



Submitted By  
Amy Seifert  
Submitted On  
1/7/2022 5:42:41 PM  
Affiliation

I am writing to voice my opposition to proposals 210 and 211.

To end the Cooper Basin Community Harvest in unit 13 is to undermine the ability of rural residents to maintain a subsistence lifestyle. There is no data to support the claim that too many moose are being taken by users of this hunt and I have seen no basis for Alaskan voters to be threatened by the activities of a small number of community user groups.

Submitted By  
AMY SEIFERT  
Submitted On  
1/7/2022 5:59:31 PM  
Affiliation

I strongly support both proposal 199 and proposal 228.

My dog was caught in a foot hold trap a few years back, and I know many families with similar and more tragic stories. A 50 yard trap set-back from high use trails in the Mat-Su area is an obvious policy to adopt. I appreciate the implications of proposal 228, to tag traps with ownership, as a way to encourage trappers' personal responsibility to take care where and when their traps are set.

Please adopt these proposals.



Submitted By  
Thomas Selmer  
Submitted On  
12/20/2021 8:18:15 PM  
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Please vote YES on proposal 199!



Submitted By  
Sergey Serebrennikov  
Submitted On  
12/20/2021 10:22:16 PM  
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I would like to strongly oppose proposal 199: Prohibit trapping within 50 yards of multi-use trails and trailheads in Units 13, 14, and 16.

Majority of trails listed in the proposal are remote trails, that are not used for recreation by dog walkers. Those trails, however, are used by responsible trappers.

The proposal does not differentiate between ground sets and elevated sets, that do not pose any risk to dogs. If such initiative is to be discussed, there should be a distinction made between sets that pose risk to dogs, and those that do not.

Finally, while it is true that some dogs find themselves into traps along trails, it is mostly because of irresponsible dog owners who let their dogs off the leash. Dog owners should consider obeying the law that requires them to keep their dogs on the leash.



Submitted By  
Maura Shea  
Submitted On  
1/5/2022 12:29:07 PM  
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I am writing in support of Proposal 199 requiring a 50 yard trap setback from designated multi-use trails. Traps set too close to trails and trailheads present a danger to adults, children and pets. It seems pointless to place traps in these areas because target game would avoid noisy congested areas. Please make the trails safe for all users.

Submitted By  
taj shoemaker  
Submitted On  
1/7/2022 10:31:10 AM  
Affiliation



PC155  
1 of 1

As an Alaskan resident of 39 years I am opposed to Proposal 28: Remove the resident bag limit of one brown bear every four years in Unit 9. Unit 9 has been well managed as a high quality trophy bear hunting area for many years. This proposal would do nothing to improve the quality of this hunt or the game population. There are already opportunities for 1 bear a year harvest for subsistence and cultural uses, so this proposal would not help in that regard. The only benefit to this proposal would be for those few resident trophy hunters who would like to kill as many bears as possible.

I am also opposed to Proposal 206: Open a resident only early/late season for brown bear in Unit 9. The Alaska Department of Fish and Game has shortened this season for both resident and nonresident hunters due to population concerns. Until the Department decides that this game population is ready for an extended season it should remain shortened. I do not believe this proposal would benefit anyone over the long term by adding extra hunting opportunity to a limited resource.



Submitted By  
Kelly Sidebottom  
Submitted On  
12/20/2021 1:49:24 PM  
Affiliation  
Palmer/Chickaloon resident

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It surprises me that we don't already have a larger set back on the Multiuse trails in the Trail Set back proposal 199. When on the trail our children don't stay right on the trail at all times. Our dogs, even when on leash, have a long leash and get quite a ways in off the trails.

With the population increasing daily, more people and pets and small children out and about, this seems appropriate and I hope you consider it.

The children, adults and pets in our Valley deserve to be safe when on these trails. A 50ft setback is a safety measure that is a necessity with the increased use of these trails by many people and pets.



Submitted By  
Bob Smith  
Submitted On  
1/6/2022 8:40:23 AM  
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I support the use of traditional archery as a management tool, as described in proposal 89.

Submitted By  
Corinne Smith  
Submitted On  
1/7/2022 5:02:41 PM  
Affiliation



PC158  
1 of 1

I am writing to support Proposal 199 that would establish 50 yard trap setbacks from over 200 designated trails in the Mat-Su area. Recreation is an important component of the Mat-Su life style and tourism economy. Many residents use trails with children and dogs and would not know how to extract their dogs from traps. And what if a child were caught? Please adopt Proposal 199. Thank you.



Submitted By  
Melanie Smith  
Submitted On  
1/6/2022 7:08:35 PM  
Affiliation

As a resident of Anchorage and Talkeetna who is very active year-round in the outdoors with my dogs, I am writing to support proposals 199 and 228 to require trapping setbacks from trails in the MatSu as well as tagging traps with the owner's name. Trails are used by everyone, and nearby traps make them potentially unsafe for all--setbacks are a minimal sensible measure. Tagging traps with the name of the owner is an additional very simple and sensible way to identify trappers not following the rules or poaching areas they should not be trapping in. Please update the outdated rules to meet the reality of today's MatSu trail users.

Sincerely,

Melanie Smith



Submitted By  
Mike Soik  
Submitted On  
1/7/2022 9:48:23 PM  
Affiliation

Chairman Hoffman and members of the Alaska Board of Game,

Thank you for considering my comments regarding the following proposals for the Central & Southwest Region meeting.

Mike Soik

Proposal 99:

I oppose this proposal and ask that you reject it. Stopping rural residents who live on or off the road system from trapping within 1/4 mile of their home is ridiculous. The author is worried about trapping in developed areas with permanent dwellings, yet the majority of the area in the proposal is undeveloped and sparsely populated. Many of the smaller animals (squirrel, ermine, mink, marten) can be trapped without danger to people's dogs. Trapping under the ice for muskrat and beaver can also be accomplished without endangering dogs.

Proposal 199:

I oppose this proposal and ask that you reject it. There is no justification for this proposal, as the author obviously does not know how all the trails listed are used. Some of these trails may not be used at all during the winter and many are remote. When they list several trails that are along the Denali Highway, which is not plowed during the winter, and expect you to believe that people are recreating with their pets on these trails demonstrates that this is purely an anti-trapping proposal.

Proposal 228:

I oppose this proposal and ask that you reject it. If a person is trapping illegally as the proposal suggests, why would that person add trap tags to their traps so law enforcement could identify them? That makes no sense. Much of the area is remote and sparsely populated so why should people who trap in those areas have to go to the trouble of having trap tags. After reading comments from anti-trappers about how they would steal or destroy traps and snares if they come across them in the field, I worry that some of those folks would move the traps or snares and put them in a location that is closed to trapping.



December 22, 2021

ADF&G Boards Support Section  
P.O. Box 115526  
Juneau, AK 99811-5526

VIA EMAIL ONLY: [dfg.bog.comments@alaska.gov](mailto:dfg.bog.comments@alaska.gov)

**RE: COMMENTS ON 2020-2021 ALASKA BOARD OF GAME PROPOSALS FOR CENTRAL AND SOUTHWEST REGION**

To the Board of Game:

The Southcentral Alaska Subsistence Regional Advisory Council (Council) met for its fall meeting (October 13-14, 2021). The Council represents the Federally qualified subsistence user and it reviews resource management actions that may impact subsistence resources critical to those users. The Council would like to provide the following comments on three Alaska Board of Game (BOG) proposals, to be considered by the Board during its January 21-28, 2022, meeting:

**Proposal 210: OPPOSE.** The Council opposes the elimination of the community subsistence harvest moose hunts in Unit 13. These hunts may not be ‘perfect’ hunts but they are the best hunts currently offered under state regulations to provide a reasonable opportunity for the community harvest of moose. The Council supports this hunt as a chance for community rural residents to meet their subsistence harvest needs.

**Proposal 211: OPPOSE.** The Council opposes the repeal of the community harvest of moose and caribou in Unit 13 for the same reasons as outlined in its opposition to Proposal 210. The Council supports the reasonable opportunity for local residents of Gulkana, Cantwell, Chistochina, Gakona, Mentasta, Tazlina, Chitina and Kluti Kash community harvest areas to meet their subsistence harvest needs of moose and caribou through these community harvest opportunities.

**Proposal 213: OPPOSE.** The Council opposes removing the requirement for Tier I caribou hunters to hunt moose in Unit 13. Before the current regulation was passed by the Board, there could be 30 to 50,000 people eligible for a Tier I permit. The current regulation helps reduce the number of people who may be eligible for a Tier I permit. The current regulation reduces user-

conflict and provides an opportunity for local subsistence hunters to fulfill their subsistence harvest needs. The Council opposes the proposed changes to the 5 AAC 92.050 regulation.



The Council appreciates the opportunity to convey its concerns about the effect of these Board of Game proposals. If you have any questions regarding this letter, they can be addressed through our Council Coordinator, DeAnna Perry, at 907-209-7817, [dlperry@usda.gov](mailto:dlperry@usda.gov).

Sincerely,

Richard (Greg) Encelewski  
Chair

cc: Federal Subsistence Board  
Southcentral Alaska Subsistence Regional Advisory Council Members  
Sue Detwiler, Acting Assistant Regional Director, Office of Subsistence Management  
Robbin LaVine, Policy Coordinator, Office of Subsistence Management  
Katerina Wessels, Council Coordination Division Supervisor,  
Office of Subsistence Management  
George Pappas, State Subsistence Liaison, Office of Subsistence Management  
Amee Howard, Acting Fisheries Division Supervisor, Office of Subsistence Management  
Lisa Grediagin, Wildlife Division Supervisor, Office of Subsistence Management  
Jonathon Vickers, Anthropology Division Supervisor, Office of Subsistence Management  
Tom Kron, Statewide Support Division Supervisor, Office of Subsistence Management  
Greg Risdahl, Subsistence Program Leader, Alaska Region 10, USDA – Forest Service  
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



Submitted By  
Ben Spiess  
Submitted On  
1/6/2022 10:21:13 PM  
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## Proposal 199

I am writing in support of Proposal 199 requiring a 50-yard trap setback from specified multi-use trails in the Mat-Su.

This rule would have saved the life of my dog who was killed in February 2021 in the Mat-Su Borough by a Conibear 330 trap set about 40-50 feet off a multiuse trail.

Use of recreational trails in the Borough is increasing, meanwhile the number of trappers is dwindling (particularly within the Borough Boundaries). Traps (including snares, leghold traps and 'conibear'-style traps) are legal everywhere in Alaska with the exception of certain Municipalities. The regulation would not prohibit trapping. It would impose a small burden on trappers to move off the trail to alleviate risk of injury and death to dogs. Simply put – it would have saved the life of our dog.

Lola was killed February 7, 2021 at the Crooked Creek trailhead at Mile 118.25 on the Glenn Highway near Glacier View, east of Chickaloon. The trap was a Conibear 330 set 40-50 feet off the trail and 50 yards from the trailhead.

My son Robert (who is Alaska Native from Nome and now lives in Anchorage) was Ptarmigan hunting with Lola, a 45-pound husky-beagle mix on the shoulder of Gunsight Mountain on the north side of the Glenn Highway. Lola was a trained dog we used for bird hunting on voice control.

They were returning to the Truck at the trailhead when Lola left his side and went to the trap which was baited with a caribou jaw and artificially scented with musk to attract animals. The trap snapped her neck and she was dead within 3-4 minutes. My wife, who has experienced trapping and has used Conibear traps, was not able to release the trap in time.

No regulations were broken in this incident. Baiting and scenting a Conibear 330 and its location – 50 yards from a trailhead and 40-50 off the trail – violates no law or regulation. We reported this incident to Fish and Game. Our extensive efforts to contact the trapper yielded nothing. Through a middle-man who knows this trapper we heard he did not want to contact us because he felt he did nothing wrong.

I also want to highlight dog-restraint: Mat-Su Borough Regs require dogs to be "under restraint" within the Borough. See 24.05.070. This includes a leash but hunting or otherwise using a dog under voice control complies: Under the regulations Restraint includes: "competent voice control while actively engaged in an organized activity, which requires that an animal not be physically restrained, or in a form of recognized hunting which requires the use of an animal such as a retriever, or while actively mushing with or training sled dogs originating from a currently licensed mushing facility"

At the time Lola was killed she was engaged in Ptarmigan hunting, a recognized form of hunting. However, I urge the Board to consider reality - which is that many dog owners simply will not leash dogs which are trained on voice control irrespective of whether they are hunting or not. Opposition to trapping regulations on the grounds that all dogs should be leashed at all times is ridiculous – as every Alaskan knows.

The regulation proposed is not perfect - personally I support more a limited restriction on trap-styles across a broader area. For example, a limit on large BodyGrip traps - i.e., Conibear and 110 and larger and only within two (2) miles of maintained roads within State Game Management Units 13, 14, and 15. An exception could be made for sets below water (i.e., for beaver) which could be placed anywhere.

However, I think Proposal 199 is a sensible regulation and urge its adoption now. It would have saved our dog's life.

Submitted By  
josh splattstoesser  
Submitted On  
1/7/2022 4:59:09 PM  
Affiliation



I am in favor of proposal 199 after my friends dog was killed in a conibear trap on a popular hiking trail in the matsu valley.



Submitted By  
Ted Spraker  
Submitted On  
1/6/2022 6:46:47 PM  
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January 6, 2022

Dear Chairman Hoffman,

Thank you and the Board for an opportunity to comment on proposals that will be addressed during the Central/Southwest Board meeting in late January. I am interested in the outcome of all proposals before the Board, but proposal #199 is the request that most concerns me. Similar, although less far-reaching proposals have been submitted to previous Boards. Apart from a compromise reached between local trappers and trail users in the Juneau area, all have been denied.

I am strongly opposed to proposal #199. The proposal is so broadly written, requiring 16 pages to list all the trails in Units 13, 14 and 16 to be restricted, there is a clear certainty the proposal is not enforceable and will lead to widespread confusion among all users. The Alaska Trappers Association (ATA) has been working with trappers statewide to reduce conflicts between trappers and other trail users for many years. A mutual level of education, understanding and awareness has not been demonstrated by most trail users or the organization submitting this request. I support the efforts of ATA to reduce conflicts and encourage others to work with the trapping community, there is opportunity to accommodate all users on these trails.

Ted Spraker  
49230 Victoria Ave  
Soldotna, AK 99669



Submitted By  
Matt Starley  
Submitted On  
1/7/2022 7:59:58 PM  
Affiliation

I am in support of hunt proposal #2.

Thanks,

Matt Starley

Submitted By  
Matt Starley  
Submitted On  
1/7/2022 7:41:43 PM  
Affiliation

To whom it may concern,

I am writing to express my support for hunt proposal #89. I would love the opportunity to apply for a traditional archery dall sheep hunt.

Thank you for your consideration!  
Dr. Matt Starley



Submitted By  
Kaarle Strailey  
Submitted On  
1/7/2022 11:50:11 PM  
Affiliation

To the Board of Game:

Thank you for considering these comments. I am writing to voice my support for Proposal 199.

I am a MatSu resident and frequent year round user of many of the trails listed in this proposal. Over the years I have personally known of multiple leashed dogs injured by traps set right next to popular trails fairly close to residential areas. Whereas I recognize that the vast majority of trappers are far more reasonable in selecting their trap placement than the individuals who set those traps, regulations are sometimes needed to protect the rest of us from the most careless. Though I would prefer a larger set-back distance, 50 yards strikes me as a reasonable compromise. outdoor recreation opportunities are a key reason many Alaskans love Alaska, but as the popularity of some recreational areas grows it is inevitable that safety concerns may breed conflict. Safety for all users of multi-use trails should be ensured as fairly as possible and i believe this proposal does just that.

Sincerely,

Kaarle Strailey



Submitted By  
Robert Tappana  
Submitted On  
1/7/2022 7:20:38 PM  
Affiliation

I am writing in support of Proposition 199 prohibiting trapping within 50 yards of designated trails in units 13, 14, 16.

Alaska is made of many different kinds of wilderness users and we should be able to work together to ensure that all can enjoy recreation safely. I support trappers and trapping (I trapped for a short while when I was in high school) but I do not believe that it is safe or necessary for traps to be placed in close proximity to trails, especially trails heavily used by others for recreation. A fifty yard set back is not an onerous requirement. In fact I cannot imagine an ethical trapper knowingly placing a trap closer to a mixed use trail than that. Even so, we know that dogs are caught near trails almost every year.

I urge the board to approve this proposal.



Submitted By  
William Taygan  
Submitted On  
1/3/2022 6:58:52 AM  
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I am a hunter and a fisher and I support ethical trapping. I am also in support of proposition 199 to require a 50 yard trapping buffer from multiuse trails.

I would like to submit an amendment to add the the "Hunter Creek" and "Lake George" Trails from the MSB Recreational Trails Plan to proposition 199.

Knik Glacier Tours has opened their parking lot on Buckshot Ln for fat bikers to legally access the snowmachine trail on the south side of the Knik Valley at Hunter Creek. This south-side Hunter Creek/Lake George trail is now more popular with nonmotorized users than the north-side Knik Glacier/Jim Creek Trail.

I would like to submit two public reports about this trail from 2021 (profanity removed)

1. December 13, 2021 Anchorage Fat Bike Facebook Group

Warning!! Beware if you have a dog with you. Someone has set 330 conibear traps in grey milk crates along part of the snowmachine route, including just yards from the Hunter Creek crossing ( on the N side of Hunter Creek). I trapped this area for quite a few years and don't know who this is but I've never seen a set like that and can't imagine what they are hoping to trap. It will attract dogs and there is a big chunk of bait in each set that I saw. A dog can easily be killed in one of these sets. I stress that the traps are legal but not, in my mind, too ethical in where they are. I haven't trapped there since fat biking got so popular and I live right here.

2. Dec 16, 2021 Anchorage Fat Bike Facebook Group

I went up to check out the trail to the glacier today, I just made it to the main river crossing (about 4 miles from Knik Glacier Tours). Trail is good, crossing is solid. On my way back I ran into the local Kid who is trapping out there. He was on a white skidoo with his girlfriend on the back. I stopped to talk with him because I found a piece of snowmachine, and I wanted to ask if it was his. I asked him if he was the one trapping out there and he immediately copped an aggressive attitude. I politely asked if he would consider not trapping near the main trail. He told me to F--K OFF and that he could trap wherever the F--K he wanted. He then told me it was perfectly legal for him to trap anywhere he F--king wanted and he didn't have to mark his traps and there was nothing I could do about. I told him indeed it was legal, but what about the trapping code of ethics; Promote trapping methods that will reduce the possibility of catching non-target animals and To act responsibly by trapping in ways that minimize conflict between trappers and other users. He could care less about that. I pointed out to him that there was plenty of country out there away from the main trail and he said we was going to continue to put his traps next to the trail.

I asked him how he would feel if he caught someone's dog and his reply was "I could give a F--K".

So, we have an inexperienced, unethical and entitled kid setting traps (baited 330 conibear) next to the main trail to the glacier, that if your dog would be caught in one, would be highly unlikely that it would survive.

If you are planning on biking out to the glacier, I would strongly advise that you leave your pups at home. Please spread the word, it would be awful if a dog was killed.



Submitted By  
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1/6/2022 12:22:07 PM  
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I support Proposals 199 and 228. Proposal 199 would, if adopted, require that traps be set no closer than 50 yards from many multi use trails in Game Units 14A, 14B, and 16. Proposal 228 would require identification of traps in Game Units 14A, 14B, and 16. I submitted Proposal 228.

Both proposals are modeled after the Safe Trails Ordinance enacted by the Municipality of Anchorage in May, 2019, which was modeled after a proposal adopted by the Board of Game in 2012 (I recall), which is now codified at 5AAC 92.550(3)(C). That regulation applies to Chugach State Park. As codified, here is 5AAC 92.550(3)(C), verbatim.

"The following areas are closed to trapping of furbearers, as indicated:

(3) Unit 14(C) (Anchorage Area):

(C) that portion of Chugach State Park outside of the Eagle River, Anchorage, and Eklutna management areas is open to trapping under Unit 14(C) seasons and bag limits, except that trapping of wolf, wolverine, land otter, and beaver is not allowed: killer style traps with an inside jaw spread seven inches or greater are prohibited; a person using traps or snares in the area must register with the Department of Natural Resources Chugach State Park area office and provide a trapper identification; all traps and snares in the area must be marked with the selected identification; the use of traps or snares is prohibited within (i) 50 yards of developed trails; (ii) one quarter mile of trailheads, campground, and permanent dwellings;"

I have been a proponent of this kind of regulation for at least twenty years, and I played a minor role in turning out people to testify and support the adoption of the State regulation in 2012, and the Ordinance in 2019.

My point in relating the history of both the Ordinance and the State regulation is to say that these are not radical measures. They are clear in stating what is required. They make sense. The Board of Game's regulation has worked in Chugach State Park, and the Municipality's Ordinance is working.

The Anchorage Ordinance improved on the State regulation. The Ordinance covers areas outside of Chugach State Park such as Girdwood, Chugiak, and Peters Creek. One problem with the State regulation is that it uses the term "developed trails", which is unclear. The Ordinance as supplemented by the City administration provides a list of trails, and maps showing where the trails are located. That is better because it gives notice to both trappers and dog owners of where traps should not be set, and where it is safe to take a dog.

Proposal 199 contains a long list of trails and maps. The proposal follows the model of the Anchorage Ordinance in that regard. The list of trails in Proposal 199 was taken from the MatSu Borough's trail plan. Greater specificity as to location could be provided if the Board of Game were to adopt Proposal 199, and direct the Department to administratively prepare maps, which could be shared on the Internet. That's what the Municipality has done.

Most people, including most trappers, do not want to see dogs killed and maimed in traps. I have heard from several trappers and former trappers who support this kind of sensible regulation. The core area of the MatSu Borough is heavily populated. Times are changing. It is time for the Board of Game to become involved in taking reasonable steps to get traps off of trails in this part of the State.



Submitted By  
Megan Taylor  
Submitted On  
12/16/2021 7:57:05 PM  
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I'm writing to add my support to the common sense Proposal 199 to increase trap setback on trails throughout the MatSu valley. As a dog owner and outdoor enthusiast, this just makes sense. There have been many times where we hesitate to use a trail because of its trap danger to our dogs. Not to mention the risk to children and adults as well. Protect our multi use trails! Thank you.



Submitted By  
Lorraine Temple  
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1/6/2022 8:13:30 PM  
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I fully support Proposal 199 to create 50 yard setbacks from particular trails in the Mat-Su Area. I personally would like to see a much greater, safer setback such as 400 yards. This conflict has been an ongoing issue for decades and is getting ramped up in many communities that are desiring equal use of the land. Outdoor recreational users heavily outnumber trappers yet the land use is dictated and in favor of the minority. The fear of having a pet trapped thwarts winter activities for recreational users with their dogs and even their children. Having publicly used trails safe for winter recreation still leaves plenty of Alaskan backcountry (where I would think the trapping would be more productive) available for that activity. It is a solution that respects all residents, not just the minority; I don't think it's fair that a few dictate the use of trails. The time is long overdue to modify and change the existing regulations to reflect the current trend of more and more recreational use, and I would hope all agencies involved would put safety first. Please, Board of Game members, come of age in this long overdue decision to represent the people of Alaska with their desires to keep pets and families safe and be able to enjoy the Alaskan winter outdoors without hesitation or fear.



Submitted By  
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1/6/2022 3:21:36 PM  
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I'm a property owner along East Butterfly lake in the southern boundary of Nancy Lake Recreation Area. I am expressing my desire to see a 50' buffer to trapping along all the trails listed in Proposal 199. Thanks.



Submitted By  
Rachel Thurmes  
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1/7/2022 4:19:17 PM  
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I am a Wasilla resident in support of proposal 199. It would make our trails safer for dogs and children and help prevent conflict between trappers and other recreation types.



Submitted By  
Nicholas Treinen  
Submitted On  
12/22/2021 3:44:41 PM  
Affiliation

I recreate on state and borough lands in the MatSu multiple times a week, and I nearly always have my dog with me. One of my biggest fears is that she will get caught in a trap or share. It strikes me as absurd that trapping is still allowed within 50 yards of most MatSu trails, and I strongly support the proposal 199 to change that. Thank you.

Submitted By  
Denise Trujillo  
Submitted On  
12/20/2021 3:07:39 PM  
Affiliation



PC175  
1 of 1

- I am in favor of Proposal 199 which requires trapping to be at least 50 yards from multi-use trails. Please make this addition to the trapping regulations. Thank you!



Submitted By  
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1/6/2022 4:18:32 PM  
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#### Proposal #2

I am writing this comment in support of proposal 2. I think this proposal is an excellent idea. It will have very low impact on Dall sheep herds in the proposed units. It would let those of us that choose to limit ourselves with archery tackle to have time in the mountains pursuing game with less pressure. Being before the general sheep season, it would be a safer option for bowhunters. There is less potential for a bowhunter to be hurt by a rifle hunter pursuing the same sheep. The optional part of this proposal is an excellent idea as well. Being 5 days isn't a great amount of time to successfully get in range of a legal sheep, giving bowhunters the option to keep pursuing sheep in the general season, with archery equipment, could extend the season.

Submitted By  
Quentin L VanPelt  
Submitted On  
1/6/2022 4:34:22 PM  
Affiliation

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Address  
17495 E Plumley Rd  
Palmer, Alaska 99645

#### Proposal #89

I am writing this comment in support of proposal 89. This proposal is a great idea, it affords those of us that choose traditional archery equipment a time to hunt sheep the way we want to, with very little disturbances. I moved to the Alaska solely for the hunting opportunities I would never be able to afford as a non resident. Getting the opportunity to hunt sheep every year with my recurve or longbow would be great. Being someone who chooses to limit themselves with the weapon I hunt with, I fully support this idea. I don't want other hunters to lose any hunting opportunities, I just want the opportunity to hunt with traditional archery equipment with less disturbances. This would be a great choice to add a hunt and revenue, with very little impact on sheep herds.



Submitted By  
Sarah Venator  
Submitted On  
1/6/2022 7:33:37 PM  
Affiliation

I support Proposal 199. This proposal is a fair way to balance the rights of trappers and the right of other users to recreate without concern for their dogs or children being caught in traps next to popular trails and trailheads. I also support Proposal 228, to require traps to be tagged in the same area. This will help identify irresponsible trappers who set traps illegally and promote accountability.



Submitted By  
Kyle Virgin  
Submitted On  
1/7/2022 4:01:46 PM  
Affiliation

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9079522602

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I am commenting in **OPPOSITION** to **PROPOSAL 2 – 5 AAC 85.055**.

Opening August 1-5th to archery hunters defeats the entire spirit of why that season was originally created. If we hope to capture the passion for sheep in young minds, it is paramount that their season is left untouched. Several young members in my family have participated in the youth season and to see the lasting impression it has left in their young minds is inspiring.

Opening the season to resident and non resident bowhunters will undoubtedly increase airplane traffic. During that timeframe it is legal to scout from the air. Given the extended daylight hours and difficulty in stalking rams with a bow, the limits of same day airborne will be stretched to give the hunter the greatest opportunity at harvest.

Due to the ease of access, the units proposed happen to be the same units most likely to be used by youth sheep hunters with only a five day hunt window. This will concentrate bowhunters and youth hunters into a few key areas increasing pressure and competition. As a young hunter navigating what is likely their first experience with sheep hunting, getting into a foot race with adult hunters will most certainly happen and likely not end in their favor.

While the archery season would benefit me as a bowhunter for a longer period of time, it would serve to undermine the more important goal of ensuring the future of sheep hunters. Youth seasons are the most important hunts in the State of Alaska. Without a retained interest in hunting, our tradition will die with this generation. Please do not cloud the otherwise pure experience that is youth sheep hunting.

Lastly, I am not opposed to more bowhunting opportunities. Rather I would suggest the same proposal with a shift in dates from August 5-9th.



Submitted By  
Kyle L Wait  
Submitted On  
12/7/2021 10:31:13 PM  
Affiliation

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Proposals 101 and 102, Corssbows in archery seasons.

Crossbows in archery only seasons is a bad idea for the following reasons.

1. Crossbows are much more effective killing tools that will limit opportunity rather than create it. If allowed in archery only seasons hunter success will increase thus forcing the BOG to limit opportunity. This scenerio has played out in Ohio and Arizona, both states are reconsidering the use of cross bows.
2. They are not archery equipment. Archery has multiple limiting factors that are all circumvented by crossbows. The projectile is loaded in the cocked position. The projectile mechanically held in the locked postion. The weapon can be fired from a rest/supported postion. The hunter does not have to expose themselves to game in the drawing process. Crossbows have ranges exceeding 100 yds with little to no experience needed. Crossbows can and will be fired from inside a vehicle. Archery equipment does not have a butt stalk, safety, scope, or bypod. Crossbows are not archery.
3. Crossbows are legal in general weapons hunts yet no one uses them... Outside of a couple youth bearhunts over bait I have never witsensed a hunter carrying a crossbow in the field. The fact that no one is using a crossbow in the general weapon season is testament to fact that there is not a crossbow fraternity, rather a select group seeking to find in inroad into archery seasons without putting forth the effort to learn archery or accept the limits of archery.
4. Archery hunting is not an exclusive group. Any hunter wishing to partake in archery seasons is welcome. The only limits are the weapon itself, not the archery community. Individuals wishing to hunt only need to put forth the effort.
5. The hard work of individual archers and the Alaska Bowhunters Association should be considered. Years of educating the public, lobbying for opportunity, and promoting the sport should not be undermined by a select few that want to benefit from from others labor. I dont feel these indivuals should ride the coat tails of others hard work only to reduce the oportunites of those that worked so hard.

Crossbow hunters already have a opportunity in the general season. Perhaps they should create an association, develop education programs, raise funds, promote their sport, and create their own opportunity. If there is validity to their passion they will find a way to create opportunity.

Thanks,

Kyle Wait

Palmer Alaska



Submitted By  
Bill Watkins  
Submitted On  
1/5/2022 10:04:39 AM  
Affiliation

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Denali Park , Alaska 99755

Dear Sirs,

I am writing in support of the Alaska Wildlife Alliance's Proposal 199.

This proposal would set a 50 yard setback from either side of over 200 multiple use trails within the Mat-Su region.

The common sense reason that this proposal is needed is to protect other users and their dogs while they utilize these multiple use trails.

It has been documented that dogs on several occasions have been caught in these traps/snares and that in one case a motorcross rider was pulled off his motor bike by a snare. All of these examples confirm the need for such a proposal.

Furthermore, enacting such a proposal will help to minimize conflicts between a variety of other trail users and trappers; helping to safely separate these users from one another.

Thank-you for your attention.

Sincerely,

Bill Watkins



Submitted By  
Adam Weber  
Submitted On  
1/7/2022 2:22:36 PM  
Affiliation

I strongly recommend that you support proposal 199. Public multi use trails are frequented by dog owners and requiring a 50 yard setback from the trails for traps will protect dogs. People's dogs don't know enough to avoid traps, and setting a buffer from trails is a reasonable regulation to protect them.



Submitted By  
Drew Weber  
Submitted On  
12/22/2021 7:35:49 PM  
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Wasilla, Alaska 99654

I am extremely against proposal 199. This is yet more regulation on trappers in the state of Alaska. Many of these trails were put in by trappers. I think it would be better idea to better regulate people who use these trails for recreation. Enforce existing leash laws for pets along with big fines for people who do not respect the law. We need to protect the state and not become another California.



Submitted By  
Mari Welch  
Submitted On  
1/7/2022 11:13:40 PM  
Affiliation

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I strongly oppose proposal 210 and 211 to end the Copper Basin Community Harvest in unit 13. I believe all the claims of both proposers, Claude Bondy and the Alaska Outdoor Council, are clearly unsubstantiated by the harvest data put forth by the Department of Fish and Game. As stated in the Departments report: "this hunt structure poses no conservation concerns". I believe this statement cannot be ignored by the board. The Community Subsistence Harvest has benefited unit 13 residents, Ahtna communities, rural subsistence users and families/communities with generational historical Subsistence use since its inception and continues to do so. While there are proportionally less unit 13 residents harvesting in the CSH, that simple data breakdown doesn't show the whole picture. The 10 year average of moose per year that have been harvested by unit 13 residents through the CM300 hunt is 33.4. That roughly equates to over 15,000 pounds of edible meat per year harvested by unit 13 residents. That to me seems like a very meaningful benefit for those communities. Calculated from ADF&G public harvest record information.

As a person who has benefited and participated in the community hunt for over 5 years I know the positive impact it has on the community members of both indigenous and non-indigenous Alaskans. We work together to grow this community and help those who cannot hunt for themselves through this exercise of physical endurance and connectivity to nature. Please don't rob this community of that with unsubstantiated claims or lack of further biological research.



## Central & Southwest Region Comments to Proposals.

PAGE 1 of 9

Proposal 2. **OPPOSE**. I oppose carving out special hunts for a select group of hunters. The proposer wrongly states that there are no bow hunting opportunities in the specified region. Individuals are allowed to use archery equipment in the general hunt. Allowing this hunt before the general hunt would also adversely effect the vast majority of hunters as the sheep will have already been hunted increasing their wariness. Also, as there are no fees for a registration hunt this would unnecessarily add to the costs of ADF&G.

Proposal 3. **OPPOSE**. If the season can be extended it should be extended for all user groups not a select few. Proposer indicates there is almost no chance of success in this proposed hunt, so why does he believe he needs a special season? Hunting has one purpose, to put food on the table this hunt cannot provide this basic need.

Proposal 4. **OPPOSE**. See above. Additionally, if the proposer is concerned about safety suggest they hunt the Dalton Highway corridor, a 10 mile wide swath of land open only to bow hunting.



Central & Southwest Region PAGE 2 of 9  
Proposal 5. OPPOSE. All these sheep hunting proposals come down to one thing; a desire to hunt without competition thereby increasing the odds of success.

Proposal 6. SUPPORT. Support for the reasons stated in the proposal.

Proposal 15. OPPOSE. There are numerous registration permits for any bull in 17B. As choice of weapon is not limited there is no need for a special archery season.

Proposal 16. OPPOSE.

Proposal 17. OPPOSE.

Proposal 23. OPPOSE. "Positioning" is only another way of saying chase something till it drops.

Proposal 32. SUPPORT

Proposal 33 OPPOSE. In any hunt limited to a permit, no permits should be given to non-residents unless residents do not use all the permits. Allocating half the permits to non-residents is preposterous.

Proposal 34, 35, 36. OPPOSE

Proposal 37. OPPOSE. After allocating permits to residents, remaining permits can go to non-residents, however, the number given to non-residents should not be pre-ordained.



## Central &amp; Southwest Region

PAGE 3 of 9

Proposal 38, 39, 40, 41. OPPOSE

Proposal 43 OPPOSE. I strongly believe that in any hunt restricted to permits none of the permits should go to non-residents. If residents do not subscribe to all the permits the left over permits can go to non-residents. However, even that should be eliminated if it helps the population being hunted.

Proposal 44 SUPPORT.

Proposal 45. OPPOSE. Besides previous objections, the Board has no authority to require the use of an outfitter for this species of game.

Proposal 46. OPPOSE.

Proposal 47. OPPOSE

Proposal 48. OPPOSE

Proposal 50. OPPOSE

Proposal 52. OPPOSE. Proposal is unclear. "Repeal pre-2018 regulations and return to conventional style." What does this even mean? Caribou hunting in Unit 13 has been limited to some form of permit - one type or several since 1979.



## Central &amp; Southwest Region

Page 4 of 9

Proposal 53. **OPPOSE**. The number of caribou permits allotted under the CHT program should be limited to the number provided at the time the CHT program was initiated. As the human population in Unit 13 increases over time there will be continued pressure to increase the ~~ant~~ number of permits in the CHT. If this is allowed, at some point only those living in Unit 13 will be allowed to hunt there. This violates the State and U.S. constitution. Continuing to increase the permits in the CHT will eventually pit individual communities against each other. The CHT program was, and is, a bad idea created only to insure local communities with a younger population could receive caribou permits as most of the TIER II permits went to Anchorage and Fairbanks residents as they had hunted in the area significantly longer than the younger residents in the local communities.

Proposal 54 **OPPOSE**. The intent of a youth hunt is to provide an opportunity for someone to hunt with their children and instill hunting traditions outside of the general season when more hunters are afield. The current youth hunt accomplishes this goal. If it truly important to someone they can forgo the youth hunt and take their children hunting during the general season; just as my and many other parents did.



## Central &amp; Southwest Region

Page 5 of 9

Proposal 56. **OPPOSE**. Hunters are able to use a bow during the general hunt so a special season is not required. Additionally, it is stated in the proposal that as only 1% of the harvest is by bow there will be no impact. The percent of the total harvest is irrelevant without knowing how many hunters used a bow. Extending the season would also result in an increased harvest as it would be ~~easy~~ easier to call a moose later in the season. I also disagree with the proposer's statement that increasing the length of the season will provide more hunters the opportunity to hunt, especially as the season in Unit 11 is one of the more generous in the State.

Proposal 57. **OPPOSE**

Proposal 59. **OPPOSE**. This is identical to proposal 53 except moose not caribou are the target. Comments to proposal 53 apply. This is also an unreasonable increase at 50%, it is not possible that the human population in Unit 13 has increased by 50%.

Proposal 60. **OPPOSE**. Success ratio likely to increase as moose are easily called that late in the year.



## Central &amp; Southwest Region

Page 6 of 6

Proposal 61. OPPOSE. Still opposed to creating special seasons for a select few. Basically the proposer wants to increase his chance of drawing the any bull permit in Unit 13. Also, there is no current Unit 13 E draw permit for anyone, it is a Unit 13 permit.

Proposal 63 OPPOSE. Proposal would allow one caribou per household member. Under this scenario over harvesting is quite possible. Additionally, other hunters not residing within the confines of Unit 13 must be given an opportunity to hunt. If adopted this proposal would effectively eliminate all hunters outside the CH program as it is proposed that the CH bag limit ~~is~~ equal the sum of all the individual bag limits, from all household. With each individual in a household eligible for a permit it takes few household to exceed the harvest quota.

Proposal 64 OPPOSE. If an individual cannot carry the hide how can he handle a quarter? It is extremely unlikely these individuals are hunting without a four-wheeler or similar equipment, so it is unlikely they are carrying anything. As these are elders seems the perfect opportunity to hunt with the younger generation and pass along their traditional values of the hunt.



Central & Southwest Region Page 7 of 9  
Proposal 65 Oppose. The hide is heavy, so what? So are the rear quarters. The real issue is they have no use for the hide and don't want to deal with it.

Proposal 66. SUPPORT

Proposal 68. OPPOSE

Proposal 69. SUPPORT. Fewer people hunt bears than in years past. This would help with population control in an area with a high bear population.

Proposal 74 SUPPORT.

Proposal 75 SUPPORT

Proposal 78. OPPOSE. Caribou hunting in the unit 16B is bulls only, the meat is inedible during the early part of October. Adoption of this proposal will result in loss of meat.

Proposal 80. OPPOSE. No reason for this hunt. Season is the same as the general hunt. I find it unreasonable to think that just because there is a special youth hunt that that has any effect on the number of youth participating in hunting in general. Their participation is effected by whether or not their parents hunt.



## Central & Southwest Region

Page 8 of 9

Proposal 81. **OPPOSE**. These weapons are not similar to shotguns with slugs. They have a much greater effective range.

Proposal 82. **OPPOSE**. There is no reason for this hunt. A registration hunt within the general season only puts burden on the ADF&G to collect data they already collect.

Proposal 87. **OPPOSE**. This proposal takes permits from one group and distributes to another. I also fail to see how harvesting "any ram" will allow more sheep to reach maturity.

Proposal 88. **OPPOSE**. This is just another example of someone who wants a specific season for their weapon of choice. This will have a negative impact on those hunters in the season opening on the 10<sup>th</sup>.

Proposal 91. **OPPOSE**.

Proposal 92. **SUPPORT**

Proposal 94. **OPPOSE**. Success rate for bear hunters with bow appears significant enough (65 of 460 or 14%) to show a special season is not warranted.



Central & Southwest Region

Comments submitted by:

Brian West

1000 Oceanview Dr

Anch Ak 99515



Submitted By  
Jack Reakoff  
Submitted On  
1/4/2022 9:48:07 AM  
Affiliation  
Western Interior Alaska Subsistence Regional Advisory Council

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Anchorage, Alaska 99503

Stosh (Stanley) Hoffman, Chair  
ATTN: Board of Game Comments Alaska Department of Fish and Game Boards Support Section  
PO Box 115526  
Juneau, Alaska 99811-5526 Dear Chairman Hoffman:

JAN 04 2022

Dear Chair Hoffman:

I am writing to you on behalf of the Western Interior Alaska Subsistence Regional Advisory Council (Council) to provide comments on proposals coming before the Alaska Board of Game (BOG) at its Central and Southwest Region meeting scheduled for January 22-28, 2022, in Wasilla.

The Council represents subsistence harvesters of fish and wildlife resources on Federal public lands and waters in Western Interior Alaska. It was established by the authority in Title VIII of the Alaska National Interest Lands Conservation Act (ANILCA) and is chartered under the Federal Advisory Committee Act. Section 805 of ANILCA and the Council's charter establishes the Council's authority to initiate, review and evaluate proposals for regulations, policies, management plans, and other matters related to subsistence uses of fish and wildlife within the region. The Council also reviews resource management actions occurring outside their regions that may impact subsistence resources critical to communities served by the Council. The Council provides a forum for the expression of opinions and recommendations regarding any matter related to the subsistence uses of fish and wildlife within the region.

The Council held a public meeting on October 14-15, 2021 via teleconference (due to COVID- 19 pandemic). Among the items discussed were BOG proposals that would affect subsistence users and resources in the Western Interior Alaska Region. The Council discussed and voted to submit the following comments to the BOG for consideration as it deliberates these proposals:

**Proposal 19:** 5 AAC 92.108. *Identified big game prey populations and objectives.* .

Council recommendation: The Council voted unanimously to **OPPOSE** this proposal.

Council comments: Council members wish to maintain the current Mulchatna caribou population objective of 30,000-80,000 animals, with a plan to build the herd back to 200,000 animals where it had been previously. The Mulchatna Caribou herd inhabits an extensive portion of the Southwestern Alaska region. The larger the herd, the more it needs to migrate. It's a disadvantage to the Western Interior Alaska region subsistence users to restrict this herd to a small population number where it stays in the Mulchatna headwaters, Togiak National Wildlife Refuge and Tikchik Lakes country. Additionally, there are concerns that the State will reduce the population objective for the Mulchatna Caribou Herd even further, and that this would hurt recovery efforts.

**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.

Council recommendation: The Council voted unanimously to **SUPPORT** this proposal.

Council comments: Establishing a Tier II process now will be helpful when the Mulchatna Caribou Herd recovers. Hunting this herd is currently closed; but when the population recovers, a Tier II season and bag limit would restrict hunting to subsistence users versus having an unlimited number of sport hunting and non-resident applicants.

**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.

Council recommendation: The Council voted unanimously to **SUPPORT** this proposal, with the defining language shown below in italics.

Council comments: This same issue is being considered under Federal wildlife proposal WP22- 40, which the Council supported as *modified by OSM* at their Fall 2021 meeting. The Federal Subsistence Board will act on WP22-40 in April, 2022. The OSM modification reads:

*"Assist in the taking of a wolf or wolverine" means a snowmachine may be used to approach within 300 yards of a wolf or wolverine at speeds under 15 miles per hour, in a manner that does not involve repeated approaches or that causes the animal to run. A snowmachine may not be used to contact an animal or to pursue a fleeing animal.*

The Council would support a similar definition under Proposal 23, noting that the passage of both Federal WP22-40 and State Proposal 23 with this language would align State and Federal regulations in Unit 17. The Council believes that Unit 19 residents who live within the Western Interior region would be affected by this proposal.

The Council thanks the BOG for considering these comments, which reflect the importance of conserving healthy wildlife populations and providing for the continuation of subsistence uses in the Western Interior Alaska region. We look forward to continuing discussions with the Alaska Department of Fish and Game and BOG on subsistence matters affecting the region. If you have questions about this letter, please contact me through Karen Deatherage, Subsistence Council Coordinator, with the Office of Subsistence Management, at (907) 474-2270 or [karen\\_deatherage@fws.gov](mailto:karen_deatherage@fws.gov).

Sincerely,

Jack Reakoff, Chair

Submitted By  
Monica Wey  
Submitted On  
10/1/2021 3:17:47 PM  
Affiliation



PC186  
1 of 1

I am in support of Proposal 199. I believe it will not inconvenience trappers much (it's such a short distance) and will help protect the lives of our pets. I support trapping in Alaska, but it is very sad to see when people's dogs are accidentally injured or killed due to a trap near a trail. Reasonable trap setbacks help us all continue to recreate and trap on the lands we love while minimizing the risk to our dogs.



Submitted By  
Julie Whatmough  
Submitted On  
12/31/2021 7:11:38 PM  
Affiliation

I am so concerned about the current trapping standards. I don't think there should be trapping allowed at ANY multi-use trails, definitely not less than 50 yards as proposed by 199. Please save our dogs!



Submitted By  
Kurt Whitehead  
Submitted On  
1/7/2022 11:50:45 PM  
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PO Box 388  
Klawock, Alaska 99925

Members of the Board of Game,

Thank you for your service. My name is Kurt Whitehead. My with and I own/operate Treasure Hunter Lodge in Klawock, AK. We guide hunters and anglers. I came to Alaska directly out of college as a fishing guide in Bristol Bay in 1995. In 1997 I started working for Butch King at Wildman Lake Lodge guiding hunters for moose, caribou, brown bear and wolf. I guided six years for Butch and seven years for Lance Kronberger at Cinder River Lodge.

The Alaska Peninsula has been managed as a trophy brown bear area and it's been working for several decades.

I'm opposed to proposal 28.

There are many GMU's in the state that have good brown bear hunting but only two that regularly produce record book, giant brown bears. GMU 8 & 9 have the best genetics and are the best managed brown bear areas in the state.

Is resident hunters have many other areas where we can harvest one brown bear a year but only two where we have a great opportunity to harvest a true giant.

Please leave it the way it is, it is working well.

Thank you.

Submitted By  
Kurt Whitehead  
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1/7/2022 11:58:14 PM  
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Members of the Board of Game,

Thank you for your service.

I am opposed to proposal 206 for many reasons.

RHAK and their anti-guide agenda have put forth another poor proposal.

Thank you!



Submitted By  
Roy Willis  
Submitted On  
1/6/2022 5:58:08 PM  
Affiliation

I support proposals 199 and 228

Submitted By  
Brett Woelber  
Submitted On  
1/6/2022 6:04:26 PM  
Affiliation



PC190  
1 of 1

I am a lifelong Alaskan writing in support of proposal 199. The proposal aims to limit trapping of lethal conibear-type and grip traps near popular multi-use trails in the Mat-Su Borough. I am not against trapping. I have read the proposal and it strikes a good balance allowing all trail users to equitably enjoy access to Alaska without fear of personal injury to themselves and injury or death to their dogs, which have long been part of Alaskas history and culture. Frankly, it's a proposal that any ethical trapper should support.

Submitted By  
Kirsten Woodard  
Submitted On  
1/7/2022 11:32:27 PM  
Affiliation



PC191  
1 of 1

I am writing in support of Proposal 199. I am a lifelong resident of the Mat-su Borough and an avid user of many of the multi-use trails included in this proposal, however for 6 months of the year I am apprehensive while using trails with my family and pets as I have known a number of people that have encountered traps (including a conibear) right on or within feet of heavily trafficked public trails. It is deeply concerning that there is no legal protection of a reasonable corridor along the popular and heavily used trails included in this proposal. Reasonable trap setbacks will reflect the true multi-use nature of these trails and provide a way to allow for multiple user groups to enjoy what the Mat-su Borough has to offer.



Submitted By  
Jed Workman  
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1/7/2022 9:34:28 AM  
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### **I strongly oppose proposal 210 and 211.**

We have been subsistence hunting, fishing, and wild harvesting in Unit 13 since 2001. My wife and I live in Chickaloon and depend on Unit 13 resources for survival. Our diets consist of 90% hunted, fished, wild harvested and grown, all from unit 13 and on our property. We depend on this resource for our survival and the Community Hunt is needed for us to maintain our existence in this rural area.

A major reason we are able to live in this rural area is directly linked to subsistence hunting and fishing. Our remote homestead would likely fail without rural subsistence hunting and fishing access.

The community hunt has had significant positive effects on our ability to subsist. It has allowed us to work with a network of hunters of varying ability and disabilities, skill, age, and economic status, share, learn, and teach skills, and assist others such as the elderly and disabled to harvest necessary meat for our diets. The community sharing of harvested meat, processing, storing, and recipes has broadened important resilient and sustainable skills throughout the group and helped to maintain these skills rather than lose them.

The community hunt has strengthened bonds between members and increased our resiliency as a community. Rather than the few people we hunted with in the past, we now have a much more diverse and stronger community of hunters and helpers that can ensure better success for subsistence lifestyles, skills, and food for all.

I am concerned that special interests will be removing a highly valuable hunt for our communities which will have a negative effect on subsistence hunters. I think that any decision to remove the community hunt is likely flawed and should require a much more in-depth study before making any major changes to the existing program. A change as radical as removal needs solid support from the data. **Anecdotal evidence found in proposals 210 and 211 are worth consideration, but are not an acceptable substitute for data driven decision making.** I would encourage the board to review the community subsistence harvest criteria to include the societal and cultural benefits this hunt provides our communities in addition to the harvest data. Also worth consideration are the conservation concerns addressed in both proposals, 210 and 211. The proposals speak to a lack of appropriate management; however the ADF&G have stated, "this hunt structure poses no conservation concerns". The fact that there is such a stark contrast in understandings here supports the need to take more time to understand the facts before making any major changes.

We use federal subsistence hunting areas for our survival, however these opportunities do not meet our subsistence needs. The design of the federal hunts is not ideal and lacks specific needs for meeting the needs of subsistence hunters. Additionally the design has flaws which render the hunt dangerous for the number of people it serves, with overcrowding issues lacking effective enforcement or safety controls. The state community hunt manages the animals, people, harvest techniques, and hunting areas in a superior fashion also resulting in much higher safety margin for hunters.



Submitted By  
Wrangell-St. Elias National Park Subsistence Resource Commission  
Submitted On  
11/10/2020 10:08:19 AM  
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Wrangell-St. Elias National Park Subsistence Resource Commission  
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November 11, 2020

Stosh (Stanley) Hoffman, Bethel, Chair  
Alaska Board of Game  
c/o ADF&G Boards Support Section  
ATTN: Board of Game Comments  
P.O. Box 115526  
Juneau, AK 99811-5526

Subject: Comments on 2020-2021 Alaska Board of Game Proposals for Central and Southwest Region

Dear Mr. Hoffman:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) met by teleconference on October 5 and 6, 2020. The commission is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. At this meeting, the SRC reviewed the Alaska Board of Game proposals being considered for the 2020-2021 meeting cycle and would like to provide the following comments.

- Proposal 2: Establish registration archery seasons for Dall sheep in Units 9B, 11, 13, 14A, 14B and 16**
- Proposal 3: Open an archery only season for Dall sheep in Units 11, 13, 14A, 14B, and 16**
- Proposal 4: Establish a registration hunt by bow and arrow only for Dall sheep within Units 9, 11, 13A, 13B remainder, 13C remainder, 13D remainder, 14A remainder, 14B, and 16**
- Proposal 5: Establish three archery registration hunts for Dall sheep in Units 9, 11, 13, 14, and 16 where there are general season hunts**
- Proposal 56: Extend the general season for moose by bow and arrow only for residents and nonresidents within Unit 11, remainder.**
- Proposal 57: Establish a registration hunt for bull moose open to certified bowhunters only within Unit 11, remainder**
- Proposal 60: Create a registration archery only hunt for bull moose in Unit 13**
- Proposal 68: Extend the general season for brown bear by bow and arrow only for residents and nonresidents within Unit 11.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposals 2, 3, 4, 5, 56, 57, 60, 68 to establish specialized seasons for archery, bow and arrow, and bowhunters for sheep, moose and bear in Units 11 and 13. Existing seasons are sufficiently long to provide opportunities for hunting all of the species, regardless of gear type. Wrangell-St. Elias is huge, so there are also plenty of places for people to hunt without specialized seasons.

**Proposal 59: Increase the community subsistence any bull moose hunt allocation in Unit 13.**

The Wrangell-St. Elias National Park Subsistence Resource Commission supported Proposal 59, with a vote of 5 in favor and 1 abstention. The proposal restores the community subsistence bull moose allocation from 100 to the original allocation of 150 bulls and will provide added subsistence opportunity.

**Proposal 64: Eliminate the salvage requirement for hide of moose for Alaska residents aged 60 years and older participating in the community subsistence moose hunt in Unit 13 and make it optional.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposal 64. Hunters who have salvaged hides find the hides are sometimes not wanted. Sometimes hides are received in poor condition unsuitable for use. If hides can't be used, hunters would rather have the option to leave them to the animals in the field. Hides are also difficult to salvage, so it should be optional for people with health problems or other issues.



**Proposal 67: Change the salvage requirements for sheep taken in Unit 11.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 67, which would change the salvage requirements for sheep taken in Unit 11. The additional trips needed to pack out meat on the bone adds risk of injury, increases risk of meat spoilage, and increases the potential for bear encounters since they would have more opportunity to find a kill site. Law enforcement should be able to assess a hunter's pack without using bones.

**Proposal 71: Lengthen the wolverine hunting season in Unit 13.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposal 71. This would align wolverine season with most of the other furbearer seasons which are open until end of February. The proposal simplifies regulations and provides more opportunity for hunters to harvest a wolverine.

**Proposal 72: Extend the wolverine trapping season in Unit 13.**

**Proposal 73: Extend the wolverine trapping season in Unit 13.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposals 72 and 73. These proposals extend wolverine trapping season to bring it in line with lynx and marten seasons. The proposals simplify regulations and increase trapping opportunity.

Thank you for the opportunity to comment.

Sincerely,

/signed/

Daniel E. Stevens

Chair

cc: NPS Alaska Regional Director  
Superintendent, Wrangell-St. Elias National Park and Preserve



# Wrangell-St. Elias National Park Subsistence Resource Commission

P.O. Box 439  
Mile 106.8 Richardson Hwy.  
Copper Center, AK 99573

November 30, 2021

Stosh (Stanley) Hoffman, Chair  
Alaska Board of Game  
c/o ADF&G Boards Support Section  
ATTN: Board of Game Comments  
P.O. Box 115526  
Juneau, AK 99811-5526

Subject: Comments on 2021-2022 Supplemental Proposals for the Central and Southwest  
Region meeting

Dear Mr. Hoffman:

The Wrangell-St. Elias National Park Subsistence Resource Commission (SRC) is a federal advisory committee that represents subsistence users of federal lands within Wrangell-St. Elias National Park and Preserve. The commission discussed the 2021-2022 supplemental proposals to the Alaska Board of Game for the Central and Southwest Region meeting at its October 5-6, 2021 meeting and would like to provide the following comments.

**Proposal 197: Reauthorize the brown bear tag fee exemptions for the Central/Southwest Region.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposal 197. This is a routine authorization and would eliminate the need to pay a \$25 fee in order to hunt brown bears.

**Proposal 198: Eliminate bear baiting or prohibit bait stations within 50 miles of cabins.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed 198. Prohibiting bait stations within 50 miles of a cabin would virtually eliminate bear baiting, and bear baiting is a customary and traditional use.

**Proposal 209: Modify the Copper River bison harvest opportunity in Units 11 and 13D.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously supported Proposal 209. The herd is growing, and this proposal could provide additional opportunity for those who would like to hunt bison.

Chair: Daniel E. Stevens; Members: Mike Christenson, Mike Cronk, Sam Demmert, Sue Entsminger, Don Horrell, Suzanne McCarthy, Kaleb Rowland, and Gloria Stickwan



**Proposal 210: Eliminate the community subsistence harvest moose hunts in Unit 13.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 210. Local families benefit from participate in this hunt, and those families share with others. Eliminating the hunt will take away subsistence opportunity.

**Proposal 211: Repeal the Copper Basin area community subsistence harvest hunt area for moose and caribou.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 211. This is a subsistence hunt that benefits many families. Eliminating the area would eliminate the hunt. The existence of a federal opportunity does not negate the state's responsibility to provide for subsistence.

**Proposal 213: Remove the requirement for Tier I caribou hunters to hunt moose in Unit 13.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 213. Removing this requirement could result in large number of hunters, which would reduce opportunity.

**Proposal 216: Establish an antlerless moose season in Unit 13C.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 216. The moose population in Unit 13C is stable, and taking cows out of the population is a concern.

**Proposal 220: Close moose and wolf hunting within Unit 13A.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 220. This would take away a hunting area and thereby reduce hunting opportunity.

**Proposal 222: Align the ptarmigan hunting season for all of Unit 13 to August 10 to March 31 and reduce the bag limit to five per day.**

The Wrangell-St. Elias National Park Subsistence Resource Commission unanimously opposed Proposal 222. In the absence of conservation concern, there is not a reason to reduce the bag limit.

Thank you for the opportunity to comment.

Sincerely,

Daniel E. Stevens  
Chair

cc: Superintendent, Wrangell-St. Elias National Park and Preserve

Submitted By  
Jessica Wright  
Submitted On  
1/7/2022 10:48:42 AM  
Affiliation



I support Proposal 199



Submitted By  
Birch Yuknis  
Submitted On  
1/7/2022 12:41:22 PM  
Affiliation

Phone  
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Wasilla, Alaska 99654

Thank you for taking the time to read my comments. My name is Birch Yuknis. I am a born and raised Alaskan. I currently reside and work in Wasilla, Alaska. I am currently also serving on the Matanuska Valley Advisory Committee. These comments are my personal comments.

Proposal #2. I am opposed to this proposal. Sheep season is already very long. Bow hunters can hunt the with harvest tickets and drawing permits. In addition these bow hunters would then be in the field during the youth sheep season.

Proposal #3. I am opposed to this proposal. As stated previously there already is amply opportunity to sheep hunt in Alaska. The bow hunting community keeps bringing up that there harvest rates are low. I do not dispute this. In my opinion it had nothing to do with harvest success but opportunity. Why should a select group of people get a special season? If the as the proposer states there is no biological concern (The Department May state that there is not while at the same time documenting sheep numbers decreasing across the State) then why not open sheep season year round for archers???(Sarcasm)

Proposal #4. I am opposed to this proposal. Please see my previous comments concerning bow hunting. Now the Alaska Bow Hunters Association would like to hunt without rifle hunters in the field at the same time Wouldn't everyone like to have a special opportunity to hunt with fewer hunters in the field? There are now long range 1000 yard plus rifles I personally do not approve of this, but as a rifle hunter I have to contend with people who can shoot much further than I would ethically want to shoot.

Proposal #5. I am opposed to this proposal. Please see my previous comments on Bow Hunting

Proposal #15 I am opposed to this proposal. Please see my previous comments concerning Bow Hunting. So in addition this proposer wants to pick the time when the bull moose are at their dumbest during the rut.

Porposal #16 I am opposed to this proposal. Please see prior comments concerning bow hunting.

Proposal #17 I am opposed to this proposal. Please see my prior comments concerning bow hunting.

Proposal #28 I support this proposal. Residents of this State should have some extra benefits compared to a nonresident.

Proposal #33 I oppose this proposal. As a kid my family would hunt waterfowl on the Alaska Peninsula every Fall Then the Emperor geese hunting was shut down for non subsistence users Finally after several years I am able to harvest one Emperor a year with a registration permit. I am opposed to a 50/50 split for resident Vs nonresident permits. If the Board wants to increase nonresident opportunity then allow for residents to harvest multiple Emperors to reach the "quota."

Proposal #34 I oppose this proposal. Please see my previous comments on this issue.

Proposal #35-39 I am opposed to these proposals based on my previous comments

Proposal #40 Of all the Emperor proposals this is one I can support. Residents still have more permits, and this increases nonresident opportunity.

Proposal #41 and 42 These proposals leave it up to the BOG to increase the number of nonresident permits. Depending on how many

permits the BOG would increase depends on my opposition or approval. As long as residents have at least an 80/20 split (resident/nonresident) I would approve. Any more than that to nonresidents I would oppose.



Proposal #43 I support this proposal. This proposal increases nonresident opportunity while still allowing for residents to still have the greater number of permits.

Proposal #44 I oppose this proposal. Why not make those permits available for residents to take multiple Emperor geese?

Proposal #45 I oppose this proposal. A permit winner should not have to hunt through an outfitter. The permit winner can choose to hunt with an outfitter if they so choose but that should not be a stipulation for the permit.

Proposal #46 I oppose this proposal. The Department's resources are already stretched with the remarkable job that they do. Instituting a preference point system that the Department has to maintain is an undue burden on the department. Plus I do not want to see a preference point system started here and eventually it would creep to other species.

Proposal #47 I am opposed to this proposal. Please see my previous comments concerning Emperor Geese. In addition as the proposer states that the areas available to hunt can be remote sometimes it is difficult to get a message or phone call out to report a harvest within the 24hrs requested.

Proposal #48 I am opposed to this proposal as it does not indicate how many permits for nonresidents the proposer wants to add. Again the strain on the Department to institute a second draw is an unnecessary burden.

Proposal #49 I am opposed to this proposal. This proposal would require a fee for an Emperor "tag" basically. Also see my previous comments concerning Emperor Geese.

Proposal #50 I am opposed to this proposal. Please see prior comments concerning Emperor Geese. If the proposer wants to have a better chance at harvesting an Emperor goose he could become an Alaska resident. Alaska residents needs a few extra benefits for being residents.

Proposal #56 and 57 I am opposed to these proposals. Please see my prior bow hunting comments. In addition caribou meat after September 20th can start to be inedible.

Proposal #60 I oppose this proposal. Please see my prior comments concerning bow hunting. In addition this proposer wants to hunt bull moose when they are at their most vulnerable.

Proposal #61 I am opposed to this proposal. There already is a drawing permit in place, just not one for a specific group of specialized hunters. Please see my prior comments concerning bow hunting.

Proposal #68 I am opposed to this proposal. If you want to increase the season do it for all hunters not a select group.

Proposal #78 I am opposed to this extended season. As stated previously Caribou meat can become very gamey after September 20th. The proposer had to know this as he has operated in that area for a long time.

Proposal #82 I oppose this proposal. There needs to be a buffer between the rifle and archery season. That's why the season's were set up this way.

Proposal #85 I am opposed to this proposal. There already is a drawing permit for this area as stated by the proposer. Again please see my comments concerning bow hunting.

Proposal #87 I am opposed to this proposal. Please see my prior comments concerning bow hunting. There are already permits for these hunts on to everyone, not just a select group of hunters.

Proposal #88 I am opposed to this proposal. Please see my prior comments concerning bow hunting. I also do not want extra hunters in the field during the youth season.

Proposal #91 and 94. I am opposed to these proposals. Please see my prior comments concerning bow hunting. Also just open the season to all hunters rather than a select group.

Proposal #206 I support this proposal. Either version. More opportunity for all Alaska residents.

Proposal #226 I support this proposal. More opportunity for Alaska residents to fill their freezers.

Proposal #227 I oppose this proposal. My father was involved with the Ruffed Grouse Society when they transplanted the Ruffed Grouse to South Central Alaska. The Ruffed Grouse are a cyclic species and are still trying to get a better foothold in South Central. When one goes fishing they need to know the difference between a king and a silver salmon. When one hunts Grouse they should know the difference between a Ruffed Grouse and other Grouse.

Again thank you for taking the time to read my comments. I am pro Alaska resident and pro equal opportunity for all.





Submitted By  
heather zimmerman  
Submitted On  
12/30/2021 8:42:09 PM  
Affiliation

Phone  
9073541447

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Please support prop 199 to require set backs in all of these multi use trails. There is no reason that traps should be set on trails that people and domestic animals use. This is inhumane.

sincerely, heather zimmerman