

Submitted By  
Zachary Larsen  
Submitted On  
1/6/2022 9:48:26 AM  
Affiliation



PC101  
1 of 1

Dear Alaska Department of Fish and Game. I recently became aware of proposal 89, which suggests creating a special registration hunt for Dall sheep which would be limited to recurves and longbows only. I believe this is an excellent idea and opportunity which will offer more revenue for the state, more opportunities for people to pursue Dall sheep all while having minimal impact on the sheep population and age class. This hunt would be the epitome of fair chase and would be a huge banner good and sustainable management of game throughout Alaska and the rest of the U.S. I personally spent 4 seasons as an Alaskan fishing guide on several rivers throughout the Bristol bay watershed and have built a deep appreciation for the wilds of Alaska and I believe this is an exceptional opportunity to create an amazing hunting opportunity. I hope it is accepted and implemented in other locations where it makes sense as well.

kind regards,

Zachary Larsen



Submitted By  
Leslie Law  
Submitted On  
1/7/2022 10:54:19 AM  
Affiliation

I am writing in support of proposal 199. Traps set as close to trails and roads like now are hazardous and lethal to both pets and small children. Dogs like Lola have been killed which is heart renching for that family to see their dog brutally killed like it was. It's just a matter time before a young child stumbles into one of these traps and may lose their leg, arm or worse their life. We can share this state but it needs to be safe for everyone and not just convenient for trappers.



Submitted By  
Anne Lee  
Submitted On  
1/7/2022 8:49:38 AM  
Affiliation

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Address  
415 Sandy Beach Road  
Petersburg, Alaska 99833

I am writing in support of Proposal 199.



Submitted By  
Matthew Lohrstorfer  
Submitted On  
1/7/2022 3:40:28 PM  
Affiliation

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Address  
1544 N St  
Anchorage, Alaska 99501

In regards to Proposal 210 please address how vehicles on the highway and the Alaska Railroad has decimated moose populations. The Alaska Railroad and vehicles on highways do not discriminate and kill bulls and cows which has a detrimental effect on populations. In addition the intense predator control efforts artificially increases moose populations and increases mortality in deep winters - something previous board member and biologist Vic Ballenberghe has pointed out. To place the blame on a small number of community hunt participants is a simple minded analysis of a complex issue.



Submitted By  
Meg Maloney  
Submitted On  
1/6/2022 5:13:11 PM  
Affiliation

I support prohibiting trappers from placing traps within 50 yards of hiking trails/ trailheads. Proposal 199



I would like to comment on Proposal 199 submitted by the group Alaska Wildlife Alliance. Many of these trails were cut by trappers and this style of management, to push the trappers off their own trails is sad. One user group just mows right over another. I am in favor of smart and ethical trapping on responsible trails and I think that this kind of setback regulation is just the first step in this groups stated intention of banning trapping in the state.

Thank you for your time and consideration,

Justin Maple  
Fairbanks, AK



*The Trails and Parks Resource for a Healthy Community in the Mat-Su Valley*



***Accessible • Wild • World-Class***

January 7, 2022

ATTN: Board of Game Comments

RE: Support for proposal 199: Prohibit trapping within 50 yards of multi-use trails and trailheads in Units 13, 14, and 16

Dear Members of ADF&G Board of Game,

I am writing on behalf of the Mat-Su Trails and Parks Foundation (MSTPF) Board of Directors to express our support for Alaska Wildlife Alliance's (AWA) Proposal 199 to be deliberated on by the Board in January.

The Mat-Su Trails and Parks Foundation is a nonprofit organization, organized ten years ago with a vision to create a world class trail and park system in the Mat-Su Borough. We work to create parks for families, trails for seniors, access for hunting, fishing, and horseback riding, and trails for backcountry adventurers. We fund park and trail construction and maintenance across the Mat-Su Valley, including state-managed trails. In addition to funding infrastructure, we advocate for sound stewardship practices on public lands.

This includes finding ways to ensure safe access for recreational users and their companion animals.

This proposal comes at a critical time in which the Borough has grown by over 20% in the last 10 years. This growth creates more outdoor recreational users and their companion animals sharing the areas with trappers.

The Matanuska-Susitna Borough enacted regulations on six Borough-managed trails and school grounds due to public pressure, but the Borough stopped short at state-managed trails – setting the stage for this proposal.



*The Trails and Parks Resource for a Healthy Community in the Mat-Su Valley*

We believe that this proposal is founded on a set of reasonable criteria that seeks a compromise between trapping and other trail uses. It is tailored for the safety needs of all multi-use trail users in the Mat-Su. We support AWA's position that this proposal does not aim to reduce trapping's deep traditional and cultural influence in the Valley, but to update regulations in a rapidly growing area.

Thank you for your consideration of this comment in support of proposal 199.

Sincerely,

Wes Hoskins  
Executive Director  
[whoskins@matsutrails.org](mailto:whoskins@matsutrails.org)



Submitted By  
John R McCulley  
Submitted On  
1/6/2022 7:32:39 AM  
Affiliation

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Address  
14237 135TH Ave  
BURLINGTON, Iowa 52601

Dear Sir or Madam,

I submitting my comments in opposition of proposition 32 to end nonresident Emperor Goose hunting and to voice my support for proposition 34 and allocate 50% of the allotted permits to nonresidents.

I have been all over the state of Alaska and I will say without reservation that Emperor Geese and the places they live are special. My trips to Cold Bay have been the highlight of waterfowling career.

The hunt should be a limited draw but limiting nonresidents to only 25 permits when residents are not using their allotment does not make sense. The population of Emperor Geese is steady from the numbers reported under the propositions. Increasing the numbers of nonresident permits would not have a measureable impact on the population.

Increasing the nonresident permits would generate more revenue for both ADF&G and the local communities that nonresident hunters would be traveling to. This would also help promote tourism in certain areas during non-traditional times of the year.

This also give hunters like me a reason to travel back to some of these remote areas. I would go to Cold Bay every year if it was feasible. Due to cost and other bucket list items, it just isn't going to happen. On top of that, many of us that have been there have checked items off our list. For example, I do not plan to ever shoot another Harlequin. They are special birds for certain, but I have taken mine. The next hunter deserves the chance. Under this mindset, I would be in favor of making these tags a once in a lifetime draw.

Thank you for your consideration.

Best Regards,

J.R. McCulley

Submitted By  
Margaret R McGinnis  
Submitted On  
11/23/2021 6:32:05 AM  
Affiliation



PC109  
1 of 1

I am writing to support Proposal 199 to institute 50 yard trap setbacks from over 200 designated multi-use trails in the Mat-Su area. While I don't live in Alaska, I am someone who regularly hikes trails in my own state/region and have had dogs running on these trails. I can't imagine the horror of someone having their dog caught in a trap. Even children or adults could get trapped. 50 yards is a reasonable compromise which allows trail users peace of mind, but still doesn't negatively impact trappers (personally, I am against all trapping, but that is not what this proposal entails).

Multi-use trails are just that - multi-use. Trappers must not be allowed to set their traps anywhere they feel like it Thank you.



Submitted By

Leslie Saunders McNeill

Submitted On

1/7/2022 4:01:56 PM

Affiliation

Lazy Mountain homeowner and resident

Please pass Proposal 199 in its entirety. Thank you!



Submitted By  
Tom Meacham  
Submitted On  
1/7/2022 8:09:26 PM  
Affiliation  
none

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Anchorage, Alaska 99507

I support proposal 199, and urge th Board to adopt it. As a former member of the Board of Game, I believe it has always been the responsibility of the Board to regulate trapping where this activity has the potential for tragic consequences for other users of the public lands.

Unfortunately, the Board has narrowly focused its concerns and actions on the health and sustainability of the resource (here, fur-bearers), and not on the relationship of the permitted activity to the health and safety of other rightful users of the public lands, those who do not happen to be "harvesting" the resource.

Adopting Proposal 199 will be a strong statment that the Board recognizes the broader scope of its obligations and responsibilities. More importantly, it will fairly allocate a public resource among a broad spectrum of rightful users, and will demonstrate that the Board of Game has the safety and the legitimate interests of all Alaskan recrestionists at the forefront of its management concerns. I urger that Proposal 199 be adopted.

Sincerely,

Tom Meacham

Anchorage



Submitted By  
Kymberly Miller  
Submitted On  
1/6/2022 8:39:33 PM  
Affiliation

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Palmer, Alaska 99645

I support proposal 199- as a past AK Park Ranger- trappers we're setting traps way too close to public hiking trails- I saw multiple dogs caught in traps- several lost part or all of their leg including one Lab that was caught in a trap set in water near a hiking trail. With less Park Rangers and F and game troopers - this type of trapping near human trails has become prolific. I support proposal 199.



Submitted By  
MIKE E MILLER  
Submitted On  
1/5/2022 4:45:06 PM  
Affiliation

I urge you to approve proposals 199 and 228.

Both of these proposals will benefit both trappers as well as trail users.

These will save lives of pet dogs that are walking the trails with their owners.

Thank you.



Submitted By  
Glenn Moeller  
Submitted On  
1/7/2022 2:15:03 PM  
Affiliation

I support proposal 199.

Submitted By  
william Mohrwinkel  
Submitted On  
1/5/2022 10:47:37 AM  
Affiliation



PC115  
1 of 1

I support Proposal 199 to create 50 yard setbacks on trails in the Mat-Su Borough. The Mat-su borough is and has been for many years, the fastest growing area in Alaska. Because there are many more people in the Valley, there are many more people out using trails. Trapping is not an activity that is compatible with other users, especially those with their pet dogs. It should be done well away from high use areas. While many trappers are ethical, many are not, hence the need for regulations. I am a hunter and fisherman and I am amazed at the lack of regulations for trapping.

My dog was caught in a baited leghold trap that was set 5 ft off a local trail in our neighborhood. This was a "legally" set trap and my dog was legally off its leash, as many of my neighbors use this trail to walk their dogs. As of now, we rely on trappers to follow a "code of ethics", this trapper did not and there was nothing legally that could be done. Laws and regulations are created for people who do not use common sense. Asking for a 50 yard setback, seems to me to be asking for the bare minimum.

Many trappers answer to this problem is to simply put your dog on a leash. While there is a leash law on Mat-Su borough lands, many of these trail do not require leash laws. And even with leash laws, many people run their dog off-leash. This is common knowledge. While there are many areas where dogs should be leashed and even certain dogs that should be always leashed on public trails, trappers should acknowledge this and not trap where they could catch a loose dog in a trap. People are always amazed that trapping is legal just about anywhere. They assume there are laws that keep trapping away from trails and parks. Unfortunately, many dogs pay with their life because of this misconception. While this regulation will not prevent an unethical trapper from trapping less than 50 yards on a trail, at least there would some legal recourse to remove the dangerous trap. As an example, several years ago, an unethical trapper set baited conibear traps in the Matanauska River Park, just outside downtown Palmer, where many people walk their dogs. The troopers were called and there was nothing that could be done. This is just plain wrong. There are many more stories like this happening every winter.

While trapping has historically been an import part of Alaska's history, unethical, weekend hobby trappers, using our trails and road system as "trapline" has become a problem. Trapping is an activity that should be done well away from high-use areas and as our population increases in the Mat-Su Valley, its time for regulations to protect other users, not just trappers.

Every time a dog is caught in an unethical and dangerously set trap, it gives a black eye to the trapping community and more and more people will view trapping with disfavor. While it is unfortunate that we need to have more regulations, it is reality. The Board of Game can no longer turn a blind eye to this problem. Its only going to get worse. Please pass Proposal 199 and create 50 yard setbacks on trails in the Mat-Su.



Submitted By  
Sylve Montalbo  
Submitted On  
1/6/2022 6:10:07 PM  
Affiliation

I am writing to support Proposal 199. It is important to have a set back from trails for trapping in the MatSu borough and 50 yards is not a very big buffer between hikers with children or pets.. and traps.

Please support this proposal which makes it clear where trapping and recreation can take place safely for all concerned.

Thank You.

Sylve Montalbo



Submitted By  
Dan Montgomery  
Submitted On  
1/7/2022 11:54:19 PM  
Affiliation  
Guide, APHA, Mat-Su A/C member

Thank you Chairman Hoffman and board members for this opportunity to submit written comments.

I'm listing all of the proposals that I support and oppose below and I will comment on some of them after that.

Support: 6, 7, 8, 9, 10, 11, 12, 13, 14, 21, 23, 24, 25, 26, 27, 29, 34, 51, 54, 55, 70, 72, 73, 86, 90, 92, 93, 95, 96, 97, 197, 202, 204, 205, 209, 213, 219 and 226.

Oppose: 1, 2, 3, 4, 5, 16, 17, 18, 19, 28, 30, 52, 53, 56, 57, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 74, 75, 78, 80, 81, 82, 83, 84, 85, 87, 88, 89, 91, 94, 98, 99, 198, 199, 206, 207, 214, 216, 217, 218, 220 and 228.

Proposal 29: Support. I submitted this proposal and I think it is very important to have this management tool especially in sub unit 9E to stop the destruction of salmon runs in these small streams.

Proposal 70: Support. Our A/C submitted this proposal and I strongly support it. I believe there is a abundance of both Black bear and Brown bear in this unit and I disagree with the Department that there maybe a conservation concern with Brown bear if this were implemented. Much of this unit is heavily timbered and very difficult to hunt bears in without using bait. There has been the same season in unit 16 for years and there hasn't been any user conflicts that I'm aware of and nobody has ever been attacked at a bear bait station. I strongly recommend you pass this proposal.

Proposal 86: Support. Our A/C submitted this proposal and I strongly support it. When this area went to draw permit in 2008 under any ram there were very few permits issued and the departments management goal was to have more older class rams in the population. With management change over they decided they were going to manage them like caribou or moose and that they had a surplus of males and they vastly increased the permits. They haven't increased the population of old males or males at all or the overall population in this area and that was the reason for this area to go to draw permits in the first place. The Department hasn't followed their own management plan. This area should go back to full curl harvest.

Proposal 219: Support. This is a good idea to add 13D to the active IM management plan. I don't believe it should have been used as a control area when the plan was first put in place. There is a high population of wolves in 13D and I have witnessed wolf predation numerous times on sheep and moose calves in this area. I have hunted this area for over 30 years and have seen both the sheep and moose population decline in that time.

Proposals 28: Oppose. I don't think this is necessary to increase the bag limit for residents. Most residents shoot one brown bear in their lifetime. It may increase the harvest of sows because the hunters might be less selective if they can hunt every year.

Proposal 206: Strongly Oppose. Having the season open earlier for residents is totally unnecessary and would completely disrupt the hunt for non-residents. Bears are very sensitive to human scent and will vacate a area completely if they smell you. There is low participation by residents because of access difficulty and their harvest remained low even in spring of 2020 when there was no non-resident hunting at all. Having a seperate season for non-residents isn't necessary either as they have plenty of access to the resource as is

Proposal 214: Strongly Oppose. This would eliminate all non-resident hunting for moose in unit 13 and has know reason for doing so. There is a very low harvest by non-residents and there are very few permits issued in each subunit.

THank you for your service to this state.

Dan Montgomery



# United States Department of the Interior

## NATIONAL PARK SERVICE

Interior Region 11 • Alaska  
240 West 5<sup>th</sup> Avenue, Room 114  
Anchorage, Alaska 99501

IN REPLY REFER TO:  
I.B (AKR-ARDR)

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

Dear Chairman Hoffman,

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

### **Proposal 7: NPS Recommendation: Oppose**

This proposal would increase the bag limit for black bear from three to five every regulatory year in Game Management Units (GMUs) 13D and 16. The NPS has concerns with this proposal, as we are not aware of black bear population data that would support the claim that increased limits will have no population-level effect.

### **Proposal 9: NPS Recommendation: Oppose**

This proposal would extend the wolf trapping season in GMUs 13 and 16 by 31 days, adding the month of May. The NPS notes that a trapping season extending past 30 April may allow take of females with dependent young during the pupping and rearing season. Therefore, an extended trapping season could jeopardize pup production and survival. Additionally, the quality of wolf pelts declines later in spring, so a result of this season extension could be to deny prime pelts to trappers the following fall.

### **Proposal 10, 29, 97, and 202: NPS Recommendation: Oppose**

Proposal 10 would allow harvest of beaver by bow and arrow with a trapping license in GMUs 9, 11, 13 and 16. Proposal 29 would lengthen the season and liberalize methods and means for trapping beaver in GMU 9. Proposals 97 and 202 would allow free-ranging beaver to be taken with a firearm and/or archery equipment under a trapping license in GMU 16 and 17, respectively. NPS regulations do not allow use of firearm or archery equipment for taking free-ranging furbearers under a trapping license. The NPS is also



opposed to allowing the destruction of beaver dams under a trapping license, as is proposed in Proposal 29. If the Board adopts any of these proposals, we request that NPS lands be excluded.

**Proposal 21, 27, and 223: NPS Recommendation: Oppose**

Proposal 21 would establish a second predator control area for Mulchatna caribou on federal lands in GMUs 17 and 18; proposal 27 would reauthorize the Northern Alaska Peninsula Caribou Herd Intensive Management Plan in GMUs 9 and 10; and proposal 223 would reauthorize the Intensive Management Plan for Wolves, Black and Brown Bear in GMU 16. Efforts to reduce native predator populations to increase ungulate populations are inconsistent with NPS mandates to manage for naturally functioning ecosystems. If the Board adopts any of these proposals, NPS lands should be excluded from predator control efforts.

**Proposal 23: NPS Recommendation: Oppose**

This proposal would allow the use of a snowmachine to position wolves or wolverines for harvest in GMU 17. Federal regulations prohibit the taking and disturbing of wildlife by snowmachines on NPS lands. The use of snowmachines may result in incidental impacts to caribou, wolves, wolverines and other wildlife species. If the Board adopts this proposal, NPS lands should be excluded.

**Proposal 24: NPS Recommendation: Support**

We support this ADF&G proposal to establish a season, daily and annual bag limits, and salvage requirements for Alaska hare in GMU 17, which is the only GMU within the hares' range without these regulations. Alaska hares warrant this additional level of protection given lack of reliable population data and concern for their population status. Adoption of this proposal will help prevent overharvest.

**Proposal 30: NPS Recommendation: Support**

This proposal would shorten the wolf trapping season by two months with no limit in GMU 9 from 10 August-30 June to 10 August-30 April and in GMU 10 from 10 November-30 June to 10 November – 30 April. The NPS notes that a trapping season extending past 30 April may result in take of females with dependent young during the pupping and rearing season, jeopardizing pup survival. Additionally, late season pelts are past prime and take of wolves at this time would deprive trappers of the opportunity to harvest those animals the following year when the pelts are again prime. If pup survival is adversely affected, their pelts would also be deprived to trappers in subsequent seasons.

**Proposal 67: NPS Recommendation: Support**

NPS supports this proposal to require the meat of hind quarters, front quarters and ribs remain on the bone of Dall sheep harvested in GMU 11, much of which is within the boundary of Wrangell-St. Elias National Park and Preserve. If passed, this proposal will reduce the likelihood of spoilage, will prevent wanton waste of meat transported from the field, and will help ensure compliance with existing state salvage requirements.

**Proposal 69 and 70: NPS Recommendation: Oppose**

Proposal 69 would increase the bag limit for brown bear from one per year to two per year in GMU 13; and Proposal 70 would open a fall baiting season for brown and black bears in GMU 13. A stated (Proposal 69) or implied (Proposal 70) justification in these proposals is predator control. Because



intensive management programs are authorized by non-hunting regulations, they require NPS approval on national preserves. If the Board adopts either proposal 69 or 70, NPS lands should be excluded.

**Proposal 96: NPS Recommendation: Oppose**

This proposal would allow the take of black bear in GMU 16B the same day a hunter has flown into the site. Same-day use of airplanes in support of big game harvest is prohibited on NPS lands pursuant to 36 CFR 13.42(d). If the Board adopts this proposal, please exclude NPS lands.

**Proposal 201: NPS Recommendation: Oppose**

This proposal would allow the use of motorized vehicles for hunting moose and caribou in the Upper Mulchatna Controlled Use Area within GMU 17B, which includes portions of Lake Clark National Park and Preserve (LACL). Federal regulations (36 C.F.R. 4.10 (b)) prohibit the use of off-road vehicles other than snowmachines in LACL unless their use is promulgated as special regulations, which is currently not the case. If the Board adopts this proposal, NPS lands should be excluded.

**Proposal 209: NPS Recommendation: Support**

This proposal would increase the number of permits for the Copper River bison hunt in GMUs 11 and 13D (DI454). We support this proposal by ADF&G to create additional harvest opportunity in this growing herd.

**Proposal 228: NPS Recommendation: Support**

The NPS supports the intent of this proposal, which would require trap identification tags in GMU 14A, 14B, and 16. Identifying owners of traps or snares would reduce confusion or conflicts regarding ownership.

Thank you for this opportunity to provide comments on these important wildlife regulatory matters. Should you or your staff have any questions, please feel free to contact me or Mary Hake, wildlife biologist and liaison to the Board of Game at [mary\\_hake@nps.gov](mailto:mary_hake@nps.gov).

Sincerely,

**GRANT**  
**HILDERBRAND**  
**AND**

Digitally signed by  
GRANT  
HILDERBRAND  
Date: 2021.12.14  
12:38:30 -09'00'

Grant Hilderbrand,  
Acting Associate Regional Director  
National Park Service

cc:

Superintendents, National Park Service, Alaska Region  
Regional Director, National Park Service  
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G  
Regional Director, U.S. Fish and Wildlife Service



Submitted By  
Ann Nelson  
Submitted On  
1/7/2022 11:35:13 AM  
Affiliation

I support proposal 199.I also support proposal 228. Both of these proposals will help to make the multi-use trails safer for everyone.



Submitted By  
Christina Newell  
Submitted On  
1/7/2022 11:55:02 PM  
Affiliation

Phone  
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Email  
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Address  
364 E 23rd Ave Unit A  
Anchorage, Alaska 99503

Christina Newell, CSH participant

I strongly oppose proposal 210 and 211 to end the Copper Basin Community Harvest in Unit 13.

The claim that Community Subsistence Hunt hunters are destroying the moose population in Unit 13 is unsubstantiated. ADF&G public harvest records show that in 2020 CSH participants harvested one quarter of the total quota of moose in Unit 13B and 13 E combined, harvesting 70 moose. Sport hunters in Unit 13B and E combined harvested 281 moose.

The salvage requirements that apply to all moose harvested under CSH Moose permit ensure that more food is coming out of the field per animal. Also, the meaningful communal sharing that is inherent with this hunt means that each animal is feeding more families.

These proposals are scapegoating the Community Subsistence Hunt for a bigger, more complex management issue. On the contrary, our management policies should be more reflective of the hunting values that are instilled through the CSH.

I grew up around hunting, but as a girl, was never invited to participate. It wasn't until friends, who hunted under the CSH permit, invited me to a processing event that I had any meaningful involvement and connection to this resource.

This past August, I was able to go out in the field with our CSH hunting group, many of whom, like me, were not taught to hunt growing up because of their gender. Our group successfully harvested and processed three caribou. I learned so much, and was even able to teach some of the knowledge I had learned from my friends at that prior processing event. The caribou were shared between 22 people in our community! Additionally, we made significant donations to Chickaloon Village YaNeDahAh school and the Alaska Native Medical Center wild foods program. This is how hunting should be done—using as much of the animal as possible and sharing with our community and fellow Alaskans.



Submitted By  
Morgan Noad  
Submitted On  
1/6/2022 7:03:54 AM  
Affiliation

I **strongly** support proposals 199 and 228.



Submitted By  
Genevieve Nolan  
Submitted On  
1/6/2022 5:24:05 PM  
Affiliation

I support proposal 199. A setback for traps around trailheads and trails is sensible for safety. More and more people are hiking and biking and using trails in general. The proposal will help mitigate conflict between trappers and other trail users. Genevieve Nolan



# United States Department of the Interior

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



In Reply Refer to:  
FWS/IR11/20140



DEC 11 2020

Mr. Stosh Hoffman, Chairman  
Attention: Board of Game Comments  
Alaska Department of Fish and Game  
Boards Support Section  
Juneau, Alaska 99811-5526

Dear Chairman Hoffman:

The Alaska Board of Game (Board) is scheduled to meet at to be determined dates to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Central and Southwest Region. We have reviewed the 100 proposals the Board will be considering at this meeting.

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

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-317-2165-or [george\\_pappas@fws.gov](mailto:george_pappas@fws.gov), with any questions you may have concerning this material.

Sincerely,

Sue Detwiler  
Assistant Regional Director  
Office of Subsistence Management

Enclosure



cc: Anthony Christianson, Chair, Federal Subsistence Board  
Deputy Assistant Regional Director, Office of Subsistence Management  
Policy Coordinator, Office of Subsistence Management  
State Subsistence Liaison, Office of Subsistence Management  
Wildlife Division Supervisor, Office of Subsistence Management  
Regional Advisory Council Coordinators, Office of Subsistence Management  
Chair, Southcentral Alaska Subsistence Regional Advisory Council  
Chair, Kodiak/Aleutians Subsistence Regional Advisory Council  
Chair, Bristol Bay Subsistence Regional Advisory Council  
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,  
Alaska Department of Fish and Game  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record



## **RECOMMENDATIONS**

### **ALASKA BOARD OF GAME PROPOSALS**

**Central and Southwest Region**

**January 22-29, 2021**

**Wasilla, Alaska**

**Office of Subsistence Management (OSM)**



**PROPOSAL 1 – 5 AAC 85.045. Hunting seasons and bag limits for moose.** Shift to later moose hunting seasons in Units 13 and 14.

**Current Federal Regulations:**

**Unit 13—Moose**

*Unit 13E—1 antlered bull moose by Federal registration permit only; only 1 permit will be issued per household Aug. 1-Sep. 20*

*Unit 13, remainder—1 antlered bull moose by Federal registration permit only Aug. 1-Sep. 20*

**Unit 14—Moose**

*No Federal open season*

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

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal would increase hunting opportunity for Federally qualified subsistence users, and could facilitate meat care by allowing harvest when temperatures are cooler. While the Unit 13 unit-wide moose population has been within State management objectives since 2008, Unit 13B’s population has been below subunit management objectives since 2013. Similarly, the unit-wide bull:cow ratio has been above State management objectives since 2004, while ratios have periodically dropped below objectives in subunits 13A, 13C, and 13E. Unit 13D has had consistently higher bull:cow ratios than the other subunits, averaging 75 bulls:100 cows from 2013-2019. The lowest bull:cow ratios have been observed in the most accessible portions of each subunit (ADF&G 2020a). Unit 13 experiences extremely high harvest pressure, with over 4,000 moose hunters in 2019; less than 9% of these hunters hunted in Unit 13D (ADF&G 2020b). Extending the moose season into October could disrupt breeding moose, depressing the moose population and bull:cow ratios.

Adoption of this proposal would result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 1 **with modification** to extend the season in Unit 13D only. (OSM is only commenting on Unit 13, not Unit 14).

**Rationale:** Extending the season in Unit 13D would provide more opportunity for Federally qualified subsistence users. There are no conservation concerns in Unit 13D due to a historically high bull:cow



ratio and a moose population within State management objectives. Additionally, harvest pressure is relatively low in Unit 13D.

High harvest pressure combined with bull:cow ratios and populations below State management objectives do not recommend a season extension in the remaining Unit 13 subunits. Additionally, extending the season further into the rut could disrupt breeding, further depressing bull:cow ratios and populations in these areas.

#### Literature Cited

ADF&G. 2020a. Annual report to the Alaska Board of Game on intensive management for moose with wolf predation control in Unit 13. February 2020. ADF&G, Division of Wildlife Conservation.

<http://www.adfg.alaska.gov/index.cfm?adfg=intensivemanagement.unit13#anchor>. Accessed April 29, 2020.

ADF&G. 2020b. Harvest General Reports database.

<https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvestreports.main>. Accessed October 1, 2020.

Anchorage, AK.

**PROPOSAL 6 – 5 AAC 92.015. Brown bear tag fee exemptions.** Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.

#### **Current Federal Regulations:**

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

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

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

**Impact to Federal subsistence users/wildlife:** It is unlikely there would be any impact on the brown bear population if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

**Rationale:** There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted, it would continue the tag fee exemption, which eliminates the requirement that Federally qualified subsistence users purchase a \$25 tag before hunting brown bears in these units. This decreases costs and maintains opportunity for Federally qualified subsistence users.

**PROPOSAL 8 – 5 AAC 84.270. Furbearer trapping.** Shorten coyote trapping season in Units 9, 13, 14B, 16 and 17.

**Current Federal Regulations:**

**Units 9, 13, 16, 17—Coyote (Trapping)**

*No limit*

*Nov. 10–Mar. 31*

**Unit 14B—Coyote (Trapping)**

*No Federal open season*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would decrease opportunity for Federally qualified subsistence users trapping under State regulations and would likely have little impact on the coyote population. The wolf State trapping seasons in these units extend until April 30 or June 30. In Units 13 and 16, the wolf State trapping season opens October 15, while in Unit 9, it opens August 10. Therefore, shortening the coyote season may result in increased incidental take in these units when the wolf season is open, but the coyote season is closed.

Adoption of this proposal would result in alignment of closing dates between Federal and State regulations, decreasing regulatory complexity and user confusion.

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

**Rationale:** Adopting this proposal decreases opportunity for Federally qualified subsistence users, and no conservation concerns exist for coyote in any of these units. Additionally, shortening the coyote season could result in increased incidental take in these units when the wolf season is still open.

**PROPOSAL 12 – 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 17A.

**Current Federal Regulations:**

**Unit 17A—Moose**

*Unit 17A—1 bull by State registration permit*

*Aug. 25-Sep. 20.*

*Unit 17A—up to 2 moose; one antlered bull by State registration permit, one antlerless moose by State registration permit*

*Up to a 31-day season may be announced*



*between Dec. 1-last day  
of Feb.*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal increases harvest opportunity for Federally qualified subsistence users. No conservation concerns exist as the antlerless season is in-line with the Unit 17A Moose Management Plan, and the Unit 17A moose population is growing and can support the additional harvest.

As a fall antlerless moose season does not exist in Federal regulations, a similar proposal would need to be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021 in order to align State and Federal moose regulations in Unit 17A and reduce regulatory complexity and user confusion.

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

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

**PROPOSAL 14 – 5AAC 85.045(15). Hunting seasons and bag limits for moose.**

Establish fixed-season dates for resident registration moose hunts RM575 & RM576 in Unit 17A.

**Current Federal Regulations:**

**Unit 17A—Moose**

*Unit 17A—1 bull by State registration permit*

*Aug. 25-Sep. 20.*

*Unit 17A—up to 2 moose; one antlered bull by State registration permit, one antlerless moose by State registration permit*

*Up to a 31-day season may be announced between Dec. 1-last day of Feb.*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would provide more opportunity and flexibility for Federally qualified subsistence users by providing a longer and predictable season. The Unit 17A moose population is currently above management objectives and can withstand additional harvest. These hunts are also managed by harvest quotas, which assures sustainable harvests.



While Federal subsistence winter moose seasons in Unit 17A require State registration permits, adopting this proposal would result in misalignment of season dates, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

**Rationale:** No conservation concerns exist as the moose population is currently above State objectives and additional harvest could help prevent habitat degradation. This proposal also increases opportunity and the ability to plan for winter hunts for Federally qualified subsistence users.

**PROPOSAL 18 – 5 AAC 85.045. Hunting seasons and bag limits for moose.**

Extend the resident winter moose season in Units 17B and 17C.

**Current Federal Regulations:**

**Unit 17—Moose**

*Units 17B and 17C—one bull*

*Aug. 20-Sep. 15.  
Dec. 1-31.*

*During the period Aug. 20-Sep. 15—one bull by State registration permit; or*

*During the period Sep. 1-15—one bull with spike-fork or 50-inch antlers or antlers with three or more brow tines on at least one side with a State harvest ticket; or*

*During the period Dec. 1-31—one antlered bull by State registration permit*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users by providing a longer season and better access to hunting areas when ice and snow conditions are safer. While bull:cow ratios and recent moose population estimates for Units 17B and 17C are not readily available, minimal impact to the population is expected if this proposal is adopted due to low harvest pressure during the winter season. Between 2012 and 2019, an average of 28 moose were reported harvested during the RM585 winter season, compared to an average of 159 moose reported harvested during the RM583 fall season (ADF&G 2020).

While the Federal subsistence December moose season in Units 17B and 17C require the State RM585 registration permit, adopting this proposal would result in misalignment of season dates, increasing



regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 18 **with modification** to also extend the winter moose season in Unit 17B, the portions extending 2 miles on either side of, and including, the following rivers: Nushagak River, beginning at the southern boundary of Unit 17B and extending north to the Chichitnok River, and including Harris Creek, Klutuspak Creek, King Salmon River and the Chichitnok River; Mulchatna River upstream to the mouth of the Chilchitna; Nuyakuk River extending west up to the falls; Koktuli River up to the mouth of the Swan River; and Stuyahok River to the confluence of the North/South Forks.

**Rationale:** Harvest opportunity for Federally qualified subsistence users would increase and minimal impacts to the moose population are expected due to low harvest pressure. Applying the extended season to all of Unit 17B and the entire RM585 permit area further increases opportunity and simplifies regulations.

Literature Cited

ADF&G. 2020. Harvest General Reports database.

<https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvestreports.main>. Accessed October 2, 2020. Anchorage, AK.

**PROPOSAL 19 – 5 AAC 92.108. Identified big game prey populations and objectives.**

Establish new population and harvest objectives for the Mulchatna caribou herd in Units 9, 17, 18, and 19.

**Current Federal Regulations:** N/A.

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would help ensure Mulchatna Caribou are available for future harvest by Federally qualified subsistence users. Revising population and harvest objectives, informed by habitat quality studies, will promote effective, sustainable management of this important subsistence resource.

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

**Rationale:** OSM is concerned about the health and conservation of the Mulchatna Caribou Herd and supports measures to ensure the herd's sustainability.

**PROPOSAL 20 – 5 AAC 85.025 (3)(4)(12)(13)(14). Hunting seasons and bag limits for caribou. 5 AAC 92.062. Priority for subsistence hunting; Tier II permits.** Establish Tier II subsistence hunting season and bag limit for the Mulchatna caribou herd (MCH).

**Current Federal Regulations:**

**Unit 9–Caribou**

- Unit 9A—2 caribou by State registration permit* Aug. 1 – Mar. 15.
- Unit 9B—2 caribou by State registration permit* Aug. 1 – Mar. 31.
- Unit 9C, that portion within the Alagnak River drainage—2 caribou by State registration permit* Aug. 1 – Mar. 15.
- Unit 9C, that portion draining into the Naknek River from the north, and Graveyard Creek and Coffee Creek—2 caribou by State registration permit. Public lands are closed to the taking of caribou except by residents of Unit 9C and Egegik* Aug. 1 – Mar. 15.

**Unit 17–Caribou**

- Unit 17A-all drainages west of Right Hand Point—2 caribou by State registration permit* Aug. 1 – Mar. 31.
- Units 17B and 17C-that portion of 17C east of the Wood River and Wood River Lakes—2 caribou by State registration permit* Aug. 1 – Mar. 31.

**Unit 18–Caribou**

- Unit 18-that portion to the east and south of the Kuskokwim River—2 caribou by State registration permit* Aug. 1 – Mar. 15.
- Unit 18, remainder—2 caribou by State registration permit* Aug. 1 – Mar. 15.

**Unit 19–Caribou**

- Units 19A and 19B (excluding rural Alaska residents of Lime Village)—2 caribou by State registration permit* Aug. 1 – Mar. 15.

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. The regulations listed above are the codified Federal regulations. The Federal Subsistence Board approved modified regulations for the Mulchatna Caribou Herd (MCH) for the 2020/21 and 2021/22 regulatory years via Wildlife Special Action WSA20-04. WSA20-04 delegated authority to the Togiak National Wildlife Refuge (NWR) manager to open/close seasons, announce harvest limits, and set sex restrictions. In July 2020, the Togiak NWR manager announced a fall 2020 season of Aug. 1-Sept. 20 with a harvest limit of one bull.

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would decrease opportunity for Federally qualified subsistence users by shortening seasons and decreasing harvest limits. However, opportunity has already been reduced under State and Federal regulations during the 2019/20 and 2020/21 regulatory years because of conservation concerns for the MCH. Adopting this proposal would help conserve the MCH, particularly by closing the season during the rut, which could promote calf production and herd growth.

Adoption of this proposal would also result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. Federal regulations currently require the State RC503 registration permit. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** the proposed season and harvest limit changes and is **neutral** on the hunt structure/Tier II permits.

**Rationale:** While this proposal would decrease opportunity for Federally qualified subsistence users, conservation measures and more conservative harvest regulations are needed for the MCH due to its recent, substantial population decline.

**PROPOSAL 23 – 5 AAC 92.080(4)(B)(vii). Unlawful methods of taking game; exceptions.**

Allow the use of snowmachine to position wolf or wolverine for harvest in Unit 17.

**Current Federal Regulations:**

**§ \_\_\_\_ .26 Subsistence taking of wildlife**

...

*(b) Except for special provisions found at paragraphs (n)(1) through (26) of this section, the following methods and means of taking wildlife for subsistence uses are prohibited:*

...

*(4) Taking wildlife from a motorized land or air vehicle when that vehicle is in motion, or from a motor-driven boat when the boat's progress from the motor's power has not ceased.*

*(5) Using a motorized vehicle to drive, herd, or molest wildlife.*

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. The Federal Subsistence Board deferred Proposal WP20-26 at their April 2020 meeting, which requested using a snowmachine to position wolves and wolverines in Unit 17. The Federal Subsistence Board is evaluating if there is a more consistent, enforceable, and statewide approach that would ensure compliance with multi-agency regulations while allowing efficient take of subsistence resources.

**PROPOSAL 24 – 5 AAC 85.065. Hunting seasons and bag limits for small game.**

**5 AAC 92.220. Salvage of game meat, furs, and hides.** Establish a season, daily and seasonal bag limit, and salvage requirement for Alaska hare in Unit 17.

**Current Federal Regulations:**

## Unit 17—Hare (Snowshoe and Tundra)

*No limit*

*July 1 – June 30.*

§ \_\_.25(j)(2) *If you take wildlife for subsistence, you must salvage the following parts for human use:*

\* \* \* \*

*(iv) The hide or meat of squirrels, hares, marmots, beaver, muskrats, or unclassified wildlife.*

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

**Impact to Federal subsistence users/wildlife:** Shortening the hunting season and decreasing the harvest limit for Alaska hare would decrease harvest opportunity for Federally qualified subsistence users, although harvest is likely low. However, conservation concerns exist for Alaska Hare as current abundance appears low and below historic levels throughout its range (Merizon and Carroll 2019). Closing the season during the breeding season between April and June when hares congregate (Murray 2003) and may be most susceptible to harvest should help conserve this species. Requiring the salvage of the hide or meat is in-line with subsistence harvest principles of utilizing harvested resources.

Adoption of the season and harvest limit part of this proposal would also result in misalignment between Federal and State regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021. Adoption of the salvage requirement would align Federal and State regulations, decreasing regulatory complexity and user confusion.

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

**Rationale:** Conservation concerns exist for Alaska Hares throughout its range. Requiring salvage of the meat or hide aligns Federal and State regulations and is in accordance with subsistence harvest principles.

### Literature Cited

Merizon, R.A. and C.J. Carroll. 2019. Status of grouse, ptarmigan, and hare in Alaska, 2017 and 2018. ADF&G. Juneau, AK.

Murray, D.L. 2003. Snowshoe hares and other hares. Pages 147 – 175 in G.A Feldhamer, B.C. Thompson and J.A. Chapman, eds. Wild mammals of North America: Biology Management and Conservation. The Johns Hopkins University Press. Baltimore, MD. 1216 pp.

**PROPOSAL 30 – 5 AAC 84.270. Furbearer trapping.** Shorten the wolf trapping season in Units 9 and 10.

**Current Federal Regulations:**

**Units 9, 10—Wolf***No limit**Nov. 10 – Mar. 31***Is a similar issue being addressed by the Federal Subsistence Board?** No.

**Impact to Federal subsistence users/wildlife:** While shortening the season would decrease opportunity for Federally qualified subsistence users, it is unlikely many users target wolves in May and June during the denning season and when fur quality is deteriorating. Changing the closing date of the wolf trapping season in Units 9 and 10 to April 30 would also align (or come closer to aligning with) the closing date of the coyote trapping season in these units under State regulations, which could reduce incidental take issues. Adopting this proposal may also reduce secondary impacts of taking wolves with active dens.

Federal and State wolf trapping seasons are currently misaligned for these units and would continue to be misaligned if this proposal is adopted, contributing to regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

**Rationale:** Take of wolves during the denning season in May and June is likely low and fur quality is deteriorating. Shortening the State wolf trapping season brings these regulations more closely in line with State coyote and Federal wolf trapping seasons, reducing incidental take issues and reducing regulatory complexity.

**PROPOSAL 31 – 5 AAC 84.270. Furbearer trapping. 5 AAC 85.057. Hunting seasons and bag limits for wolverine.** Close wolverine trapping and hunting in Unit 10.

**Current Federal Regulations:****Unit 10—Wolverine (Hunting)***1 wolverine**Sep. 1 – Mar. 31***Unit 10—Wolverine (Trapping)***No limit**Nov. 10 – Feb. 28***Is a similar issue being addressed by the Federal Subsistence Board?** No.

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would decrease opportunity for Federally qualified subsistence users, although wolverine harvest in Unit 10 appears to be extremely low

to nonexistent. No conservation concerns exist for wolverine in Unit 10 due to the lack of harvest, and ADF&G questions whether wolverines still occur on Unimak Island.

Adoption of this proposal would also result in misalignment between Federal and State regulations in Unit 10, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

**Rationale:** While adopting this proposal would decrease opportunity, wolverines are not being harvested in Unit 10 and may not even occur in the unit anymore. Regardless, harvest opportunity is not warranted for an extremely low or even nonexistent population.

**PROPOSAL 58 – 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 13.

**Current Federal Regulations:**

**Unit 13—Moose**

*Unit 13E—1 antlered bull moose by Federal registration permit only; only 1 permit will be issued per household Aug. 1-Sep. 20*

*Unit 13, remainder—1 antlered bull moose by Federal registration permit only Aug. 1-Sep. 20*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users, although opportunity is limited as this is a drawing hunt with a limited number of permits. The Unit 13A moose population is within State management objectives and can sustain limited antlerless moose harvest. The hunt is also closely managed through permit numbers, which ensures sustainable harvests.

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

**Rationale:** No conservation concerns exist as the antlerless hunt is closely managed through permit numbers and monitoring of the Unit 13 moose population.

**PROPOSAL 62 – 5 AAC 85.045(a)(11). Hunting seasons and bag limits for moose.**

Establish an antlerless moose season in Unit 13E.

**Current Federal Regulations:**

**Unit 13E—Moose**

*Unit 13E—1 antlered bull moose by Federal registration permit only; only Aug. 1-Sep. 20  
1 permit will be issued per household*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users, although opportunity is limited as this is a drawing hunt with a limited number of permits. The Unit 13E moose population has been within or above State management objectives and can sustain limited antlerless moose harvest. The hunt would also be closely managed through permit numbers, which ensures sustainable harvests.

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

**Rationale:** No conservation concerns exist as the antlerless hunt would be closely managed through permit numbers and monitoring of the Unit 13E moose population.

**PROPOSAL 71 – 5 AAC 85.057. Hunting seasons and bag limits for wolverine.**  
Lengthen the wolverine hunting season in Unit 13.

**Current Federal Regulations:**

**Unit 13—Wolverine (Hunting)**

*1 wolverine*

*Sep. 1 – Feb. 28*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users by providing a longer season under State hunting regulations. No impact to the wolverine population is expected as unlimited harvest is allowed under trapping regulations, and wolverines may be shot under a trapping license.

Adopting this proposal would almost align State and Federal seasons for wolverine hunting in Unit 13, decreasing regulatory complexity and user confusion. During leap years, the State season would be one day longer than the Federal season.

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

**Rationale:** No conservation concerns exist. This proposal would increase opportunity for Federally qualified subsistence user and align State and Federal hunting seasons.

**PROPOSAL 72 – 5 AAC 84.270. Furbearer trapping.**

Extend the wolverine trapping season in Unit 13.

**Current Federal Regulations:**

**Unit 13—Wolverine (Trapping)**

*No limit*

*Nov. 10 – Feb. 28*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users by providing a longer season under State trapping regulations. Minimal impact to the wolverine population is expected as current harvest limits for trapping are ‘no limit’ and the Federal wolverine trapping season already extends until Feb. 28. Adopting this proposal would almost align State and Federal seasons for wolverine trapping in Unit 13, decreasing regulatory complexity and user confusion. During leap years, the State season would be one day longer than the Federal season.

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

**Rationale:** Minimal conservation concerns exist. This proposal would increase opportunity for Federally qualified subsistence user and align State and Federal trapping seasons.

**PROPOSAL 73 – 5 AAC 84.270. Furbearer trapping.**

Extend the wolverine trapping season in Unit 13.

*See comments for Proposal 72.*

**PROPOSAL 76 – 5 AAC 85.065. Hunting seasons and bag limits for small game.**

Extend the ptarmigan season and the lower bag limit in Unit 13B and 13E.

**Current Federal Regulations:**

**Unit 13—Ptarmigan (Rock, Willow, and White-tailed)**

*20 per day, 40 in possession*

*Aug. 10-Mar. 31.*

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

**Impact to Federal subsistence users/wildlife:** Extending the season would increase, while lowering the harvest limit would decrease opportunity for Federally qualified subsistence users. Conservation concerns exist for ptarmigan in Unit 13 as populations have declined, particularly along the road-accessible areas in Units 13E and 13B where harvest pressure is highest. Extending the season could exacerbate these concerns as ptarmigan are easier to hunt during March when they are entering the breeding season and less prone to flying. Additionally, late winter (mid-February-March) harvest mortality historically accounted for 60% of the Unit 13 ptarmigan harvest, appears to be additive, and contributed to the population declines. State regulations changed in 2018 and more time is needed to assess the effectiveness of these regulation changes before making additional changes (OSM 2019).

Federal subsistence and State ptarmigan regulations are currently misaligned in Unit 13 and would continue to be misaligned if this proposal is adopted, contributing to regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

**Rationale:** Conservation concerns exist for ptarmigan in Unit 13. Extending the season to March 31 could result in higher harvests and additive mortality, preventing population recovery.

Literature Cited

OSM. 2019. Staff analysis WSA19-08. Office of Subsistence Management, USFWS. Anchorage, AK. <https://www.doi.gov/subsistence/wildlife-special-actions>. Accessed October 6, 2020.

**PROPOSAL 84 – AAC 85.045. Hunting seasons and bag limits for moose.**  
 Establish an antlerless moose season in Unit 16B.

**Current Federal Regulations:**

**Unit 16—Moose**

*Unit 16B-Redoubt Bay Drainages south and west of, and including the Kustatan River drainage—1 bull* Sep. 1-15.

*Unit 16B-Denali National Preserve only—1 bull by Federal registration permit. One Federal registration permit for moose issued per household* Sep. 1-30.  
 Dec. 1-Feb. 28.

*Unit 16B, remainder—1 bull* Sep. 1-30.  
 Dec. 1-Feb. 28.

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



**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users, although opportunity is limited as the proposed hunts are a Tier II and drawing hunt with a limited number of permits. The Unit 16B moose population is currently above State management objectives and can sustain limited antlerless moose harvest. The hunt would also be closely managed through permit numbers, which ensures sustainable harvests.

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

**Rationale:** No conservation concerns exist as the antlerless hunt would be closely managed through permit numbers and monitoring of the Unit 16B moose population.

**PROPOSAL 98 – 5 AAC 84.270. Furbearer trapping.**  
Extend the beaver trapping season in Unit 16.

**Current Federal Regulations:**

**Unit 16—Beaver**

*No limit*

*Oct. 10 – May 15.*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users. Beaver are considered common in the region according to trapper questionnaires, mitigating conservation concerns.

Federal subsistence and State beaver regulations are currently misaligned in Unit 16 and would continue to be misaligned if this proposal is adopted, contributing to regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window in January-March 2021.

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

**Rationale:** No conservation concerns exist and harvest opportunity would increase.



IN REPLY REFER TO:  
OSM.21063.LG

# United States Department of the Interior

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

DECEMBER 17 2021

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

Dear Chairman Hoffman:

The Alaska Board of Game (Board) is scheduled to meet January 21-28, 2022 to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Central and Southwest Region. We have reviewed the 133 proposals the Board will be considering at this meeting.

The Office of Subsistence Management, working with other Federal agencies, has developed preliminary recommendations on those proposals that have potential impacts on both Federal subsistence users and wildlife resources. Our recommendations on the 2021-2022 supplemental proposals are enclosed. Our recommendations on the original 2020-2021 proposals were previously submitted.

We appreciate the opportunity to comment on these important regulatory matters and look forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, 907-786-3822 or [george\\_pappas@fws.gov](mailto:george_pappas@fws.gov), with any questions you may have concerning this material.

Sincerely,

Sue Detwiler  
Assistant Regional Director  
Office of Subsistence Management

Enclosure

cc: Anthony Christianson, Chair, Federal Subsistence Board  
Deputy Assistant Regional Director, Office of Subsistence Management  
Policy Coordinator, Office of Subsistence Management  
State Subsistence Liaison, Office of Subsistence Management  
Wildlife Division Supervisor, Office of Subsistence Management  
Council Coordinators, Office of Subsistence Management  
Chair, Southcentral Alaska Subsistence Regional Advisory Council  
Chair, Kodiak/Aleutians Subsistence Regional Advisory Council  
Chair, Bristol Bay Subsistence Regional Advisory Council  
Kristy Tibbles, Executive Director, Board of Game, Board Support Section,

Alaska Department of Fish and Game  
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game  
Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game  
Interagency Staff Committee  
Administrative Record



## **RECOMMENDATIONS**

### **ALASKA BOARD OF GAME PROPOSALS**

**Central and Southwest Region**

**January 21-28, 2022**

**Wasilla, Alaska**

**Office of Subsistence Management (OSM)**

**PROPOSAL 197 – 5 AAC 92.015. Brown bear tag fee exemption.** Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region

**Current Federal Regulations:**

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

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

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

**Impact to Federal subsistence users/wildlife:** It is unlikely there would be any impact on the brown bear population if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

**Rationale:** There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted, it would continue the tag fee exemption, which eliminates the requirement that Federally qualified subsistence users purchase a \$25 tag before hunting brown bears in these units. This decreases costs and maintains opportunity for Federally qualified subsistence users. Retaining this tag fee exemption is particularly important in areas where there are few vendors.

**PROPOSAL 198 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.**  
Eliminate bear baiting or prohibit bait stations within 50 miles of cabins.

**Current Federal Regulations:**

**§100.26 Subsistence taking of wildlife.**

*(b)(14)(v) You may not use bait within 1 mile of a house or other permanent dwelling, or within 1 mile of a developed campground or developed recreational facility.*

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

**Impact to Federal subsistence users/wildlife:** While no direct impacts to bear populations are expected from this proposal, they may be indirectly affected by reduction in baiting stations and, by extension, reduction of harvest. Restricting or eliminating bear baiting would also reduce opportunity for subsistence users harvesting a bear under State regulations. Enforcement would also be very difficult. Adopting this proposal would also misalign State and Federal regulations, creating user confusion, and increasing regulatory complexity.

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

**Rationale:** This regulation would restrict subsistence opportunity. There is no biological reason, at this time, to stop or restrict this practice.

**PROPOSAL 200 – 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose season in Unit 17A.

**Current Federal Regulations:**

**Unit 17A—Moose**

*Unit 17A-1 bull by State registration permit; Aug. 25 – Sept 25*

*OR*

*1 antlerless moose by State registration permit; Aug. 25 – Sept 25*

*OR*

*Unit 17A-up to 2 moose; 1 antlered bull by State registration permit, 1 antlerless moose by State registration permit. Up to a 31-day season may be announced between Dec.1 and the last day of Feb.*

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

**Impact to Federal subsistence users/wildlife:** This proposal will provide Federally qualified subsistence users continued opportunities to harvest antlerless moose. It is not expected to have a detrimental effect on the Unit 17A moose population.

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

**Rationale:** This proposal is consistent with the Unit 17A moose management plan, which calls for a limited antlerless harvest when the moose population exceeds 600 animals. The current population estimate is in excess of that threshold, and this proposal provides management flexibility. It also provides additional harvest opportunity to Federally qualified subsistence users without risking the long-term viability of the moose population.

**PROPOSAL 201 – 5 AAC 92.540. Controlled use areas.** Allow motorized vehicles for hunting moose and caribou in the Upper Mulchatna Controlled Use Area in Unit 17B.

**Current Federal Regulations:**

**50 CFR 100.26(n)(17)(ii)(A)**

*Except for aircraft and boats and in legal hunting camps, you may not use any motorized vehicle for hunting ungulates, bear, wolves, and wolverine, including transportation of hunters and parts of ungulates, bear, wolves, or wolverine in the Upper Mulchatna Controlled Use Area consisting of Unit 17B, from Aug. 1 through Nov. 1.*

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

**Impact to Federal subsistence users/wildlife:** Adoption of this proposal would provide Federally qualified subsistence users with increased opportunities to harvest big game by allowing for motorized transport within Unit 17B. The Upper Mulchatna controlled use area (CUA) was established under State and Federal regulations in 1990 due to concerns that all-terrain vehicles access was not biologically justified and due to their incompatibility with other recreational uses (Van Daele 1993).

The proposed regulation maintains motorized vehicle restrictions for guided hunters, while allowing motorized vehicle use for RM583 and RC503 permit holders. The RC503 caribou hunt is only open to Alaska residents (and currently closed), while the RM583 permit is only available in Unit 17. These stipulations assuage past concerns when the CUA was established, while providing additional hunting opportunity to Federally qualified subsistence users.

This proposal may increase harvest of moose and caribou (when open); however, increases are expected to be small due to the remoteness of Unit 17B and the additional stipulations of the proposal. The effect on bears, wolves, wolverines is unknown as the proponent's intent for using a motorized vehicle to harvest these big game species is unclear. No impacts to the habitat and other species are expected as motorized vehicle use within the CUA is already allowed for other activities such as hunting for small game and waterfowl, and berry picking. Adopting this proposal would misalign the Federal and State regulations.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 201 **with modification** to exclude National Park Service lands.

**Rationale:** Adopting this proposal would allow Federally qualified subsistence users with an RM583 or RC503 permit to harvest a moose or caribou (when open again) when utilizing a motorized vehicle for other activities, thus increasing subsistence harvest opportunity.

Off-road vehicle use (other than snowmachines) is not allowed in national parks and preserves unless their use is promulgated as special regulations, which is not currently the case for park lands in the Upper Mulchatna CUA. Therefore, if this proposal is adopted, lands within Lake Clark National Park and Preserve should be excluded.

### Literature Cited

Van Daele, L.J. 1993. Unit 17 moose – Northern Bristol Bay. Pages 191-197 [In] Abbot, S.M., editor. Moose management report of survey and inventory activities 1 July 1989-30 June 1991. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC Juneau, AK.

**PROPOSAL 202 – 5 AAC 92.095(3). Unlawful methods of taking furbearers; exceptions.** Allow the use of a firearm to take beaver while trapping in Unit 17.

### **Current Federal Regulations:**

#### **§ 100.26 Subsistence taking of wildlife.**

*17 (D) If you have a trapping license, you may use a firearm to take beaver in Unit 17 from April 15 through May 31. You may not take beaver with a firearm under a trapping license on National Park Service lands.*

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

**Impact to Federal subsistence users/wildlife:** If this proposal is adopted, it would increase beaver harvest opportunity for Federally qualified subsistence users under State regulations. It is unlikely there would be any significant impact on the beaver population, especially given the current harvest of ‘no limit’.

Adopting this proposal would misalign State and Federal regulations, increasing user confusion and regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 202 **with modification** to exclude National Park Service (NPS) lands.

**Rationale:** Currently Federally qualified subsistence users are only able to use firearms to take beavers while trapping in Unit 17 from April 15 through May 3. If this proposal is adopted, it would increase beaver harvest opportunity for Federally qualified subsistence users under State regulations. Additionally, there are no conservation concerns for beaver in Unit 17.

However, this support does not extend to NPS lands as agency specific regulations prohibit the take of a furbearer with a firearm under a trapping license. Therefore, NPS lands must be excluded if the proposal is adopted.

**PROPOSAL 203 – 5 AAC 84.270. Furbearer trapping.** Extend the trapping season for muskrat in Unit 17.

**Current Federal Regulations:**

**Unit 17**

*2 muskrats*

*Nov. 10 – Feb. 28*

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

**Impact to Federal subsistence users/wildlife:** This proposal would provide Federally qualified subsistence users increased opportunities to trap muskrat. Adopting this proposal would have an unknown effect on the Unit 17 muskrat population. Since the 2015/16 regulatory year, zero muskrats have been reported trapped within Unit 17. During the same timeframe, trapper surveys have indicated that muskrat are scarce in Unit 17 (Bogle 2020; Parr 2017, 2016; Spivey 2019, 2018).

While adoption of this proposal would align the opening date of the Unit 17 muskrat season under State and Federal regulations, the closing date would remain misaligned. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March, 2023.

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

**Rationale:** This proposal would provide additional opportunity for Federally qualified subsistence users by allowing users to have two additional months of trapping during a time when it is easier to access muskrats. However, little is known about the status of the muskrat population in Unit 17 or the effect this proposal would have on it.

Literature Cited

Bogle, S. 2020. Alaska Trapper Questionnaire. Page 37-39. 2019 Trapper Report: 1 July 2019-30 June 2020. ADF&G. Juneau, AK.

Parr, B. 2017. Alaska Trapper Questionnaire. Page 32-33 2016 Trapper Report: 1 July 2016-30 June 2017. ADF&G. Juneau, AK.

Parr, B. 2016. Alaska Trapper Questionnaire. Page 39-40 2016 Trapper Report: 1 July 2015-30 June 2016. ADF&G. Juneau, AK.

Spivey, T. 2019. Alaska Trapper Questionnaire. Page 34-36. 2018 Trapper Report: 1 July 2018-30 June 2019. ADF&G. Juneau, AK.

Spivey, T. 2018. Alaska Trapper Questionnaire. Page 34-36. 2017 Trapper Report: 1 July 2017-30 June 2018. ADF&G. Juneau, AK.

**PROPOSAL 204 – 5 AAC 84.045(a)(8). Hunting seasons and bag limits for moose.** Lengthen moose season in Units 9B and 9C and align hunt areas in Unit 9C.

**Current Federal Regulations:**

**Unit 9B**

<i>1 bull by State registration permit</i>	<i>Sept. 1 – Sept. 15</i>
	<i>Dec. 1 – Jan. 15</i>

**Unit 9C**

<i>That portion draining into the Naknek River from the north—1 bull by State registration permit</i>	<i>Sept. 1 – Sept. 15</i>
	<i>Dec. 1 – Jan. 15</i>

<i>That portion draining into the Naknek River from the south—1 bull by State registration permit</i>	<i>Aug. 20 – Sept. 20</i>
	<i>Dec. 1 – Dec. 31</i>

*Federal public lands are closed during Dec. to the harvest of moose, except by Federally qualified subsistence users in Units 9A, 9B, 9C, and 9E.*

<i>9C, remainder—1 bull by State registration permit</i>	<i>Sept. 1 – Sept. 20</i>
	<i>Dec. 15 – Jan 15</i>

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes, currently there is a closure review (WCR22-05). WCR22-05 reviews the closure of Federal public land in Unit 9C, draining into the Naknek River from the south to non-Federally qualified users for the Dec. 1 – 31 moose hunt.

**Impact to Federal subsistence users/wildlife:** The fall season date extensions in Units 9B and 9C provide increased opportunity for Federally qualified subsistence users. The extension at the end of the fall season, however, is of concern. After September 20, it is local knowledge that the quality of the meat would be much less desirable due to bulls going into rut. Adding the additional 5 days to the start of the season offers more opportunity for subsistence users to harvest meat that is of higher quality.

Impact to the moose population is uncertain as population estimates for Unit 9 are not available. However, bull:cow ratios have been above State management objectives, indicating surplus bulls available for harvest. In the Federal closure area, surveys conducted by the Alaska Peninsula and Becharof National Wildlife Refuge indicate a low-density moose population (~0.35 moose/mi<sup>2</sup>) that may be declining. The lowest estimate occurred in 2020 when survey conditions were ideal (Smith 2021, pers. comm.).

Alignment of the hunt areas in Unit 9C further misaligns hunt areas between Federal and State regulations, which adds additional complexity to the regulations and may increase user confusion. Federal lands in a portion of Unit 9C are currently closed during December, which coincides with the

Federal and State winter hunts currently in regulation. If the winter season is extended to January 15 under State regulations, non-Federally qualified users would be able to hunt on the Federal public lands within the closure area in January, which is contrary to the intent of the closure.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 204 **with modification** to extend the fall moose season in Units 9B and 9C from Aug. 25-Sept. 20, without aligning the hunt areas of Unit 9C or extending the winter season in Unit 9C.

**Rationale:** OSM opposes extending the fall moose season at the end of September, but supports additional opportunity at the beginning of the fall moose season. Additionally, OSM opposes extending the winter season in Unit 9C, draining into the Naknek River, which also precludes combining the Unit 9C hunt areas.

The overall moose population in Units 9B and 9C is unknown, as population surveys are difficult to conduct in the area. The information currently available indicates that the Unit 9B and 9C moose populations are below the State management objectives. However, recent composition surveys indicate that the bull:cow ratio is higher than the current State management plan objective, indicating that there may be additional bulls available for harvest.

The additional days added to the hunting season would provide additional opportunity for Federally qualified subsistence users. However, the additional days at the end of the season potentially conflict with the bulls going into rut and the meat would be less desirable.

Information about the location of where moose harvest is taking place within the Federal closure area of Unit 9C during the winter hunt is limited. That, combined with recent local surveys indicating a low-density and possibly declining moose population within the closure area, suggest extending the winter season in Unit 9C is not consistent with the conservation measures being taken through the Federal public lands closure.

#### Literature Cited

Smith, W. 2021. Supervisory Biologist. Alaska Peninsula and Becharof National Wildlife Refuge. U.S. Fish and Wildlife Service. King Salmon, AK. Personal communication: e-mail.

**PROPOSAL 212 – 5 AAC 92.050(a)(4)(I). Required permit hunt conditions and procedures.** Clarify the Unit 13 Tier I subsistence caribou permit condition that members of a household may not hunt caribou or moose in any other state hunts in other locations.

**Current Federal Regulations:** None

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

**Impact to Federal subsistence users/wildlife:** There would be less confusion for Federally qualified subsistence users. This proposal clarifies that Federally qualified subsistence users may still hunt moose

and caribou under Federal regulations if they obtain a Unit 13 Tier I subsistence permit under State regulations.

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

**Rationale:** OSM supports opportunities to clarify regulations to reduce confusion.

**PROPOSAL 218 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.** Increase the bag limit for brown bear in Unit 13.

**Current Federal Regulations:**

**Unit 13 – Brown Bear**

*Brown Bear: 1 bear. Bears taken within Denali National Park must be sealed Aug. 10-  
within 5 days of harvest. That portion within Denali National Park will be closed by May 31.  
announcement of the Superintendent after 4 bears have been harvested*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would increase opportunity for Federally qualified subsistence users. However, as ADF&G (2018) reports, the brown bear population trend in Unit 13 is declining, while harvest trends remain stable. Brown bear populations in adjoining Units 12 and 20 are described as being relatively high density with a sustainable level of harvest. Since brown bear monitoring methods are imprecise and expensive (Miller et al. 2011) and brown bears require large home ranges to meet their resource needs (McLoughlin et al. 2002), harvest should be managed conservatively until definite population trends are established.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** Proposal 218.

**Rationale:** While this proposal would allow additional opportunity for Federally qualified subsistence users to harvest brown bear, the Unit 13 population may be declining, and a conservative management approach is recommended.

Literature Cited

Alaska Department of Fish and Game (ADF&G) 2018. GMU 11 & 13 Overview. Presentation at the Alaska Board of Game, Central/Southwest Region: Feb. 16- 23, 2018.

McLoughlin, P.D., H.D. Cluff and F. Messier. 2002. Denning ecology of barren-ground grizzly bears in the central Arctic. *Journal of Mammalogy*. 83(1):188-192.

Miller, S.D., J.W. Schoen, J. Faro, D.R. Klein. 2011. Trends in intensive management of Alaska's grizzly bears, 1980-2010. *The Journal of Wildlife Management*. 75(6): 1243-1252.

**PROPOSAL 221 – 5 AAC 84.270. Furbearer trapping.** Align otter and beaver trapping seasons in Unit 13.

**Current Federal Regulations:**

**Unit 13 – Otter**

*Otter: No limit*

*Nov. 10-Mar. 31.*

**Unit 13 – Beaver**

*Beaver: No limit*

*Sept. 25-May 31.*

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

**Impact to Federal subsistence users/wildlife:** Federally qualified subsistence users would be provided more opportunity to harvest otter under the proposed trapping regulations. In addition, it would allow trappers to legally keep otter incidentally caught in a beaver set. No conservation concerns exist for either species in Unit 13, and current harvest limits are very liberal at ‘no limit’. Additionally, ADF&G reports the three-year harvest average for otter is stable (Bogle 2021).

Adopting this proposal would misalign Federal and State trapping seasons for otter, increasing user confusion, regulatory complexity, and enforcement concerns. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 221.

**Rationale:** This proposal would allow additional opportunity for Federally qualified subsistence users to harvest otter in Unit 13. It would also align State beaver and otter seasons and reduce the number of incidental catches of out-of-season river otter.

Literature Cited

Bogle, S. E. 2021. 2019 Alaska trapper report: 1 July 2019–30 June 2020. Division of Wildlife Conservation, Wildlife Management Report ADF&G/DWC/WMR-2021-2, Juneau.

**PROPOSAL 222 – 5 AAC 85.065. Hunting seasons and bag limits for small game.** Align the ptarmigan hunting season for all of Unit 13 and reduce the bag limit to five per day.

**Current Federal Regulations:**

**Unit 13 – Ptarmigan**

*Ptarmigan (Rock, Willow, and White-tailed): 20 per day, 40 in possession*

*Aug. 10-Mar. 31.*

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

**Impact to Federal subsistence users/wildlife:** Federally qualified subsistence users would be provided more opportunity through a longer season to harvest ptarmigan under State regulations if this proposal is adopted. But as there has been a conservation concern in Unit 13 for ptarmigan in the past, this may have adverse effects on the population. Although this proposal would reduce the daily harvest limit, the overall season would be extended, allowing more harvest during the late winter and early spring months when mortality has a greater impact on ptarmigan population by removing breeding males from the flocks (Carroll 2021).

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** Proposal 221.

**Rationale:** This proposal would allow harvest of ptarmigan during the late winter when harvest mortality has a greater effect on the overall population. By not allowing late season harvest, the breeding population would remain protected and may lead to population increases.

Literature Cited

Carroll, C. J., and R. A. Merizon. 2021. Status of grouse, ptarmigan, and hare in Alaska, 2019 and 2020. Alaska Department of Fish and Game, Wildlife Management Report ADF&G/DWC/WMR-2021-1, Juneau.

**PROPOSAL 228 – 92.095. Unlawful methods of taking furbearers; exceptions.** Require trap identification tags in Units 14A, 14B, and 16

**Current Federal Regulations:** None

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

**Impact to Federal subsistence users/wildlife:** If this proposal is adopted, it would require Federally qualified subsistence users to mark traps with permanently affixed tags identifying the individual when trapping under State regulations. This would put a significant burden on users to mark all their traps, while unethical trappers may still set illegal traps without identification tags. No impacts on the furbearer population are expected if this proposal is adopted. Adoption of this proposal also misaligns State and Federal regulations.

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

**Rationale:** Requiring users to mark traps is an unnecessary burden on subsistence users. Additionally, mandatory marking does not prevent illegal trapping activity.



Submitted By  
Doug OHarra  
Submitted On  
1/7/2022 12:59:36 PM  
Affiliation

RE: Proposal 99 / Trapping restrictions near popular MU trails

I am generally in favor of this proposal. Like it or not, the population of Alaska has changed, with weekend recreationists spreading in large numbers onto trails that formerly saw only hunting and trapping traffic. Many of these visitors new to the backcountry bring companion dogs with them. To argue that local regulations require these dogs to be leashed or under strict voice command is to stubbornly ignore the facts on the ground—that many dogs are simply NOT leashed and some of them inevitably range all over the place, sometimes temporarily (and occasionally completely) out of immediate control.

Every dog or human who encounters or becomes injured by a trap risks creating more and more passionate opposition to the custom. It won't take many more companion dogs killed in conibear sets in the Valley before a groundswell of suburban and urban residents begin organizing anti-trapping initiatives. If you value trapping, and want to head off restrictions imposed top-down from outside of the BOG regulatory process, the BOG should work toward segregating outdoor recreation from trapping as much as possible. Proposal 99 is a good start.

I invite you to view this proposal as a compromise that will help preserve trapping in areas far from user conflict.

Rather than work through the list of trails, I have several regulatory changes that I think could go a long way toward defusing this controversy.

1. Ban the use of all "kill" traps in areas with recreation potential. It's the death of companion dogs that generates the anti-trapping fury. Stipulate that leg-hold and other non-lethal traps must be used along these popular trail corridors. Take this step toward eliminating the possibility of dead dogs in traps along popular trails and populated areas, and this controversy might just subside before it gains further momentum.
2. Warning signs. In the spirit of signage warning about bear baiting stations, require signage that gives real-time notice of active trapping along recreation corridors. Most recreationists will react by securing dogs and taking precautions. To say, as ADFG does, that everybody should assume traps may be on every trail and act accordingly, ignores human nature. Out of sight is out of mind.
3. 100-yard setbacks. Based on my observation of recreationists and their dogs, I believe that 50 yards is not sufficient distance. Require 100 yards minimum—with a quarter mile around trailheads and campgrounds. I can walk an extra 50 yards in a minute or two, and cover a quarter mile in 3-4 minutes. As with a ban on kill traps, a large enough setback might make this controversy moot. The benefit of effective setbacks far outweighs the extra time needed.

My POV—I am a 39-year resident of Alaska and an avid fisherman. I also travel in the backcountry during trapping season—snow-biking, skiing and hiking. I often bring along a companion dog trained for recall. He almost always keeps within a few yards of me and he's often on leash, But I admit that he sometimes ranges for a minute or so when off leash. I consider my dog's safety in those moments to be entirely my responsibility. I call him back, but have also taken in-person training and carry a kit so I can release him from various traps, including conibear style.

You must recognize that most urban and suburban recreationists do not take these precautions and may not be prepared to travel a corridor with active trapping. I am not suggesting nor asking for abolition of trapping in Alaska. Just a sensible, real-world compromise that recognizes and tries to resolve this growing conflict. Don't dig in your heels on this. Be shrewd.

Regards,

Doug O'Harra



Submitted By  
Alyssa Overby  
Submitted On  
1/6/2022 1:48:19 PM  
Affiliation

Please keep subsistence hunting open for the group hunters in 211 and the copper river basin. It is very important to our survival and connection to the land.



Submitted By  
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I have been a member of a few different community hunts now for a few years. My household doesn't always need a large amount of meat, so being able to hunt with community member, harvest and share has been one of the more powerful lessons I have gotten as an Alaskan hunter.

The community hunt is a staple to my household and my elder neighbors who I get to then supply for. It's community building, empowering, and makes me think more about how I treat the land and how I harvest. I encourage you to reconsider stopping the community hunt in unit 13. Below is a less personal and more diplomatic reason as to why.

I am opposed to the proposals 210 and 211 that are being introduced at this board meeting.

I am opposed to Proposal 210 to eliminate community harvest moose hunts in unit 13.

Alaska Department of Fish and Game has stated in their comments that "this hunt structure poses no conservation concerns". Claude Bundy's claim for this proposal is that it has impacted his ability to hunt moose, should his ability to hunt moose be put above all the communities who participate in the Copper Basin Community harvest?

If there is a legitimate concern about the moose population in unit 13, this needs to be documented with scientific evidence, and addressed for all unit 13 moose hunters. Last year in 2020 community hunt participants harvested 70 moose in Unit 13B and 13 E combined, which encompasses the Denali Highway. Sport hunters in unit 13B and E combined harvested 281 moose. So community hunters harvested 1/4 of total quota in the Denali Highway area.

There is heavy usage in unit 13 that has a more significant impact than the community hunt. The clause that forces all tier 1 caribou hunters to also hunt for moose in unit 13 might be more of an issue to address if there is concern that too many moose are being taken in unit 13. Another significant factor is the excessive motorized access in unit 13.

Due to the stringent meat salvage requirements of the community hunt, more meat is brought out of the field. This means that per moose hunted, there is proportionally more meat harvested off community subsistence moose than the sport hunts in unit 13. Less moose needs to be harvested in order to feed more people.

The hunt also prioritizes supplying meat to elders and the disabled, teaching youth, and sharing with the community. When one moose is harvested it is going to sometimes a dozen different households or more, spreading the meat among more people than your typical sport hunt.

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 in it's entirety. The Alaska Outdoors Council claims the hunt does not benefit those who it was intended for (rural and Ahtna users).

Over the past ten years an average of 33.4 moose per year have been harvested by unit 13 residents through the CM300 hunt. With an estimate of 450 pounds of edible meat, that makes 15,030 pounds of meat. Over the past ten years there has been an average of 25 caribou per year harvested by unit 13 residents through the CC001 hunt. With an estimate of 80 pounds of edible meat per caribou, that makes 2,000 pounds. According to these estimates, 17,030 pounds of meat per year has been harvested by unit 13 residents from the CC001 hunt and the CM300 hunt combined. This data is from ADFG public harvest record information. <https://secure.wildlife.alaska.gov/index.cfm?fuseaction=harvest.lookup>

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. 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.

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 great state.



Submitted By  
Vijay Patil  
Submitted On  
1/7/2022 11:22:24 AM  
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I am writing in support of proposal 199, which would create 50 yard trapping setbacks around major multi-use trails in the Matanuska-Susitna Borough. This is a reasonable regulation that is consistent with the trapper's code of ethics, and would not interfere with responsible trapping. However, it is also absolutely necessary. I nearly lost my dog Cali when she was caught in a conibear trap within 50 feet of the parking lot for a popular trail this past winter, and that was far from the only recorded incident. As has been widely reported, at least one dog was killed last year in a trap set close to a trail, and a person was caught by a snare and pulled from a moving snowmachine in the Jim Creek area. Clearly, trapping near multi-use trails represents a significant safety hazard for dogs and people.

Cali is a husky mix who until last year was my frequent companion on winter ptarmigan hunting trips. She is well trained, and I have worked hard to make sure I can keep her under voice control and recall her when necessary. When she was caught, she was well within a comfortable recall distance, but the trap was set in deep snow at the base of a spruce tree, and I had no idea it was there until I heard her start screaming. The incident occurred at the Knik-Nelchina trailhead, a well-developed multi-use trailhead that is hugely popular with ptarmigan hunters and hikers. Luckily, Cali's head was caught sideways and her windpipe was not totally obstructed, which gave me time to release her just before she passed out. It was still a traumatic experience both for me and for her. I no longer feel safe hunting with her at all, and I am reluctant to use Borough trails even for leashed walks.

The most frustrating part about my experience was that there was no way for me to prevent it from happening to anyone else. I called the local ADFG office, the state troopers, and a member of the Borough assembly, who all told me that there was nothing they could do. I even left a message with the local chapter of the Alaska Trappers Association. My hope was that the trapper would find out about my experience and move his traps to a safer location. Unfortunately, another dog was killed in a similar trap set just a few miles down the road later that year.

I believe in responsible trail-sharing, and I recognize that dog owners bear a significant share of the responsibility for minimizing trapping accidents. But my experience shows that some trappers are not holding up their end of the bargain. Hiking, Skijoring, and hunting with dogs are all legitimate trail uses on public lands, and trapping rights should not supersede the rights of other trail users. Proposal 199 is a small but necessary step towards resolving that imbalance. It will reduce the incidence of trapped dogs while imposing minimal burdens on trappers, and by doing so it will help ensure that Alaskan trapping traditions can continue into the future.

Thank you for your consideration. I encourage you to pass Prop 199.

Sincerely,

Vijay Patil



Submitted By  
Laramy Paulson  
Submitted On  
1/3/2022 8:43:22 AM  
Affiliation

I believe proposal 99 is completely ridiculous. For starters most trails in the Matsu area were put in by trappers and I don't see how it's there fault other people use them. Not to mention animals stick to trails and would be very tough to pull them 50 yards from said trail. I myself have a bird dog and I as a trapper won't take him to areas that are hi risk. It's called being responsible. Next this 1/4 mile from a dwelling is insane I have a dwelling a 1/4 mile from my house so you're saying I can't set a trap in my yard that's called communism. If the neighbors dog gets caught in my yard it's not my problem train your dog. Proposal 228 is not going to fix anything I grew up in Wisconsin and we had to tag traps and it did nothing but a pain in the ass for trappers. It's kinda like gun control cause ya know criminals abide by laws right.

Submitted By  
Tantiana Peterson  
Submitted On  
1/7/2022 8:16:12 PM  
Affiliation



PC129  
1 of 1

I am against Proposals 210 and 211.

This land is dear to us and the community hunt is a main resource of food for many of us. Many people do not have people they can hunt with or feel safe going on their own. Our community hunt provides a space that is safe, educational, respectful of the land and also allows for us to give back to our beloved community and to the people who rightfully belong to the land. Personally, I have not had an opportunity to go out and hunt for my self, my family, or my community; that was until I joined a remarkable group of humans that have been hosting the community hunt in the Copper Basin for the past 9 years. This honor is not taken for granted and we give back.

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. 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.

As far as the claims for moose population and lack of structure for conservative concerns; If there is a legitimate concern about the moose population in unit 13, this needs to be documented with scientific evidence, and addressed for all unit 13 moose hunters. Last year in 2020 community hunt participants harvested 70 moose in Unit 13B and 13 E combined, which encompasses the Denali Highway. Sport hunters in unit 13B and E combined harvested 281 moose. So community hunters harvested  $\frac{1}{4}$  of total quota in the Denali Highway area.

There is heavy usage in unit 13 that has a more significant impact than the community hunt. The clause that forces all tier 1 caribou hunters to also hunt for moose in unit 13 might be more of an issue to address if there is concern that too many moose are being taken in unit 13. Another significant factor is the excessive motorized access in unit 13.

Due to the stringent meat salvage requirements of the community hunt, more meat is brought out of the field. This means that per moose hunted, there is proportionally more meat harvested off community subsistence moose than the sport hunts in unit 13. Less moose needs to be harvested in order to feed more people.

We beg you to rethink these proposals, to see our big picture and the amount of folks it would actually affect if these were to go through. We love the land and our community and we want the opportunity to keep providing for those who cannot provide for themselves.



Submitted By  
Zach Plant  
Submitted On  
1/7/2022 8:23:16 AM  
Affiliation

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Astoria , Oregon 97103

Hi my name is Zach,

I'm writing in support of proposal #2 and #89. I would love the opportunity to go chase sheep with my bow! I have family that live In Valdez and it would be amazing to go visit and then take my father on an epic adventure.  
thank you,

Zach Plant



Submitted By  
Sharon powder  
Submitted On  
1/7/2022 2:13:05 PM  
Affiliation

I support proposal 199. For over 41 years now I've encountered irresponsible trappers putting their lines close to multiuse trails. This is not a new issue. I've had a dog caught in a neck snare close to my previous home, within 20 ft of the trail. I do not wish to interfere with responsible trappers, I hope this proposal will hopefully give guidance to those who are less responsible and require clear guidelines.



Submitted By  
Bridget Psarianos  
Submitted On  
1/6/2022 8:54:37 AM  
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I support proposal 199 to provide for 50 yard buffers around trails and trail heads, where trapping would not be permitted. As an avid hiker, resident, and owner of two wonderful dogs who are part of our family, I understand that it is critically important to prevent dogs from getting caught in traps as they accompany their owners. We generally keep our dogs leashed, but do occasionally like to let them explore, and to play with and chase our pre-teen kids. 50 yards is a reasonable distance for trappers to walk off trail, while still being far enough that the vast majority of dogs AND children would not risk getting caught in traps.

Submitted By  
cory rausch  
Submitted On  
12/20/2021 8:10:31 PM  
Affiliation



PC133  
1 of 1

To who it may concern. I am a trapper in the matsu area i have ben hear going on 4 years. I am from the lower 48 from ohio and lived in multiple states before i moved to alaska and i can tell you we have dog problem not a trapper problem. proposal 199 will have no effect on trappers catching none target catches (dogs). My first week in alaska at my new place outside of talkeetna. I had multiple dogs running through my drive almost everyday and night some where vicious and i thought a few times i was going to have to euthanize them. I never experienced such horrible dog owners in my life anywhere i lived like i do hear in alaska. Just last year i made a trail on public land with snowshoes and i had multiple people i did not know fallow my trail and let there dogs run loose all over my line. one dog almost stuck his head in a 160 bodygriper i set for mink coming out of a beaver lodge the part that makes me upset is i went out of my way to set traps as far as i physically could to avoid people and the people came to me. we have a dog owner problem not a trapper problem. If the laws that we had was actuly enforced and people was heald accountable for letting there dogs run off leash you would not hear about so many dogs in traps because it is 100 percent the owners blissful ignornce that is effecting law abiding trappers. We pay \$25 evry year for our trapping license so we can do what we enjoy. It is not right that we should be regulated more than we already are. How about instead of punishing a trapper when a dog is caught we fine the dog owner \$500 to send a message dog owners alaskans are tired of there disrespect for mutual space. I also want to point out trappers with disability's in the next 20 years i won't have a choice but to trap from a snowmachine. I can hardly walk as it is. If we start this law when will it end? it will open the door for more regulation and all trails will be put under this regulation. What am i going to do walk 50 yards off a trail i made 20 years ago? Just because everyone wants to ride down and recreate on it? Essentially that is what is happening most of these trails hear in alaska was made by trappers. Thank you for your time and please consider the laws we have now to be enforced.



Submitted By  
Janet Reed  
Submitted On  
1/5/2022 9:14:45 AM  
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I'm writing in support of proposal 199. I live along the Knik River and twice in the past three years my dogs have had near misses with traps that were set right on social trails outside our neighborhood. Each time, these traps were unmarked and less than 5 feet from trails with obvious foot and dog traffic signs. A dog on leash could easily be caught in these traps. I've seen several families with dogs, young children and toddlers use these trails. Last winter, our neighbor's dog was snared right on a trail across the river from our neighborhood. Again, it was clear that people were using this trail and again the trap was on the trail and unmarked.

Much of the Valley is simply not rural anymore and regulations need to reflect that. There are still plenty places folks can use for trapping that aren't so highly trafficked. If people insist on trapping along highly trafficked trails, signage and offsets would be valuable in keeping our people, children and pets safe. Sadly, we can't rely on all Alaskans to follow ethics guidelines anymore. We need regulations to keep people safe in our growing borough.



**unapologetically FOR ALASKAN RESIDENTS**

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January 6, 2022

**Comments to Alaska Board of Game  
Region IV Central/Southwest Region  
January 21 – 29, 2022**

Proposals we support: 10, 11, 14, 28, 206, 209

Proposals we oppose: 2-5, 33-50, 67

**Proposals 2,3,4,&5 - 5AAC 85.055. Hunting seasons and bag limits for Dall sheep**

**OPPOSE**

While we are supportive of more archery sheep hunting opportunities for resident hunters, the declines in most of our sheep populations right now don't support any additional sheep hunting opportunities.

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**Proposals 10 & 11 - 5 AAC 84.270. Furbearer trapping, & 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions**

**SUPPORT**

These proposals align with regulations in other units. When and where it is allowed to take beaver with a firearm, it should also be allowed to take beaver with a bow.

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**Proposal 13 - 5 AAC 85.045(a)(15). Hunting seasons and bag limits for moose**

**Neutral – as ADF&G claims to be on allocation proposals**

This is a proposal from the Alaska Department of Fish & Game, which has said for years that it must remain neutral on all allocation proposals yet has submitted an allocation proposal requesting a doubling of the number of nonresident moose permits and extending the nonresident moose season in Unit 17A by 10 days.

How is it okay for the Department to submit their own allocation proposal to increase nonresident hunting opportunities and season when game populations are high, yet not support decreasing nonresident hunting opportunities and seasons when game populations are low or in trouble?



This is a clear double standard, and if the Department is truly allocation neutral in all circumstances, this should have been submitted by an Advisory Committee or member of the public.

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**Proposal 14 – 5AAC 85.045(15). Hunting seasons and bag limits for moose**

**SUPPORT with recommendation that RM 575/576 permits be available online**

This proposal from the Department is tied to Proposal 13 in that the moose population in Unit 17A is over the objective, and more moose are available for harvest. It would set firm dates for the resident winter season that was formerly opened and closed by Emergency Order, to ensure resident opportunity to harvest more moose. However, as stated in the proposal, the Department can still close this hunt by EO if the established harvest quota is reached.

There is nothing in Proposal 13 from the Department, however, that asks for a longer nonresident fall season and a doubling of nonresident moose permits, as to any EO closure or sunseting of the proposed new regulations for nonresidents should the moose population decline.

It would also seem prudent that if the Department wants to ensure resident moose hunters have more opportunity to harvest a moose during the winter season, the RM 575/576 registration permits would be available online to make it easier to obtain one. They are not currently available online.

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**Proposal 28 - 5 AAC 85.020. Hunting seasons and bag limits for brown bear**

**SUPPORT**

This is a Resident Hunters of Alaska (RHAK) proposal. Current regulations only allow resident brown bear hunters in most of Unit 9 under the RB 368/369/370 registration permits the opportunity to hunt in the spring of even numbered years and fall of odd-numbered years. Nonresidents are under the same registration permit system and make up the majority of brown bear hunters in Unit 9 and take 80 percent of the harvest. Resident participation is low and we see no need for the one-every-four-years requirement for resident brown bear hunters in Unit 9 under the registration permit system.

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**Proposals 33-50 - 5 AAC 85.065. Hunting seasons and bag limits for small game (Emperor Goose)**

**OPPOSE**

We do not support **any** increases in the nonresident allocations of Emperor Geese.

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**Proposal 206 – 5AAC 85.020 Hunting seasons and bag limits for brown bear**

**SUPPORT**

Resident Hunters of Alaska (RHAK) submitted this proposal with the intent to get back the latter portion of the spring and earlier portion of the fall brown bear seasons in Unit 9 that the Board of Game rescinded at the 2018 Region IV meeting in Dillingham due to conservation concerns from the Department.

Based on Department comments on our proposal, we'd like to clarify and amend our proposal to only include Units 9C, 9D, and 9E, to return the portions of the spring and fall seasons the Board of Game removed:

- RB XXX - Units 9C, 9D, 9E: October 1-6 Residents Only odd-numbered years
- RB XXX – Units 9C, 9D, 9E: May 26-31 Residents Only even-numbered years

The seasons were shortened by a week at the 2018 Region IV Board of Game meeting due to conservation concerns for the brown bear population, but resident hunters in no way contributed to those conservation concerns as the vast majority of **all** the brown bears in Unit 9 (both boars and sows) are taken by nonresident guided hunters, who have an unlimited opportunity to hunt under registration permits.

The data presented in the Department comments on this proposal did not separate out the resident and nonresident hunter numbers or harvests; just the total number of hunters and harvests were listed. Department data presented in the past also skews the reality of sow harvests, by only listing the “percentage” of sow harvests among residents and nonresidents, and since resident hunters overall have a slightly higher percentage of sow harvests, this makes it seem like the majority of sows are taken by resident hunters. The facts, however, show that nonresident sow harvests in Unit 9 are 3 to 4 times higher than resident sow harvests:

Unit 9 Brown Bear Sow harvests by residency (provided by Department)

	Nonresidents no. females % females		Residents no. females % females	
1995	109	28.8	45	34.6
1997	121	27.8	41	33.3
1999	166	31.7	53	36.3
2001	156	29.1	48	37.2
2003	143	29.7	54	37.2
2005	153	29.5	35	29.7
2007	139	26.7	39	37.1
2009	142	29	38	35.5
2011	123	25.4	39	32.5
2013	110	26.8	25	29.1
2015	87	23.7	26	30.2



Here is the data the Department presented in their comments on Proposal 206:

**Table 206-1.** Unit 9 bear harvest and hunter participation in registration hunts RB368, 369 and 370.

Unit	2011	2013	2015	2017	2019 <sup>a</sup>	2020 <sup>b</sup>
9A hunters	64	78	70	111	57	63
Harvest	40	46	48	63	34	45
9B hunters	107	82	79	63	51	17
Harvest	65	47	39	31	31	10
9C hunters	51	37	63	48	30	12
Harvest	31	14	39	27	13	6
9D hunters	188	186	211	157	77	103
Harvest	124	132	114	92	46	67
9E hunters	472	432	379	350	184	204
Harvest	332	242	217	206	109	126
Unit 9 hunters	882	815	802	729	399	399
Harvest	592	481	457	419	233	254

<sup>a</sup> Spring season open to residents only.

<sup>b</sup> Spring season only (May 2021); preliminary data.

Below is the data requested from area biologist Dave Crowley, that lists both nonresident and resident hunter numbers and harvests in Units 9C, D, & E. From 2011-2021, nonresident brown bear hunters in those units accounted for 74 percent of total hunters and 80 percent of the total harvest, and as the data above shows on sow harvests, between 1995 and 2015 nonresident brown bear hunters took nearly 70 percent of the sow harvests.



Units 9C, D & E brown bear harvest			
Hunts RB368, 369, 370			
Hunters and harvest by residency			
Number of hunters			
	Nonresident	Resident	Total hunters
2011	554	158	712
2013	522	135	657
2015	515	144	659
2017	483	77	560
2019	178	115	293
2020	272	46	318
2021	140	24	164
	2664	699	3363
Bear harvest			
	Nonresident	Resident	Total harvest
2011	397	91	488
2013	326	62	388
2015	300	70	370
2017	295	32	327
2019	107	61	168
2020	176	22	198
2021	84	8	92
	1685	346	2031

There are continuing conflicts in these units due to the high number of nonresident guided brown bear hunters that also lead to access difficulties for unguided resident hunters. Anytime we see such a large percentage of nonresident hunters compared to residents it will lead to conflicts and make it harder for residents to gain access to the hunt area. That's just common sense when a guided nonresident brown bear hunt is so expensive, and guides want to ensure their clients have the best opportunity at taking a trophy bear.

Allow resident bear hunters to have a portion of the hunting season to themselves in the spring or fall seasons without competition between guides and their clients. Resident harvests compared to nonresidents are extremely low and additional resident hunting opportunity poses no conservation concerns for the resource. Resident hunters are not and



have not been contributing to the conservation concerns the Department had in 2018 when the Board of Game shortened seasons for all. We want to see those seasons returned for residents.

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**Proposal 209 - 5 AAC 85.010(1)(a). Hunting seasons and bag limits for bison**

**SUPPORT**

With Ahtna land closures for the DI 454 Copper River bison hunt, increasing the number of permits is necessary to ensure adequate population control for the bison herd.

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Thank you to Board of Game members for your service, and as always thank you to Board Support and Agency staff!

Resident Hunters of Alaska (RHAK)  
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Submitted By  
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1/7/2022 5:54:00 PM  
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Hello Distinguished Board of Game:

I would like to comment on 4 small game proposals in this cycle, namely 76 regarding ptarmigan, number 77 also regarding ptarmigan, number 222 regarding ptarmigan, and number 227 regarding grouse. I am an avid bird hunter over versatile hunting dogs. My wife and I own 3 German Short-haired Pointers that we train and have used to assist the ADF&G with its ptarmigan brood surveys for the last 6 summers. We hunt upland birds every year in Alaska and throughout Canada and the USA. The hunting opportunities in Alaska are wonderful, but we all need to take care to manage this precious resource wisely. I am currently the Secretary of the Arctic Bird Dog Association, but these comments are mine alone. I am also a member of the Alaska-Yukon Chapter and the Northern Lights Chapter of North American Versatile Hunting Dog Association (NAVHDA).

Proposal 76:

This proposal wishes to extend the ptarmigan season and lower the bag limit in Unit 13B and 13E. If approved, it would extend the season from February 15 to March 31 and reduce the daily bag limit to 5 per day per person. The reduced bag limit is proposed to reduce the pressure on the population; however, as the proposer points out, few people bag 10 birds per day. Thus, this concession would not really help reduce the pressure on ptarmigan in late February and the month of March. I have hunted ptarmigan in these areas in March with others and their dogs, and what I observed was hunters zooming around on snowmachines until they spotted tracks or ptarmigan and then they just blasted them on the snow. Few were wing-shot. The dogs were merely used for retrieving, not hunting. As Alaska Small Game Biologist Rick Merizon discovered in wing reports, March was a killer month. The birds that survive into late winter are the breeding birds for next season. On top of this, during June in the last two springs in this part of the Alaska Range have seen devastating snows or heavy rain that have decimated ptarmigan chicks. The July brood surveys showed tremendous chick survival in 2017 and 2018, average in 2019, much reduced in 2020, and zilch in 2021. Though the proposal has some merit, now is not a good time to extend the season. We would only decimate breeding birds, which could help the depressed population recover. I have met and respect proposer Claude Bondy of Alpine Creek Lodge, and I think when he initially submitted this proposal the population was doing well or steady, but conditions have changed the last 2 years. I urge the Board to hold off on approving this proposal at this time until the ptarmigan population has a chance to recover.

Proposal 77:

The Paxson AC has proposed a youth only hunt for ptarmigan in Unit 13 from August 10-24 for hunters under age 16. All older hunters would be able to hunt the area from August 25 to February 15. I agree that most years the ptarmigan of the year are too small between August 10 and 25. This depends on the weather. In some years ptarmigan of the year are acceptable by August 10. We generally hold off hunting ptarmigan until later in August. Why does the season start so early? Is it to give sheep hunters an opportunity to harvest a few birds if they fail to harvest a sheep? My main concern about this proposal is who would monitor the situation? If a youth is transported to remote Unit 13B by an adult, then what would prevent the adult(s) from assisting the youth with harvest? This area is remote for most youth under 16; it is not like similar youth hunts near Palmer, which we support. If the concern is for waste from hunting birds that are too small in this area, then why even have a youth only hunt from August 10-25?

Proposal 222:

This proposal would align the season for ptarmigan for all of Unit 13 and extend it from February 15 to March 31, and it would reduce the bag limit to five per day. The proposer asserts that "ptarmigan numbers are good in Unit 13. As noted in comments on proposal 76, this proposal would still adversely impact breeding ptarmigan that could help recover the reduced population from very poor recruitment during the last two summers. Also, most hunters (but some) do not achieve the 10 per day limit, so reducing the bag limit does not help the population either. Snowmachiners cover great areas rapidly in March and can easily wipe out breeding birds. I think after the population has recovered, then possibly this proposal would have merit. Approving this proposal now is not conducive to conserving this resource for the enjoyment of hunters in the future. We have hunted this area for the last couple of decades in the fall, and during the last two summers the results were dismal. Last fall we mostly harvested a few adult birds, which convinced us to go elsewhere.

Proposal 227:

This proposal would reduce the bag limit for grouse in Unit 14A from 15 per day and 30 in possession to 5 per day and 10 in possession, with not more than two grouse per day being Ruffed Grouse. The proposer notes the grouse limit is 5 per day and 10 in possession for

Unit 14C. We agree the grouse limits for Unit 14A should be reduced to 5 per day and 10 in possession as it is in Unit 14C. Not only is access in Unit 14A extensive with roads and trails, the grouse species other than Ruffed Grouse are getting more scarce. Spruce Grouse numbers seem to be plummeting as white spruce die and collapse after spruce bark beetle and fungus infestations. Many spruce were toppled in the recent wind storms. Though Sharp-tailed Grouse have been seen in the Palmer area and Talkeetna Mountains, their numbers have receded and their population is not steady in Unit 14. In the last few years I have harvested more Ruffed Grouse than Spruce Grouse in Unit 14C, which has not always been the case. This proposal seems to make sense to this bird hunter as this time. I recommend the BOG adopt this proposal for conservation reasons. It does not really adversely affect opportunity.



Submitted By  
Benjamin Rich  
Submitted On  
1/7/2022 12:25:29 PM  
Affiliation

Board of Game 2021 Cycle Comments:

Proposal 2:

I support proposal 2 to provide an archery only season for Dall Sheep. I believe a choose your weapon option like the one Paul noted might be prudent to limit pressure and keep opportunistic folks who don't bowhunt otherwise from competing with the Dall Sheep youth hunt.

Proposal 7:

I strongly oppose Proposal 7 to increase bag limits on black bear in unit 16 and 13D. My main concern is for the bear population in Unit 16A. This area is relatively remote and is mainly accessed and hunted from Petersville and Oilwell Roads and along the Deshka and Susitna Rivers. I work in the area and spend May-September working on remote stretches of the Deshka River. This area has a very low density of bear sign and I have only observed three bears in the area in three years. There is also an exceptionally high density of bear hunters and likely bait sites off of Petersville road in the spring potentially concentrating bears and making them more susceptible to over harvest. ADFG should conduct and publish population estimates, and publish harvest data for black bear in unit 16A before the Board of Game further considers this proposal.

Proposals 10 and 11:

I support proposals 10 and 11 to clarify beaver hunting regulations and allow use of archery equipment. In my personal experience, archery equipment has high efficacy for beaver due to the close nature of most shots and allows for selective harvest. This proposal is likely to have a low impact on the resource while creating additional opportunity.

Proposal 64:

I strongly support proposal 64 as it appears to require an unnecessary burden on elders who might otherwise participate in the hunt.

Proposal 209:

I support this proposal by ADFG to increase permit allocation for nonnative plains bison in the Copper River Basin.

Proposal 89:

I strongly support proposal 89 to create a late traditional archery only dall sheep hunt in the metal creek unit.

Proposals 92, 93 and 94:

I strongly oppose proposals 92, 93 and 94 as they would legitimize bear baiting and harvest of bears in Unit 16A during a time when there hide is likely rubbed and unusable and the meat is unsalvageable. Any harvest resulting this regulation change would likely be from chance encounters with brown bears while fishing etc in this area centered around salmon streams such as the Deshka and would further reduce low brown bear densities. I have spent extensive time during the summer in the Deshka over the last three years and have observed scarce brown bear sign and have only seen two bears despite spending large amounts of time in remote areas where salmon were actively spawning.

Proposal 96:

I strongly oppose proposal 96 to allow same-day airborne hunting of black bears in 16B on the grounds that it undermines the status of black bears as a game animal and may allow for future regulation changes allowing for excess harvest and questionable hunting ethics.

Proposal 223:

I strongly oppose Proposal 223 because the proposals wording is unclear and some of the methods detailed for bear harvest are unethical with the potential for negative perception of hunting, and adverse effects on the bears and other wildlife in the identified predator management unit. My interpretation of the proposal (which may be incorrect) is that this amendment would allow for foot snaring of bears although ADFG doesn't recommend it, as well as same day airborne bear hunting and possible helicopter gunning on a limited basis. These management actions seem heavy-handed especially considering how ineffective previous measures have been at reducing bear populations in the area. The extension of bear baiting opportunities may concentrate bear bait sites and the bears they attract near accessible areas such as Petersville rd and the Deshka River altering the behavior and distribution of bears in the area.



Submitted By  
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12/15/2020 5:37:57 PM  
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Proposal 8: I'm opposed to this proposal. Coyotes caught in mid October will sell just as well as coyotes caught in December. My fur buyers are quite happy with the quality of these furs. I would also like to mention that hunting seasons on coyotes are open throughout most of the state all year long and in some instances there is no need to salvage thier hide. Seasons should remain open as long as possible and the option of when to harvest fur should be left up to the trapper. Kristopher Richard - Kasilof AK

Submitted By  
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12/15/2020 5:15:47 PM  
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Proposition 100: I'm in favor of this proposal. I've had the same situation arise as discribed by the author during both fall and spring seasons when this regulation takes effect in units 7 and 15. It should be up to the trapper on how to set his/her traps safely and effectively, without being bound by regulation. Kristopher Richard-Kasilof AK



Submitted By  
Kristopher Richard  
Submitted On  
12/15/2020 5:15:47 PM  
Affiliation

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Proposition 100: I'm in favor of this proposal. I've had the same situation arise as discribed by the author during both fall and spring seasons when this regulation takes effect in units 7 and 15. It should be up to the trapper on how to set his/her traps safely and effectively, without being bound by regulation. Kristopher Richard-Kasilof AK



Submitted By  
Doug Robbins  
Submitted On  
11/22/2021 5:57:50 PM  
Affiliation  
None

I am writing in support of Proposal 199, for trapping set-backs from multi-use trails in Game Management Areas 13, 14 and 16, generally in the Mat-Su Borough. The Borough Assembly has deferred to the Board of Game on this decision.

I hike frequently, mostly around Anchorage, but also in other parts of the state that are within a day's drive, including trails in the Mat-Su Borough. The trails referenced in Proposal 199 are multi-use trails, and should be safe for hikers and pet owners using these trails as an opportunity to walk with their dogs off-leash. The possibility of traps takes away those freedoms from other trail users. Its hard to imagine the anger and regret of a dog owner whose pet is hurt or killed by a trap near a trail, as has happened to several dogs in recent years. For myself, I'd like the assurance that I can step off a trail a few dozen yards to take a photograph or take a pee without the risk of stepping into a trap. If I had written the proposal, I would have asked for far more stringent step-backs from roads, parking lots, and trails.

There are more recreational trail users than trappers, and game regulations should respect the rights and their safety of recreational trail users ahead of the convenience of trappers.

Doug Robbins



Submitted By  
Tavis Rogers  
Submitted On  
1/6/2022 11:58:26 AM  
Affiliation

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23545 Willow Island Trail  
Oak Creek, Colorado 80468

RE: Proposal 89, 5AAC85.055. Hunting Seasons and bag limits for Dall sheep

I am writing in support of the registration hunt for certified bowhunters by longbow or recurve bow only within Unit 14A, Metal Creek. This hunt will provide more opportunity for hunters to be in the field while having minimal impact on the resources in a time frame that does not conflict with other hunts held in that unit. Additionally, this hunt will provide additional income to the ADF&G and the local community.

Please consider establishing this season in this unit.

Thank you,

Tavis Rogers



Submitted By  
Renee Romsland  
Submitted On  
1/7/2022 12:10:26 PM  
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I am firmly in support of Propasal 199 (to push the minimum setback for trapping to 50 yards from established trails). There have been 2 specific instances where I have stepped a short way off trail to take a pee and I've nearly stepped in leghold traps that were not well identified (in fact, one had leaves for camouflage but was otherwise out in the open...if I had not seen the thin wire attached to the adjacent tree in time, things could have gotten ugly). I did report this trap (in the Peters Creek drainage) but was told that it was legal and there was little I could do. The other trap was in the MatSu Borough...similar situation. I did not report this near miss as I had no resolution the previous time. I do hike with my dogs and typically they are leashed, unless something dramatic happens so I am not as worried about their safety as others who have off leash dogs. However, in the past I have been involved with K9 SAR and have always had grave concerns about one of the dogs getting caught, specifically in a Conibear style trap especially when close to a trail. I understand that trappers have a right to trap but with rights come responsibility...as the polulation has grown and land use has shifted, what was acceptable in the past needs to be reviewed in new context. Thank you for you time and consideration of my comments.



Submitted By  
Matthew Roster  
Submitted On  
1/6/2022 9:07:11 PM  
Affiliation

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Address  
1181 E Dellwood St Apt 1  
Wasilla, Alaska 99654

I am a Resident Disabled Veteran Hunter residing in Wasilla, AK. I possess a Bowhunter Certification as well.

#### Proposal 2

I strongly **OPPOSE** any kind of season for Adult Hunters that conflict with a Youth Hunt. Youth hunters shouldn't have to physically compete with adults to harvest a Dall Sheep which is enough of a challenge already. I believe this is a proposal of pure greed to get the first shot at Legal Rams each season by bowhunters. Youth Hunters are the future of conservation, and their positive experiences while hunting will continue the hunting legacy. If anything, the State should be expanding youth opportunity instead of creating competition for it.

#### Proposal 4

I strongly **SUPPORT** a Sept 21-Oct 10 Archery only FULL CURL RAM Dall Sheep season. The extra opportunity would have little affect on the sheep populations due to historically low archery harvest and late season weather complications. This is an excellent opportunity to expand opportunity in the state.

#### Proposal 5

I strongly **OPPOSE** any kind of season for Adult Hunters that conflict with a Youth Hunt. Youth hunters shouldn't have to physically compete with adults to harvest a Dall Sheep which is enough of a challenge already. I believe this is a proposal of pure greed to get the first shot at Legal Rams each season by bowhunters. Youth Hunters are the future of conservation, and their positive experiences while hunting will continue the hunting legacy. If anything, the State should be expanding youth opportunity instead of creating competition for it.

#### Proposal 6

I strongly **SUPPORT** brown bear tag fee exemptions for resident hunters in the GMU's listed in the proposal.

#### Proposal 8

I strongly **SUPPORT** the reduction of Coyote Trapping Seasons in these GMU's. I believe this consolidation of season could help lessen trap "bycatch".

#### Proposal 9

I strongly **OPPOSE** an extension of the wolf trapping season in Units 13 and 16. There is already an adequate season with an unlimited bag limit in these units.

#### Proposal 199

I strongly **SUPPORT** the prohibition of trapping within 50 yards of multi-use trails and trailheads in unit 13,14,16. My family runs pointing dogs for ptarmigan in the winter. We are severely inhibited by lazy trapping practices on common access trails throughout south-central Alaska. A 50 yard setback would be a **MINIMUM** amount of distance from the trails listed in the proposal to help user group conflicts. The

amount of dogs being caught in traps within the Mat-Su borough is sickening. It's honestly sad to see how much trapping ethics have went by the wayside in our area. This is a positive solution that helps all user groups.



Submitted By  
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1/6/2022 9:46:17 PM  
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#### Proposal 33

I **OPPOSE** reducing resident opportunity for Emperor Geese. Nonresidents should not have the right to take half of all allotted tags every year. There isn't a state in the US that allows nonresident harvest in these proportions. This kind of tag allocation is detrimental to resident and resident youth hunters.

#### Proposal 34

I **OPPOSE** reducing resident opportunity for Emperor Geese. Nonresidents should not have the right to take half of all allotted tags every year. There isn't a state in the US that allows nonresident harvest in these proportions. This kind of tag allocation is detrimental to resident and resident youth hunters.

#### Proposal 35

I **OPPOSE** reducing resident opportunity for Emperor Geese. Nonresidents should not have the right to take half of all allotted tags every year. There isn't a state in the US that allows nonresident harvest in these proportions. This kind of tag allocation is detrimental to resident and resident youth hunters.

#### Proposal 36

I **OPPOSE** reducing resident opportunity for Emperor Geese. Nonresidents should not have the right to take half of all allotted tags every year. There isn't a state in the US that allows nonresident harvest in these proportions. This kind of tag allocation is detrimental to resident and resident youth hunters.

#### Proposal 37

I **OPPOSE** reducing resident opportunity for Emperor Geese. There isn't a state in the US that allows nonresident harvest in these proportions. This kind of tag allocation is detrimental to resident and resident youth hunters.

#### Proposal 38

I **OPPOSE** reducing resident opportunity for Emperor Geese. There isn't a state in the US that allows nonresident harvest in these proportions. This kind of tag allocation is detrimental to resident and resident youth hunters.

#### Proposal 39

I **OPPOSE** reducing resident opportunity for Emperor Geese. Nonresidents should not have the right to take half of all allotted tags every year. There isn't a state in the US that allows nonresident harvest in these proportions. This kind of tag allocation is detrimental to resident and resident youth hunters.

Proposal 40



I **OPPOSE** reducing resident opportunity for Emperor Geese. There isn't a state in the US that allows nonresident harvest in these proportions. This kind of tag allocation is detrimental to resident and resident youth hunters.

Proposal 41

I **OPPOSE** reducing resident opportunity for Emperor Geese. There isn't a state in the US that allows nonresident harvest in these proportions. This kind of tag allocation is detrimental to resident and resident youth hunters.

Proposal 42

I **OPPOSE** reducing resident opportunity for Emperor Geese. There isn't a state in the US that allows nonresident harvest in these proportions. This kind of tag allocation is detrimental to resident and resident youth hunters.

Proposal 43

I **SUPPORT** a reasonable 10% allocation of Emperor Goose tags to nonresident hunters. This a reasonable allotment for a SMALL GAME proposal.

Proposal 45

I **OPPOSE** an outfitter requirement for small game hunting in the State of Alaska for nonresidents. This costly hunt shouldn't be saddled with the addition of a guide requirement. There is no evidence of illegal take or need for guidance to nonresident hunters for these tags.

Proposal 46

I strongly **OPPOSE** any kind of preference point system in the state. We have one of the best draw systems in the country. Point creep directly affects youth hunters as seen in other states. Opportunities are limited because of this.

Proposal 47

I strongly **OPPOSE** a quota system to allow nonresident hunters to overtake the goose quota. Resident hunters shouldn't have to worry about a hunt being closed due to an influx of nonresident hunters filling quotas early.

Proposal 48

I **OPPOSE** reducing resident opportunity for Emperor Geese. Nonresidents should not have the right to take more resident hunting tags. There isn't a state in the US that allows nonresident harvest in these proportions. This kind of tag allocation is detrimental to resident and resident youth hunters.

Proposal 49

I **OPPOSE** a second tag option for emperor geese. One per year is more than adequate.

Proposal 50

I **Oppose** a quota for harvests on residents with an increased amount of tags for nonresidents without the same quotas.



Board of Game,

This comment is submitted by McCarthy Resident David Rowland regarding proposal 67.

As I subsistence user in unit 11, my primary goal in harvesting a sheep is to provide food for the winter, so all precautions and extra effort are taken to ensure all possible meat is salvaged and cared for.

Creating a meat-on-bone salvage requirement for sheep harvested in unit 11 will cause undue hardship to subsistence users and other hunters, as well as causing safety concerns and leading to a greater risk of spoilage of the harvested meat.

This fall I was part of a subsistence hunt with an elder. We both were successful in harvesting a sheep. We boned out both sheep, taking great care to not waste any meat. We were barely able to pack out both sheep in a total of 2 trips each. My first load down the mountain was later weighed to be 155 lbs. on the return for the second load of meat, we encountered a bear within 500 yards of the meat stash. He had not yet found the meat. Also, at this time there was a grizzly that had just found the kill site, which was less than ½ a mile away. If we were required to keep the meat-on-bone, we would have been forced to make 3 trips instead of two. The extra time spent on the last trip would have surely given the bear time to find our meat stash and devour/ruin the remainder of the meat. Additionally, all the meat would need to be in the field for an additional day to allow us the time to make the third trip. This would cause a greater chance of spoilage from the elements and would allow wildlife additional time to find it.

There are a couple of safety concerns as well. Some hunters may try to pack a boned sheep in the same number of trips as a deboned sheep. The added weight would put them at a much greater risk for slip/trip/fall hazards such as broken legs etc...

Another hazard would be rafting the sheep home. We are unable to use airplanes for our subsistence hunts, so we use small river rafts. This year with two hunters, and two sheep our boat was grossly overloaded, and we had a hard time keeping the bow above the class 3 rapids. At one point we took on a large wave and swamped the boat. We had to immediately go to shore to bail water before the boat sank.

Instead of changing to a meat-on-bone salvage requirement. It would be a good idea to educate enforcement officers how to easily identify the different cuts of a boned-out sheep.



Submitted By  
Larry Rundquist  
Submitted On  
12/23/2021 8:01:24 PM  
Affiliation

I support Proposal 199 of the Alaska Wildlife Alliance.

I also can not think of any other occupation or hobby that is a threat to kill or injure people, pets, eagles, and other non-target species. Traps are cheap and purchase should require the same background checks as guns since they are devices that kill. I also do not understand why the majority of trail users must train themselves and carry release kits to protect themselves and their loved ones just so a small minority continue to use century old techniques to arbitrarily kill things for furs that have been replaced by better fabrics. I assume that all trappers are legally responsible for any injury or death caused by their traps... a good reason to require that every trap is labeled with the trappers name and license number. I enjoy being outside on and off of established trails and do not want to step into an unmarked trap.



Submitted By  
Lian Rydeen  
Submitted On  
12/20/2021 8:22:03 PM  
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Dear Board of Game members, I am a Palmer resident and fully support Proposal 199 to regulate 50 yard no-trap setbacks from multiuse trails in the Matsu area. Please consider approving this proposal, as there are many children and dogs on these trails that could get seriously injured. Thank you.



Submitted By  
Brittney Salazar  
Submitted On  
11/19/2021 4:53:18 PM  
Affiliation

Hello,

I am in support of Proposal 199 which prohibits trapping within 50 yards of multi-use trails and trailheads in Units 13, 14, and 16. This is a very serious issue regarding safety, especially being an avid hiking and dog owner myself. These are trap encounters that occurred in the 2020-21 trapping season:

- Dog killed in conibear trap at Crooked Creek Trailhead
- Dog nearly killed in a conibear trap placed less than 30 feet from the parking lot of the Nelchina-Knik trailhead on the Glen Highway near Eureka
- Motocross rider pulled off motorbike from snare in Jim Creek Recreation Area
- Dog caught in snare at Iditarod headquarters on Knik-Goose Bay Road
- Dog caught in snare in Western Matanuska Range Trail system
- Dog caught in snare in Meadow Lakes
- Dog caught in trap near Big Lake Airport

This proposal is critical to the safety of multi-use trails in the Mat-Su region.

Thank you,  
Brittney Salazar



Submitted By  
Riley Savage  
Submitted On  
1/6/2022 11:58:09 AM  
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In favor of Proposal 89

I would just like to voice my support of proposal 89, Traditional archery is a fantastic way to give hunters opportunity while not having an impact on the game resource. Hunters who use traditional equipment have much lower success rates than other archers. This allows more people to be introduced to the excitement of the sport and maintains game numbers at an acceptable level. Please consider approving Proposal 89.



Submitted By  
Charly Savely  
Submitted On  
1/7/2022 4:54:25 PM  
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Hello,

I support Proposal 199. I want reasonable trap setbacks, since my friends dog was killed on a popular hiking trail in the Mat-Su region by a conibear trap. The photos are horrific. There is NO reason why fur trappers should be placing traps on or near trafficked trails. Additionally, there needs to be more accountability for those who break the rules resulting in a family's dog's death. How hard would it be to have serial numbers on these traps to keep the trappers accountable? Let's at least start with 50-yard setbacks.



Submitted By  
Stephen Schell  
Submitted On  
1/7/2022 12:44:02 PM  
Affiliation

I support Proposal 199, which limits the use of traps near multi-use trails. As a frequent trail user on foot, ski, and bike, I'm typically accompanied by my dog. My dog is well trained and always under voice control, but the fact that traps are permitted essentially anywhere is incredibly worrying. Prohibiting traps within 50 yards of well-used trails and trailheads is the bare minimum that the State can do to ensure everyone's safety.



Submitted By  
Craig Schwanke  
Submitted On  
10/29/2020 5:13:13 PM  
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I oppose allowing the positioning of snowmobiles to harvest wolverine in GMU 17 as requested in proposal 23. I hunted and trapped in unit 17 for 15 years. Once it became legal, I harvested wolves by positioning my snowmobile. When I came across wolverine tracks I did not pursue them due to regulation and a feeling that it wasn't fair chase. Wolves are wary and savvy of snowmobile pursuit and can use their speed to attempt to make it to hills or cover. Wolverine are not as wary of snowmobiles and much slower than wolves. As a result, wolverine are relatively easy to track down and kill. I don't feel that a low density and valuable species such as wolverine should be exploited by this method of harvest. The positioning of snowmobiles for wolves was initially allowed to aid in predator control. Wolverine are not major predators of ungulates and don't require population control. I know the tracking and harvesting of wolverine with snowmobiles has and still commonly occurs in unit 17. In my experience most wolverine harvested by firearm in unit 17 during the winter have been illegally tracked down on a snowmobile. Just because this currently illegal method has occurred for many years does not mean it should be acceptable and made legal.