to support the work of AWA as a member of its advisory committee for several years and can attest that AWA has incredibly talented staff. It is evident from reviewing Proposal 199 that a great deal of thought and research went into its drafting. I believe that Proposal 199 represents a logical and thoughtful solution to protecting all users of multi-use trails in the Mat-Su Borough.

In 2017, at the behest of the area's citizens, the Mat-Su Borough Assembly approved trapping restrictions on six borough-managed trails. However, the assembly did not issue restrictions for state-managed trails. They opted to leave this decision for the State Board of Game.

Though Anchorage and Juneau both have enacted city ordinances designating setbacks for trapping near trails, current state law is murky about what limits local governments may place on trapping on state land. For several years, I've sponsored legislation to expand the ability of local governments to regulate trapping within their own boundaries; the current version of this bill is HB 50. However, until this or similar legislation passes, the primary responsibility for regulating trapping on state land falls to the State Board of Game.

Trails throughout Alaska are multi-use and enjoyed by skiers, snowmachines, hikers and trappers alike. It is notable that the selection of trails for this proposal was an intentional process designed to identify true multi-use trails utilized by a variety of users during the trapping season. There must be room in Alaska for all user groups to recreate safely on multiuse trails. The well-documented issue of pets being caught in traps on trails throughout the state is tragic and unacceptable. The setback of 50 yards, suggested by Proposal 199, is a reasonable accommodation to avoid these unfortunate situations in the first place. The 50-yard setback has already been adopted within the Municipality of Anchorage and has proven broadly effective.

It is also worth pointing out that current state law is very protective of trapping activities. Under state regulations there is no requirement for traps or trap lines to be marked and there is no requirement as to how often traps must be checked. Also, under A.S. 16.05.790, disabling or removing a trap is considered a crime of "Obstruction or Hindrance of Lawful Hunting, Fishing, Trapping, or Viewing of Fish or Game" and can lead to up to a fine of \$500 or 30 days in jail. There is little recourse available to a recreational user who encounters a trap on a public multi-use trail.

January-April: State Capitol, Juneau, Alaska 99801 • (907) 465-4939 • (800) 465-4939

May-December: 1500 W Benson Blvd, Anchorage, Alaska 99503 • (907) 269-0265

Rep.Andy.Josephson@akleg.gov



It is easy for conversations around regulation of trapping to become heated. My intention with this letter is not to attack anyone or to suggest that all trappers are bad actors. I know this is not the case and am aware that most trappers adhere to ethical practices. Rather, I simply hope to urge the Board of Game to implement common sense restrictions along frequently used trails in the Mat-Su Valley, the region of the state with the fastest-growing population. The goal of Proposal 199 is simply to ensure safety of recreational users and their pets and to reduce trap related injuries of pets and people.

I believe that this is a goal all Alaskans can embrace. Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Andy Josephson".

Rep. Andy Josephson
State House District 17



Submitted By
Paul Keller
Submitted On
2/5/2021 6:59:27 PM
Affiliation

Phone
9077647643
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pdkea@aol.com
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7110 Ambler Lane #16
Anchorage, Alaska 99504

To whom it may concern:

Between two and three years ago, the Alaska Board of Game published a regulatory change that prohibited the taking of big game species in the State of Alaska (SOA) with devices that are known as "slingbows" (a slingshot-type device that utilizes elastic bands or torsion-limbs to allow the launch of an arrow or quarrel) and "air bows" (a pneumatic launcher that accelerates an arrow using a compressed charge of gas). I have a couple of inquiries as to why this decision was made, as the pragmatic evidence for such a decision does not correspond with an understanding of the engineering of the devices listed above.

As listed in the original proposal for the regulation of the devices from 2017:

"PROPOSAL 17 – 5 AAC 92.085. Unlawful methods of taking big game; exceptions. Prohibit the use of airbows for taking big game as follows: You may NOT take big game with an "airbow," Or, "Airbows" are not legal for use in any archery only area, archery season or special archery hunt. 24

What is the issue you would like the board to address and why? A new device called an "airbow" has recently come on the market. It is essentially a compressed gas device that shoots an arrow-like projectile. The Alaskan Bowhunters Association wants to be certain that this device is not confused with or considered conventional archery tackle. "

I searched the proposal books for the original language for the prohibition of slingbows, but I was unable to locate it (I may have overlooked it). Given the relatively short range of a slingbow with sufficient energy to launch a suitable arrow for clean kills in an ethical hunt (usually within 15 yards or so), it may be reasonable to maintain a prohibition on slingbows for use in most big game hunts, though they retain a potential survival tool application in extreme situations due to their portable design and ease of use at close distances for either emergency food procurement or physical defense from potentially hostile wildlife (as is described in the "Emergency Taking of Game" section in the Alaska Hunting Regulation supplement).

However, air bows are another animal entirely (pun intended). These devices, like crossbows of the last five years, have made tremendous strides in their engineering, and they are very capable of firing arrows or bolts faster and farther than many traditional vertical bows since they derive their propulsive energy from compressed gas. Hence, they are not like any conventional archery equipment (other than the fact that they fire a similar projectile), and they allow for the arrow-type projectile to obtain significant performance, accuracy, and range increases over arrows fired by the use of torsion-bound limbs or lever arms. I would postulate that air bows are worthy of reconsideration into legal big game hunting status within the SOA, so long as they remain in the purview of a general, unrestricted hunt where any legal weapon may be used to harvest an appropriate big game specimen. Traditional or primitive weapons have already been successfully and extensively defined within the state regulations, and there are corresponding hunts where *only* those specified weapons may be used to harvest big game. These hunts and weapons should retain their specified legal status, as preserving the historical and skillful use of the ancillary forms of more contemporary technologies used in hunting is a vital, worthwhile goal. So long as they were used in unrestricted hunts and within any other applicable technical or methodological factors, I see much merit in allowing air bows to be reinstated as a legal procurement means.

Given the fact that the previous proposal for air bow prohibition was made by a professional organization (the aforementioned Alaskan Bowhunters Association), I sense that there may be some apprehension on the part of the Association to allowing the use of air bows due to a fear of encroachment on their already-established niche of traditional/restricted weapon hunts. As modern firearms currently coexist quite well with archery as a complementary method of hunting, there already exists a solid example of another hunting method that successfully enables Alaskans and non-resident hunters alike to enjoy one of our most popular outdoor sports. Allowing air bows to be legally used gives a unique opportunity for others to be enjoyably introduced to hunting, and it gives experienced hunters a different option for times when terrain, weather, species, or other factors might otherwise stall a successful hunt.

Please feel free to reply back at your convenience if you have questions or comments (I imagine I will probably get a fair share of "hate mail" responses to this proposal). I welcome feedback, with the understanding that I retain all other legal rights should someone commit libel, slander, or threats of harm in responding. Thank you for your time and consideration to this subject.

Sincerely,

Paul Keller



Submitted By
Hunter keogh
Submitted On
9/7/2021 7:08:51 PM
Affiliation

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7120 s yohn bay place
Wasilla, Alaska 99687

To Whom it may Concern,

Today I am writing you to show my OPPOSITION to proposal 99 and 228, both of which pertain to trapping regulations. These proposals are trying to further restrict trappers opportunities in units 14a, 14b and unit 16. These are already some of the most restricted trapping areas and do not need any further restrictions.

Hunter Keogh

Submitted By
Hunter keogh
Submitted On
12/20/2021 7:57:09 PM
Affiliation

Today I am writing in opposition to proposal 199. I do travel a lot of the areas included in this proposal and to think that the state wants to shut down trapping within 50yards of the trail due to conflicts with dogs is absurd. Very few of these areas actually have dog traffic which run the trails. Please do not approve this proposal!



Submitted By
Natalie Kiley-Bergen
Submitted On
1/7/2022 5:00:12 PM
Affiliation

Phone
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Address
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Anchorage, Alaska 99508

I support PROPOSAL 199 5 AAC 92.550 to prohibit trapping within 50 yards of multi-use trails and trailheads in Units 13, 14, and 16.

It is a responsible and balanced initiative to manages diverse recreation uses. It is approximately one to two minutes off trail and will not noticeably affect a trappers experience on public lands. However, it could save a dogs life which would noticable affect dogs and dog owners experience on public lands.

I fully supports its approval and implementation. I would support a further set back. A 5 minute walk from trail would have a minimal impact on trappers time management.



Submitted By
Carl Kinney
Submitted On
12/23/2021 7:02:38 AM
Affiliation

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Wasilla, Alaska 99687

Proposal 199 Comment - Trap Setback on Multiuse Trails I do not support proposal 199. They have covered way to much area and restricted too many places in this proposal.. I am both a Trapper and a pet owner. I have even actively trapped with my Labrador. I can understand restriction on popular "foot only" use trails. Restrictions like this on "motorized" use trails is just too much. I have trapped in units 13, 14 & 16 for close to 20 years. Travel to my cabin in unit 16 near Alexander Creek has me traveling along many of these trails. I have never had any conflicted with other users. This restriction is simply not needed in this area. I have also traveled many of the trails listed in this restriction over the last 40 years. Based on my knowledge of them this restriction is not required on them as well. I feel for those who have pets impacted by traps, however, in conclusion this proposal is way too much and should not be implimented. Thank you, Carl Kinney



Submitted By
Timothy Kirk
Submitted On
1/6/2022 3:31:43 PM
Affiliation

Phone
907-980-2815

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tkmbean@gmail.com

Address
7821 Ladasa Pl
Anchorage, Alaska 99507

Dear Board Members,

I would like to add my support of Proposal 199 that would create a setback of 50 yards from the multiuse trails specified in the proposal. The demographics and culture of Alaska has and continues to change. I believe we must adopt policies that create the greatest benefit for the entire outdoor recreational community in Alaska. While I support the right of subsistence trapping, the value of "hobby" trapping must be weighed with the value to the greater outdoor community overall. Irresponsible trapping can have terrible consequences to the families of beloved pets or mushers that might accidentally lose control of a dog. I do not feel the concept of "trap anywhere" can be justified by a plea to tradition or "old Alaska". It is clear from recent incidents that the trapping community cannot be "self policing" when it comes to responsible trapping. Please put a stop to enabling lazy, irresponsible, trapping and adopt proposal 199.

Respectfully,

Tim Kirk



Submitted By
Carolyn Klein
Submitted On
1/7/2022 3:10:42 PM
Affiliation

I'm writing to support the passing of Proposal 199 to institute a 50 yard setback from the listed multiuse trails. These trails are used yearround but a variety of recreationalists and trapping on the trails isn't compatable with free movement for some users. The fifty yard setback seems a reasonable compromise between banning trapping and allowing it everywhere. Please look for the middle ground.



Submitted By
Joe Klutsch
Submitted On
1/8/2021 12:06:59 PM
Affiliation

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Address
Po Box 313
King Salmon, Alaska 99613-0313

Members of the BOG:

My name is Joe Klutsch and I have lived in King Salmon for nearly 50 years now and have hunted, fished and trapped the Alaska Peninsula during all of those years. I have also served on the Naknek/Kvichak Advisory Committee for 38 consecutive years and attended many Board of Game and Regional council meetings. During these years I have worked with members of the Department to learn about and shape management objectives for all the game species of the AK Peninsula. I appreciate the opportunity to make comments on GMU 9 proposals.

Proposal 27

In general, I support the reauthorization of the NAP Caribou Herd Intensive Management Plan. However, I have questions regarding the brown bear population objective for unit 9 "(D)the brown bear population objective for Unit 9 is to maintain a high density bear population with a sex and age structure that can sustain a harvest composed of 60 percent males, with 50 males eight years of age or older during combined fall and spring seasons." As I understand it, these are minimum guidelines. My question: why was this provision included, since it does not seem to relate directly to the NAP Caribou Herd Intensive Management Plan? I will most likely address this in oral comment

Proposal 28

I oppose proposal 28. As currently, the 1 bear every 4 regulatory years offers ample opportunity for residents to harvest a bear on the Alaska Peninsula. The one bear ever 4 regulatory years has been an integral part of the Alaska Peninsula Brown Bear Management system for decades.

Most of the best brown bear hunting areas on the Alaska Peninsula are remote and very expensive to access, which is a factor in the level of participation. Residents have more than ample opportunities to hunt brown bears on the Alaska Peninsula as well as in other gmus of the state where access is much less expensive and they can harvest a bear every regulatory year.

In the last regulatory cycle, the BOG shortened brown bear seasons in response to interpretation of harvest data indicating that perhaps too many old age class bears were being harvested, which may indicate a lower level of middle age class bears. I am personally not confident that this change was warranted but middle and younger age class bears are what residents primarily harvest.

This proposed regulation is unnecessary and unwarranted given the ample opportunity for residents to hunt brown bear. Once again, the maker of this proposal asserts that any real or perceived harvest concerns and resident opportunity concerns are due to non-resident guided effort. This is simply not true.

Proposal 29

I urge this proposal to be rejected for the following reasons:

During the 1970s and 80s I trapped beaver and other furbearers in the very area the maker of this proposal cites. Do silver salmon travel miles up a small creek, encounter a beaver dam, and conclude they should swim back to the ocean and find another creek? Most beaver dams have breaches to allow for run off. Fish can get up these. Beaver season is currently open in GMU 9 from October 10 - May 31. This offers time to harvest them during both spring and fall brown bear season. Additionally, beaver ponds provide excellent habitat for silver salmon smolt. It's more than likely that any existing beaver dams are an impediment to rafts and skiffs trying to access the upper reaches of these small creeks. Even if it was possible to eliminate all of the beavers in one of these small drainages (highly unlikely) the dams are not going to go away unless someone blows them up.

Proposal 30

Oppose this proposal. Leave the current season as it stands. Intensive management efforts on wolves in unit 9 have been generally unsuccessful. Wolves are prolific breeders and the current level of effort and harvest does not pose any threat to wolf populations.

Proposal 32



Oppose this proposal. The current level of effort and harvest by residents and non-residents is not a limiting factor in ensuring stability and growth in the emperor goose population.

Proposals 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50

I request the Board design a new allocation formula which increases non resident opportunity. The current split seems unreasonable especially given the fact that so many resident permits are not being used. Frankly I have never seen such a maze of proposals related to one species. Many of these proposals are completely unworkable and don't recognizing current resident – non resident allocation issues. If there is a harvestable surplus, permits should be made available. You may want to consider higher permit fees for non-residents. I believe it will take a working group to sort this out.

I will offer additional thoughts on this in future comment prior to the BOG meeting.

Thank you for your consideration.

Respectfully,

Joe Klutsch

Submitted By
mike knapp
Submitted On
12/26/2021 2:12:40 PM
Affiliation



PC093
1 of 1

I am opposed to proposal 199 for the following reasons:

Just because the trail is designated "Multi-use" does not necessarily mean that the trail is used by all user groups, and it especially does not mean that the entire trail is used by even a limited amount. For instance, I have never seen a cross country skier, snow shoer, or dog sled on the Willow Mountain Trail or the Willow Sled Trail on Willow Mountain. Some of these trails are in the middle of nowhere and are only used by trappers, hunters and recreational snowmachiners. Another example, the Petersville area.

Also, once again, as with many of these proposals, it is over generalized. For example, it states it is easy to traverse 50 yards off the trail. This is in fact, not realistic for many trails. What looks good on paper is not good in practice. In a forested setting, it is not always possible to drive a snowmachine 50 yards off the trail, in the areas that may need to. It is not realistic, especially in areas where there is blow down, beetle killed spruce or thick vegetation. Furthermore, when the trail is far removed from population, or other uses, there is no benefit, but a large deficit, to the trapper or hunter that does use it, especially if they are handicapped like myself.

The people who live in the Matanuska Susitna Borough have long understood that there is absolutely NO COMPARISON to locations like Junaeu and Anchorage. They simply do not compare. The writers have cited examples of closures from both these areas, and again, this is like using an apple to justify an orange.

Punishing the responsible trappers for the actions of a few irresponsible trappers, and willfully ignorant proposal writers with an agenda, is morally wrong and serves no beneficial purpose, Especially considering the majority of their cited incidents are in the core areas of highly populated areas, such as Wasilla, Palmer and Big Lake. Furthermore, there are no exemptions or variances for traps that pose absolutely no threat to pets or people as they are above the ground, below the ice, or under the water. The examply being a Martin Pole Set, or a beaver trap under the ice.

In summary, I have been trapping and hunting for over 40 years, and specifically using a multitude of the trails listed and have never had a problem. And in fact, much of the time, I have a simbiotic relationship with recreational snow machiners, because they often use the trails that I have cleared in order to access the back country.

Intead of restrictive proposals, and blanket closures, written by people that show clear lack of knowledge, experience, or understanding of the environment they are writing about, implementing mandatory trapper education for Unit 14 would be a much more successful solution.



Kodiak/Aleutians 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

In Reply Refer To
RAC/KA21049.KW

JAN 07 2022

Stosh (Stanley) Hoffman, Chair
Alaska Board of Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Hoffman:

I am writing to you on behalf of the Kodiak/Aleutians Subsistence Regional Advisory Council (Council) to provide comments on the Alaska Board of Game Central and Southwest Region Proposals 30 through 50.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in the Kodiak/Aleutians Region. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's Charter establishes 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 their regions that may impact 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.

The Council held a public meeting via teleconference on September 27-28, 2021. Among the agenda items discussed were 21 Alaska Board of Game Central and Southwest Region proposals that are relevant to subsistence users and resources in the Kodiak/Aleutians Region. At that meeting, the Council reviewed and made recommendations on the following 2020-2021 Alaska Board of Game Central and Southwest Region wildlife proposals:

Oppose Proposal 30: Shorten the wolf trapping season in Units 9 and 10

Justification: If adopted, Proposal 30 will reduce the harvest of wolves in Units 9 and 10. The Council believes that reducing the harvest of wolves will lead to wolf population increases, which could then prevent the recovery of caribou populations in these units.

Support Proposal 31: Close wolverine trapping and hunting in Unit 10



Justification: According to Council members' observations, there are only a small number of wolverines in Unit 10 and few people trap them. The Council supports closing the season and the State wildlife biologist's position on wolverine.

Support Proposal 32: Close the nonresident season for Emperor Goose in Units 9 and 10.

Justification: Recent surveys show that the Emperor Goose population has declined below the index of 28,000 birds. The management plan requires that a restrictive quota of 500 birds be put in place statewide once the population is below the index. In the 1980s, the emperor goose population in Alaska experienced significant decline, and even though the population rebounded, the species remains vulnerable to overharvest. The Council supports the closure of the nonresident season in Units 9 and 10 until the population index is above 28,000 birds. The subsistence users in the Kodiak/Aleutians Region are putting forth a real effort to reduce their harvest to ensure that the Emperor Goose population rebounds from its recent set back, but no efforts have been observed on the part of nonresident hunters. The Council supports the Alaska Migratory Bird Co-Management Council's efforts to get the message out across the State on the importance of Emperor Goose conservation while also supporting harvest opportunities for subsistence users.

Oppose Proposals 33 through 50: All proposals request increasing nonresident hunting opportunity for Emperor Geese in Units 9, 10, and 17; many specifically request an increase in the number of Emperor Goose permits allocated to nonresident hunters with some requesting up to 50% of permits be allocated to nonresident hunters.

Justification: Currently only 25 Emperor Goose drawing permits are available to nonresident hunters. The demand for this species is largely coming from nonresidents who hunt these birds for a trophy and not for food. Emperor Geese are an important subsistence resource, which have just recently recovered to a point to allow some customary and traditional harvest. While the nonresident hunters can afford to hire a guide and hunt one bird, the local subsistence users cannot and prefer to wait until the population numbers increase, and they are allowed to hunt several birds at once. The Council is not against the guided hunts, especially because they help the local economy, but it is against issuing more permits to nonresident hunters because this undermines conservation of the Emperor Goose population that took 30 years to recover to a level allowing for legal hunts.

The Council thanks the Alaska Board of Game for considering these comments, which reflect the importance of conserving healthy wildlife populations and providing for the continuation of subsistence uses in the Kodiak/Aleutians Region. The Council looks forward to continuing discussions with the Alaska Department of Fish and Game and the Alaska Board of Game on subsistence matters affecting the region. If you have questions about this letter, please contact me through Katerina Wessels, Supervisory Program Analyst, Council Coordination Division, Office of Subsistence Management, at (907) 786-3885 or katerina_wessels@fws.gov.

Sincerely,



A handwritten signature in cursive script that reads "Della Trumble".

Della Trumble
Chair

cc Federal Subsistence Board
Kodiak/Aleutians Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Administrative Record



Submitted By
Andrew kohlhofer
Submitted On
1/6/2022 12:08:51 PM
Affiliation

I support proposal 89. Creating opportunities for bowhunting is a win for sportsmen

Submitted By
Katherine Krajzynski
Submitted On
1/7/2022 2:57:33 PM
Affiliation



PC096
1 of 5

RE: Comments on Proposal 199 – Prohibit trapping within 50 yards of listed multi-use trails and trailheads in Units 13, 14A and B, and 16.

Dear Board of Game Members,

I write this letter to support the Board of Game (BOG) approving Proposal 199. I have read the proposal submitted by the Alaska Wildlife Alliance and their Map the Trap report, as well as the comments on the proposal submitted by Alaska Department of Fish and Game and the Alaska Wildlife Troopers. Furthermore, I researched the issue of trapping near trails in Alaska at large, and specifically in the MSB. From all of this, I have come to the conclusion that the request for traps along select multi-use trails in the Matanuska-Susitna Borough (MSB) to be set back at least 50 yards from the trails is a reasonable compromise for serving in the best interest of public safety for humans and pets, while still allowing trappers ample areas within the MSB to continue trapping.

Some basic information I learned is that according to ADF&G's "Alaska Trapping Information" webpage^[1], there are less than 3,500 trappers in all of Alaska. When compared to Alaska's population size (~734,000 in 2021^[2]), the Alaskan trapping community constitute less than 0.005% of Alaska's population. I was quite surprised to learn how few Alaskans trap, especially when compared to the strong pro-trapping voice I've heard presented by BOG members when I've attended/listened to prior BOG meetings.

I find the fact that there are fewer than 3,500 trappers spread across the state especially interesting when I researched the public perceptions locally on trapping near trails in the MSB. I first looked at the MSB's official website, and searched on the word "trapping." There was a paucity of results that were returned, with only two of the three results having valid links. The first result was very informative in that it was a press release from March 2017, indicating the MSB Assembly passed an ordinance to prohibit trapping on multiple Borough lands^[3]. This suggests there is community concern warranting the need for such an ordinance. Of particular interest was that the MSB's press release indicated Assembly Member Mayfield was approached over a year prior by a group which had gathered over 3,500 signatures opposing traps near trails. This means that in the MSB alone there were more people on record expressing concern about traps near trails than there are trappers in all of Alaska. The following is an excerpt from the March 8, 2017 press release on this topic:

"During the debate, Assembly Member Mayfield told the audience they have given a face to the 3,568 signatures. 'We're the second largest borough in the entire state. More and more people are looking for healthy ways to recreate. Obviously there will be conflict. We need to take some reasonable actions to make sure that conflicts don't exist. ... We need to be able to give folks an opportunity to recreate in a healthy manner. As many of you have said this borough is gigantic. There's many areas to trap,' Mayfield said."

This led me to look at the MSB's "About Trails" webpage^[4] to see how use of trails was depicted. According to that page:

"Residents and visitors use trails year-round for fishing and hunting, access to remote recreation property, hiking, horseback riding, biking, off-road vehicle riding, skiing, snow machining, dog mushing, skijoring, and snowshoeing. Demands for quality trails increases every year and is expected to continue as visitors and residents get outside and enjoy the MSB's natural beauty and wild country in ever increasing numbers."

No where on the official MSB government's webpage about trails is trapping mentioned as one of the uses of trails. What is referenced is how important "quality trails" are for other recreational purposes for residents and visitors alike to be able to "get outside and enjoy the MSB's natural beauty and wild country." Seeing a person or pet caught in a trap on or near a recreational trail is surely no one's idea of enjoying the MSB's natural beauty, nor part of anyone's definition of a "quality trail."

Moreover, the MSB's "Trails" webpage^[5] provides an option to "Filter by Trail Type." The options for filtering by use of trails includes: disk golf, hiking, ice fishing, jogging, mountain biking, mushing, skating, skiing, sledding, snow machines, snow shoeing, and walking. None of the filter options are for trapping, clearly indicating that these other recreational uses of trails in the MSB take priority over trapping. The only indication I was able to find on the MSB's website about allowing trapping was from the third result returned when I searched on the word "trapping" (noting the second result had an invalid link). It led to a listing of "Generally Allowed Uses on Borough Land," with only one reference to trapping in the context that "hunting, fishing or trapping that complies with applicable borough, state and federal statutes and regulation on the taking of fish and game" is a generally allowable use for the removal or use of borough resources. To me, all the information I was able to find via the MSB's website suggests there is strong and long-standing community support for requiring traps to be set more than 50 yards from the trails listed in Proposal 199. Hence, there should also be strong support by the BOG for Proposal 199 since the BOG members are supposed to be "appointed on the basis of interest in public affairs, good judgement, knowledge, and ability in the field of action of the board, with a view to providing diversity of interest and points of view in the membership." ^[6]

In addition to educating myself on the local community perspective about trapping near trails in the MSB, I have also reviewed the comments submitted by Alaska Department of Fish and Game (ADF&G) and the Alaska Wildlife Troopers (AWT) specific to Proposal 199. First, I note that ADF&G's comments state "The current furbearer trapping regulations for Unit 13, 14A and B, and 16 can be found in 5 AAC 85.027." Unfortunately, this is an invalid reference, as when I looked up Title 5 in the Alaska Administrative Code, there is not a section 85.027^[7]; the regulations jump from 85.025 (hunting seasons and bag limits for caribou) to 85.030 (hunting seasons and bag limits for deer). Thus, I was unable to educate myself further on this specific topic, and cannot help but question the veracity of the other comments submitted by ADF&G.

Although ADF&G states they are neutral on Proposal 199, the implication in their remaining comments is that they do in fact have an opinion, and the comments do not appear to be neutral. ADF&G rightly recognizes that many trails in the MSB were historically "established by trappers and over time use has diversified as development and the human population has expanded." What were once trapping trails are now multi-use trails, catering to a variety of recreational uses by a large number of non-trapping users. It is surprising that ADF&G acknowledges the multi-use nature of these trails in their comments on Proposal 199, but instead of requiring safe trapping practices through regulation, ADF&G seems comfortable to simply "encourage trappers to be cognizant of potential conflicts and to follow the trapper's Code of Ethics." This gives the impression that ADF&G is dismissing the existence of conflict between user groups, and justifying the transference of responsibility for enforcing the guidelines to private entities, because "ethical and safe trapping practices are actively encouraged" by two Alaska trapping organizations. However, these organizations have no legal enforcement authority over the actions of trappers. Self-policing by third party, non-governmental entities is not an effective management strategy, especially when there are no regulatory consequences for violations. It is also particularly interesting to note that there is no language in the trapper's Code of Ethics[8] about reducing conflict with other user groups, or not setting traps near multi-use trails or other areas where human and pet safety may be jeopardized (e.g., parking lots). Thus, ADF&G's recommendation for trappers to follow the trapper's Code of Ethics does not address the issue that Proposal 199 is trying to address. To reduce user conflicts with trapping along these multi-use trails, there must be defined rules and penalties for violations.

Additionally intriguing to me is ADF&G's stance on placing the burden of safety and avoidance of traps, which legally can be hidden or camouflaged, on the multitude of non-trapping users of recreational trails. In their comments on Proposal 199, immediately after acknowledging the increased recreational use of trails as the population has grown, ADF&G points out some trails have "regulations under different authorities to restrain pets to minimize user conflicts and for safety." They also state that they do not keep any records to know when, where, or how many pets (or humans) are caught in traps, but do acknowledge they are aware of incidents in GMUs 14 A and B near multi-use trails and trailheads. Despite claiming lack of information, a reasonable person would conclude that the issue has been frequent enough, and occurring long enough, to warrant ADF&G expending resources to develop a brochure in 2014 entitled "Trap Safety for Pet Owners"[9] plus a series of five videos demonstrating how to release a pet from various trap types or snares[10]. Beyond that, the Alaska Trappers Association also developed a 30-minute video, the content of which "was largely dictated by some of the comments [they've] heard over the years from people who have had dogs and cats caught." In the brochure, ADF&G states that everyone should keep track of when trapping seasons are open (which can range over a 9-month period from September to May), and that because trapping occurs "on some popular recreational trails," that every trail user should "assume all maintained winter trails are traplines unless otherwise marked." Personally, I've never seen a trail that is specifically marked as not being a trapline. Additionally, despite leash laws in many areas allowing dogs under voice control to not have to be physically tethered to a human, ADF&G advises pet owners to always keep their pets on a physical leash when walking in the woods.

This means for someone to enjoy a short leisurely stroll along one of Alaska's trails with their pet between September and May, they should:

- stay abreast of all the regulations regarding every trail they may hike to inform themselves when trapping is allowed;
- study the Trap Safety for Pet Owners brochure and watch, practice, and memorize all the videos about how to remove a pet from all the different types of traps and snares; and
- make sure their pet is always tethered to them on a leash, despite some areas having no leash laws, or leash laws that allow dogs to be off leash if under voice control.

However, since traps are allowed "on some popular recreational trails", a pet may get caught even if the owner is not walking in the woods, but rather on the trail itself and the pet is leashed. In such cases, the pet owner better hope they are carrying the cumbersome "Trap Removal Tool Kit" recommended in ADF&G's brochure to try and free the caught pet. However, if the pet is caught in a body-grip type of trap, there is little hope for the pet because, according to the brochure, these types of traps are "designed to kill small to medium-size animals" and "are often deadly to pets if not released quickly." This was the unfortunate situation for two people skiing and hunting with their dog in the MSB in February 2021. When they were only 50-60 yards from the trailhead, their dog was enticed to a trap baited with meat just 30 feet off the trail. Despite their best efforts, including calls to the State Troopers, searching YouTube for videos on how to release the traps, reaching out to a family member who is a trapper, and soliciting the help of a passerby who was finally able to release the trap using his belt, their dog was killed by the trap. It took no more than 6-7 minutes to spring the trap, but it was already too late.

To further put the burden on the non-trapping community, it is against the law to move or tamper with any trap or snare, regardless of the immediate risk they may pose to human or pet safety. It's also against the law to try and release any wild animal caught in a trap or snare, even one that clearly isn't the target species (e.g., moose; eagle), but there are no requirements on how frequently trappers must check their traps.

According to the Map the Trap report[11], during the 2020-2021 trapping season "69% of reported trap encounters were located in recreational areas, hiking trails, snow machining trails, and mushing trails" with the remaining 31% of encounters being "found along roads, highways, and parking lots." For encounters with reported distances from trails and roadways, 80% were reported within 100 feet (~ 33 yards) of a trail or road. While 23% of reports with an animal in a trap were trapped dogs, several reports were of encounters involving people without pets who had close encounters with traps, including some in the MSB; one person "nearly stepped in a body grip trap set near a street light off of Parks Highway"; one person "saw a snare four feet off a plowed road in Fairbanks"; and most shocking was the report of person being "pulled from their motorbike after a snare caught their foot while riding in the Jim Creek Recreational Area." These reports likely underestimate the true extent of encounters with traps by the non-trapping community because no agency, including ADF&G, has been responsible for tracking these events. Of the people who reported trap encounters through the Map the Trap program during the 2020-2021 trapping season, only 26% indicated they reported the incident to another organization, such as ADF&G, Alaska State Troopers, Interior Alaska Land Trust, Juneau Animal Control, and the Arctic National Wildlife Refuge.

Unlike the burden currently placed on the non-trapping trail users to keep themselves and their pets safe so that less than a fraction of trappers statewide can continue to trap near multi-use recreational trails, implementation of Proposal 199 would mean a fraction of trappers statewide would be asked to make sure their traps are placed no closer than 50 yards from specific designated trails in the MSB. Fifty yards is half the distance of a football field. Such a short distance takes just a couple of minutes to walk even in inclement weather, and is covered in a matter of seconds if the trapper is on a snow machine. The burden to a small number of trappers if Proposal 199 is implemented is significantly less than the current and future burden to all other users to avoid traps.



Confoundingly, ADF&G's comments on Proposal 199 claims unequivocally that "This proposal will result in a decreased take of furbearers"; however, they provided no explanation or justification for why the take of furbearers would definitively be reduced. The proposal is not advocating for large portions of the MSB to be off-limits to trapping, merely that traps be set a short distance away from the identified trails. ADF&G's comments also claims that "Impacts to conflicts, as described in the proposal, are unknown," yet they do acknowledge that there have been reports indicating "that incidents occurred on or near multi-use trails or trailheads" in units 14A and B and private lands. Thus, a reasonable person could conclude that had there been a requirement in place that traps/snares could not be placed within 50 yards of the multi-use trails or trailheads, then such "incidents" may not have occurred, and the potential for them occurring in the future will be reduced with the passage of Proposal 199. Assuming ADF&G has information to verify with certainty that take of furbearers will be reduced if Proposal 199 is approved, in light of the fact that ADF&G also verified in their comments that there have been reports of incidents with traps "on or near multi-use trails or trailheads", if the BOG denies Proposal 199 then the BOG will be condoning the actions of irresponsible trappers who endanger humans and their pets by placing traps on or near popular multi-use trails in the MSB.

Trapping has a long history in Alaska, and was a necessity when transportation options were few and far between. That is hardly the case in MSB in modern day times. More and more Alaskans are asking for greater protections and restrictions around trapping across the state, to include identification tags for traps and setbacks, as evidenced in the numerous proposals on the general topic around the state submitted for consideration since 2011 (see Table 1 at the end of this letter for a summary). Unfortunately, the BOG has consistently ignored the voice of the majority of Alaskans in favor of the few trappers who constitute less than 0.005% of Alaskans, as evidenced in the BOG denying every single proposal asking for trap setbacks, trap identifications, and time periods for trap checks. The only proposal the BOG approved was in 2016 when the board approved removal of all requirements for identification tags on traps and snares statewide. This has led municipalities having to do the job of the BOG by passing their own regulations. In addition to the MSB's ordinance in 2017, Anchorage recently passed a 50-yard trap setback from popular trails, while Juneau was much more protective of their non-trapping trail users and established ¼ mile (440 yard) setbacks. In comparison to Juneau's setbacks, the 50-yard request in Proposal 199 is quite reasonable.

It is clear that Proposal 199 is not attempting to stop trapping in the MSB; rather, it is asking for no traps to be set within 50 yards of heavily recreated, multi-use trails. This distance is but a few minutes walk from trails, and enhances the safety of all trail users, humans and pets alike. It is true implementation of this proposal may be a minor inconvenience to the small number of trappers who aren't working to reduce user conflicts and who are placing traps on or near multi-use trails in the MSB. However, given the safety benefits to the significantly larger population of non-trapping users of these trails, the greater good is served by approving the measures included in Proposal 199. The concerns brought forth in the ADF&G and AWT comments on Proposal 199, referencing burdens placed on trappers to remain in compliance, or for enforcement officers to know where the setbacks are, are easily remedied by agreeing to and publishing what AWT refers to as "a proper publicly accessible map." It is worth noting that Proposal 199 included maps of the trails under consideration, which were obtained from the MSB Recreational Trails Plan^[12]. Efforts associated with updating information, if necessary, about where these specific trails are can easily be addressed; undoing an injury to a human or bringing back someone's pet are not so easily remedied.

Thank you for your time to read and consider my comments arguing for approval of Proposal 199.

[1] ADF&G's "Alaska Trapping Information" webpage accessed January 6, 2022; <https://www.adfg.alaska.gov/index.cfm?adfg=trapping.main>

[2] Alaska Department of Labor and Workforce Development's "Research and Analysis – Population Estimates" webpage accessed January 6, 2022; <https://live.laborstats.alaska.gov/pop/>

[3] MSB's March 8 and 21, 2017 press releases about the MSB Assembly's ban on trapping, accessed January 6, 2022; https://www.matsugov.us/news/arss/17788-assembly-bans-trapping-in-7-parks?highlight=WyJ0cmFwcGluZyJd&template=msb_bolide

[4] MSB's "About Trails" webpage accessed January 6, 2022; <https://www.matsugov.us/trails/about-trails>

[5] MSB's "Trails" webpage accessed January 6, 2022; <https://www.matsugov.us/trails>

[6] Excerpt taken from ADF&G's "Welcome to the Alaska Board of Game - About the Alaska Board of Game" webpage, accessed January 6, 2022; <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.main#about>

[7] The Alaska Administrative Code, from the 32nd Legislature (2021-2022), does not include 5 AAC 85.027; accessed January 6, 2022; <http://www.legis.state.ak.us/basis/aac.asp#5.85.025>

[8] The Code of Ethics – A Trapper's Responsibility was accessed on January 6, 2022 from ADF&G's website; <https://www.adfg.alaska.gov/index.cfm?adfg=trapping.code>

[9] ADF&G's "Trap Safety for Pet Owners" brochure is available at https://www.adfg.alaska.gov/static/hunting/trapping/pdfs/trap_safety_for_pet_owners.pdf.



[10] ADF&G's video series on how to release pets from specific kinds of traps is available at <https://www.adfg.alaska.gov/index.cfm?adfg=trapping.sharing>.

[11] The Map the Trap report was accessed January 6, 2022; <https://www.akwildlife.org/safetrails>.

[12] The MSB Recreational Trails Plan was accessed January 6, 2022; <https://matsugov.us/plans/recreational-trails-plan>

Table 1: Summary of proposals for reducing user conflicts with trapping activities submitted to the Board of Game in the past 10 years

Year	Proposal #	Area	Proposal Summary	Result
2020	56	Interior and Eastern Arctic	Establish minimum distance requirements for trapping around dwellings in the Interior and Eastern Arctic Region	Failed
2019	91	15c	Prohibit the discharge of certain weapons used for hunting and trapping within 1/2 mile of any residence in Unit 15C.	Failed
2019	13	SE 1-5	Require identification tags for traps and snares in Units 1-5	Failed
2019	14	SE 1-5	Require trappers to post identification signs for traps and snares in Units 1-5	Failed
2019	32	1D	Modify the regulations to close trapping and restrict the use of certain traps near roads and trails within the Skagway Borough in Unit 1D	Failed
2019	Misc. action	Ketchikan	Ketchikan Gateway Borough requested the BOG take emergency measures to govern trapping in Ketchikan region (150 ft from named trails, signs on public trails and roads adjacent to placement of traps).	Failed
2016	67	Statewide	Prohibit hunting and trapping from highway right-of-ways	Failed
2016	78	Statewide	Remove all requirements for identification tags on traps and snares	Carried
2016	79	Statewide	Require traps to be checked every 24 hours	Failed
2016	80	Statewide	Move trapping away from cities with a population of 1,000 or more	Failed
2015	178	SC GMU 7 and 15	Require trap identification in Units 7 and 15	Failed
2015	179	SC GMU 7 and 15	Establish a trapper identification numbering system for Units 7 and 15. (<i>The board took no action due to action</i>)	No Action



2015 180	Cooper Landing	Restrict trapping in the Cooper Landing Area	Failed
2015 181	Seward and Moose Pass	Restrict trapping in the Seward and Moose Pass areas	Failed
2012 124	Statewide	Require trap identification for all Units on lands managed by the National Park Service.	Failed
2012 125	Statewide	Require a 72-hour trap check for all traps and snares set on National Park Service lands. <i>(could not find result on BOG site)</i>	UNK
2011 192	Region II and Region IV	Restrict trapping near trails and roads in all Region II and Region IV Units	Failed
2011 72	14A	Close a portion of the Palmer Hay Flats Wildlife Refuge in Unit 14A to trapping	Failed



Submitted By
Krysta M Kurka
Submitted On
1/7/2022 11:30:27 AM
Affiliation

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Proposals 210 and 211 require much further data collection from Qualified Biologists in Alaska whom are familiar with Unit 13. This Community Subsistent Hunt is a huge benefit to a diverse population from many economic backgrounds, geographic areas, age groups, and racia/ethnic/cultural identities. It is not simply a benefit; as it is a crucial gathering of valuable food resources for many people looking to eat local game. People come together to hunt, process and share the caribou and moose that are harvested. I have been on 2 hunts near Windy Creek via bike and bike trailers and have learned so much from my community members of various ages about finding caribou and moose, field dressing, maintaining the quality of the meat and processing appropriately. We put a lot of effort into sharing information about how to butcher, working side-by-side, and package the meat ourselves. We make it a priority to share with elders, Ahтна people, rural communities and divide the harvest amongst ourselves. How can these values be called into question? There is nothing to suggest that this specific hunt in Unit 13 is causing any biological pressure on moose or caribou. The ADF&G have stated, "this hunt structure poses no conservation concerns". We cannot trust the Federal Government alone to manage our local subsistence areas and means, we must maintain and protect the Community Subsistence Hunt on a State Level.

Thank you for your time and consideration.

Submitted By
Oscar Lage
Submitted On
1/7/2022 2:28:30 PM
Affiliation



PC098
1 of 1

I would like to express my support for Proposal 199 to prohibit trapping within 50 yards of multi-use trailheads in Units 13, 14, and 16. I believe this proposal will help prevent accidental trapping of pets and should not hinder the trapping activities of responsible trappers



Submitted By
Nathaniel Lagerwey
Submitted On
1/7/2022 4:52:10 PM
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I am writing in support of proposals 199 and 288 to help protect trails and trailhead areas from traps. I have been a trapper myself and feel it is exceptionally important that trappers act responsibly and keep their traps separated from domestic animals and away from high traffic areas. This helps public perception of an important past time.

I also had my dog caught in a trap in the Willow area a couple years ago. The trap was less than 50' off the trail and baited with raw meat. I also talked to a trapper last winter who was setting a leg hold trap 20' off the trail in the same area. This is not responsible.

Nathan



Dear ADF&G Board of Game Members,

Please find listed below a brief narrative of why I am strongly opposed to Proposal 207.

The Brown bear population in Unit 9A is still growing compared to 25 to 35 years ago, with strong increasing numbers especially in the past 12 years. In the 1980's and 1990's into the early 2000's, we would tell prospective hunting clients that they could expect to see up to 25 bear on a 10 day spring hunt. Nowadays, I can in good faith tell them that if they are there for the full 10 days of hunting, they can expect to see upwards of 100. In the fall, we would see 10 to 15 bears on a 15 day hunt, Now we are seeing 50 to 70 in that same time frame. Of course part of that depends on how strong the Salmon runs are and of course the weather is always a factor in the fall. In addition to the increase of single bears, the number of sows with 2 to 3 cubs has also been increasing, indicating that the reproductive rate is doing well. To me, all of this indicates a strong bear population that continues to grow.

In my opinion, with consideration to the topography, weather, current management plan (spring/fall-short season), private land ownership, large park lands to the north and south, limited access, it would be very difficult to over harvest, the way it is set up now.

While I do not have data numbers to include with this comment, these observations and opinions are based on what I have personally seen and experienced throughout each of the past 37 bear seasons in Unit 9A. I have always been the first one in and the last one to leave that area. Bottom line is that the current management plan is working very well.

Please consider this information when making any decisions regarding Proposal 207.

Thank you for your time.
Sincerely,
Laine W Lahndt
Master Guide/Outfitter