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The following comments did not include proposal numbers or last names:

They are available for viewing on the meeting information webpage at:

<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-21-2022&meeting=wasilla>

Comments without proposals numbers or last names supporting trapping restrictions:

.....PC197-PC260

Comments without proposal numbers or last names opposing trapping restrictions:

.....PC261-PC267

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The Ahtna Intertribal Resource Commission (AITRC) represents eight (8) tribal communities, two ANCSA Corporations, their shareholders & tribal citizens. We are submitting the following comments on select proposals in the Board of Games' 2020-2021 Proposal Book and 2021-2022 Supplemental Proposal Book.

Proposal 1 —Shift hunting window to end on October 9

AITRC **opposes** Proposal 1. While we are seeing changes in the climate, it is not consistent and not enough to push the hunting season beyond the end of September. The moose are in full rut soon after September 20. This can disrupt the moose while they are in rut and actively breeding potentially impacting fecundity.

Proposal 51—Expand bison hunt area

We **oppose** Proposal 51. We are concerned that this could increase trespass on native corporation lands. One of the primary reasons Ahtna, Inc. instituted for a closure for bison hunting was because the State of Alaska has never consulted with Ahtna, Inc. or Chitina Native Corporation when opening up new lands to hunting. Ahtna, Inc. has yet to be consulted concerning this closure. We oppose hunting within rights-of-way through native corporation lands.

The bison were introduced to the area at a very low number and are continuing to grow. They are expanding into different ranges. There would be ecological benefits to having more bison on the land, such as creating disturbance on the land and allowing for more willow growth.

As a result, we do not see the need for increased harvest that ADF&G has indicated. ADF&G has never done a study to determine the number of bison on the landscape.

Proposal 52—Repeal pre-2018 caribou hunt regulations for Unit 13

We **support** this proposal. It is a housekeeping proposal that will make the regulations more current by removing pre-2018 language.

Proposal 53—CSH allocation—increase to 500

We **support** this proposal to increase to 500 the number of caribou allotted for the state Community Subsistence Hunt (CSH) to accommodate for the additional demand by a larger number of hunters participating in the CSH.

Managers have often stated that the CSH never reaches its quota. However, they have repeatedly failed to provide participants in the CSH the opportunity to reach the quota. In 2020, ADF&G closed the CSH after only 178 caribou had been harvested—less than 5% of the total Unit 13 harvest (4,038 animals). 50 groups, representing a combined total of 818 permits, vied for these 178 animals. This indicates a failure to provide a reasonable opportunity for a normally diligent hunter to participate with a reasonable expectation of success, according to 5 AAC 16.05.258(f).



The CSH should have its own quota and should not close till that quota is met for both moose and caribou. Board finding number 2015-209-BOG states: "Keep the Copper Basin community subsistence hunt open for the entire season or until the Copper Basin community subsistence caribou quota has been met, whichever occurs first." ADF&G has failed to follow this direction from the BOG. While 2019-223-BOG not speak to keeping CSH open throughout the entire season, we believe the 2019 finding should be revised to reflect the 2015 finding—the CSH should remain open throughout the season or until its quota is met.

Regulatory language for the CSH states that "up to 400 animals may be taken." ADF&G managers have provided an allocation of as few as 200 animals in some years. Because of this under-allocation, and the fact that they have shut down the hunt before even this reduced quota has been reached, ADF&G has not truly been following the intent of the BOG's allocative decisions. Closing down the CSH before its quota has been met represents, again, a failure to provide for priority subsistence uses of wildlife. The department should be closing sport hunts early, not the CSH. In 2020, the department closed the draw-hunts only a few days before they closed the community harvest. In 2021, the Nelchina caribou harvest quota was determined to be 1,600 caribou, yet 10,251 permits were issued. While this includes 2,250 drawing permits, the question is raised as to whether 8,000 Alaska residents attempting to harvest less than 1,600 caribou presents a reasonable opportunity for a normally diligent subsistence hunter to harvest with a reasonable expectation of success.

Proposal 54—Caribou youth season bag limits and season length

AITRC **opposes** proposal 54. Youth can hunt with their parents during regular hunting seasons just as people have done for generations.

While we are aware of the statutory requirement that the BOG provide youth hunt opportunities (AS 16.05.255(i)), we feel that there are already adequate youth hunt opportunities currently available in the region. We do not feel this proposal should be passed because it is a non-subsistence drawing hunt. The current demand cannot support adding additional non-subsistence hunts while subsistence hunts have been closed prior to the subsistence season end dates and prior to harvest allocations being met. Furthermore, as with subsistence hunts, children often accompany their parents during regular subsistence and non-subsistence seasons.

Winter hunts are more difficult and less likely to be successful, as most caribou are migrated out of GMU13 during these months. Much of the point of youth hunts is to provide kids with positive opportunities that will entice them into further participation in hunting activity. Having a youth winter hunt thus seems misplaced.

Proposal 55—Registration goat hunt in 13(A)

AITRC **opposes** Proposal 55 because goats found in Unit 13A are likely found in the Sheep Mountain closed to hunting area. We support keeping this area closed to hunting goats.

Proposal 56—Extending general season for bow-hunters



We **oppose** this proposal. By September 25th, moose are in full rut and are not good to eat. Bow-hunters can hunt during the regular season. Unit 11 is not high-traffic and is not particularly competitive, so there should be plenty of opportunity for archery hunting.

Proposal 57—Hunt for bow-hunters from September 21-30 in Unit 11 remainder

We **oppose** this proposal for similar reasons to proposal 56. This hunt proposes to create a special season from September 21-30, when the moose are in full rut. For this reason, this proposal could easily result in more meat being wasted. Again, Unit 11 presents many opportunities for bow-hunting during the regular season.

Additionally, we are concerned that this proposal could disrupt the federal sheep hunting opportunity provided for elders and youth.

Proposal 58—Reauthorize antlerless moose-hunt

We **oppose** proposal 58, to reauthorize the antlerless moose season in Unit 13A. Unit 13A currently has no surplus of moose; the population is currently within ADF&G's management objectives. This indicates that ADF&G does not need another tool in its management toolbox at this time. If exceeding management objectives becomes an issue, ADF&G can submit a similar proposal at a future time. Reauthorizing this hunt will result in cows being harvested, which could likely destabilize the population.

These drawing hunt for cows do not provide for subsistence opportunities. One bad winter can bring the population down.

Proposal 59—Increase any bull allocation

We **support** this proposal to increase to 150 the number of moose allotted for the state Community Subsistence Hunt (CSH) to accommodate for the additional demand by a larger number of hunters participating in the CSH.

When the CSH was established, participation was limited to residents of eight Ahtna communities. The quota of 100 moose was intended to reflect the subsistence needs of these communities, specifically. The 2010 Manning v. State court decision required that all Alaska residents be afforded the opportunity to form community groups eligible for participation in the CSH. Today, a majority of the moose harvests in this hunt are by urban residents. Increasing the quota would reflect the larger population base that the hunt is now serving.

If there is no increase to the any bull allocation, at a minimum, ADF&G should review groups participating in the hunt to ensure that they are consistent with the regulatory definition of "community" (as defined in 5 AAC 92.072(i)(2)). Until the department actually reviews groups to ensure their consistency with this regulatory definition, there should be a moratorium on any further changes to the CSH.



In the staff comments, ADF&G has not provided the standard error for their population estimates. Accordingly, we do not know whether or not their deviation from their management objectives is statistically significant.

Proposal 60—Archery hunt

We **oppose** this proposal for similar reasons to proposals 55 and 56. During the 9/25-10/15 period, moose are in full rut. Bow-hunters can hunt during the regular season. This proposal would extend the moose season, which could make it more difficult to maintain populations at management-objective levels.

As the Alaska Supreme Court noted in *McDowell v. State*, 785 P. 2d 6 (Alaska 1989): "Exclusive or special privileges to take fish and wildlife are prohibited." The bow hunters here appear to be requesting a special privilege that other groups of Alaska hunters do not have.

This proposal also involves a non-subsistence request for any-bull moose allocation in Unit 13. These moose must instead be allocated to the CSH, which is a management priority over any sport hunt. Any-bull moose opportunities are limited to Tier II applications, which identifies those who are most customarily and traditionally dependent on the resource. There are already too few any-bulls available to meet priority subsistence needs.

There is plenty of opportunity to have an archery-only hunt within non-subsistence areas and near highly populated areas.

Creating this hunt could disrupt the moose while they are in rut, actively breeding potentially impacting fecundity.

Proposal 61—draw hunt for bull moose for resident certified bow hunters

We **oppose** this proposal, which would create a draw hunt for bow hunters from September 1-20. There is plenty of opportunity for archery hunting under general harvest.

Like the previous proposal, this proposal involves a non-subsistence request for any-bull moose allocation in Unit 13. These moose must instead be allocated to the CSH, which is a management priority over any sport hunt.

Proposal 62—Antlerless hunt in 13E

AITRC **opposes** proposal 62, which would establish an antlerless hunt in Unit 13E. The bull-cow ratio is currently at management objectives. The harvest objective is below the management objective. Currently, the moose population is estimated at approximately 11 animals above management objectives. However, because we do not know the standard error for this estimate, it is not clear that moose populations are *significantly* above management objectives.

Environmental factors, such as heavy snow, could easily reduce the population to within or below management objectives within a single year. Additionally, there is the potential for more train fatalities.



Based on the seasons specified in this proposal, it is extremely likely that the targeting of cows will occur. From a conservation standpoint, one challenge with antlerless hunts is that some of the cows that are killed may be pregnant, effectively increasing the impact of these harvests on the following year's moose population. Cows harvested may also have calves with them, the killing of which would orphan the calves.

Although subsistence is supposed to have priority allocation, there are currently no subsistence hunts for antlerless moose in Unit 13.

Finally, we are concerned that these cow-hunts may create a conservation concern that could result in restrictions on ceremonial moose harvest.

Proposal 63—eliminate household bag limit in CSH

We **support** this proposal, as it will help provide for the subsistence priority established in the Alaska Statute. The current regulations effectively preclude multiple members of the same household from hunting simultaneously in different places, because only one permit is issued for the entire household. Caribou are only present at certain places and at certain times. Allowing only one household member to hunt at a time severely limits community harvest opportunity.

One caribou is not enough for many households, especially in light of the well-documented patterns of sharing and redistribution that typically accompany subsistence uses of fish and wildlife, as recognized by the Board in community harvest hunts. In other words, a caribou harvested by one participating household may well end up feeding four or five other households. This is the nature and spirit of the community subsistence hunt: it is intended to be a collective endeavor in which community members work together to harvest and process animals, based on the needs of the community as a whole. Department comments note that this regulatory change would give the CSH a higher per-household bag limit than in Tier I hunts. Again, this reflects a community pattern of use, rather than the household pattern of use that the Tier I hunts are designed to provide.

Currently, the restriction of CSH permits limiting one per household does not support the community pattern of use the Board is trying to provide because ADF&G research has demonstrated, over the past four decades, that on average in rural Alaska, 30% of a community's households harvest 70% of the wild foods used by that community. This is why participants in the community hunt should not be limited to one bag limit per household.

This proposal would not increase the allocation or quota for the CSH, and thus would place no extra conservation burden on the resource.

Proposal 64 & 65—eliminate hide salvage requirements for older hunters.

We **support** proposal 64 and 65 **with a modification requiring that the entire hunting party be over the age 60 or 62 in order for the hide salvage requirement to be optional.** We also suggest clarifying that this proposal should apply only to hunters who are actually participating in the hunt, regardless of who holds the tags for them.



This would give those hunters that are older, and who do not have younger hunters in their parties, the opportunity to leave hides in the field. This would eliminate a potential barrier that is likely to disproportionately discourage elders from participating in this hunt. As ADF&G points out in its comments, it is true that traditionally, multi-generational family groups went out hunting, working together to pack the meat and other animal products back. While many CSH participants still reflect this traditional demographic pattern, it is also the case that some elders hunt alone, or in groups with other elders. It is important that subsistence regulations should strive to reflect the flexibility and adaptability of tradition in the modern world. Compared to other demographics, elders are less likely to have ATVs that they can use to bring the hides out.

Proposal 66 – Clarification on CSH and Federal Hunt.

See comments on Proposal 212.

Proposal 67 – Change salvage requirements for Sheep

AITRC **supports** this proposal, with a modification to exempt the ribs from these proposed salvage requirements. In contrast to the front legs and hindquarters, ribs do not have very much meat on them but are quite bulky and heavy. It would be reasonable, then, to require that the quarters remain on the bone, while allowing that the ribs may be left in the field once any reasonably salvageable meat has been taken off of them.

Proposal 68 – Bow hunt for Brown Bear July 1 – August 9

We **oppose** this proposal: there is plenty of opportunity to hunt brown bears under the current season. GMU 11 is not a high-traffic area and is not particularly competitive, so there should be plenty of opportunity for archery hunting.

Neither brown bear hides nor meat are desirable during this time period, so the purpose of this hunt is unclear.

In the lower 48, special seasons for bow hunters reflect the fact that in most states, hunters are required to wear safety orange during the general season—something that is highly undesirable to bow hunters. In Alaska, there is no such requirement—archery hunters can wear full camouflage during the general season. Thus, there is no need for a special, separate season for bow hunters.

Proposal 69 – Increase brown bear from 1 per year to 2 in GMU13.

AITRC **opposes** this proposal due to its potential impacts on an ongoing research project. AITRC is currently working with the ADF&G on a population density study to fill significant data gaps on brown bears in GMU13. While AITRC is certain there are more bears than originally estimated, we are not done with the study – increasing the bag limit could have an impact on the study results. This collaborative study will produce a population abundance estimate by the next regulatory cycle to better inform the Board of Game in addressing proposals such as this.



It is imperative that AITRC and its partners have two additional years to complete this study. We would not necessarily oppose this proposal if it is proposed again during the next regulatory cycle.

Proposal 70 – open a fall baiting season for black and brown bears in unit 13

AITRC **opposes** this proposal. People are out in the woods hunting during this time of year. Bait-stations and the bears they attract could present a significant hazard to hunters. Bait-stations are not public knowledge, so there would be no way for the public to know where they are to avoid them.

Proposals 71-73 – Extend wolverine season to end of February (hunting & trapping)

AITRC **supports** proposals 71-73, which would extend the wolverine season till the end of February for both hunting and trapping. We believe this would benefit local trappers by providing them with additional harvest opportunity. Often, snow conditions are not good for trapping until late in the season. This would also contribute to regulatory consistency within the broader region.

We are not aware of any biological concerns with wolverine populations in the area. At the very least, trappers should be able to retain incidental harvest, and should not be cited for it.

Proposal 74 – No motorized access in CSH unit 13

AITRC **opposes** proposal 74, which would restrict motorized access to the Community Subsistence Hunt in GMU 13. Although the proposers point out that motorized transportation may give a larger advantage to nonlocal hunters, a majority of locals also depend on motorized transportation for access to the CSH. Restricting motorized access, then, will have the effect of restricting subsistence opportunity.

Although competition between urban and non-urban users may be a concern in the CSH, a larger concern is the fact that, several times in recent years, the hunt has been closed before meeting its allocation. Imposing this kind of restriction would make the CSH more restrictive than some sport hunts in Unit 13, thus going against the spirit of Alaska's subsistence priority law.

By eliminating any-bull opportunities, this proposal would effectively gut the CSH Tier II provisions that the CSH is fulfilling. Adopting this proposal could lead to eliminating the CSH. Terminating any-bull opportunity for moose would result in the lack of a reasonable opportunity for customary and traditional uses as defined by the BOG.

Proposal 75 – Close Tokositna State Park to use of airboats for hunting

AITRC **supports** this proposal. Airboats are very noisy and disruptive. They can be heard for many miles.

Proposal 76 – Extend ptarmigan season at a lower bag limit in 13 B&E

AITRC **opposes** proposals 76, to extend the ptarmigan season and lower the bag limit from 10 to 5 in units 13B. We are not aware of any conservation concerns that would justify such a change. Ptarmigan seasons were just changed during the last regulatory cycle for conservation reasons. Ptarmigan seasons and bag limits should remain consistent as much as possible, and should not be subject to constant regulatory changes.

**Proposal 77 – Youth-only ptarmigan hunt**

AITRC **opposes** this proposal. Small game animals such as ptarmigan generally tend to be oriented toward youth participation already. Youth have ample opportunity to participate in the regular ptarmigan season. Competition is not a major factor in ptarmigan hunting in this area. This proposal would restrict opportunity for adult hunters by setting back the season start-date from August 10th to August 25th.

ADF&G is already providing ample opportunity for youth hunts. The statutory requirement to establish youth hunts in AS 16.05.255(i) pertains only to big game other than bison and musk ox. There is no requirement to provide youth hunts for small game.

Proposal 197 – reauthorize brown-bear tag fee exemption

AITRC **supports** this proposal, as it would remove some of the barriers to participation in brown-bear harvest. Brown bear populations are currently healthy and we are not aware of any conservation concerns that this proposal would negatively impact.

Proposal 198 – prohibit bear-bait stations within 50 miles of cabins

AITRC **opposes** proposal 198, which would prohibit bear-bait stations within 50 miles of cabins. The proposal would amount to a de facto ban on bear-baiting in Unit 13, and the proposer says as much in the proposal: "Anyway, I propose we do away with bear-baiting."

Proposal 199 – prohibit trapping within 50 yards of a multi-use trail

AITRC **opposes** proposal 199, to prohibit trapping within 50 yards of multi-use trails in units 13, 14 and 16. The proposal lists nearly 50 multi-use trails in Unit 13 alone. Combined, this would amount to a significant restriction on trapping within some of the parts of 13 with the best access.

Trappers do a significant amount of maintenance on these trails. Many well-established trails, including the multi-use trails cited in this proposal, started off as trapping trails.

This proposal would unduly restrict the customary and traditional activity of Trapping. There are already decreasing number of people trapping, and this proposal may further discourage a long lived Alaskan tradition.

Proposal 209 – Expand bison hunt

AITRC **strongly opposes** proposal 209, which would expand the bison hunt in units 11 and 13D. We cannot find any studies that have been conducted to address the issue of the carrying capacity of the Tonsina bison herd, or that otherwise would support an increase in harvest. For instance, a moderate amount of nutritional stress may be beneficial to the bison population, as it may push them to expand their range into new areas.

There is concern about increased trespass on native corporation lands that adjoin the proposed area. Ahtna, Incorporated and Chitina Native Corporation were never consulted on expansion and potential trespass and increased land use.



Proposals 210—eliminate CSH for moose

AITRC **opposes** this proposal to eliminate the community harvest hunt. While the inclusion of groups of all Alaskan residents have resulted in many more people participating in this CSH than originally anticipated, this opportunity is consistent with the community customary and traditional use pattern identified by the BOG. Elimination of the community harvest system for moose would result in the lack of a reasonable opportunity for customary and traditional uses as defined by the BOG.

Rather than eliminating the CSH, ADF&G needs to review groups participating in the hunt to ensure that they are consistent with the regulatory definition of “community” (as defined in 5 AAC 92.072(i)(2)).

Until the department actually reviews these groups to ensure their consistency with this regulatory definition, there should be a moratorium on any further changes to the CSH.

- According to the Area Biologist's report at the Copper Basin AC meeting in December, 2021, the moose populations are currently within their management objectives.
- The CSH any-bull harvest has represented only 9-11% of the total harvest since 2015.
- Since 2009, the CSH any bull quota of 100 moose has only been met two times (2016 and 2017).

If the CSH were eliminated, the only other viable option would be to return to Tier II status for all of Unit 13.

Proposal 211– Eliminate CSH

The Ahtna Intertribal Resource Commission **adamantly opposes** Proposal 211.

Unfortunately, Proposal 211 submitted by the Alaska Outdoor Council contains much misinformation, which appears to be focused on soliciting further opposition to the state community hunts. In this era where “alternative facts” and falsehoods are commonly deployed to advance political agendas, the Ahtna Intertribal Resource Commission seeks to clarify the actual facts associated with the state community harvest hunts.

State and federal community harvest systems recognize in regulations the customary and traditional patterns of harvest and use that have been validated consistently through several decades of scientific research. ADF&G research demonstrates that in rural Alaskan communities, on average 30% of a community’s households often provide 70% of a total communities’ wild food harvests (see ADF&G’s pamphlet, “Alaska’s Economies and Subsistence”). We understand that for whatever reasons, the fact that these well-documented community patterns of hunting, fishing, harvesting, and sharing are quite different than the prototypical Euro-American focus on individualism where one hunter hunts one bag limit for one family’s uses with one individual permit, both the Alaska Legislature and the US Congress recognized that community patterns of use also exist and should be reflected in state and federal subsistence regulations.

The Alaska Outdoor Council, and by association their litigation funding organization, “The Alaska Fish and Wildlife Conservation Fund,” state that the Board of Game’s actions to provide a community hunt for moose and caribou in the Copper Basin were found to be unconstitutional.



However, this is not true. In 2018, the Alaska Supreme Court ruled:

"...the community harvest permit system applied equally to all Alaska citizens and thus did not implicate equal protection or the equal access clauses...and was not a sufficient bar to access to implicate constitutional rights" (347 P.3d 97, 100, 102-103 [Alaska 2015] cited in 420 P.3d 1270 [Alaska 2018]).

The Alaska Supreme Court continued:

"We reiterated this holding a few months later in Manning II. In that case, we expressly rejected Manning's argument 'that the community harvest permit eligibility criteria are unconstitutional' under the equal protection and equal access clauses, noting that 'we [had] upheld the constitutionality of these criteria in AFWCF'" (420 P.3d 1270 [Alaska 2018]).

The case referred to by the Alaska Supreme Court in 2018 was filed by the Alaska Fish and Wildlife Conservation Fund (AFWCF), otherwise referred to in 2015 court documents as "The Fund." In 2015, the Alaska Supreme Court ruled,

"The Fund argues that the community harvest permit system is unconstitutional because it creates classifications that result in disparate treatment of Alaskans who are otherwise similarly situated. The superior court rejected this argument, reasoning that '[a]ny Alaskan is eligible to participate in either opportunity [i.e., the individual hunt or the community harvest] by complying with the regulatory requirements for each.' We agree" (347 P.3d 97, 102 [Alaska 2015]).

The State of Alaska's subsistence priority statute (AS 16.05.258) obligates the Alaska Board of Game to provide for reasonable opportunities for customary and traditional uses of moose and caribou in the Copper Basin. The state's statutory obligations cannot be fulfilled by federal subsistence hunting opportunities that are limited to federally qualified rural residents, especially given that there are relatively few federal lands in Unit 13 (approximately 12% according to OSM staff analysis on WSA20-03, p. 4), and federal opportunities are limited to only certain federal public lands in the area involved with the community subsistence harvest hunt area regulations.

The proponent's contention that the original request to the Alaska Board of Game to create a community subsistence harvest hunt area on state lands is now achieved through the newly established federal community harvest system on federal public lands is incorrect as outlined above.

The proponent continues to state that the federal subsistence management program "...allows for Ahtna Intertribal Resource Commission (AITRC) to achieve their goal of exclusive community member moose and caribou hunts on federal lands in Units 11, 12, and 13" is also false. The newly established federal community harvest system is open to all eligible federally qualified rural residents living in the Census Designated Places surrounding the 8 Ahtna communities and provides the same opportunities already



available to those qualified rural residents under the individual federal caribou and moose hunting permits.

Finally, as clarified above, the Alaska Board of Game must adhere to the state subsistence law found in AS 16.05.258 and cannot ignore their obligations to provide reasonable opportunities for customary and traditional uses by deference to the Federal Subsistence Board.

Alaska Statute 16.05.330(c) is clear: “The Board of Fisheries and the Board of Game **may** adopt regulations providing for the issuance and expiration of subsistence permits for areas, **villages**, communities, groups, or individuals as needed for authorizing, regulating, and monitoring the subsistence harvest of fish and game. The boards **shall** adopt these regulations when the subsistence preference requires a reduction in the harvest of a fish stock or game population by non-subsistence users” (emphasis added).

As noted above, on Proposal 210, should this proposal pass, a reasonable opportunity for the community pattern of use, as defined by the Board, will no longer be provided. This suggests that the whole of Unit 13 would need to go back to a Tier II status for moose and caribou. Again, we urge the Board to institute a moratorium on changes to CSH regulations.

Proposal 212—Clarify unit 13 subsistence caribou permit

AITRC **supports** this proposal. The public should be able to have a clear understanding over the conditions associated with the CSH.

Federally-qualified hunters are still limited to one moose per person, whether they take it under state or federal regulations.

Proposal 213—remove the requirement that Tier I caribou hunters have to hunt moose in Unit 13

AITRC **supports** this proposal. In its comments, ADF&G may be correct that there will be more caribou hunters as a result of this proposal passing. However, this proposal will likely ease pressure on moose-hunting in the region, as moose hunters will have the option of hunting outside of Unit 13. From a subsistence standpoint, moose is a more predictable resource for food security because the populations and locations are more consistent from year to year. Large numbers of Copper Basin residents currently must compete with hunters from throughout Alaska for a small number of moose.

The narrow range in which the population objectives fall for Nelchina Caribou Herd management results in a surplus of animals that should be made available for harvest, without the onus of a regulatory requirement that negatively impacts moose population.

In its 2018 comments on a similar proposal (proposal 99), ADF&G made the following observation: "The draw hunt, which now provides up to 5,000 hunters annually an opportunity to hunt Nelchina caribou in Unit 13 without the restrictions on hunting big game throughout the rest of the state, would no longer be necessary." By eliminating the need for drawing-permit hunts for residents, this proposal will reduce regulatory complexity.

**Proposal 214 – eliminate all moose draw hunts in Unit 13**

We **support** Proposal 214 **with modification**, based on a review of the data, **to only eliminate the DM335-DM339 nonresident draw hunts.**

Alaska State law specifies that subsistence uses have priority over other uses of fish and wildlife. As it is, quotas for the CSH are lower than they should be, given that they were adopted based on the eight villages that were originally eligible to participate in the CSH. As a result, nonresident drawing hunt opportunities should not be allowed to continue while Alaska residents are not meeting their needs, and are not realizing the full regulatory season due to frequent early closures.

This modification will still allow for residents to apply for draw permits.

Proposal 215 – Reauthorizing antlerless moose season in 13A

AITRC opposes proposal 215, which would reauthorize the antlerless hunt in 13A. The bull-cow ratio is currently at management objectives. The harvest objective is below the management objective.

Currently, the moose population is estimated at 88 animals above the midpoint of management objectives. However, because we do not know the standard error for this estimate, it is not clear that moose populations are *significantly* above the midpoint of management objectives, as directed by the BOG. There was no reported data on the twinning rates to indicate that the habitat cannot sustain the current population. Environmental factors, such as heavy snow, could easily reduce the population to within or below management objectives within a single year.

It appears that these cow hunts are being used as a tool to keep within the bull-cow ratio while maintaining current levels of bull harvest; if there is no indication that habitat is declining, there should be no actions taken.

Although subsistence is supposed to have priority allocation, there are currently no subsistence hunts for antlerless moose in Unit 13.

Finally, we are concerned that these cow-hunts may create a conservation concern that could result in restrictions on ceremonial moose harvest.

216 – Establish an antlerless season in 13C

AITRC is **opposed** to proposal 216, which would establish an antlerless season in Unit 13C. Although moose are currently above management objectives in Unit 13C, they are still at approximately the proper bull-cow ratio. However, according to the ADF&G Area Biologist, the calf-cow ratio is low (12:100 rather than the objective of 30:100).

Because this would be an antlerless hunt drawing permit, it would only provide for non-subsistence uses. Rather than creating a new antlerless hunt in Unit 13C, the Board should instead increase its any-bull allocation to the Community Subsistence Hunt. This would help to ensure that subsistence needs



are being met, while also addressing any concerns ADF&G may have about moose populations being above management objectives.

There was no reported data on the twinning rates to indicate that the habitat cannot sustain the current population. Environmental factors, such as heavy snow, could easily reduce the population to within or below management objectives within a single year.

It appears that these cow hunts are being used as a tool to keep within the bull-cow ratio while maintaining current levels of bull harvest; if there is no indication that habitat is declining, there should be no actions taken.

217 – Eliminate all draw hunts for caribou in Unit 13

AITRC **supports** this proposal. In 2020, ADF&G closed the Community Subsistence Hunt, failing to provide reasonable opportunity for subsistence. This is despite the fact that the BOG identified in its 2015-2019-BOG finding number 3 to keep the Copper Basin community subsistence caribou hunt open for the entire season or until the community subsistence caribou quota has been met, whichever occurs first. Eliminating non-subsistence opportunities would be a positive step toward meeting these goals.

218 – Increase bag limit for brown bear to 2 per year

AITRC is **strongly opposed** to this proposal. No data have been presented to signify that the population can withstand the harvest of two brown bears per year. The State of Alaska's aerial surveys will be done in 2022. ADF&G, AITRC and Ahtna, Inc. are currently working on a study on bear density that will be completed in 2023.

219 – Add intensive management to 13D

AITRC **supports** proposal 219, which would add intensive management to Unit 13D. This would be an important tool in the toolbox for managers seeking to ensure healthy ungulate populations in the area. Currently there are wolf refugia in both Wrangell St. Elias and Denali national parks. As a result, there are plenty of places in the broader landscape for wolf populations to remain strong. There are also areas within 13D that provide refugia as it is difficult to access via plane.

220 – Close moose and wolf hunting in 13A

AITRC **strongly opposes** proposal 220, which would close all moose and wolf hunting in unit 13A. There are triggers for when intensive management happens. Currently population, harvest, and bull-cow-ratio are all within management objectives. Moreover, this would close down the community subsistence hunt and take away subsistence opportunity.

This proposal would simply shift hunting to other areas, causing hunting pressure to increase in those areas.

221 – Align otter and beaver trapping seasons

AITRC **opposes** proposal 221, which would align otter and beaver trapping seasons. Otter pelts are not good as late in the season as are beaver pelts. Additionally, otters are already carrying and having kits at this time of year. As a result, this proposal could impact otter production.



222 – Extend ptarmigan season and reduce bag limit

AITRC **opposes** and sees no reason to adopt proposal 222, which would extend the ptarmigan hunting season and reduce the bag limit. Ptarmigan seasons were just changed during the last regulatory cycle for conservation reasons. It is important to keep the seasons consistent, rather than changing them every three years.



To members of the Alaska Board of Game:

On behalf of the shareholders of Ahtna, Incorporated ("Ahtna"), we are submitting the following comments on select proposals in the Board of Games' 2020-2021 Proposal Book and 2021-2022 Supplemental Proposal Book.

Proposal 51 - Expand the DI454 bison hunt area in Unit 11

We oppose Proposal 51. We are concerned that this could increase trespass on Ahtna lands. One of the primary reasons for the closure that we instituted was the State of Alaska's lack of consultation with us when opening new lands to hunting. We have yet to be consulted concerning this closure and we oppose hunting within rights-of-way through Ahtna lands.

This hunt would not represent a customary or traditional use of the resource, as bison were introduced to the area only recently. They were introduced at a very low number, are continuing to grow and are expanding into different ranges. There would be ecological benefits to having more bison on the land, such as creating disturbance on the land and allowing for more willow and spruce growth.

ADF&G has never done a study to determine the number of bison on the landscape. As a result, we do not see the need for the increased harvest that ADF&G has indicated.

Proposal 52 - Repeal the "pre-2018" caribou hunting regulations for Unit 13

We support this proposal. It is a housekeeping proposal that will make the regulations more current by removing pre-2018 language.

Proposal 53 – Increase the community subsistence caribou hunt allocation in Unit 13

We support this proposal to increase the number of caribou allotted for the state Community Subsistence Hunt ("CSH") to 500, accommodating for the additional demand by a larger number of hunters participating in the CSH.

Managers have often stated that the CSH never reaches its quota. However, they have repeatedly failed to provide participants in the CSH the opportunity to reach the quota. In 2020, ADF&G closed the CSH after only 178 caribou had been harvested – less than 5% of the total Unit 13 harvest (4,038 animals). 50 groups, representing a combined total of 818 permits, vied for these 178 animals. This indicates a failure to provide a reasonable opportunity for a normally diligent hunter to participate with a reasonable expectation of success, according to 5 AAC 16.05.258(f).

The CSH should have its own quota and should not close until that quota is met for both moose and caribou. Board finding number 2015-209-BOG states: "Keep the Copper Basin community subsistence hunt open for the entire season or until the Copper Basin community subsistence caribou quota has been met, whichever occurs first." ADF&G has failed to follow this direction from the BOG. While Board finding number 2019-223-BOG does not speak to keeping the CSH open throughout the entire season. We believe that the 2019 finding should be revised to reflect the 2015 finding – the CSH should remain open throughout the season or until its quota is met.



Regulatory language for the CSH states that "up to 400 animals may be taken." ADF&G managers have provided an allocation of as few as 200 animals in some years. Because of this under allocation, and the fact that they have shut down the hunt before this reduced quota has been reached, ADF&G has not truly been following the intent of the BOG's allocative decisions. Closing the CSH before its quota has been met represents, again, a failure to provide priority for subsistence uses of wildlife.

ADF&G should be closing sport hunts early, not the CSH. In 2021, the ADF&G closed the draw-hunts only a few days before they closed the CSH. See Emergency Order issued January 20, 2021, closing the Nelchina Caribou Subsistence Hunt. That same year, Nelchina caribou harvest quota was determined to be 1,600 caribou and yet 10,251 permits were issued. While this includes 2,250 drawing permits, the question is raised as to whether 8,000 Alaska residents attempting to harvest less than 1,600 caribou presents a reasonable opportunity for a normally diligent subsistence hunter to harvest with a reasonable expectation of success.

Proposal 54 – Increase the youth hunting season for caribou in Unit 13

Ahtna opposes Proposal 54. Youth can hunt with their parents during regular hunting seasons just as people have done for generations.

While we are aware of the statutory requirement that the BOG provide youth hunt opportunities (AS 16.05.255(i)), we feel that there are already adequate youth hunt opportunities currently available in the region. We do not feel this proposal should be passed because it is a non-subsistence drawing hunt. The current demand cannot support adding additional non-subsistence hunts while subsistence hunts have been closed prior to the subsistence season end dates and prior to harvest allocations being met.

Winter hunts are more difficult and less likely to be successful as most caribou are migrated out of Unit 13 during these months. Much of the point of youth hunts is to provide kids with positive opportunities that will entice them into further participation in hunting activity. Having a youth winter hunt seems misplaced.

Proposal 55 – Open registration goat hunt for residents in Unit 13

Ahtna opposes Proposal 55. Goats found in Unit 13A are likely found in the Sheep Mountain area which is closed to hunting. We support keeping this area closed to goat hunting.

Proposal 56 - Extend the general season for moose by bow and arrow only for residents and nonresidents within Unit 11, remainder

We oppose Proposal 56. By September 25th, moose are in full rut and are not good to eat. Bow hunters can hunt during the regular season. Unit 11 is not high-traffic and is not particularly competitive, so there should be plenty of opportunity for bowhunting.



Proposal 57 – Establish a registration hunt for bull moose open to certified bowhunters only within Unit 11, remainder

We oppose Proposal 57 for similar reasons to Proposal 56. This hunt proposes to create a special season from September 21-30, when the moose are in full rut. For this reason, this proposal could easily result in more meat being wasted. Again, Unit 11 presents many opportunities for bowhunting during the regular season.

Additionally, we are concerned that this proposal could disrupt the federal sheep hunting opportunity to provide customary and traditional use to elders and youth.

Proposal 58 - Reauthorize the antlerless moose seasons in Unit 13

We oppose Proposal 58. Unit 13A currently has no surplus of moose; the population is currently within ADF&G's management objectives. If exceeding management objectives becomes an issue, ADF&G can submit a similar proposal at a future time. Reauthorizing this hunt will result in cows being harvested, which could likely destabilize the population.

These drawing hunts for cows do not provide for subsistence opportunities. One bad winter can bring the population down.

Proposal 59 - Increase the community subsistence any bull moose hunt allocation in Unit 13

We support Proposal 59, increasing the number of moose allotted for the state Community Subsistence Hunt ("CSH") to 150 to accommodate for the additional demand by a larger number of hunters participating in the CSH.

When the CSH was established, participation was limited to residents of eight Ahtna communities. The quota of 100 moose was intended to reflect the subsistence needs of these communities, specifically. The 2010 Manning v. State court decision required that all Alaska residents be afforded the opportunity to form community groups eligible for participation in the CSH. Today, a majority of the moose harvests in this hunt are by urban residents. Increasing the quota would reflect the larger population base that the hunt is now serving.

Proposal 60 – Create a registration archery only hunt for bull moose in Unit 13

We oppose Proposal 60 for similar reasons to Proposals 55 and 56. During the September 25th to October 15th period, moose are in full rut. Bowhunters can hunt during the regular season. This proposal would extend the moose season, which could make it more difficult to maintain populations at management-objective levels.

As the Alaska Supreme Court noted, "Exclusive or special privileges to take fish and wildlife are prohibited." *McDowell v. State*, 785 P. 2d 6 (Alaska 1989). The bowhunters here appear to be requesting a special privilege that other groups of Alaska hunters do not have.



This proposal also involves a non-subsistence request for any-bull moose allocation in Unit 13. These moose must instead be allocated to the CSH, which is a management priority over any sport hunt. Any-bull moose opportunities are limited to Tier II applications, which identifies those who are most customarily and traditionally dependent on the resource. There are already too few any-bulls available to meet priority subsistence needs.

There is plenty of opportunity to have an archery-only hunt within non-subsistence areas, near highly populated areas.

Creating this hunt could disrupt the moose while they are in rut and actively breeding.

Proposal 61 – Establish a drawing permit hunt for bull moose limited to resident certified bowhunters only within Unit 13E

We oppose Proposal 61, which would create a draw hunt for bowhunters from September 1-20. There is plenty of opportunity for bowhunting under general harvest.

Like Proposal 60, this proposal involves a non-subsistence request for an any-bull moose allocation in Unit 13. These moose must instead be allocated to the CSH, which is a management priority over any sport hunt.

Proposal 62 – Establish an antlerless moose season in Unit 13E

Ahtna opposes Proposal 62. The bull-cow ratio currently meets management objectives and the harvest objective is below management objectives.

Currently, the moose population is estimated at approximately 11 animals above management objectives. However, because we do not know the standard error for this estimate, it is not clear that moose populations are significantly above management objectives.

Environmental factors, such as heavy snow, could easily reduce the population to within or below management objectives within a single year. Additionally, there is the potential for more train fatalities.

Based on the seasons specified in this proposal, it is extremely likely that the targeting of cows will occur. From a conservation standpoint, one challenge with antlerless hunts is that some of the cows that are killed may be pregnant, effectively increasing the impact of these harvests on the following year's moose population. Cows harvested may also have calves with them, the killing of which would orphan the calves.

Although subsistence is supposed to have priority allocation, there are currently no subsistence hunts for antlerless moose in Unit 13.

Finally, we are concerned that these cow-hunts may create a conservation concern that could result in restrictions on ceremonial moose harvests.



Proposal 63 - Eliminate the restrictions of one harvest report per household and one bag limit per household in the community subsistence hunt for Unit 13

We support Proposal 63, as it will help provide for the subsistence priority established in Alaska's statutes. The current regulations effectively preclude multiple members of the same household from hunting simultaneously in different places, because only one permit is issued for the entire household. Caribou are only present at certain places and at certain times. Allowing only one household member to hunt at a time severely limits community harvest opportunity.

One caribou is not enough for many households, especially considering the well-documented patterns of sharing and redistribution that typically accompany subsistence uses of fish and wildlife, as recognized by the Board in community harvest hunts. In other words, a caribou harvested by one participating household may well end up feeding four or five other households. This is the nature and spirit of the CSH - it is intended to be a collective endeavor in which community members work together to harvest and process animals, based on the needs of the community as a whole.

ADF&G comments note that this regulatory change would give the CSH a higher per-household bag limit than in Tier I hunts. Again, this reflects a community pattern of use, rather than the household pattern of use that the Tier I hunts are designed to provide.

Currently, the restriction of CSH permits limiting one per household does not support the community pattern of use the Board is trying to provide because ADF&G research has demonstrated, over the past four decades, that on average in rural Alaska, 30% of a community's households harvest 70% of the wild foods used by that community. Therefore, participants in the community hunt should not be limited to one bag limit per household.

This proposal would not increase the allocation or quota for the CSH, and thus would place no extra conservation burden on the resource.

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 & Proposal 65 – Eliminate the moose hide salvage requirement for hunters aged 62 years and older participating in the community subsistence moose hunt in Unit 13 and make it optional

We support Proposals 64 and 65 with a modification requiring that the entire hunting party be over the age 62 for the hide salvage requirement to be optional. We also suggest clarifying that these proposals should apply only to hunters who are actually participating in the hunt, regardless of who holds the tags for them.

This would give those hunters that are older, and who do not have younger hunters in their parties or do not have access to ATVs, the opportunity to leave hides in the field. This would eliminate a potential barrier that is likely to disproportionately discourage elders from participating in this hunt. As ADF&G points out in its comments, it is true that traditionally, multi-generational family groups went out hunting, working together to pack the meat and other animal products back. While many CSH participants still reflect this traditional demographic pattern, it is also the case that some elders hunt



alone, or in groups with other elders. It is important that subsistence regulations should strive to reflect the flexibility and adaptability of tradition in the modern world.

Proposal 66 – Clarify the Unit 13 Tier I subsistence caribou permit condition that members in a household may not hunt caribou or moose in any other state hunts in other locations.

We support Proposal 66. See comments on Proposal 212.

Proposal 67 – Change the salvage requirements for sheep taken in Unit 11

Ahtna supports Proposal 67, with a modification to exempt the ribs from these proposed salvage requirements. In contrast to the front legs and hindquarters, ribs do not have very much meat on them but are quite bulky and heavy. It would be reasonable to require that the quarters remain on the bone, while allowing that the ribs be left in the field once any reasonably salvageable meat has been gleaned off them.

Proposal 68 – Extend the general season for brown bear by bow and arrow only for residents and nonresidents within Unit 11

We oppose Proposal 68. There are plenty of opportunities to hunt brown bears under the current season. Unit 11 is not a high-traffic area and is not particularly competitive, so there should be plenty of opportunity for bowhunting.

Neither brown bear hides nor meat are desirable during this time period, so the purpose of this hunt is unclear.

In the lower 48, special seasons for bowhunters reflect the fact that in most states, hunters are required to wear safety orange during the general season—something that is highly undesirable to bowhunters. In Alaska, there is no such requirement—bowhunters can wear full camouflage during the general season. Thus, there is no need for a special, separate season for bowhunters.

Proposal 69 – Increase the bag limit for brown bear in Unit 13

Ahtna opposes this proposal due to potential impacts on an ongoing research project. Ahtna is currently partnering with AITRC and the ADF&G on a population density study to fill significant data gaps on brown bears in Unit 13. While we are certain there are more bears than originally estimated, they are not done with the study – increasing the bag limit could have an impact on the study results. This collaborative study will produce a population abundance estimate by the next regulatory cycle to better inform the Board in addressing proposals such as this in the future.

It is imperative that Ahtna and its partners have two additional years to complete this study. We would not necessarily oppose this proposal if proposed again during the next regulatory cycle.



Proposal 70 – Open a fall baiting season in Unit 13 for brown and black bear

Ahtna opposes Proposal 70. People are out in the woods hunting during this time of year. Bait-stations are not public knowledge, so there would be no way for the public to know where they are to avoid them. Bait-stations and the bears they attract could present a significant hazard to hunters.

Proposals 71-73 – Extend the wolverine hunting and trapping seasons in Unit 13

Ahtna supports Proposals 71-73, which would extend the wolverine season until the end of February for both hunting and trapping. We believe this would benefit local trappers by providing them with additional harvest opportunity. Often, snow conditions are not good for trapping until late in the season. This would also contribute to regulatory consistency within the broader region.

At the very least, trappers should be able to retain incidental harvest, and should not be cited for it.

Proposal 74 – Limit motorized access during the community subsistence moose hunt in Unit 13

Ahtna opposes Proposal 74, which would restrict motorized access to the Community Subsistence Hunt (“CSH”) in Unit 13. Although the proposers point out that motorized transportation may give a larger advantage to nonlocal hunters, a majority of locals also depend on motorized transportation for access to the CSH. Restricting motorized access will have the effect of restricting subsistence opportunity. Although competition between urban and non-urban users may be a concern in the CSH, a larger concern is the fact that, several times in recent years, the hunt has been closed before meeting its allocation. Imposing this kind of restriction would make the CSH more restrictive than some sport hunts in Unit 13, going against the spirit of Alaska's subsistence priority law.

By limiting motorized access, any-bull opportunities are reduced. Adopting this proposal could lead to eliminating the CSH.

Proposal 75 – Close the Tokositna State Recreation Area in Units 13E and 16A to the use of airboats for hunting

Ahtna supports Proposal 75. Airboats are very noisy and disruptive and can be heard for many miles.

Proposal 76 – Extend the ptarmigan season and the lower bag limit in Unit 13 B and 13E

Ahtna opposes Proposal 76. We are not aware of any conservation concerns that would justify such a change. Ptarmigan seasons were just changed during the last regulatory cycle for conservation reasons. Ptarmigan seasons and bag limits should remain consistent as much as possible and should not be subject to constant regulatory changes.



Proposal 77 – Open a youth-only hunt for ptarmigan in Unit 13, August 10-24

Ahtna opposes Proposal 77. Small game animals such as ptarmigan tend to be oriented toward youth participation already. Youth have ample opportunity to participate in the regular ptarmigan season. Competition is not a major factor in ptarmigan hunting in this area. This proposal would restrict opportunity for adult hunters by setting back the season start-date from August 10th to August 25th.

ADF&G is already providing ample opportunity for youth hunts. The statutory requirement to establish youth hunts in AS 16.05.255(i) pertains only to big game other than bison and musk ox. There is no requirement to provide youth hunts for small game.

Proposal 197 – Reauthorize the brown bear tag fee exemption for the Central/Southwest Region

Ahtna supports this proposal, as it would remove some of the barriers to participation in brown bear harvest. Brown bear populations are currently healthy and we are not aware of any conservation concerns that this proposal would negatively impact.

Proposal 198 – Eliminate bear baiting or prohibit bear bait stations within 50 miles of cabins

Ahtna strongly opposes Proposal 198. The proposal would amount to a de facto ban on bear-baiting in Unit 13, and the proposer says as much in the proposal: "Anyway, I propose we do away with bear-baiting."

Proposal 199 – Prohibit trapping within 50 yards of a multi-use trails and trailheads in Units 13, 14, and 16

Ahtna opposes Proposal 199. The proposal lists nearly 50 multi-use trails in Unit 13 alone. Combined, this would amount to a significant restriction on trapping within some of the parts of Unit 13 with the best access.

Trappers do a significant amount of maintenance on these trails. Many well-established trails, including the multi-use trails cited in this proposal, started off as trapping trails.

Trapping is a customary and traditional activity that this proposal would unduly restrict. There is already a decreasing number of people trapping, and this proposal may further discourage the activity.

Proposal 209 – Modify the Copper River bison harvest opportunity in Units 11 and 13D

Ahtna strongly opposes Proposal 209, which would expand the bison hunt in units 11 and 13D. We cannot find any studies that have been conducted to address the issue of the carrying capacity of the Tonsina bison herd, or that otherwise would support an increase in harvest. For instance, a moderate amount of nutritional stress may be beneficial to the bison population, as it may push them to expand their range into new areas.



There is concern about increased trespass on native corporation lands that adjoin the proposed area. Ahtna and Chitina Native Corporation were never consulted about this proposal.

The bison hunt is a drawing permit hunt and is not customary or traditional.

Proposals 210 – Eliminate the community subsistence harvest moose hunts in Unit 13

Ahtna opposes this proposal to eliminate the Community Subsistence Hunt (“CSH”). While the inclusion of groups of all Alaskan residents has resulted in many more people participating in this CSH than originally anticipated, this opportunity is consistent with the community customary and traditional use pattern identified by the BOG in 2006 and 2011. The BOG recognized that the community-based pattern of subsistence hunting originated with the Ahtna-Athabascan communities in the region and was adopted later by other Alaska residents. The CSH provides an important opportunity for Alaskans to meet their subsistence needs. Elimination of the community harvest system for moose would result in the lack of a reasonable opportunity for customary and traditional uses as defined by the BOG.

If the CSH were eliminated, the only other viable option would be to return to Tier II status for all of Unit 13.

Rather than eliminating the CSH, ADF&G should review groups participating in the hunt to ensure that they are consistent with the regulatory definition of “community” (as defined in 5 AAC 92.072(i)(2)).

Subsistence needs for customary and traditional users of the resource are not being met. According to the Area Biologist's report at the Copper Basin AC meeting, moose populations are currently within their management objectives.

The CSH any-bull harvest has represented only 9-11% of the total harvest since 2015. Since 2009, the CSH any bull quota (100 moose) has only been met two times (2016 and 2017).

Proposal 211 – Repeal the Copper Basin area community subsistence harvest hunt area for moose and caribou & Proposal 244 – Eliminate all community subsistence harvest hunts

Ahtna opposes Proposals 211 & 244.

Unfortunately, Proposal 211 submitted by the Alaska Outdoor Council contains much misinformation, which appears to be focused on soliciting further opposition to the state community hunts. In this era where “alternative facts” and falsehoods are commonly deployed to advance political agendas, the Ahtna Intertribal Resource Commission seeks to clarify the actual facts associated with the state community harvest hunts.

State and federal community harvest systems recognize in regulations the customary and traditional patterns of harvest and use that have been validated consistently through several decades of scientific research. ADF&G research demonstrates that in rural Alaskan communities, on average 30% of a community's households often provide 70% of a total communities' wild food harvests (see ADF&G's pamphlet, “Alaska's Economies and Subsistence”). We understand that for whatever reasons, the fact that these well-documented community patterns of hunting, fishing, harvesting, and sharing are quite



different than the prototypical Euro-American focus on individualism where one hunter hunts one bag limit for one family's uses with one individual permit, both the Alaska Legislature and the US Congress recognized that community patterns of use also exist and should be reflected in state and federal subsistence regulations.

The Alaska Outdoor Council, and by association their litigation funding organization, "The Alaska Fish and Wildlife Conservation Fund," state that the Board of Game's actions to provide a community hunt for moose and caribou in the Copper Basin were found to be unconstitutional.

However, this is not true. In 2018, the Alaska Supreme Court ruled:

"We upheld the bifurcated hunt system on the basis that the community harvest permit system applied equally to all Alaska citizens and thus did not implicate equal protection or the equal access clauses...and was not a sufficient bar to access to implicate constitutional rights" *Manning v. State Dep't of Fish & Game*, 420 P.3d 1270, 1279 (Alaska 2018) (citing *Alaska Fish & Wildlife Conservation Fund v. State*, 347 P.3d 97, 102-03 (Alaska 2015)).

The Alaska Supreme Court continued:

"We reiterated this holding a few months later in *Manning II*. In that case, we expressly rejected Manning's argument 'that the community harvest permit eligibility criteria are unconstitutional' under the equal protection and equal access clauses, noting that 'we [had] upheld the constitutionality of these criteria in *AFWCF*.'" *Manning v. State Dep't of Fish & Game*, 420 P.3d 1270, 1280 (Alaska 2018).

The Alaska Supreme Court relied on an earlier case filed by the Alaska Fish and Wildlife Conservation Fund (AFWCF), otherwise referred to in 2015 court documents as "The Fund." In 2015, the Alaska Supreme Court ruled,

"The Fund argues that the community harvest permit system is unconstitutional because it creates classifications that result in disparate treatment of Alaskans who are otherwise similarly situated. The superior court rejected this argument, reasoning that '[a]ny Alaskan is eligible to participate in either opportunity [i.e., the individual hunt or the community harvest] by complying with the regulatory requirements for each.' We agree." *Alaska Fish & Wildlife Conservation Fund v. State*, 347 P.3d 97, 102 (Alaska 2015).

The State of Alaska's subsistence priority statute (AS 16.05.258) obligates the Alaska Board of Game to provide for reasonable opportunities for customary and traditional uses of moose and caribou in the Copper Basin. The state's statutory obligations may not be met simply by relying on fundamentally different federal subsistence hunting opportunities that are limited to federally qualified rural residents, especially given that there are relatively few federal lands in Unit 13 (approximately 12% according to OSM staff analysis on WSA20-03, p. 4), and federal opportunities are limited to only certain federal public lands in the area involved with the community subsistence harvest hunt area regulations.

The proponent's contention that the original request to the BOG to create a community subsistence harvest hunt area on state lands is now achieved through the newly established federal community



harvest system on federal public lands is incorrect as outlined above. The BOG has separate obligations under state law to provide a reasonable opportunity for subsistence, and the BOG has appropriately determined that the CSH is necessary to meet that obligation.

The proponent misleadingly states that the federal subsistence management program “...allows for Ahtna Intertribal Resource Commission (AITRC) to achieve their goal of exclusive community member moose and caribou hunts on federal lands in Units 11, 12, and 13.” That is also false. The newly established federal community harvest system is open to all eligible federally qualified rural residents living in the Census Designated Places surrounding the eight Ahtna communities and provides the same opportunities already available to those qualified rural residents under the individual federal caribou and moose hunting permits. Finally, as clarified above, the BOG must adhere to the state subsistence law found in AS 16.05.258 and cannot ignore their obligations to provide reasonable opportunities for customary and traditional uses by relying on different opportunities provided by the Federal Subsistence Board.

Alaska Statute 16.05.330(c) is clear: “The Board of Fisheries and the Board of Game may adopt regulations providing for the issuance and expiration of subsistence permits for areas, villages, communities, groups, or individuals as needed for authorizing, regulating, and monitoring the subsistence harvest of fish and game. The boards *shall* adopt these regulations when the subsistence preference requires a reduction in the harvest of a fish stock or game population by non-subsistence users” (emphasis added).

As noted above, if the BOG adopts Proposals 211 or 244, a reasonable opportunity for the community pattern of use, as defined by the Board, will no longer be provided. This suggests that the whole of Unit 13 would need to go back to a Tier II status for moose and caribou, worsening the user conflicts in Unit 13.

Proposal 212 - 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

Ahtna supports this proposal. The public should be able to have a clear understanding over the conditions associated with the CSH.

Federally qualified hunters are still limited to one moose per person, whether they take it under state or federal regulations.

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

Ahtna supports this proposal. In its comments, ADF&G may be correct that there will be more caribou hunters because of this proposal passing. However, this proposal will likely ease pressure on moose hunting in the region, as moose hunters will have the option of hunting outside of Unit 13. From a subsistence standpoint, moose are a more predictable resource for food security because the populations and locations are more consistent from year to year. Large numbers of Copper Basin residents currently must compete with hunters from throughout Alaska for a small number of moose.



The narrow range in which the population objectives fall for Nelchina Caribou Herd management results in a surplus of animals that should be made available for harvest, without the onus of a regulatory requirement that negatively impacts moose population.

In its 2018 comments on a similar proposal (Proposal 99), ADF&G made the following observation: "The draw hunt, which now provides up to 5,000 hunters annually an opportunity to hunt Nelchina caribou in Unit 13 without the restrictions on hunting big game throughout the rest of the state, would no longer be necessary." By eliminating the need for drawing-permit hunts for residents, this proposal will reduce regulatory complexity.

Proposal 214 – Eliminate all moose drawing permit hunts in Unit 13

We support Proposal 214 with modification, based on a review of the data, to only eliminate the DM335-DM339 nonresident draw hunts.

Alaska State law specifies that subsistence uses have priority over other uses of fish and wildlife. As it is, quotas for the CSH are lower than they should be, given that they were adopted based on the eight villages that were originally eligible to participate in the CSH. As a result, nonresident drawing hunt opportunities should not be allowed to continue while Alaska residents' needs are not being met and are not realizing the full regulatory season due to frequent early closures.

This modification will still allow for residents to apply for draw permits.

Proposal 215 – Reauthorize the antlerless moose seasons in Unit 13A

Ahtna opposes Proposal 215. The bull-cow ratio is currently at management objectives. The harvest objective is below the management objectives.

Currently, the moose population is estimated at 88 animals above the midpoint of management objectives. However, because we do not know the standard error for this estimate, it is not clear that moose populations are *significantly* above the midpoint of management objectives, as directed by the BOG. There was no reported data on the twinning rates to indicate that the habitat cannot sustain the current population. Environmental factors, such as heavy snow, could easily reduce the population to within or below management objectives within a single year.

It appears that these cow hunts are being used as a tool to keep within the bull-cow ratio while maintaining current levels of bull harvest; if there is no indication that habitat is declining, there should be no actions taken.

Although subsistence is supposed to have priority allocation, there are currently no subsistence hunts for antlerless moose in Unit 13.

Finally, we are concerned that these cow hunts may create a conservation concern that could result in restrictions on ceremonial moose harvests.



216 – Establish an antlerless season in Unit 13C

Ahtna is opposed to Proposal 216. Although moose are currently above management objectives in Unit 13C, they are still at approximately the proper bull-cow ratio. However, according to the ADF&G Area Biologist, the cow-calf ratio is low (12:100 rather than the objective of 30:100).

Because this would be an antlerless hunt drawing permit, it would only provide for non-subsistence uses. Rather than creating a new antlerless hunt in Unit 13C, the Board should instead increase its any-bull allocation to the Community Subsistence Hunt. This would help to ensure that subsistence needs are being met, while also addressing any concerns ADF&G may have about moose populations being above management objectives.

There was no reported data on the twinning rates to indicate that the habitat cannot sustain the current population. Environmental factors, such as heavy snow, could easily reduce the population to within or below management objectives within a single year.

It appears that these cow hunts are being used as a tool to keep within the bull-cow ratio while maintaining current levels of bull harvest; if there is no indication that habitat is declining, there should be no actions taken.

217 – Eliminate all caribou drawing permit hunts in Unit 13

Ahtna supports this proposal. In 2020, ADF&G closed the Community Subsistence Hunt, failing to provide reasonable opportunity for subsistence. This is despite the fact that the BOG stated in its 2015-209-BOG finding to keep the Copper Basin community subsistence caribou hunt open for the entire season or until the community subsistence caribou quota has been met, whichever occurs first. Eliminating non-subsistence opportunities would be a positive step toward meeting these goals.

218 – Increase bag limit for brown bear in Unit 13

Ahtna is strongly opposed to this proposal. No data have been presented to signify that the population can withstand an increase in the bag limit to two brown bears per year. The State of Alaska's aerial surveys will be done in 2022. ADF&G, AITRC and Ahtna are currently working on a study on bear density that will be completed in 2023.

219 – Modify the Unit 13 predation control program

Ahtna supports Proposal 219, which would add intensive management to Unit 13D. This would be an important tool for managers seeking to ensure healthy ungulate populations in the area. Currently there are wolf refugia in both Wrangell St. Elias and Denali National Parks. As a result, there are plenty of places in the broader landscape for wolf populations to remain strong. There are also areas within 13D that provide refugia as it is difficult to access via plane.



220 – Close moose and wolf hunting within Unit 13A

Ahtna strongly opposes Proposal 220. There are triggers for when intensive management happens. Currently, population, harvest, and bull-cow-ratio are all within management objectives. Moreover, this would close the Community Subsistence Hunt and take away subsistence opportunity.

This proposal would simply shift hunting to other areas, causing hunting pressure to increase in those areas.

221 – Align otter and beaver trapping seasons in Unit 13

Ahtna opposes Proposal 221. Otter pelts are not as good as late in the season as beaver pelts are. Additionally, otters are already carrying and having kits at this time of year. As a result, this proposal could impact otter production.

222 – Align the ptarmigan hunting season for all of Unit 13 and reduce the bag limit to five per day

Ahtna sees no reason to adopt Proposal 222. Ptarmigan seasons were just changed during the last regulatory cycle for conservation reasons. It is important to keep the seasons consistent, rather than changing them every three years.

Respectfully,

A handwritten signature in black ink, appearing to read "Nicholas Jackson".

Nicholas Jackson, Chair
Customary & Traditional Committee
Ahtna, Incorporated



2021-2022 Board of Game Proposals: Proposal 199

Alaska Frontier Trappers Association opposes Proposal 199 and requests that the Board of Game reject this proposal for the following reasons:

1. Proposal 199 is political stunt by the Alaska Wildlife Alliance, who submitted this proposal. This organization has published their goals of ecosystem wildlife management, which are in direct opposition to the constitutionally protected rights of all Alaskans according to the Alaska Constitution-Section VIII. We believe this poorly concealed attack on Alaskan voters is based on an intentionally false premise of protecting people and pets.
2. This proposal is asking for changes to trapping regulations for the purpose of protecting people and pets without demonstrating the risk trapping activities pose. The entire justification for limiting trapping is centered around the risk trapping poses. There is an obvious lack of evidence and analysis completed by the author of this proposal to demonstrate that trapping activities somehow increase the risk to other trail users versus another user group. Of the five examples of pet / trap conflict provided, three were not even on the list of trails in this proposal so this proposal would be ineffective at minimizing these unfortunate events. Also, there is no mention whether these animals were on or off a leash at the time of the incidents. Leashes have been proven to minimize trapping related conflict. Allowing off leash animals to roam would negate the benefit of this proposal and is in violation of borough code in some areas. The person / snare conflict is in an area where there are 100s of, often narrow, trails winding through gravel bars and woods with no clear path, adjacent to the Kink River. This area is frequented by 100s of motorized trail users and numerous non-trapping related accidents occur in this area every year due to collisions with vegetation, other motorized users and the terrain itself. Overall, the examples provided lack details and are skewed to promote an agenda. We consider the entire premise false and manipulative.

There is always risk associated with recreating in remote and semi-remote areas of South-Central Alaska, especially in the Winter. Alaska Frontier Trappers Association's position is that trapping activities have a positive impact on outdoor safety simply because of the increased likelihood of a trapper coming along to assist people stranded, lost, or otherwise in trouble in these remote areas. We can provide numerous accounts of this very occurrence. Trappers are the reason many trails in Alaska exist and continue to be maintained. Trappers also continue to be a safety net for many "recreational" users of these trails as they are often the first responders to accidents on recreational trails. While recreationalists may travel a trail or two, a few times a year; trappers are traveling these trails day-in and day-out throughout the winter. Trappers and trapping activity reduce the overall risk for others recreating on trails in South-Central Alaska.

3. The proposal is a thoughtless approach to restricting trapping along miles of trails in South-Central Alaska. By the Alaska Wildlife Alliance's own admission, the included list of trails was pulled directly from the Matsu Boroughs trail planning list. They provided no consideration of the frequency the public is using these trails, unbiased surveys, or any detailed analysis on the

types of public user groups on specific trail sections where pet / trap interactions are claimed to be occurring. For example, one trail listed (13A, Crosswind Trail System) in this proposal is pictured here on January 1, 2022.



An Alaska Frontier Trappers Association member has been the only user of this trail since the snow fell in November 2021. He is trapping along a portion of this trail. Claims that these are frequently used during the trapping season by multiple users is clearly not accurate along all the trails listed. Without additional unbiased research on trail-use and frequency of pet /trap interactions, justifying the inclusion of over 200 trails in South-Central Alaska into this trapping restriction proposal presented by the Alaska Wildlife Alliance is not in the best interest of Alaskans or of wildlife.

4. Enforcement issues: If this regulation is adopted, the Board of Game will be asking trappers and Wildlife Enforcement Officers to measure from an unknown point. These trails are like watercourses and frequently move back and forth along a general route of travel. Many of them are unmarked or infrequently marked so trappers and Wildlife Troopers would have to guess how far 50 yards is from the trail edge. If the packed portion of the trail moves over the course of the Winter (i.e., in open areas), the trapper could be at fault unless they are constantly measuring and adjusting trap locations based on infrequent traffic. The trappers only option would be to move well beyond 50 yards or forgo trapping along the trail entirely. This unjustified burden would be placed on Wildlife Troopers and Trappers due to the possibility that



another recreationalist many decide to use the trail (frequently packed and maintained by the trappers themselves) during the course of the winter.

5. **Ignorance of Wildlife Behavior and Trapping Techniques:** This proposal also demonstrates the lack of understanding regarding wildlife in general and of trapping techniques in South-Central Alaska. As the snow depth increases, wildlife frequently follow packed trails in the snow created by trappers and other recreational users. This is especially true of predatory furbearers. Moving traps and snares 50 yards off the path of travel on many remote trails will impact the trapper's ability to effectively harvest these animals without the use of large amounts of bait or lure to draw animals off the primary trail. These baits and lures will also draw non-target catches such as pets from trails as well. This negates the purpose for this regulation in the first place.

Conclusion: Proposal 199 unfairly prohibits one trail user group over a claim that they negatively impact other users. The proposal indicates that all forms of trapping create safety hazards along multi-use trails which is just not true. The proposal also lacks evidence and is full of ulterior motives. The very definition of multi-use trails means that many methods of travel and types of activities occur on these trails. Restricting trapping based off an opinion and unsubstantiated claims is not an effective management practice. This proposal should be promptly rejected. Alaska Frontier Trappers Association believes that educating both trappers and outdoor recreationalists is the best way to minimize conflict. This will provide opportunities to all Alaskans to enjoy and benefit from the great outdoors!



Submitted By
Rod Arno
Submitted On
1/7/2022 2:00:54 PM
Affiliation
Alaska Outdoor Council

Phone
(907) 841-6849
Email
rodarno@gmail.com
Address
310 K Street, Suite 200
Anchorage , Alaska 99501

The Alaska Outdoor Council written position on select Board of Game proposals for the Central&Southwest Region.

Proposal 198. Oppose.

Proposal 199. Oppose

Proposal 201. Support

Proposal 23. Support

Proposal 32. Oppose

Proposal 211. Support. Don't make it where you have to have 24 other folk in your group to have a responsible opportunity to hunt an any bull moose in GMU 13. Sharing is a hunting tradition.

Proposal 217. Oppose.

Proposal 214. Oppose

Proposal 62. Support

Proposal 75. Oppose

Proposal 224. Support with amendment. Reduce the up to harvest of antlerless moose to 1,000.

Proposal 226. Support. It's still only up to language, the department can stop whining.

Proposal 86. Support. Correcting this all wrong will help with future Dall sheep allocation.

I will be available to attend the board meeting should board members have any questions. Thank you for your time and contributing to the state's regulatory process of harvesting game.

Rod Arno. Alaska Outdoor Council



Submitted By
Thor Stacey
Submitted On
1/7/2022 4:08:06 PM
Affiliation
Alaska Professional Hunters Association

Phone
907 723 1494
Email
thorstacey@gmail.com
Address
PO Box 211231
Auke Bay, Alaska 99821

January 7, 2022

Dear Alaska Board of Game Members,

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

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

APHA commissioned its first socioeconomic report with the McDowell Group in 2014, titled *"Economic Impacts of Guided Hunting in Alaska."* More recently (2019), APHA partnered with Dallas Safari Club to add to and update McDowell's 2014 seminal work. *"The Economic Importance of Hunters Visiting Alaska; Alaska's Guided Hunting Industry 2019"* provides new information on funding for conservation that our visiting clients contribute to wildlife management. Guiding hunters is primarily an activity that occurs in rural areas of Alaska.

<ul style="list-style-type: none">91.8 Million total economic output (2019)	<ul style="list-style-type: none">57.4 Million new dollars to Alaska (2019)
<ul style="list-style-type: none">59% of guide industry spending occurs in rural areas (2019)	<ul style="list-style-type: none">1,380 people directly employed, total employment with multipliers; 1,890 (2019)
<ul style="list-style-type: none">85% Active Guides are AK Residents (2019)	<ul style="list-style-type: none">Visiting hunters (guided & non-guided) purchase 14% of total Alaska hunting licenses (2019)
<ul style="list-style-type: none">Guided hunters are approx. 3% of total hunters in the field (2019)	<ul style="list-style-type: none">Visiting hunters (guided & non-guided) contribute 76% of total revenue to the ADFG wildlife conservation fund (2019)

Significance to Alaskans & Meat Sharing

Guiding hunters in Alaska has its origins in Territorial days. Because of our rich history, guides have deep roots in communities across Alaska, with many guides living in remote communities or “Bush Alaska.” APHA worked with McDowell to quantify what some of the benefits that Alaskans reap from Guided Hunting. In 2019, 31.9 million new dollars went to Alaska business that were directly attributed to Guided Hunting. This generated another 19.1 million in economic activity in the support sector. Hunting guides do what they can to share the harvest; 223,500 lbs of well cared for, high quality game meat was shared with their fellow Alaskans in 2019.

Individual Proposal Comments

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

Proposal 7- SUPPORT

APHA supports Prop. 7 based on ADFG staff reports and comments that implementation will likely not increase overall harvest or cause a conservation concern. Prop. 7 offers some additional harvest opportunity that analysis shows to be sustainable so it should be adopted.

Proposal 198- OPPOSE

APHA opposes creating bear baiting closed areas within 50 miles of “cabins.” Passage of Prop. 198 would create a dangerous precedent where private landowners essentially veto hunting opportunity on public lands. This precedent would fly in the face of the public trust doctrine Alaska's wildlife is managed under to the great expense of hunters and wildlife conservation in the state.

Proposal 13- SUPPORT

APHA supports ADFG proposal 13 for the reasons stated in the proposal. Moose populations are growing in Unit 17 A and expanding to additional units. Management objectives are being met however failure to pass Prop. 13 could put management objectives at risk. We note that a similar proposal was not adopted during the last cycle. We are grateful to ADFG staff for continuing to monitor and survey moose in 17 A with the end result being this proposal to increase harvest in 17A.

Proposal 28- OPPOSE

APHA opposes the broad relaxation of the historically successful “one brown bear every four year” bag limit in GMU 9.

Background:

During the cycle APHA supported shortening brown bear seasons in much of GMU 9 based on stated conservation concerns by the department. Shortening the season resulted in less opportunity to guide brown bear hunters and thus reduced guide business profitability. APHA remains supportive of close monitoring of the brown bear population in GMU 9, especially the southern portion where most of the concerning harvest trends were identified. Neither GMU 9 guides or APHA has offered a proposal to lengthen the season and regain lost hunting opportunity for both resident and non- resident hunters as we remain cautious based on recent department conservation concerns.

Resident Annual Seasons:

“Residents may also hunt bears near towns and villages of Unit 9 with a RB525 registration permit with no closed season and a 1 bear per year bag limit. There is also a subsistence brown bear registration hunt in Unit 9B from September 1 – May 31, and a subsistence brown bear registration hunt in a portion of Unit 9E from November 1 – December 31; both have a bag limit of one bear per year.” ADFG Staff Comments- CSWR 2021

Conservation Concerns:

Department staff provided an analysis based solely on expected overall harvest. APHA members expressed concerns that opening up the general season to one bear every year would cause hunters to be less selective and more willing to take smaller boars or female bears. These observations and concerns about human selectivity and behavior are based on literally thousands of cumulative days in the field guiding clients who are restricted to either one bear or sheep every four years. Guided experience has shown hunters are more likely to be selective if than cannot simply return next year to “get a bigger one.” Sow harvest is closely managed in other areas of the state operating under bear management plans because high rates of sow harvest can have cascading, negative effects on bear



Human Wildlife Conflicts/Subsistence:

Current "one bear a year" bag limits for residents close to communities or for subsistence are more than adequate to provide for bears as a food source or to alleviate human/bear conflicts near communities.

Summary:

Current bag limits and seasons for resident and non-residents in GMU 9 are working well. Resident sport hunters can harvest a large coastal brown bear in GMU 9 every four years. Harvest of boars/sows is reasonable and appears sustainable. Subsistence hunting opportunity is ample, with long seasons and liberal bag limits. Seasons were recently shortened in southern GMU 9 as a precaution but guide businesses remain viable. APHA opposes altering the highly successful "one bear every four years bag limit" for residents because we fear the possibility of increased sow or young boar harvest occurring thus reducing the overall harvestable surplus that will ultimately lead to a reduction in opportunity.

Proposal 205- SUPPORT

Proposal 206- OPPOSE

APHA opposes the variety of ways Prop. 206 seeks to increase harvest and reallocate bears in GMU 9. APHA encourages the board to fail all aspects of this proposal for the stated conservation reasons expressed by the Department. However, the department is concerningly neutral on lengthening the season for residents even as they admit that increased harvest will have to be monitored closely and may lead to conservation problems.

Background:

ADFG began flagging what they viewed as troubling bear harvest data in 2012 according to comments filed for this meeting and the last cycle meeting in Dillingham. Leading up to the Dillingham meeting APHA members were also concerned about bear numbers in southern GMU 9 and we were prepared to work towards a conservation oriented solution with the board and members of the public to address conservation concerns at the Dillingham meeting. Ultimately APHA supported shortening the season for both resident and non-resident hunters to reduce harvest. This was after many options were considered and over the legitimate objections of some individual guides.

One of the options that was considered and ultimately rejected by the board was keeping resident seasons longer and only shortening non-resident seasons. This option is discussed and greater length in the remainder of our comments on Prop. 206.

Commercial Use Considerations:

Non-resident hunters must overcome economic barriers to hunt brown bears in GMU 9 because they are required to hire a guide. Resident hunters also must overcome economic concerns, albeit smaller in magnitude, to hunt GMU 9 bears because anecdotally most resident use either an on demand air carrier or license air transporter.

Non-resident pay \$1000 for a bear tag while resident pay \$25 for a bear tag. Guided hunts average close to \$30,000 while transported hunters average \$3-4000 for their services.

It is important to consider commercial use impacts of de-coupling GMU 9 resident and non-resident hunter seasons. Commercial use and market forces are NOT considered in their comments on Prop. 206 or any other comment but play an important role on projecting hunter participation. First, obtaining a transporter license requires an air taxi merely pay a fee and report use to the Big Game Commercial Services Board (BGCSB). Second, it would be a unique situation in Alaska and offer transporters in the area the ability to advertise an advantage on paper. This advantage would likely increase demand, increase hunter participation and increase harvest- exactly what the department opposes at this time. Second, transporters are empowered by their license to charge above and beyond their air charter rate- transporters can sell Alaska big game. The interplay between increased demand for "resident only season," the ease of obtaining a transporter license and the ability to charge above and beyond normal charter rates may disadvantage the average Alaskan hunter desiring to hunt bears in GMU 9. Absent staff analysis of impacts on hunter effort by creating a new commercial market for bear hunting in GMU 9 the board can look at a few other isolated cases where transporters took over market share.

In NW Alaska GMU 23 and 26A transported caribou hunts became popular. Remember caribou are not a guide required species so the market for caribou hunts extended to both resident and non-resident hunters. Community conflicts over meat care became rampant in the late 2000s according to a legislative audit and Big Game Commercial Services Board investigation. During this time the burden on enforcement (cost to the state) was increased significantly as a result. Conflicts between transported hunters were also common as well as trespass concerns. Unlike guides who are responsible for knowing hunter land status, game laws and who can lose federal concessions for conflicts, transporters are not responsible for violations of their clients in the field nor are they responsible for education their clients as to land status or any other aspect of hunting laws. Transporters are allowed to charge a premium for the use of the resource but have limited, if any real accountability beyond reporting the numbers of clients dropped off. Caribou hunts in GMU 23 and 26A are currently under consideration to close for all non- federally qualified users to include resident Alaskan hunters. While the decline in caribou numbers is not attributed to human harvest the conflicts and compliance issues originating from a segment of the transporter industry in the area has



Lodges offering transportation services in SE Alaska began to chisel out a dominate market share of the non-resident and resident black bear hunters in GMU 2 & 3. Hunter effort rose as did similar conflicts in the field to the caribou hunts in NW Alaska. However in GMU 2&3 conservation concerns began to arise based on increased harvest from a higher volume of black bear hunters. The board was compelled to

address these conservation efforts by putting non-guided (transported) hunters on draw in these areas. In this case bear conservation concerns were created as transporters increasingly exploited long seasons and generous opportunity.

Lengthening only the resident season in GMU9 will create a new, niche market for transporters. Social impacts in the form of conflicts in the field, tress pass and game violations will require an increased enforcement presence. Additional harvest will result and conservation concerns are likely to be compounded or new ones created. Because transporters are not limited like guides on federal land areas, it is hard to predict what the increased use will look like but bit the NW Alaska caribou example and the SE Alaska black bear example that both ultimately led to reduced hunting opportunity and more division within user groups. GMU 9 bear populations are sustainable but additional harvest is not warranted at this time. The proponent of Prop 206 identifies conflicts in the field as an issue, its hard to imagine how adding an additional commercial opportunity will alleviate them.

Harvest Allocation and Access:

Prop. 206 is proposed as an way increase resident harvest where guided non-residents take the larger share of the harvest. The department addresses harvest rates in their comments:

"The reason that nonresident hunters harvest the majority of bears taken in Unit 9 is not because guides out-compete resident hunters, but rather because of low participation by resident hunters. Hunting the Alaska Peninsula is expensive for non-local residents, and very few non-local resident hunters harvest more than one brown bear in Unit 9." ADFG Staff CSWR- 2021

If resident hunter effort and interest in bear hunting in GMU 9 substantially increases in the future it might be appropriate to reapproach resident/non-resident harvest disparity. As of now, resident hunters do not need to draw a tag and can hunt unfettered during the open seasons. Harvest rate disparities are the result of a lack of resident hunter interest in bear hunting in GMU 9.

Summary:

APHA opposes Prop. 206 in its entirety. Historic management decisions to address bear population depletions have worked and continue to work well. Alternating year spring and fall seasons has proven to be an effective conservation tool as has limiting bag limits to one coastal brown to every four years. Maintaining the course with the goal of eventually lengthening the seasons for both resident and non-residents once the bear population returns to pre-2012 levels makes sense.

Proposal 207- OPPOSE

APHA opposes closing brown bear seasons in GMU 9A. The bear population in GMU 9A is healthy and harvest levels are sustainable.

Proposal 208- SUPPORT

APHA supports aligning hunting seasons in GMU 9C with GMU 9A&B. Much discussion about GMU 9 bears occurred during the last meeting in Dillingham. Initially bear seasons in all of GMU 9 were shortened. Staff analysis and work with the public resulted in reverting to longer seasons in GMU 9 A&B in 2019. Unfortunately GMU 9C was left out even though it became apparent after seasons were reverted in GMU 9 A&B that 9C bear populations are healthy with much of the sub-unit not hunted at all. Bear seasons in GMU 9C should be aligned with GMU 9 A&B instead of GMU 9 D&E.

Proposal 51 & 209- SUPPORT- AMMEND

APHA supports Prop. 51 and 209 but asks that the board incorporate the Departments suggestions on simplified unit boundaries.

Proposal 68- OPPOSE

APHA opposes Prop. 68 because members caution that grizzly bear populations in Unit 11 are not at historic high levels.

Proposal 69 & 218- OPPOSE

APHA opposes Prop. 69 based on the Departments state conservation concerns.

Proposals 214 & 217- OPPOSE

APHA opposes Prop. 214 & 217 because they would completely eliminate the hunt structure used to manage non-resident participation in moose and caribou hunts in GMU 13. Current hunt opportunities are resulting subsistence harvests in excess of ANS. Non-resident opportunities are capped with "up-to" tag allocations depending on the available harvestable surplus. Removing "up-to" 200 non-resident caribou tags and "up-to" 150 non-resident moose tags is unwarranted and takes a tool out of the toolbox to provide legal and important non-resident hunter opportunity in GMU 13.

Proposal 219- SUPPORT



PC005
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APHA supports the Departments efforts to manage moose in GMU 13D so that they do not *"reach a low-density-dynamic-equilibrium mediated by predation."* ADFG CSWR Staff Comments- 2021

Proposal 220- OPPOSE

Proposal 86- SUPPORT

We support Prop. 79 based the stated conservation objectives. The Matsu AC makes it clear that its intention is to rebuild the old ram cohort to eventually allow for less restrictive hunt structures then the current drawing hunt. We encourage the Board to work towards the stated goal of this proposal and rebuild the old ram component in 14A with the eventual goal of managing harvest via registration hunt.

Proposal 95 & 92- SUPPORT

Proposal 95 & 92 will provide more hunting opportunity for healthy bear populations in GMU 16 and 13 but will not create an identified conservation concern. APHA supports providing more sustainable hunting opportunity.

Proposal 223- SUPPORT

**ALASKA RANGE TRAPPING SUPPLY****12131 HORSESHOE DRIVE EAGLE RIVER, AK 99577****907-726-7567**

Gentleman:

I am the general manager for Alaska Range Trapping Supply, the only full line trapping store in the state of Alaska. I deal with and talk to a great many of the people trapping in the state. Since the time your two proposals, 100 and 8 were released I have talked to most of my customers about the changes being considered .

Most agree that proposal # 100 is worthwhile as we all have to deal with water fluctuations but try very hard to comply with the law.

When it comes to proposal # 8, it is an entirely different story. No one can understand the shorting of the season on coyotes in areas where they are so plentiful that under the hunting regulations you are allowed to kill them the through the entire year and are not required to even salvage the fur.

Thank you for allowing me to express the feeling of the trapping community.

Jim Portch

General Manager

Alaska Range Trapping



***Alaska Trappers Association
PO Box 82177
Fairbanks, AK 99708***

Alaska Department of Fish and Game
Boards Support Section
PO Box 115526
Juneau, AK 99811
ATTN: BOG COMMENTS

January 5, 2022

Dear Chairman and Members of the Board:

On behalf of over 1000 members of the Alaska Trappers Association, we wish to share our opinions on the supplemental proposals for the Central and Southwest areas which you will be considering at your January meeting in Wasilla.

Proposal 199

This proposal is unwieldy, unnecessary and would be cumbersome to enforce. It would eliminate a lot of trapping opportunity where there is no compelling reason to do so. ATA does not support the careless use of traps anywhere, and puts a lot of effort into educating new and young "wanna be" trappers on the dangers of inappropriate and poorly located traps. There is a lot of safe trapping that can happen within the limits of this proposal. Under ice, under water, elevated and enclosed traps can be operated safely within the proposed limits. The proposal simply over reaches its stated purpose. It should not be adopted.

Proposal 202

ATA supports allowing the harvest of beaver by firearm in Unit 17 but maintains that trapping should remain the primary means of harvest, as stated in our Position Statement which was adopted in 2015 (enclosed). Adoption of this proposal would be another step in the standardization of beaver harvest regulation where ever warranted in the state.



Proposal 203

Like Proposal 202, ATA supports the extension of the muskrat season in Unit 17.

Proposal 220

ATA energetically opposes closing the moose and wolf hunting seasons in Unit 13A. This proposal appears to be based on philosophy rather than sound management. The economic, nutritional, recreational, cultural, etc. loss would simply be too great. At the end of five years we would realize that nothing had been accomplished.

Proposal 221

ATA is opposed to extending the otter trapping season in Unit 13 to May 31. Otter fur is no longer prime by the end of May. We could support a shorter extension of the otter season if the Board were opt for that.

Proposal 228

This is a perennial nuisance proposal that the Board has considered and rejected multiple times in the past. It offers too much opportunity for falsification and abuse, and would encourage disturbance of trap sets by people who oppose our activities. ATA remains consistently opposed to this sort of regulation, as stated in our Position Statement adopted in 2015 (enclosed).

We appreciate the opportunity to participate in the regulatory process.

Sincerely,

Randall L. Zarnke, president



Alaska Trappers Association Official Position Statement Firearm Harvest of Furbearers

The Alaska Trappers Association believes that trapping and snaring should remain the primary means of harvest for furbearer species. We are not opposed to harvest of furbearers by means of firearms. However, we don't support expansion of hunting seasons to the point that harvest by firearms surpasses harvest by traps and snares. Traditional trapping and snaring should remain the primary method of harvest.

Adopted this 28th day of April, 2015

ATA president



Alaska Trappers Association Official Position Statement Trap Identification Tags

The Alaska Trappers Association does not support a requirement that identification tags be attached to traps and snares anywhere in Alaska. Proponents of this concept suggest that trap tags would reduce or eliminate trapping violations. That is idle speculation. Only law-abiding trappers would obey this new regulation. "Outlaw" trappers would ignore the requirement, as they do with other regulations. Thus, trap tags would serve no useful purpose and would place an unnecessary burden on law-abiding trappers.

In addition, tagged traps belonging to law-abiding trappers could be stolen and re-set illegally. This is not idle speculation. It happened to a member of our Board of Directors when he was trapping in the Lower 48. Fortunately, local law enforcement officials were aware of his ethical standards and normal trapping areas. He was not cited, but this incident serves as an example of how tagged traps can be used against a law-abiding trapper. Threats of similar actions have been made in recent years in Alaska.

We are also concerned about the potential for uneven enforcement throughout the State. Regulations should be enforced equally in all areas.

The Alaska Trappers Association does not support implementation of a regulation requiring identification be attached to all traps and snares.

Adopted this 28th day of April, 2015

ATA President

Submitted By
Nicole Schmitt
Submitted On
1/7/2022 3:36:13 PM
Affiliation
Alaska Wildlife Alliance



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Phone
907-917-9453
Email
nicole@akwildlife.org
Address
PO Box 202022
Anchorage, Alaska 99520

Alaska Wildlife Alliance comment on Proposal 207

Alaska Wildlife Alliance shares concerns about protecting the brown bear resource in GMU 9A, particularly in the context of this game unit linking coastal brown bear habitat between Lake Clark National Park and McNeil River State Game Sanctuary and Refuge, otherwise known as Bear Coast. Currently, this GMU is managed mainly for guides and trophy hunters. GMU 9A, with a more conservative management scheme, could balance trophy hunting and bear viewing interests, while maintaining sustained yield.

The current harvest management scheme is on the highest end of sustainable bear management (assuming the harvest continues to be skewed towards a higher take of males than females), with the harvest level bumping consistently against 9%. However, there is no inherent reason to manage right up to 9% harvest, why not manage towards 6% harvest? This would ensure sustained yield for the trophy industry, maintain opportunity for resident hunters, create a buffer for seasonal variations that impact bear populations, and bolster the growing bear viewing industry. This is a special place with world-renowned bear viewing - the Board can reduce harvest to balance all users.

Further, we agree with the proposal regarding the poor timing of hunt reports and BOG meetings in relation to this unit's management. We also share concerns about the push to liberalize hunting in the sub-unit, unless total harvest levels remain near 6%.

Finally, we are concerned that the State's last estimated population was almost 2 decades ago. Management is based on ensuring harvest is within a sustainable percentage of the total population, and therein lies the problem. The population could tank while assumptions are being made from numbers that are decades old. We recommend that estimates be done at least once every decade, if not every 5 years. Five years would be ideal, as it coincides with a bear generation; i.e., a female young-of-year cub needs approximately 5 years to enter into the reproductive cohort. Recognizing the limited capacity of the Department to run population estimates, perhaps there is an opportunity for collaboration with nonprofits or the National Park Service on data collection in the region.

Alaska Wildlife Alliance comment on Proposal 19

Alaska Wildlife Alliance respectfully submits this comment in support of Proposal 19. We echo the agency's concerns about the declining caribou numbers and request that the Board adjust objectives to an ecologically sustainable level, with particular regard for changes in habitat quality.

Alaska Wildlife Alliance comment on Proposal 21

Alaska Wildlife Alliance respectfully submits this comment in opposition to Proposal 21 for two reasons:

1. This proposal requires concurrence from the Department of Interior for implementation on federal lands, which has not yet been approved and is highly unlikely;
2. We challenge the department's beliefs that reducing wolf predation is effective, and that reducing wolf predation is in the best interest of subsistence users.

To the second point, Supervisory Biologist at Togiak National Wildlife Refuge, Pat Walsh, published an article in the journal *Rangifer* titled "Influence of wolf predation on population momentum of the Nushagak Peninsula caribou herd, southwestern Alaska" (<https://doi.org/10.7557/2.39.1.4455>), it essentially asks if wolf predation can be good for caribou.

Walsh laid out a fascinating ecological story. During 1997–2007, the nonmigratory caribou herd on the Nushagak Peninsula, located within Togiak Refuge, declined from 1,400 to 500 individuals. Walsh, working closely with his ADF&G and Game State colleague, James Woolington, investigated the time budgets of three wolf packs that used the peninsula during the following five years (2007–2012) to figure out if wolves were responsible for the herd's decline. During their study, wolf predation steadily increased on the caribou; however, contrary to expectations, the caribou population steadily increased as well.

These two field biologists tracked 20 GPS- and VHF-collared wolves during their study. They found that only one of three packs regularly

used the peninsula. This pack, known as the Ualik Lake pack, spent 35% of its time there. Its use of the peninsula was disproportionately high in late summer and fall, disproportionately low in winter, and proportional during the caribou calving season in early summer.



The overall wolf use of the Nushagak Peninsula increased in direct response to increasing caribou abundance. Walsh and Woolington concluded that, in this instance, wolf predation was not driving caribou population dynamics. Instead, the caribou population was the driver and wolves were simply responding to an increasingly abundant food. The Nushagak herd had previously declined, then increased, due to internal demographic factors apparently unrelated to predation (graph available in article).

Not all wolf-caribou interactions are the same, and that the geography of the Nushagak Peninsula makes this situation somewhat unique. The 800 square mile peninsula is narrow enough that this single wolf pack was able to establish its territory near the head of the peninsula, and thus defend the area from other wolves on the mainland. So, as the Nushagak caribou population increased, the Ualik Lake wolf pack spent more time preying on them, and concurrently (and ironically) spent more time protecting them from predation by other wolves.

Since the conclusion of their study in 2012, the caribou population has continued to increase to the point that habitat damage is evident. In short, high numbers of caribou may be eating themselves out of house and home. Wildlife managers have attempted to address this by increasing human harvest through several regulatory changes, but lack of snow in recent winters has prevented snowmachine access, which is the primary transport used by hunters there. We believe it possible that the Nushagak Peninsula caribou will face winter food shortages in the near future, and may simply walk away. Should this happen, local villages could lose an important subsistence resource.

Although wolf predation has not served as a very effective population control for caribou, it is certainly working in the direction of management. And to answer the question as to whether wolves can be beneficial for caribou, it appears that in this case, it could be that the protection resident wolves provide may be too much. In fact, a bit more predation might prevent degradation of caribou habitat, which could help sustain the caribou population itself.

Walsh and Woolington wrote that the principal reason they conducted their study was to assess whether wolf population control was necessary to prevent the population decline in this herd. Had predator control been instituted at the onset of this study (as requested by local management committees), it is reasonable to believe that the caribou population would have increased as it did.

However, these two seasoned biologists also point out “stakeholders might have incorrectly concluded that wolf control caused the caribou population response.” This case illustrates the importance of careful thought and having sufficient data for both ungulate and predator populations before invoking predator control.

Alaska Wildlife Alliance comment on Proposal 199

Alaska Wildlife Alliance respectfully submits this comment in support of Proposal 199. In addition to the rationale outlined in the proposal, we offer the following considerations:

- As you are aware, no department or agency is tracking trap encounters in a consolidated manner. Each year, Alaska Wildlife Alliance receives many calls from Alaskans who had run-ins with traps while recreating. We always encourage folks to report these incidents with AWT and ADF&G, but since those departments don't track this information, we also sought to understand the context around these encounters. So, during the 2020-21 trapping season, we opened a form on our website for people to submit information about trap encounters. We consolidated this information into a Map the Trap report, available on our website.

During the 2020-2021 trapping season we found that, of the trap encounters reported statewide, 69% of them were located in recreational areas, which include hiking trails, snow machining trails, and mushing trails. The remaining 31% of encounters were found along roads, highways, and parking lots. For encounters with reported distances from trails and roadways, 80% were reported within 100 feet (~ 33 yards) of a trail or road. Of the Alaskans who saw an animal in a trap while recreating and reported it on the survey, 23% of those trapped animals were dogs. But dogs weren't the only ones impacted. One person nearly stepped in a body grip trap set near a street light off of Parks Highway; another reported a snare four feet off a plowed road in Fairbanks; and one man was pulled off his motorbike after a snare caught his foot while he was riding in the Jim Creek Recreational Area. The true extent of trap encounters with other recreationalists is unknown because no agency, including ADF&G, has been responsible for tracking these events. Our survey likely underestimates encounters because we did not widely advertise the survey. ADF&G stated in their comments that they do not keep any records to know when, where, and how many pets (or humans) are caught in traps, but do acknowledge they are aware of incidents in GMUs 14 A and B where pets have been caught near multi-use trails and trailheads.

- It is reasonable to conclude that the issue of trail-side traps has been frequent enough, and occurring long enough, to warrant ADF&G utilizing resources to develop a brochure in 2014 entitled “Trap Safety for Pet Owners” plus a series of videos demonstrating how to release a pet from various traps. Alaska Trappers Association also developed a lengthy video, the content of which “was largely dictated by some of the comments [they’ve] heard over the years from people who have had dogs and cats caught.” In short, trap conflicts exist and are acknowledged by the Department and by ATA. Historically, the Board of Game has put the onus of trail safety entirely on the 728,045 Alaskans who do not trap. Conflicts have continued even after the brochures and videos; the status quo is not working.
- In 2017, the Mat Su Borough Assembly was presented with a petition that included 3,568 signatures by Mat Su Borough residents requesting trap setbacks on local trails (<https://www.matsugov.us/news/assembly-bans-trapping-in-7-parks>). For scale, more people in the Mat-Su Borough signed that petition than there are trappers in Alaska. Despite their interest, the Borough could not issue setbacks on trails under the Board of Game’s purview. Please consider this proposal an opportunity for this Board to strike a



- Regarding the concerns that this proposal would be too difficult to regulate, we remind the Board that similar regulations exist in Juneau (made by this Board) and in Anchorage (made by the Municipality). The concerns brought forth in the ADF&G and AWT comments on Proposal 199 regarding enforcement may be remedied by agreeing to what AWT refers to as “a proper publicly accessible map.” Again, a similar management scheme has been in place in Juneau for over 10 years, it can be replicated here.
- Once again, the goal of this proposal is not to end or unduly restrict trapping. We acknowledge that many trails in the MSB were established by trappers, but over time the use of those trails has diversified. All of the trails listed in this proposal are designated in comprehensive trails management plans as being regularly maintained and enjoyed for multi-use. The Mat Su Borough population has increased by 20% in the last ten years, and recreation is increasing too. Things change, and regulations need to keep up with those changes.

We do not seek to put a setback on every trail in the Mat-Su area, only the trails that are most utilized and maintained for multi-use, such as the Iditarod trail, Iron Dog connectors, Nancy Lakes trail, and the Ski Hill and Su Valley ski trails. ADF&G even acknowledges the multi-use nature of these trails in their comments. By selecting only the most utilized and popular trails for this proposal, primitive or trapper-maintained trails would not be restricted by setbacks. Again, this proposal only prohibits traps on or next to trails where people are running dog teams, skiing, hiking, or hunting – are those areas where we want unmarked trailside traps? We respect the rights of trappers to utilize multi-use trails, but allowing traps on or right next to trails that are maintained for multi-use recreation is not reasonable.

- Some may interpret this proposal as an affront to trapping, but it’s important to note that this proposal asks for very little. Trapping seasons are open as early as September and can go through May. That’s at least half the year, in places three quarters of the year. In their brochure, ADF&G states that Alaskans should, “assume all maintained winter trails are traplines unless otherwise marked.” Additionally, ADF&G recommends that “if you encounter traps or snares, immediately leash your pet and leave the area.”

According to the State, there are only 2,500-3,500 trappers in all of Alaska, with just a fraction of those trappers trapping in the Mat Su. Respecting the rights of the minority is a key principle of democracy, and we can still honor the rights of a small population of urban trappers to trap in these areas. But, should that tiny population of trappers have unrestricted access to trap on multi-use trails for half to three-quarters of the year while everyone else is instructed to “leave the area”?

- In their comments, ADF&G suggests that it’s enough to simply “encourage trappers to be cognizant of potential conflicts and to follow the trapper’s Code of Ethics”. This enforces the status quo is that one small user group can legally place weapons in multi-use areas, and they’re limited only by the non-binding terms of the Alaska Trappers Code of Ethics. If an individual trapper does not follow these voluntary recommendations, their actions can cause serious harm. What other user group is only regulated by a suggested Code of Ethics? None, other than trappers. Without any regulations to mark traps, check traps, or even place traps off trails, trappers have free reign over all trails in the Mat Su area, except for the 6 trails protected by the Borough.
- Alaskans make compromises between user groups all the time: some trails only allow skiers, mushers, or bikers while others are multi-use; some trails have leash laws and others do not; some areas are closed to motorized access while others cater to those users. There’s more than enough space for all users in the Mat-Su, including trappers. All we ask is that a small portion of some of the most popular, utilized trails in that open space be free of traps so that all users have places to recreate safely. If the Board takes issue with a specific trail/trails, we encourage you to not throw the baby out with the bathwater, but amend the proposal as you see is fair.

Finally, Alaska Wildlife Alliance submits an attachment via email of signatures in support of this proposal.

Petition to Alaska's Board of Game



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We, the undersigned, support the 2021-2022 Alaska Wildlife Alliance proposal for 50 yard no-trap setbacks on either side of designated trails in Game Units 13, 14, and 16. We seek no-trap setbacks to protect people who recreate and their pets on the area's most utilized multi-used trails.

Many people live in Alaska for the year-round recreational activities, and tens of thousands of people in the Mat-Su Borough (MSB) and surrounding areas enjoy multi-use trails in the region. As summarized by the MSB Trails Information Page, "Residents and visitors use trails year-round for fishing and hunting, access to remote recreation property, hiking, horseback riding, biking, off-road vehicle riding, skiing, snow machining, dog mushing, skijoring, and snowshoeing. Demands for quality trails increases every year and is expected to continue as visitors and residents get outside and enjoy the MSB's natural beauty and wild country in ever increasing numbers."¹ We respect the rights of trappers to utilize multi-use trails, and seek reasonable, regulated boundaries that ensure safe multi-use on the area's most heavily-used trails for thousands of other trail users as outlined in this proposal.

Printed Name	Signature	Address	Comment	Date
Michele Wasson		2708 Aspen Dr Anchorage AK 99517	Thank you!	8/10/21
GRABY WILSON		3320 COSMIC CIR 99517		8/10/21
Gloria Oswald		3320 Cosmic Circle 99517	THANKS!	8/10/21
Robert Gent		1646 W 26th Ave Anchorage AK 99503		8/16/21
Melanie Andreanoff		5340 East 26th Ave Apt 205 Anchorage AK 99503	Awesome	5/10/21
Fred Timmisi		3226 Lake Park Cir Anchorage AK 99517		↓
Robin Ruhn		3640 E. 42nd Cir		8/10/21
Heather Werning		1511 Woo Blvd	← 3	8/10/21
Lavinia Harris		1965 E. Ridgeway Dr.		8/10/21
Charlie Mills		936 W 20th Ave Apt 5 Anchorage AK 99503	Save the dogs!!	8/10/21
Jay Grassman		1046 W 26th Ave #205 Anchorage AK 99503		8/10/21
Deborah Vantruff		1820 Logan St - Anchorage AK		8/10/21

¹ Matanuska-Susitna Borough "About Trails", <https://www.matsugov.us/trails/about-trails>.

Petition to Alaska's Board of Game



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Printed Name	Signature	Address	Comment	Date
Martha Pitts		4340 Seley Circle Anchorage, AK 99502		10 Aug 21
Margaret Anderson		2321 Legacy Dr. Anchorage, AK 99576	Safety First!	10 AUG-21
Richard L. Anderson		"		"
John Mann		2200 Sunrise dr. ANC 99508		Aug-10th
Marty Turner		3900 Purdue Street		8/10
Janel Veulek		800 E Dimond Blvd Ste 193-407		8/10/21
HANK		1544 N St ANC AK 99501		8/10/21
BRENNALYN FORD		1345 D ST ANCH AK 99501	YES!!	8/10/21
Krista Peckenstein		1427 P St. Anch 99501		8/10/21
James Nyren		Anchorage 99501		8/10/21
Jaylene Peterson-Nyren		1521 W. 15th Ave. 99501		8/10/21
Korrin Nyren		1521 W. 15th Ave 99501		8/10/21

¹ Matanuska-Susitna Borough "About Trails", <https://www.matsugov.us/trails/about-trails>.

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Printed Name	Signature	Address	Comment	Date
Lisa Radl		7089 Fairweather Park Loop Anchorage, AK 99518		7/17/21
Leke Kelley		1105 Wildrose Ct. Anchorage AK 99518	Defy tyrants	7/17/21
Yvonne Ziegler		3439 E Secord Pkwy Loop Wasilla, AK 99654		7/17/21
Nelson Windman		1701 Beaver Pl. Anchorage, AK 99504		7/17/21
Kirsten Rothacker		2824 North Cir ANC AK 99507		7/17/21
ANNA THORPE		PO BOX 243763 ANCHORAGE, AK 99524		7/17/21
DAMIAN HARDIN		SAKAI ST WASILLA, AK 99654		07/17/21
Kellie Mossbarger		PO Box 243763 Anchorage, AK 99524		7/17/21
Tatiana Polushkin		157 E. Nelson Ave #284 Wasilla, AK 99654		7-17-21
James Doherty		645 W Holiday Drive Unit 1 Wasilla AK 99654		7/17/21
Amantia Doherty		645 West Holiday Dr. Unit 1 Wasilla AK 99654		7/17/21
Jacob Wade		19307 Cherni Cir Eagle river Alaska 99577		07/17/21

¹ Matanuska-Susitna Borough "About Trails", <https://www.matsugov.us/trails/about-trails>.

Petition to Alaska's Board of Game



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Game Units

We, the undersigned, support the 2021-2022 Alaska Wildlife Alliance proposal for 50 yard no-trap setbacks on either side of designated trails in Game Units 13, 14, and 16. We seek no-trap setbacks to protect people who recreate and their pets on the area's most utilized multi-used trails.

Many people live in Alaska for the year-round recreational activities, and tens of thousands of people in the Mat-Su Borough (MSB) and surrounding areas enjoy multi-use trails in the region. As summarized by the MSB Trails Information Page, "Residents and visitors use trails year-round for fishing and hunting, access to remote recreation property, hiking, horseback riding, biking, off-road vehicle riding, skiing, snow machining, dog mushing, skijoring, and snowshoeing. Demands for quality trails increases every year and is expected to continue as visitors and residents get outside and enjoy the MSB's natural beauty and wild country in ever increasing numbers."¹ We respect the rights of trappers to utilize multi-use trails, and seek reasonable, regulated boundaries that ensure safe multi-use on the area's most heavily-used trails for thousands of other trail users as outlined in this proposal.

Printed Name	Signature	Address	Comment	Date
Nicole Schwartz		1300 W 7th Ave #205 Anchorage 99501	We need safe trails!	7/15/21
Mary Garrett		P.O. Box 213875 Anchorage 99524	Thank you for being here	7/15/21
Kyle Mielke		22150 POSSIP CT #5 Chugiak, AK	Thank you	7-15-21
Cassie Comen		Wasilla	Thank you	7/15
Dusty Heckel		Wasilla	Thank You	7/15
Rochelle Burrell		24945 Homestead Rd Chugiak AK 99567		7/15
Lillian Harris		Eagle River	Thanks	7/15/21
Haylee Longsine		1308 F St. #3 Anchorage, AK 99501	Thank you for making me aware of this.	7/15/2021
Dorothy Hansen		12590 Old Glenn #B Eagle River, AK 99571	Shake	7/15/2021
Tabitha Jones		23807 Chandelle Dr Chugiak, AK 99577	Thanks!	7/15/21
Lauren Cortez		10219 Caribou St ER AK 99577		
Andrea Hartman		Peters Creek, AK		7/15/21

¹ Matanuska-Susitna Borough "About Trails", <https://www.matsugov.us/trails/about-trails>.

Petition to Alaska's Board of Game



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Printed Name	Signature	Address	Comment	Date
AKIN KEANAWA		17611 S BIRCHWOOD LP RD CHUGIAK, AK 99567		7/15/21
ndson Wicker		3469 Lunar Dr. Anchorage, AK 99504		7/15/21
Matt Wicker		↓ Same ↓		7/15/21
Denise Frost				7/15/21
Summer Frost				7/15/21
Tatom Bales				7/15/21
Robert Caprine		4435 Stephen Circle Chugiak Alaska 99567		"
Sonyia Hood		"		"
Jasmine Carter		11017 Celestial St Eagle River, AK 99571		7/15/21
Kristin Sniffen		760630 E Sandstone DR Wasilla AK 99654	no traps!	7/15/21
Mae Lynn Golosten		7411 Warden Cir Anchorage, AK 99518		7/15/21
Therese Stetsen		2734 Juneau Street Anchorage AK 99508		7/15/21

¹ Matanuska-Susitna Borough "About Trails", <https://www.matsugov.us/trails/about-trails>.

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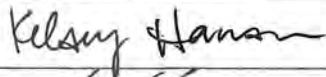
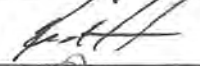
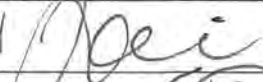


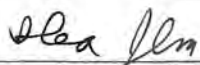
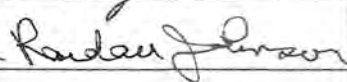
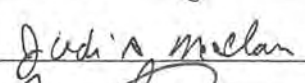




Printed Name	Signature	Address	Comment	Date
Keegan McDonald		11320 Bear Run		7/16/21
Nathan Muel		7867 E Flint Drive		7/16/21
Suzanne K MacKay		3349 Highland Rd. Eagle River AK 99577	Excellent	7/16/21
Wesley Compton		1835 L Suburban Dr	Awesome	7/16/21
Nicole Kelleher		P.O. Box 671801		7/16/21
Jordan Archuleta		Vasilk 99654		7/16/21
Kenny Korzon		14000 old glenn Hwy, 99577, #B		7/16/21
Elias Haroldsen		612 Lara Loop, 99515 #B	Awsome	7/16/21
Richard West		5429 East 19th Ct.		
Lisa Arner		17922 Teklanika D		7/16/21
Tara Brooker		19521 Highland Ridge		7/16/21
ROBERT BROOKER		"		7/16/21

¹ Matanuska-Susitna Borough "About Trails", <https://www.matsugov.us/trails/about-trails>.

Petition to Alaska's Board of Game

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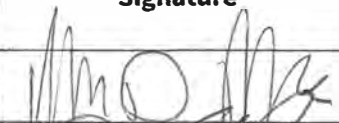


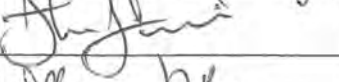
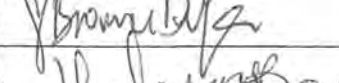
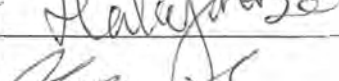
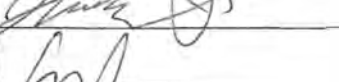

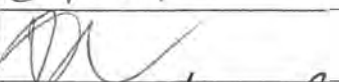
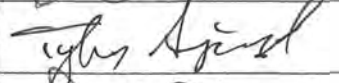
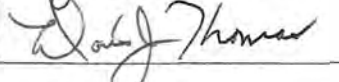

Printed Name	Signature	Address	Comment	Date
Kelsey Hanson		1701 Beaver Pl. Anchorage AK 99504	We want safe trails!	7/17/21
Keith Herring		2230 Deer Park Chugiak, AK 99567		7/17/21
FARRS KORSHIN		11571 ROCKLEDGE DR ANCHorage 99516		7/17/21
Jack Price		630 cedar park		7/17/21
Olivia Cookman		165B Kenai Ave		7/17/21
Rhea Johnson		2323 Tundra Rose Ave		7-17-21
Randall Johnson		23233 Tundra Rose Ave Chugiak, AK 99567		7-17-21
Sud: Annelin		23233 Tundra Rose Ave Chugiak AK 99567		7-17-21
ROBERT TAYLOR		19030 2nd ST, ER AK 99577		7/17/21
Hudson Taylor		19030 2nd ST, ER AK 99577	Let's protect the wildlife.	7/17/21
Patricia Taylor		" " "	Protect the wildlife	7/17/21
Stacey Fuccillo		27283 Vantage Ave ER AK 99577		7/17/21

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Printed Name	Signature	Address	Comment	Date
Kylee Keller		3575 N Charley Dr Wasilla, AK 99654		7-18-21
Matthew Marsh		3575 N Charley Dr Wasilla, AK 99654		7-18-21
Jennifer Hanger		8501 Hidden View Ct Anchorage AK 99504		7-18-21
John Limon		1513 Elmendorf Anchorage AK 99504		7-18-21
Sarah Bramley-Dufau		1513 Elmendorf Dr. Anchorage AK 99504		7-18-21
Haley Barnes		1051 N Elsinore Ave Wasilla AK		7-18-21
IKuko Ziegler		3439E Serendipity Loop Wasilla AK 99654		7/18/21
Carz Ticich		1604 B Patriot Pkway SBER, AK		7/18/21
Stephanie Mattson		3070 Kintyre Ln. Wasilla, AK 99654		7/18/21
PNOYAKUK		3438 Cape St #20 Anch AK 99503		7/18/21
Tyler Spiegel		11902 Town Park Circle Eagle River, AK 99577		7/18/21
Doris Thomas		16422 Marcus St Eagle River, AK 99577		7-31-21

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Petition to Alaska's Board of Game



PC008
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Printed Name	Signature	Address	Comment	Date
Lincoln Fang		Anchorage . 99507		7/31/21
Christina Kr		Seward, AK 99664		7/3/21
Art Davidson		2200 Seward H 99503	good game	"
Dawnell Smith		2501 Northrup Pl Anch AK 99508		7/31/21
Caitlyn Tetterton		Anchorage 99501		7/31/21
James Llover		Girdwood AK 99587		7-31-21
Michelle Young		99587 Girdwood, 226 Higher Terrace AK		7/31/21
Dorothy M Collins		3111 S 42nd Ave #1	☺	7/31/21
Laura Crox		3102 Willow	SMILES ☺	7/31/21
Bruce Reih		3001 Brookside Dr, Anch.	YES - SHARE	7/31/21
Janie Taylor		2300 Jefferson Av 99517 Anch AK 99517	Change BOARD	7/31/21
Madeline Dunn		7302 W Park Hwy PMS Wasilla #152	♡	7/31/21

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Petition to Alaska's Board of Game



PC008
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Game Units

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Printed Name	Signature	Address	Comment	Date
Gregory Stewart		3430 E Belchen Dr, Anchorage AK 99517	I want safe trails	7/31/21
Bonnie Bailes		8120 Little Dipper #A Anchorage, AK 99504		7/31/21
Ben Gordon		3001 Brookside Dr. Anch. AK 99517		7/31/21
Dale Gardner		PO Box 161514 Anch. AK 99510	Good Luck	7-31-21
MARGARET FINNEGAN		2400 W MARSTON TR ANCH AK 99517		7/31/21
Shelley Plumb		936 Willow AK 99688		7/31/21
Tracy Bohman		1401 Winchester Ln Anchorage, AK 99507	No trapping!	7/31/21
Courtney Owen		1150 Cordova St. Anchorage 99501		8/10/21
Steve Nason		2515 COTTONWOOD ST Anch. AK 99503		8/10/21
Micaela Hogan	Micaela Hogan	5808 Cordova St Apt 2 Anchorage AK		8/10/21
Marlene May		1409 E 11 Av.		8-10-21
Steven McNichols		4111 MacInnes St. Anch. AK 99508		8.10.21

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Petition to Alaska's Board of Game




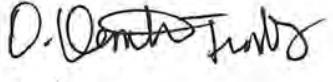

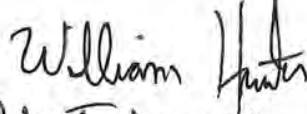
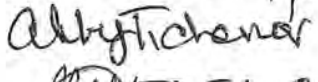
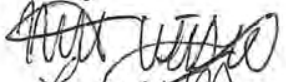
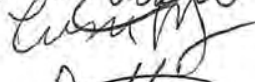

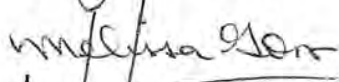





PC008
14 of 16

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Printed Name	Signature	Address	Comment	Date
Michele Wasson		2708 Aspen Dr Apt 951 Anchorage	Thank you!	8/10/21
GRABY WILSON		3320 COSMIC CIR 99517		8/10/21
Gloria Oswald		3320 Cosmic Circle 99517	THANKS!	8/10/21
Robert Gant		1646 W 26th Ave Apt 205 Anchorage 99503		8/16/21
Melanie Andreanoff		5340 East 26th Ave Apt 99503	Awesome	5/10/21
Fred Torrisi		3226 Lake Park Cir 99517		↓
Robin Rubin		3640 E. 42nd Cir		8/10/21
Heather Werning		1511 Woo Blvd	<3 :3	8/10/21
Lavinia Harris		1965 E. Ridgeway Dr.		8/10/21
Charlie Mills		936 W 20th Ave Apt 5 99503	Save the dogs!!	8/10/21
Joy Grassman		1046 W 26th Ave #205 Anchorage 99503		8/10/21
Deborah Vankruff		1820 Logan St - Anchorage AK		8/10/21

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<u>printed name</u>	<u>signature</u>	<u>address</u>	<u>comment</u>	<u>date</u>
RIKKI FEIGHTNER		19307 cherni cir. Eagle River AK	Safe trails for all!	7/15/21
Denise Demetree-Trombley		25040 Schaff Dr Chugiak AK 99567		7/15/21
Virginia Hunter		5101 S. Surrey Rd Wasilla AK		7/15/21
William Hunter		5101 S. Surrey Rd Wasilla, AK 99654		7-15-21
Abby Tichenor		9223 W Parkview Terr LP Eagle River, AK 99577		7-15-21
Nat		12441 bke St Apt 1		7-15-21
Cristen Relf		3419 G. Dayton Circle		7-15-21
Isabella Worst		19721 Big Diomedes Circle		07-17-2021
Melissa Goins		2207 N. Tabasco Ct Palmer AK		7/17/21
KARLA F. Hornington		17720 S Joana Ln Eagle River, AK 99577		7/17/21
Brandon McElroy		12116 Business Blvd		7/11/21
ARN MATINIS		Ste. 6 9th 327 1115 CONINGTON CT A/A 99503		7/17/21
Elizabeth Wiegele		1831 Rebel Ridge Dr Anchorage, AK 99504		7/17/21
Rebecca Brewington		3767 W. Marble Way, Wasilla 99654		7/17/2021

12/5/20

Analia Steinberg | ASteinberg
KNEEBAND TAYLOR
Tent of Tails

2400 Galewood St
Anchorage, AK 99508
2244 Loussac
Anchorage, AK 99507

No traps near
tails!

8/10/21



PC008
16 of 16

8/10/21



Submitted By
Mike Harris
Submitted On
1/7/2022 8:27:05 PM
Affiliation
Alaskan Bowhunters Association

Phone
208-739-7445
Email
mikeharris.aba@gmail.com
Address
2880 West Youngtree Drive
Wasilla, Alaska 99623

The Alaskan Bowhunters Association

Comments to the Alaska Board of Game

Central and Southwest Region

Wasilla, AK. January 21-29, 2022

Submitted January 7, 2022

The Alaskan Bowhunters Association (ABA) is a membership 501C-4 nonprofit organization representing conventional bowhunters. Our membership consists of both Alaska residents and non-residents who use archery tackle to hunt in in our great state. We thank the Board of Game for the opportunity to comment on some of the proposals that you find before you at this meeting.

Bowhunters are not a special interest group but rather are individuals who greatly enjoy the added challenges of hunting with gear that is significantly less effective than modern firearms. The challenge in bowhunting is spending enough time with your quarry to get inside of its normal defensive perimeter for an ethical killing shot. Alaska has a rich bowhunting history. From Art Young in the 1920s, to Fred Bear and Glenn St. Charles in the 1950's, and many more until this present day. These pioneers of bowhunting did not choose there methods out of convenience, but out of a sense of challenge and adventure created by the limitations in their equipment. Today, bowhunting allows for the opportunity to challenge ones self, while at the same time having a limited impact on the resource. To many of us, bowhunting seems to be an inherently more fair way of hunting. For others, it may be a way to extend their season by hunting with a bow during the bow season and a rifle during the general season. Regardless of ones choice, archery seasons add hunting opportunity to all user groups who choose to take advantage of them. To be certain, bowhunters must be persistent and usually spend considerably more time in the field with lower chance of success.

Most states have recognized that the limitations of equipment of bowhunting result in greater opportunity for hunters to spend time in the field with lower impact on the game resources. As a result nearly every state (except Alaska) has established long archery seasons both before and/or after the regular firearms seasons. Some would say that special archery seasons exclude those who enjoy hunting with a rifle but that could not be further from the truth. Anyone can take advantage of participating in an archery hunt provided they are willing to accept the challenge.

The ABA has submitted proposals for special archery hunts for Moose (**PROPOSALS 17, 57, & 82**), Dall Sheep (**PROPOSAL 4**), Brown Bear (**PROPOSALS 68, 91, & 94**), and Beaver (**PROPOSAL 11**). We would urge you to seriously consider these proposals from the perspective of significantly increasing hunter opportunity while having very minimal, if any, impact on the respective game populations. It is important to note that ADFG has commented on all ABA proposals that there would be **NO NEGATIVE BIOLOGICAL EFFECTS**.

Proposal 4:

This proposal advocates for a 10 day registration hunt for Dall Sheep immediately following the general season in Units 9, 11, 13A, 13B remainder, 13C remainder, 14B and 16. This hunt would give bowhunters a short period of time to pursue Dall Sheep without any neqative

effect on populations. Based on data collected from ADFG, only 1.3% of rams were taken by bowhunters in a 10 year period. The legal size requirements and bag limits would be the same as during the general season and the fact that it would be a registration hunt would allow ADFG to control it based on their data. There are also currently no archery specific hunts for sheep in Alaska other than a few drawing permit hunts. This hunt would have zero downsides and we would strongly urge you to **SUPPORT** this proposal.

Proposal 11:

This proposal advocates for archery equipment to be added to the means of taking beaver ONLY WHEN FIREARMS ARE ALREADY ALLOWED in units 9, 11, 13 and 16. It simply makes sense that if firearms are a legal means to take beaver, a bow should be as well. There are already areas in the state where bow and arrow are legal to take beaver and we would ask that the same apply to these units. We ask that you **SUPPORT** this proposal.

Proposal 17:

This proposal advocates for an extended moose season for residents and non-residents in unit 17B. Currently, the moose season in 17B ends fairly early as compared to most other seasons throughout the state. By allowing bowhunters to hunt until September 25th, there would be significantly more hunter opportunity without any negative biological impact. The antler restrictions, bag limits, and reporting requirements would stay the same as already implemented in this area. The fact that this would be a registration hunt would allow for ADFG to control it based on their data. This hunt would have no downsides and we would strongly urge you to **SUPPORT** this proposal.

Proposal 57:

This proposal advocates for a 10 day registration hunt for moose immediately following the general season in Unit 11 remainder. This proposal is very similar to proposal 17 in that there would be significantly more hunter opportunity without any negative biological impact. Antler restrictions, bag limits and reporting requirements would be unchanged and a registration hunt would allow for ADFG to control it based on their data. This hunt would have no downsides and we would strongly urge you to **SUPPORT** this proposal.

Proposal 82:

This proposal advocates for a 2 day extension to the early archery seasons in units 14A, 14B and 16A. This would allow for bowhunters on extended backcountry hunts to continue hunting into the general season in 16A and allow for additional hunting days with no negative impact in 14A and 14B. We strongly urge you to **SUPPORT** this proposal.

Proposals 68,91, & 94:

These proposals would advocate for extended brown bear seasons for bowhunters. While the ABA does support the idea of extending these seasons for all legal methods of take, we offer up these options as an alternative in the middle. We strongly believe that these seasons for brown bears be extended especially in units 14 and 16. We strongly urge you to **SUPPORT** these proposals.

Bowhunting related proposals **NOT** submitted by the ABA:

The ABA respectfully asks the Board of Game to consider supporting the following proposals. Many of these proposals are very similar to those submitted by the ABA and we feel that all of these would provide great opportunity to hunters without having any negative impact. We strongly urge you to consider **SUPPORTING** the following;



Proposal 87:

While this proposal would take away the opportunity for those wishing to use a rifle in a select few permit hunts, the ABA would support that rather than the number of permits being reduced. Over the past few years, ADFG has brought permit numbers down for many of these any ram permit hunts. Rather than continue to lower permit numbers, the ABA would rather see more permits while restricting those permits to archery equipment in order to maintain a healthy population. This way, more hunters can draw these permits without a negative biological impact. If passed, this proposal also has the potential to create a more stable breeding population of rams in these areas as well as a higher percentage of older rams to be pursued. For these reasons we ask that you consider **SUPPORTING** this proposal.

Proposals 60 & 61:

Although the ABA supports the addition of opportunity provided by more archery only hunts, we cannot support these two proposals. According to ADFG, Unit 13 cannot support additional any bull permits and for this reason and to stay within the bounds of sound conservation, we ask that you **OPPOSE** proposals **60** and **61**.

Thank you for your consideration of our opinions.

Sincerely,

Mike Harris –Legislative Vice President

Alaskan Bowhunters Association

208-739-7445

mikeharris.aba@gmail.com



Submitted By
Meghan Aube-Trammell
Submitted On
1/6/2022 7:56:44 PM
Affiliation

Phone
907-631-8079

Email
meggieaube@hotmail.com

Address
241 N Oscar St
Palmer, Alaska 99645

I support proposal 199 to prohibit trapping within 50 yards of multi use trails and trail heads. I am a mother of an active toddler and own a dog. Both of them are in danger from traps that can be found near trails. We love to get out and be active in our beautiful state. Please help us to continue to do this safely! Thank you!

Submitted By
Johanna Bakker
Submitted On
1/7/2022 10:03:03 AM
Affiliation



PC011
1 of 1

Proposal 199.

5 AAC 92.0550. Areas closed to trapping.

I support proposal 199 to prohibit trapping within 50 yards of multi-use trails and trailheads.



Submitted By
Allie Barker
Submitted On
1/7/2022 9:57:38 AM
Affiliation

Phone
9077464566
Email
alliebarker77@gmail.com
Address
PO Box 1223
Chickaloon, Alaska 99674

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

I have lived and hunted in unit 13 and 14A from my late teens for 22 years into my adult life. I have valued living an off grid, subsistence life, where I've worked hard to hunt-fish-gather-grow 100% of my food.

I believe all the claims from both proposals brought forth by Claude Bondy and the Alaska Outdoor Council, are clearly unsubstantiated by the harvest data put forth by the Department of Fish and Game. ADF&G have stated themselves that "this hunt structure poses no conservation concerns". *Please consider this statement.* It goes without saying that **The Community Subsistence Harvest has benefited numerous communities including, unit 13 residents, Ahna communities, rural subsistence users and families/communities with generational historical Subsistence use.**

Contrary to Bundys comments about the rich and abundant wildlife that has provided living in unit 13, I've found it a struggle to survive living off the land for the past 22 years. In fact, I started raising pigs, chickens, ducks, and vegetables to offset the years when I was unable to harvest wild game during general season. Our state needs strictly managed alternative hunts like the CSH that provide a wider range of opportunities to feed our communities. When managed as intended, the CSH is a more sustainable hunt and gives another opportunity to sustain the Alaskan way of life.

In general season moose hunts, it is increasingly challenging to compete with technology's lightning speed demand for expensive rigs and 4 wheelers. There are few opportunities for those who choose to hunt in a non-motorized, more traditional way.

I stand with Alaska's strong identity with living off the land, hunting and fishing for sustenance, and supporting our god given right to our resources. We need data and science, not politics, to show best management practices to sustain our moose and caribou populations.

I believe Bondy's challenges have nothing to do with the community hunt, but instead the states lack of regulation, lack of non-motorized hunting zones which would reduce popular motorized hunting areas, and lack of enforcement for other hunts.

I want to start by talking about my experience being part of the community subsistent hunt. This hunt, more than any other, embraces and values Alaskan ethics including community, taking care of each other, sharing, using every part of the animal which ensures the meat positively impacts more households, sharing skills with less skilled friends, neighbors, family, and nourishing ourselves and our community. The strict meat salvage requirements mean our hunt uses meat more efficiently, feeds more families, and eliminates waste. My observations of others general season moose hunts have shown incredible waste. This is a stark contrast to the CSH and this fact alone should be reason to continue this hunt.

The current harvest data does not tell the entire picture. From firsthand experience I can tell you that the benefits of one hunter in a community group harvesting one moose goes far beyond a normal general season hunt. In the CSH, one moose is shared with up to 10 families, the hide is used for teaching traditional skills at a local school, the bones are made into nourishing bone broth, recipes are shared, potlucks are enjoyed by all. This hunt helps communities to thrive, share and wisely use resources, and honors Alaskan values. This type of community hunt does not exist anywhere else in the world, and it deserves to be honored for what the hunt was intended to do.

As it relates to Proposals 210 and 211, it should be known that living in and *qualifying for a federal subsistence hunt is not reason for eliminating the community subsistence hunt.* The federal hunt has always been a back up hunt and a more challenging hunt compared to state hunts. The federal land hunts are overcrowded, dangerous, and difficult to access.

The federal hunt does not meet our hunting needs. We depend on the community subsistence hunt to fulfill our needs.

I believe that more non-motorized zones as well as stricter management of hunts will improve the health and balance of the moose population in unit 13. If we look at all the moose taken in unit 13 every year, we can see it is not directly related to the community hunt but instead the advancements of technology, more money, and faster transport into unit 13. This unsurpassed opportunity is not equal within our communities.

I am encouraging and requesting that ADFG bring forth harvest data for unit 13 for "spike fork/50 moose" and we'll clearly see how few are taken by the CSH, in fact less than 10%. The CSH is an amazingly managed hunt, and could be managed better, but the request for this

proposal is clearly political. For the CSH hunt, I recommend enforcing the criteria of the hunt, which can be done through the end of season surveys that are required to participate in the hunt.



The CSH hunt follows state statutes per the Alaska constitution, has won court cases including the Alaska Supreme court and deserves to be given the respect intended by those who designed the hunt.

Additionally, *I support proposals 214 and 217* to eliminate the non-subsistence draw hunts for moose and caribou in unit 13 proposed by Ahtna Tene Nene'. Subsistence law, Section 16.05.258, are in place to give priority to subsistence hunters in times of a shortage of the resource. Its irrational for the board to consider eliminating the Copper Basin Community Harvest when these draw sport hunts still exist.

As the priority under Alaska State Law, I support more opportunities for subsistence users in unit 13. No unit 13 moose should be going to non-Alaska residents under these draw hunts while Subsistence user's moose harvest needs are not being met.

For these reasons **I ask you to strongly oppose Proposals 210 and 211.**

Sincerely,

Allie Barker

Submitted By
Nathan Beck
Submitted On
1/3/2022 7:29:27 PM
Affiliation



PC013
1 of 1

I am writing this in support of proposal 199. There is simply no valid reason for trapping to continue to be allowed right next to or alongside multiuse trails, roads, and trailheads. This does not remove or prohibit trapping on any substantial amount of land or area. The setbacks are limited and will prevent most accidental deaths of dogs in traps. The negative publicity that occurs when these accidents happen reflect poorly on the trapping community as a whole. If this proposal is accepted, it benefits all user groups.



Submitted By
Linda Benson
Submitted On
1/5/2022 3:04:51 PM
Affiliation

Phone
907-376-0005
Email
waylinak@hotmail.com
Address
275 W Gerondale Cir
Wasilla, Alaska 99654

I am commenting on Prop 199 which is concerning restricting trapping in well traveled areas in Alaska. It is time that the Dept of Game consider the impact trapping is having on the majority of Alaska's population for about 6 months every year. Traps and snares indiscriminately maim and kill. Allowing trapping in populated areas is not acceptable. Trapping should not be allowed near trails or streets, in or near parks, near schools or ballfields, near houses or neighborhoods. I have heard trappers say if you see a trap leave the area. Rarely are traps seen or even marked with signage. Most Alaskans have no idea the park or trail they are on is an active trapping area. I have seen Fish and Game videos on how to release a pet from trap or snare by using a stuffed toy. It is never mentioned that you are most likely removing a dead or severely injured pet. I personally have helped recover a dog from a snare and it is not easy or pretty. Most people are not strong enough to release a trap. I know I can't even with practice. Asking trappers to be ethical when placing traps has not been working up to now. Nature does not need trapping to regulate Alaska wildlife. Traps are often left for days, weeks or past season and with no ID tags required game officers cannot fine those responsible. It is time to step up and protect Alaskans not just the minority trappers.

Submitted By
Linda Beson
Submitted On
1/7/2022 12:28:31 PM
Affiliation
Phone
907 376 0005
Email
waylinak@hotmail.com
Address
275 W Gerondale Cir
Wasilla, Alaska 99654

I am in favor of Proposal 228 requiring all traps and snares to have ID tags attached. Trappers who break trapping laws are not paying any fines because there is no way for Game Officers to ID the criminal. Also any trap or snare without an ID tag can be removed immediately. There is no valid reason for law abiding trappers to fear ID tags. When I burbot fish each of my setups has to have my ID info in plain sight but trappers are completely exempt. It makes no sense.



Submitted By
Molly Benson
Submitted On
1/6/2022 3:08:58 PM
Affiliation

I support Proposal 199. Please require trappers to keep their traps away from multi-use trails and trailheads.

Submitted By
Molly Benson
Submitted On
1/6/2022 3:10:40 PM
Affiliation

I support Proposal 228. Please require trappers to attach identification to their traps, to encourage compliance with trapping regulations and to make it easier for authorities to track down violators.



Submitted By
Wayne Benson
Submitted On
1/7/2022 9:08:30 AM
Affiliation
Private Party

I am in support Proposal 228 requireing trappers to put identification tags on there traps. I don't see how any lititimate, responsible trapper would oppose this simple requirement.

Submitted By
Wayne Benson
Submitted On
1/5/2022 3:50:00 PM
Affiliation
Private Party

I am in support of Proposal 199 to prohibit trapping within 50 yards of multi-use trails and trailheads in Units 13, 14, and 16. I can't believe that any resposible trapper would find any fault with this set-back distance. In addition I beleive that this listing should include the areas around all parks, sports fields and public establishments of any kind. I also believe that the set back shoould be 100 yards not 50.. Thank you.

Submitted By
Brianna Beswick
Submitted On
1/6/2022 4:17:03 PM
Affiliation



PC017
1 of 1

I am in support of proposals 199 & 228. As an Anchorage dog owner, I am terrified of going out anywhere where traps could be near trails. I would prefer even further than 50 yards, but that would be a very good start! And ID'ing will help to deter unethical trappers.

Submitted By
Bill Billmeier
Submitted On
1/6/2022 7:36:14 PM
Affiliation



PC018
1 of 1

I support Prop 199.

I think high-traffic public-use trails and roadside pullouts should be managed for all user groups and not in preference of one minority group. I do not agree that trapping considerations should supercede those of all other user groups. 50 yard setbacks on popular multi-use trails will not impact ethical trappers and greatly reduce problem interactions between user groups.

The trapper code of ethics is followed loosely in my neighborhood (Glacier View) and does not seem to be any deterrent at all, evidenced by the ongoing sets I find within 20' of roadside trails and pullouts every year, and by the ongoing instances of dogs being caught and injured or killed in public parking lots and easily-accessible trails and trailheads. I know of 3 sets currently active in my neighborhood, all within 10 yards of a trail or highway pullout, and I was not even looking for them. This is behavior expressly condemned by the Alaska Trapper's Association and they express dismay at roadside trapping when I report roadside traps to them directly.

This persists year after year. Although most trappers I know conduct themselves ethically, this proves to me that the voluntary code of ethics is not enough to encourage responsibility and provides absolutely no deterrence to unethical trappers.

A main argument used against pet owners is that there is a 'leash law' in the Mat-Su borough, implying that all pets must be leashed at all times. **This is not supported by the actual legislation** but the argument it is used to shut down any discourse and incorrectly deflect the responsibility of onto non-trappers.

At this point regulation in the form of Prop 199 is required to manage the land for all user groups.



Submitted By
Mary Bishop
Submitted On
1/6/2022 11:25:19 AM
Affiliation

Phone
907-455-6151

Email
Dmbishop@ptialaska.net

Address
1555 Gus's Grind
Fairbanks , Alaska 99709

I am not sure I have selected the correct BOG meeting. Re BOG proposal 199

I support the general concept of proposal 199. I also would support an expansion of the proposal to include all private property unless The trapper obtains permission of the land owner. This provision is also consistent with the trappers code of ethics.



Submitted By
Kerri Blaser
Submitted On
1/7/2022 11:09:18 AM
Affiliation

Phone
4802090822

Email
Kerriblaser@gmail.com

Address
4401 N Charley Dr
Wasilla, Alaska 99654

I support proposal 199 to prohibit trapping within 50 yards of multi-use trails and trailheads.
I also support proposal 228 and am in full support of identification tags on traps.



Submitted By
Dale Block
Submitted On
1/7/2022 10:21:58 PM
Affiliation

Phone
(907) 355-5142
Email
birchblock@gmail.com
Address
3203 W Discovery Lp
Wasilla, Alaska 99654

I would like to voice my opposition to proposals 210 and 211 to end the Copper Basin Community Harvests in unit 13. I have lived in Alaska my entire life and subsistence has been a way of life for me and my family. I am third generation Alaskan my grandparents came to Palmer in 1935 and were part of original colonists families that moved to the mat-su valley. Since then we have established a generational tradition of subsistence hunting in unit 13 and 14 that is nearing on 90 years now. I have seen a lot of wasteful hunting practice from a lot of these newcomers who don't respect the old subsistence ways like we used to. I'm happy to see a hunt that makes you use all edible parts of the animal you kill and share it with people in your community less fortunate in the hunting season than you. That's the way I was taught by my parents and it's good to know at least some people are still living and hunting by those old subsistence ways. I'm turning 72 years old next month and I can't hunt anything but mushrooms and berries anymore because its harder for them to run away, but I taught my kids how to hunt with those old Alaskan values and they still do their best to bring me some meat to have every year to feed me and my disabled daughter who I care for at home. I know I don't live out in the woods anymore but subsistence and having wild meat and food is still a big joy and a meaningful part of my life. The community hunt has helped our family hold on to some of those old traditions and continue to have access to moose and caribou meat.



Submitted By
Matthew Block
Submitted On
1/6/2022 11:46:36 PM
Affiliation
CSH coordinator

Phone
(907) 414-2410
Email
birchblock@gmail.com

Address
13921 S Knik Goose Bay Rd.
Wasilla , Alaska 99623

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.

I would also like to add that simply the harvest data falls short to show all the other positive cultural and societal impacts a hunt like this has on communities and the continuation of traditional subsistence values. It is very important that the board members take the time to read the criteria of these Community Subsistence Harvests before they vote on eliminating them. A few of the criteria I would like to highlight is the strict meat salvage requirements, which allow for proportionally more meat to be harvested from every animal harvested. Hunters should also demonstrate a pattern of meaningful communal sharing that provides first for the needs of the community or group elders and disabled, as identified by the community or group. Personally these hunts have had an incredible and meaningful impact on myself, my family and my community around practicing subsistence and pushing ourselves to be better community hunters sharing more meat with those without the ability of access to the resource.

All unit 13 federal hunters in our Community Subsistence Harvest group completely disagree with the Alaska outdoor councils claims that the federal hunts are enough for them to meet their Subsistence needs. Without the state Community Subsistence Harvest rural users will not be able to meet their Subsistence needs for meat requirements. The federal land hunts tend to be overcrowded, dangerous, and difficult to access among other issues that makes it an insufficient hunt to fully meet the needs of rural subsistence users.

Eliminating 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 integrate more of the traditional subsistence values, meaningful sharing, community support, less wasteful, and teaching youth into more hunts positively influencing hunting culture in the future.

I support proposals 214 and 217 to eliminate the non-subsistence draw hunts for moose and caribou in unit 13 proposed by Ahtna Tene Nene'. Subsistence law, Section 16.05.258, is in place to give priority to subsistence hunters in times of a shortage of the resource. The board should not even be considering eliminating the Copper Basin Community Harvest if these draw sport hunts are to continue. This will create more opportunity for subsistence users in unit 13 as a first priority under the law. I also believe that no unit 13 moose should be going to non-Alaska residents under these draw hunts while Subsistence users' moose harvest needs are not being met.



Submitted By
Ben Bolson
Submitted On
1/6/2022 2:29:07 PM
Affiliation

Phone
503 983 6747

Email
Stickbow86@gmail.com

Address
624 SW. Drumwood Ave. Apt 91.
Mcminnville, Oregon 97128

Please consider proposal 89. Traditional archery is a great management tool and great way for hunter opportunity with a lesser impact than modern equipment. Thank you.



Name: Jason Bontrager
Address: 5250 De Armoun Rd
City: Anchorage
State: AK
Zip Code: 99516
Phone: 907-727-0999
Email: jasonb@gci.net

COMMENTS IN SUPPORT OF PROPOSAL 75

I support Proposal 75.

Per AAC 11.20.985 (a)(12), the Tokositna State Recreation Area, except the Tokositna River is closed to the use of airboats between April 20 and July 10 annually. The primary purpose of this regulation is to protect the nesting Trumpeter Swans until such time as their cygnets hatch. In the past, this regulation has been enough to assist the Swan recovery; however, with increased airboat use over the past decade, mainly during moose hunting season, the critical habitats used by the Swans are being endangered.

Airboats are similar to jet boats in that they are used as a means to traverse shallow rivers. However, what is different is that airboats are specifically designed to be an all-terrain vehicle. It is purpose-built to excel at jumping off the main waterways and accessing wetland environments such as those that exist in the Tokositna Valley. These environments are critical to the nesting and rearing of the Trumpeter Swan. I argue that these sensitive environments be protected in perpetuity to the destruction of vehicles traversing them. For example, if an airboat happens to jump a beaver dam to access the backcountry and winds up destroying the surrounding wetlands critical to the swans, then that environment has been compromised. I have personally witnessed users of airboats engaging in this behavior. In fact, it is what the vehicle is designed to do and the very reason it is used.

Another issue is the soundscape environment:

Survey data indicated that fewer swans were observed in the upper reaches of the Tokositna River from 1995-2005 compared to 1975-1985. Long-term park employees are concerned that an increase in low-flying sight -seeing aircraft traffic is displacing swans in this area. McIntyre, C. 2006. *Changes in the abundance and distribution of trumpeter swans in Denali National Park and Preserve, Alaska. Alaska Park Science* 5(2):25-29.

The soundscape target limit set by Denali National Park is 60 decibels. Research on the soundscape indicates that the Tokositna Valley reaches or exceeds this limit solely from aircraft. In fact, it is one of the noisiest backcountry places monitored by the research project (<http://www.npshistory.com/publications/dena/nrr-2011-424.pdf>, pages 276-300). From personal witness, I can assure you airboats can be heard for several miles and they are very loud to the point of obnoxious. I am not sure what impact these have on displacing or disrupting the wildlife, but one only has to be in the vicinity of one operating to know it cannot be good. I assure you it is much greater than 60 decibels.



It cannot be argued that the temptation and main purpose of use for airboats in the Tokositna Valley is to traverse the Tokositna Flats in pursuit of moose. The destruction of critical wetlands used by the swans for nesting and rearing of their young is happening and the unfair taking of game is another issue to be tabled for another day. The Tokositna River Valley encompasses wetlands critical to the nesting of Trumpeter Swans and their young. They raise their young until migration in the fall. It important for the preservation of the critical nesting habitat and survival of the cygnets to extend the protection corridor until such time as they are able to migrate.

I am a property owner at Pirate Lake off the Tokositna River and user of the area for over 20 years. I have witnessed increased traffic and airboat use over the last few years. Steps should be taken now to protect the critical wetlands that nature has produced naturally over hundreds of years that can too easily be damaged in an instant by airboats traversing the wetlands. I am a long-time Alaskan and do not have an aversion to airboat use in the Tokositna Valley. My argument is to continue to allow airboat use, but in a responsible, sportsmanlike, and environmentally favorable way.



Submitted By
Douglas Borland
Submitted On
1/7/2022 2:34:28 PM
Affiliation
Various; testifying as an individual

Phone
907-419-0541
Email
odborland@yahoo.com
Address
box 1268
Sitka, , Alaska 99835

I am an Alaskan who has been involved in hunting in our great state since 1968. As a founding member and past board member of the Alaska Bowhunters Association, a past president of a major national bowhunters associating founded in the 1960s, a past outfitter and bowhunting guide in both Alaska and Russia, I have been invloved and engaged in the board process as a hunter/conservatinist in Alaska for over 50 years. I hunt exclusively with traditional bowhunting equipment, and prefer backpack hunts using the quads God gave me!

Having extensive experience both watching and participating in the ever-increasing pressures on the resource by competeing interests targeting on our limited wildlife, I can only commend the Department and the Game Board for their efforts; and especially for the process that allows us this input.

I would like to offer my perspective and testimony on the following proposals:

PROP 2 RE: Archery seasons for dall sheep. SUPPORT Also support the "choose your weapon" option and it should be included in this proposal if past. Only the truly committed and most serious bowhunters would be participating in these extended seasons, the either/or weapon provision removes the "special privileges" argument, further reduces the pressure on the resource by spreading out hunters in the field, and reduces conflicts between bowhunters and rifle hunters in the general seasons.

PROP 4 RE: Establish archery only registration hunting SUPPORT Extends opportunity with limited or no measurable affect on resource, spreads out hunters and reduces conflict.

PROP 15 RE: Establish archery only registration hunt for moose: 17B SUPPORT Extends opportunity with little or no measurable affect on resource, spreads out hunters and reduces conflict.

PROP 16 RE: Establish archery only registration hunt for moose, remaineder 17B SUPPORT Extends opportunity with ittle or no measurable affect on resource, spreads out hunters and reduces conflict.

PROP 17 RE: Establish Archery only registration hunt for moose 17B SUPPORT Extends opportunity with little or no measurable affect on resource; spreads out hunters and reduces conflict.

PROP 60 RE: Create registration archery only hunt for Unit 13 SUPPORT The concept of eirther-or known as "choose your weapon" regulations under this proposal will first create new hunting opportunity with little or no impact on the resource. Secondly, it removes the conflict in the field between different methods and means (gun hunters vs archers) and it will result in only serious, more competant, and dedicated bowhunters in the field at this time. Finally, by restricting archers that choose this hunt to forgoing their rifles in other hunts, it negates the argument of "special privelege" given to bowhunters, and spreads the hunting pressure out over time. It is a positive and "new" way to approach the ever increasing competition between hunter factions.

PROP 70 RE: Open new season for baiting brown and black bear hunting in fall Unit 13 AGAINST Besides the obvious public image impacts of bear-baiting being unethical and contrary to the rules of fair chase, there are serious safety considerations. I have hunted in Alaska for 60 years, and as a bowhunter been up close and personal with hundreds if not thousands of black and brown bears. I know first hand the dangers of bears "habituated" to human food. Even one encounter with unattended food in camp invites a return visit with serious consequences. I oppose any bear baiting, but understand bear management issues. Baiting does allow harvest in a static environment; and many, including myself, relish bear meat and the resulting bear fat for cooking! But most importantly, baiting of brown bears, (which very few hunters do to put meat in the freezer) can only habituate the ones not taken that enjoy the bait; and increase bear-human conflicts, and I do not see how responsible wildlife managers can condone this practice.

PROP 89 RE: "Tradional Only" archery hunt, 14A Metal Creek SUPPORT With increase pressure on Alaska's iconic Dall sheep population, this is a way to spread the pressure, and allow a committed hunter/conservation group to avoid conflicts with other hunters in the field. By self-liniting themselves to only traditional archery equipment, the hunters in this late season hunt will have little impact on the resource, while maximizing the hunting process as an end in itself. To negate any arguments from other hunters regarding giving Traditional archers "special privilege", I would recommend adding a provision that archers choosing this new hunt not be allowed to rifle hunt in any other sheep areas, i.e. make this also a "choose your weapon" hunting area.



Submitted By
Robert Bourland
Submitted On
1/6/2022 3:32:00 PM
Affiliation

I would like to voice my support for proposal 2 put in by Paul Forward. Any time we can increase our opportunity without hurting the populations is a win. Archery sheep hunts early are a great idea!! The low success rates of archery hunters will allow more opportunity. Thanks

Submitted By
Robert Bourland
Submitted On
1/6/2022 8:02:50 AM
Affiliation

I am writing this in support of Proposal 89 put in by Mike Harris. A traditional archery sheep hunt would be a win for hunters and the department! The added opportunity to go afield with the increased difficulty of hunting with a short range weapon means less animals will be harvested.

There are many traditional archery restricted hunts now in the lower 48, several in Oregon, Oklahoma, West Virginia, Maryland. These hunts are a great way to increase opportunity without hurting the ungulate population because of the low success rates. A study done by Auburn University on Oklahoma's traditional hunt boasted the success of the program by cutting the success rates by about half while maintaining a older age class and healthier herd all together.

Thank you,

Submitted By
Matthew Bowes
Submitted On
1/7/2022 7:47:21 AM
Affiliation
28 yr AK resident



PC027
1 of 1

This comment is in support of Propositions 99 and 228 regarding trapping, trapper identification information attached to traps, and creation of a buffer zone adjacent to trailheads and along popular trail corridors.

As a long- time resident, trail user, hunter, and fisherman I spend a good deal of time outdoors. I have not always been a dog owner/ handler, but also have been at different times. Arguably well trained/ behaved dogs do not require leashes where allowed. Many activities are hampered by leashed dogs and in some cases create a greater threat to the owner, dog, and others while leashed.

Trapping is and should remain a part of our culture; performed ethically and legally trapping can easily coexist with other users in the same areas provided a reasonable buffer is maintained. With this said it is important to also make adjustments to regulations to accommodate the needs of the majority stakeholders in heavily used areas. The "buffer" proposed will accommodate the increased flux of recreational users while still maintaining the bulk of these spaces as areas where trapping can continue. Requiring traps to have owner ID information (maybe lic. # rather than personal info.) and/o trap line markers would potentially improve accountability of trappers to ensure regulations are followed whether maintaining buffers, frequency at which traps are checked, and timing of when traps are pulled for the season.

Trapline markers would also alert other users to the added hazards present in areas frequented by multiple user groups. As a trail user and outdoor enthusiast I've encountered traps while hunting, skiing, hiking, and fishing. In most cases the traps were located in areas not heavily used or entirely in the MatSu region. Despite having one 'close call' with a snare many traps are distinguishable from the surroundings, but all would be more easily avoidable if active trap lines and traps were visibly marked.

Regulations change with the times, the needs of the stakeholders, and the judgment of the managers. Just like the fisherman may need to adjust to only using a single-hook or no bait, migratory bird hunters limiting the number of shells or size of shot, it is time for trapping regulations to adjust.

Thank you for your consideration in this matter.

Matthew Bowes



Submitted By
Reba M Brady
Submitted On
12/26/2021 2:28:21 PM
Affiliation

Phone
9077754126
Email
rbradyccswp@gmail.com
Address
7647 W Tia Terrace Dr
WASILLA, Alaska 99623

I disagree with proposal 199 for the following reasons:

This proposal clearly has not been thought out and has massive contradictions within it. It should not stand. Definitions within the proposal clearly are contradicted.

"This proposal specifically states that The proposed setback zone does not occupy enough space to significantly limit trapper opportunity. Further, by selecting only the most utilized and popular trails, primitive or trapper-maintained trails are not restricted by setbacks and would not reduce current trapping opportunity. "

"Also, Relative to the thousands of trails identified in MSB Recreational Trails Plans since 1984, 253 trails are considered "regionally significant" in the most recent plan. Regionally significant trails are defined as: "existing or proposed trails requiring borough action that are likely to attract recreationalists due to the quality of the recreational opportunities the trail provides." Regionally significant trails may be managed by the state, federal or borough governments, and are "considered to be the borough's highest priority for preservation."4 From the list of 253 Regionally Significant Trails, we further narrowed eligible trails to those that: • Exist (omitted proposed trails and connectors) • Have documented year-round use from multiple user groups • Are regularly maintained for multi-use "

Yet, the writer plainly listed pretty much every trail in units 13, 14, and 16 without regard to their own definition of Regionally Significant Trails for Multi Use as shown above. Just one example of clear contradiction is Unit 14B Willow Mountain Trail as described from their own list within proposal as follows:

Multi-use year round trail, portions are within the Kashwitna Management Plan Area, most of which is classified for forestry and managed by Division of Forestry. This is an unmaintained trail with trailhead parking available at WillerKash Road. Shown on Maps 1 and 7. Noted in the Kashwitna Management Area Plan. 1,7

Therefore this proposal should be null and void on premise of broad sweep without regard to specificity.

Submitted By
Derrick Branson
Submitted On
1/4/2022 7:58:10 PM
Affiliation



PC029
1 of 1

I am writing in support of proposal 199. I am a lifelong Alaskan, hunter, and fisherman. I think trapping should occur a safe distance from trails to protect kids and pets. My opinion is that 50 yards is still way too close! if you want to trap you should be well off the beaten path. Trails are for the community, not trapper right of ways.

Submitted By
Maile Branson
Submitted On
1/4/2022 7:52:56 PM
Affiliation



PC030
1 of 1

I am writing in support of proposal 199. As an avid hunter and wildlife biologist, I am in full support of trapping as part of the Alaskan lifestyle. However, I DO NOT believe it should occur in recreational areas with high traffic that pose a risk to children, families, and pets.

Thank you for your consideration of this proposal.

Maile Branson, PhD



Submitted By
Scott bredbenner
Submitted On
1/6/2022 7:30:25 PM
Affiliation

Phone
9076876138

Email
Akbred@hotmail.com

Address
2711 Jaime Way
Fairbanks , Alaska 99709

I support props 199 and 228. Best for all Alaskans to reduce conflict. Just common sense.



Submitted By
Jason Brett
Submitted On
12/15/2020 5:18:46 PM
Affiliation

Phone
19078419904
Email
jasonbrett84@yahoo.com
Address
201 e. quincy cir.
wasilla, Alaska 99654

Jason Brett

Proposal 75

I oppose proposal 75. It is unfair to ALL users of the area. There are current restrictons already in place for sensitive bird habitat. I am a property owner and an airboat user on the tokositna river and this proposal was written by my neighbor, (a jet boater) who dislikes any competition during hunting season. Means and methods vary from user to user, wanting restrictions on users with other means and methods seems selfish. While i thank him for his concern of the area I encourage him to report all infractions he has witnessed to law enforcement.



Submitted By
Thomas Brewer
Submitted On
1/5/2022 8:26:09 PM
Affiliation

Phone
907-854-2656

Email
Padmae.Brewer@gmail.com

Address
3940 Checkmate Dr.
Anchorage, Alaska 99508

I am writing in support of propositions 199 (50 yards trap setback from trails in MatSu) and 228 (identification on traps). I have experienced traps set within five yards of a commonly used trail in the Nancy Lake SRA, and came close to losing my dog to one. Completely legal, but totally unethical. There are few enough opportunities for dog owners to let their pets run free, we need to be able to feel safe with our pets on our trails. I don't generally support more government regulations, but lazy and unethical trappers have made this necessary. As a corollary, enforcement will be impossible unless traps have to be labeled. If I can label my shrimp and crab pot buoys, trappers can label their traps; that's not difficult. Thank you for your consideration.



Bristol Bay Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888, Fax: (907) 786-3898

In Reply Refer To:
RAC/BB21057.EP

JAN 07 2022

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

Dear Chairman Hoffman:

I am writing to you on behalf of the Bristol Bay Subsistence Regional Advisory Council (Council) to provide comments on the 2022 Alaska Board of Game Central and Southwest Region Proposals 204, and 32 through 50.

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

The Council held a public meeting via teleconference on October 26-27, 2021. Among the agenda items discussed were 20 Alaska Board of Game Central and Southwest Region proposals that are relevant to subsistence users and resources in the Bristol Bay Region. At that meeting, the Council reviewed and made recommendations on the following 2020-2021 Alaska Board of Game Central and Southwest Region wildlife proposals:

Proposal 204: Lengthen moose seasons in Units 9B and 9C and align hunt areas in Unit 9C

The Council supports Proposal 204 with modification

Modification:

Unit 9B

One bull by permit available online at <http://hunt.alaska.gov> or in person in Unit 9B villages or in King Salmon beginning Aug. 15,

~~Sept. 1 - Sept. 20~~
Aug. 26 – Sept. 20



contact King Salmon for additional information

Unit 9C (that portion draining into the Naknek River)

One bull by permit available online at <http://hunt.alaska.gov> or in person in King Salmon beginning Aug. 15

~~Sept. 1 – Sept. 20~~

Aug. 26 – Sept. 20

Justification: The Council supports the idea of extending the moose season; however, the Council suggests to extend the season to an earlier date instead of a later date. If the season is extended to a later date as it is currently proposed by the Proposal 204 proponent, it is very likely that the bull moose will be in rut and the usability of meat will be questionable. The Council views this proposal as a good way of providing additional opportunity to the local residents to harvest meat, if it is extended into August and not September. If the proposal is extended later into September then it provides additional opportunity to trophy hunters and not local users. Additionally, the Council is concerned that later in the season the bull moose will be more vulnerable and possible overharvest can occur.

Proposals 32 and 33 through 50: Proposal 32 request closing the nonresident season for Emperor Goose in Units 9 and 10. Proposals 33-50 request increasing nonresident hunting opportunity for Emperor Geese in Units 9, 10, and 17; many specifically request an increase in the number of Emperor Goose permits allocated to nonresident hunters with some requesting up to 50% of permits be allocated to nonresident hunters.

Council discussed these 19 proposals in one block and didn't take position, but requested to provide their comments to the Board of Games.

Council's comment: The Council remembers with great pleasure when the Emperor Goose season was open again, how it was celebrated and how people were happy to have the geese. The residents of King Cove and Sand Point cherish these birds extremely as a valuable subsistence resource. The Council is concerned that in the recent two years the Emperor Goose population numbers are going down. The Alaska residents have been working hard to rebuild the population and to bring it to a level when it was possible to open the hunt. The Council wants to remain in the conservation mode to not to undermine the past successes and to pause until we have a stronger population. Some of the Council members were in support of establishing some restrictions, others were speaking in favor of maintaining the status quo, because only 25 drawing permits are available for nonresident hunters. A lot of the times when nonresident hunters take a bird they are not interested in and do not like its meat (sometimes it tastes like kelp). The Council thinks that the nonresident hunters are interested in the uniqueness of the bird and hunt it as a trophy. Depending on the population status it might be fine to allow a few geese to be taken by nonresident hunters, but the majority take should be by local residents.

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

Chairman Hoffman



PC034
3 of 3

Sincerely,

A handwritten signature in black ink, appearing to read "Nanci Morris Lyon".

Nanci Morris Lyon
Chair

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



Submitted By
Bryan Burkhardt
Submitted On
1/7/2022 10:21:01 AM
Affiliation

Phone
248-881/9840

Email
Shootsarrows@comcast.net

Address
6361 Crest Forest Ct W
Clarkston , Michigan 48348

I support proposals #2 and #89. These proposals are a win-win in that they provide additional opportunities to be in the field with minimal impact on the resource.

Submitted By
Shelby Burrige
Submitted On
1/7/2022 5:55:17 PM
Affiliation



PC036
1 of 1

I support Proposal 199. As a trail user and dog owner, I am very concerned about the possibility of traps/snares placed close to the edge of trails. On trails where off-leash is permitted, my dog is well under voice control but I still fear an accident if she steps off trail for a sniff. Although I do not have children, there is a very real concern that a child could also be seriously injured in a trap. These trails are used by many different user groups and it can easily be argued that trappers are in the minority. I am not advocating for the prohibition of trapping on these trails, but I see the 50-yard minimum setback to be a very reasonable compromise to continued trapping and multi-user group safety.

Submitted By
Shelby Burrige
Submitted On
1/7/2022 6:27:11 PM
Affiliation

I support Proposal 228. Requiring that identification tags be placed on traps will be an aid to law enforcement and also a possible deterrent to those who may trap illegally. The majority of states that allow trapping require identification tags. It should not be a hinderance to those that are lawfully trapping.

Submitted By
Matthew Buszka
Submitted On
1/6/2022 11:05:31 PM
Affiliation



PC037
1 of 1

Hello Board of Game,

Please consider proposals 2,3,4,5,10,11,15,16,17,57,68,82,85,87,88,89,91,94 to help with archery hunting in your state and open more doors to bowhunters. I have never hunted Alaska but it is on my bucket list of places to hunt and this would help with that

Thank you Matt Buszka



Submitted By
Tracey A Butler
Submitted On
12/20/2021 12:17:01 PM
Affiliation

Phone
907 733 1457
Email
fireweedstation@mtaonline.net
Address
PO Box 200
Talkeetna, Alaska 99676

As a recreational trail user in areas 14A, 14B and 16A I strongly urge the board to support Proposal 199 5 AAC 92.550 – to prohibit trapping within 50 yards from either side of multi-use trails and trailheads in Units 13, 14, and 16.

Some dangerous trap placements near trails and trailheads have serious consequences for hikers, skiers, mushers, and non-target animals. Traps near popular recreation areas pose a risk to people who recreate, families with children, and pets during winter recreation.

I have personal experience of trying to release my dog from a foot hold trap in a transportation right of way. It is an extremely disturbing and dangerous situation to find oneself in.

The ADF&G 2021-2022 trapping regulations booklet reminds trappers to:

“Act responsibly as a trapper and conservationist by trapping in ways to minimize conflict between trapping and other users, for example, avoid high recreational use areas. Avoid situations where you might catch a domestic dog or cat, such as near homes or trails frequently used by hikers, skijorers, dog mushers, or other people.”

The goal of this proposal is not to unduly restrict trapping, but to protect and reduce the uncertainty for users of multi-use trails by providing defined boundaries on trap placement. Trapping would still be permitted near the listed trails, provided they are placed farther than 50 yards from the trail and trailheads.

Trappers who follow the Trapper’s Code of Ethics’ third tenant, to “promote trapping methods that will reduce the possibility of catching non-target animals,” already trap away from heavily used trails. This setback will likely not impact trappers who already avoid trap conflicts in multi-use areas.

So please respect everyone's use of these popular trails by supporting proposal 199 5 AAC 92.550 and vote to prohibit trapping within 50 yards from either side of multi-use trails and trailheads in Units 13, 14, and 16.

Submitted By
Janette Cadieux
Submitted On
1/7/2022 10:37:21 AM
Affiliation



PC039
1 of 1

I support Proposal 199. I hope it becomes a model state-wide. Other states put reasonable requirements on trapping that are not in place in Alaska. Why is that? Why is it that this small group of trappers has such an outsized impact on the rest of Alaskans? Please put Proposal 199 into place.

Submitted By
Daniel Casner
Submitted On
10/1/2021 3:24:29 PM
Affiliation



PC040
1 of 1

I am writing a comment in support of Proposal 199. I believe reasonable trail trap setbacks are the best way for us to share our beautiful trails. As an Alaskan, I support the rich tradition of trapping in our State. I also believe trails should be available for safe use by all recreators, including our dogs. I believe this proposal to be a fair compromise that allows for all of us to enjoy our beautiful trails without fear of injury to our dogs.

Submitted By
Robert Cassell
Submitted On
1/7/2022 10:56:37 AM
Affiliation



PC041
1 of 1

Comments from Robert Cassell
Proposal 206

Brown bear hunting in GMU 9 has been suggested as an alternative to the limited access draw hunt in GMU 8. The Board of Game during the last Region IV meeting found that there was a biological concern in Unit 9 due to over harvest of female brown bears. 80% of the brown bears harvested in GMU 9 is by guided non-resident hunters and these non-resident hunters killed on average from 1995 through 2015 3.4 times more female brown bears than the resident hunters. During this same time the guided non-resident hunters harvested 1,449 sows while the residents took 443. Non-residents killed 1,006 more female brown bears than the resident hunters. At the last Region IV BOG meeting ADFG stated the over-harvest of female brown bears is causing a conservation concern for this population. The BOG responded by shortening the GMU 9 brown bear season for all participants by one week for both the spring and fall seasons. This further limited resident opportunity to participate in a trophy hunt for the largest brown bears in Alaska. Proposal 206 asks to open the brown bear season to resident hunters that take fewer female brown bears and in 2013 4.4 times fewer female brown bears than the guided non-resident hunters. Reinstate the resident hunter access trophy brown bear hunt that was taken from the residents by guided non-resident hunters killing an unsupportable number of female brown bears in GMU 9.

year	nonres sows	res sows	ratio of nonres sows	total sows	% of nonres sows	nonres over res
1995	109	45	2.4	154	71%	64
1997	121	41	3.0	162	75%	80
1999	166	53	3.1	219	76%	113
2001	156	48	3.3	204	76%	108
2003	143	54	2.6	197	73%	89
2005	153	35	4.4	188	81%	118
2007	139	39	3.6	178	78%	100
2009	142	38	3.7	180	79%	104
2011	123	39	3.2	162	76%	84
2013	110	25	4.4	135	81%	85
2015	87	26	3.3	113	77%	61
totals	1449	443		1892		1006
averages	132	40	3.4	172	77%	



Submitted By
Jeff Chadd
Submitted On
1/4/2022 5:22:16 AM
Affiliation

Proposal 206

This should not even be looked at there is plenty of time on the season dates that are now for everyone. This has worked for years and there is NO use in Changing them!

Submitted By
Jeff Chadd
Submitted On
1/4/2022 5:18:27 AM
Affiliation

Proposal 28

I think that taking the 1 every 4 years off would put more pressure on the bears! It has worked for decades and now there are more people and that adds the pressure on the resource and bears don't bounce back like some other animals. Leave it like it is!

Submitted By
Jeff Chadd
Submitted On
1/4/2022 5:35:34 AM
Affiliation

Proposal 208

I think the board should change this back to go along with 9A .When it was changed in 2019 it should have stayed with 9A. The weather is a big factor in 9C as it gets winter sooner in the fall and spring comes later than the lower peninsula. Also 75% of this unit is in the Katmai NP/P. It would give additional opportunity to hunters and you might see alittle more harvest. The population right now is doing good and this would not affect it. Over harvest would be very hard as the Katmai NP/P is most of it closed to Hunting and it also borders the Mcneil bear sanctuary.



Submitted By
Mike Chihuly
Submitted On
11/29/2021 3:46:45 PM
Affiliation

Phone
9073987459
Email
chihuly@ptialaska.net
Address
16170 N Star Cir
Ninilchik, Alaska 99639

I oppose Proposals #76 & #222 regarding seasons and bag limits in Unit 13.

Contrary to the proposal's statements, rock and willow ptarmigan numbers in units 13 E & B have been low/depressed for the last several years. Seeing large flocks of ptarmigan in the winter while on snow machines is hardly an accurate nor dependable indicator of overall ptarmigan health in a area as large as units 13B & E when ptarmigan typically congregate in large numbers. Please see ADF&G ptarmigan brood survey data for the past three years. Please see ptarmigan movement and migration habits in the winter per radio telemetry studies by ADF&G.

I have hunted the Denali Highway for ptarmigan since I was a young boy in the late 1950s. In the last 20 years, there has been a dramatic increase in interest for hunting these birds. More snowmachine hunters, more on-foot hunters, more road hunters, and a greater use and popularity in hunting ptarmigan with dogs. These birds now get hammered hard from 10 August until late fall and early winter when sport harvest tapers off. Late winter/spring harvests (late February-March 31) are **additive** mortality to these already stressed populations and should not be allowed when bird numbers are low/depressed. Most importantly, I support a continued season closure of February 15. In addition, I would welcome any reduction in daily bag limits in these units when numbers are low.

I would also suggest that the ADF&G/Board of Game consider the use of Emergency Orders in the future for managing small game in some areas. As you well know, this is a common practice with large game populations, and yes, this would be new for small game management. Due to increasing hunting pressures in some areas, I think we are getting close to the time when we need to think about this (EOs). We need to train our small game hunters to stay informed of regulations and get them more involved in small game management. It might take awhile to get small game hunters on board, but I think it can be done. When numbers are low, we should be restricted by seasons and bag limits to maintain opportunity in the field. When numbers are high, seasons and bag limits should be responsive enough to allow for more liberal harvest and time in the field.

One last note. Harvesting "limits" of birds for maximum poundage of meat is becoming less and less important than having the opportunity to hunt at all. I would rather hunt all day on foot with my dog for one or two birds than be shut down due to overly liberal bag limits, overly-liberal seasons, and greed. Reduce seasons and bag limits when populations are depressed, and loosen those same regulations when populations are healthy and can tolerate greater mortality.



Submitted By
Ashlee Clarke
Submitted On
1/7/2022 3:14:48 PM
Affiliation

Phone
2025492205

Email
ash.clarke91@gmail.com

Address
9331 Stuart Circle
Eagle River, Alaska 99577

I support Proposal 199 and 228. I think the restriction of trapping lines to outside of 50 yards of popular trails and the requirement of trap tags is reasonable and will increase the safety and enjoyment of trail users without putting unnecessary restrictions on trappers.



Submitted By
Kenneth H. Cook
Submitted On
12/24/2021 5:37:48 PM
Affiliation
Alaskan

Phone
907 317 0642

Email
knfcook@mtaonline.net

Address
21818 Lower Canyon Dr
Eagle River, Alaska 99577

As an avid Alaskan outdoorsman and resident for over 43 years, I have reviewed proposal 199 that would prohibit trapping within 50 yards of multi-use trails and trailheads in Units 13, 14, and 16 and I agree with the regulation. It would greatly lessen the conflicts and tragedies between the majority of other users groups and trappers.



Submitted By
Katherine cooper
Submitted On
1/6/2022 7:03:46 AM
Affiliation

Phone
9073170768
Email
Katherine.delia@gmail.com
Address
6101 azalea drive
Anchorage, Alaska 99516

I am waiting in support of 199 & 228. Clearer regulations would make it easier for trappers & dog owners to peacefully co-exist. I'm a dog owner but I have family members who trap. I believe that both parties should be respected & provided access to safely enjoy the trails & wilderness.

Submitted By
Katherine cooper
Submitted On
1/6/2022 6:58:41 AM
Affiliation

Phone
9073170768
Email
Katherine.delia@gmail.com
Address
6101 azalea drive
Anchorage, Alaska 99516

We want to peacefully co-exist with trappers- I have family members that trap & hunt & game meat is in my freezer. This proposal would reduce friction with trappers & make it easier to take dogs out on bike rides or hikes where they stay within visual range- but can wrestle & run!



Submitted By
David crandall
Submitted On
1/3/2022 9:42:37 AM
Affiliation

Phone
907-982-7471

Email
David.crandall.2@us.af.mil

Address
7212 w silver dr
Wasilla , Alaska 99623

I do not support the proposal for the 199 trapping set backs, these trails are for everyone not just one group over the other. Most trappers follow the rules, why don't the dog owners which are the main supporters of this rule follow the leash law or educate themselves about the possibility of traps are always in the area!

Submitted By
William Criner
Submitted On
1/7/2022 6:20:47 PM
Affiliation



PC048
1 of 1

I oppose Proposal 211, the repeal of this hunt would be loss of a tradition going back a long time in this state. This hunt has a unique ability to engage an entire community that shares traditional knowledge. Working hard to put up meat for the year and doing it together to support those in our community who need it are values which are strongly supported by the structure of this hunt. A lot of people depend on it. It poses no threat whatsoever to anyone else or other users of the area.

I strongly oppose proposal 210. I believe all the claims of overharvest 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".



Submitted By
Brad Dahme
Submitted On
1/6/2022 2:17:41 PM
Affiliation

Phone
Dahme
Email
C8outdoors@gmail.com

Address
1855 Brush Creek Rd
Santa Rosa , California 95404

Dear ADFG,

I have never applied for a dall sheep hunt in the great state of Alaska as the draw odds are simply to long to justify the cost.

If Prop 89 were to pass I would quickly change my stance as a much smaller group of hunters would put in for this hunt and the draw odds could potentially increase dramatically. This would represent a revenue increase to ADFG and the guide service I would be hiring to assist with the hunt.

Thanks for your consideration.

Sincerely,

Brad - Longbow Hunter



Submitted By
Carol B Damberg
Submitted On
1/7/2022 9:08:58 AM
Affiliation

Phone
19078919004
Email
cd_damberg@hotmail.com
Address
6000 Azalea Drive
Anchorage, Alaska 99516

I am writing to voice my support for proposal 191.

Please support this very balanced approach to management of multiple uses on trails. Trappers and recreationists will all benefit by having clear expectations as to where traps may be set along multi-use trails. This proposal is very well written and clearly discusses why this regulation is needed and why it is a balanced and fair approach towards all user groups.

Alaskans make compromises between user groups all the time: some ski trails don't allow dogs, others do; some trails have leash laws and others do not; some areas are closed to motorized access or bikes while others cater to those users. There's more than enough space for all users in the Mat-Su. This proposal asks that a small portion of some of the trails in that open space be free of traps so that all users have places to recreate safely. Such regulations have been implemented in other areas of Alaska and continue to preserve the opportunities for trapping without an unfair burden being placed upon trappers.

Clear regulation is needed. A voluntary approach is not appropriate when dealing with such lethal methods of harvest. This is a simple and understandable regulation for all user groups that sets a clear demarcation.

Please support this proposal! Sincerely Carol Damberg.



Submitted By
Kelly Dau
Submitted On
1/6/2022 7:06:47 PM
Affiliation
46 year Resident of Alaska

Phone
9073548595
Email
Dau@mtaonline.net
Address
P.O. Box 558
Palmer, Alaska 99645

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

Thank you.

Kelly Dau

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



PC052
1 of 1

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



Submitted By
Daniel Donnelly
Submitted On
1/5/2022 1:34:45 PM
Affiliation

Phone
7573489867

Email
flycaster3@gmail.com

Address
10045 Thimble Berry Drive
Anchorage, Alaska 99515

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

Thank you for your consideration of this rule change,

Dan Donnelly

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



PC054
1 of 1

I support Proposals 199 and 228.



Submitted By
Thaddeus Dubois
Submitted On
9/8/2021 7:03:24 AM
Affiliation

Phone
2283660149

Email
Mk2tkd@att.net

Address
PO Box 670710
Chugiak, Alaska 99567

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



Submitted By
Faye Ewan
Submitted On
1/7/2022 3:40:28 PM
Affiliation

Phone
907.720.3926
Email
fayeewan54@gmail.com

Address
PO Box 1
Copper Center, Alaska 99573

To the Alaska Board of Game:

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

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

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

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



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

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

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

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

Thank you for your consideration.



Submitted By
Bill Fikes
Submitted On
12/21/2021 1:47:33 AM
Affiliation

Phone
9078927439

Email
bill@webmusher.com

Address
8990 West Angel Drive
Wasilla, Alaska 99623

I fully support the 50 yard trap setback proposal 199 and urge you to impliment it.

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



PC059
1 of 1

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



Submitted By
Galen Flint
Submitted On
1/6/2022 8:02:54 AM
Affiliation

Phone
6502070810
Email
galenflint@gmail.com

Address
2129 Sunrise Dr
Anchorage, Alaska 99508

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

Submitted By
Paul Forward
Submitted On
1/6/2022 2:44:29 PM
Affiliation



PC061
1 of 2

Phone
907-854-2959
Email
paulforward@gmail.com
Address
191 Agostino Mine Rd
Girdwood, Alaska 99587

Proposals 2, 3, 4, 5 all propose variations of the addition of an archery season for Dall Sheep in units 9, 11.13, 14A, 14B and 16. As a lifelong Alaskan and avid sheep hunter for most of my life, I am convinced that the addition of an archery season for sheep is critical for a number of reasons.

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

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

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

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

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



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



Tory Fredrickson

Proposal 199 of the 2021-2022 Supplemental Proposal Book

I oppose Proposal 199.

Dear Board of Game,

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

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

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

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

Submitted By

Robert Fuller

Submitted On

12/23/2021 11:52:56 AM

Affiliation



PC063
1 of 1

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

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



PC064
1 of 1

I support proposals 198 and 228.



Submitted By
Decker Goodman
Submitted On
1/7/2022 2:43:37 PM
Affiliation

Phone
9075195135
Email
DECO.GOODMAN@GMAIL.COM
Address
1200 W 45th Ave
Anchorage, Alaska 99503

I oppose proposals 210 and 211 introduced at this board meeting.

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

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

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

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

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

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

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

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

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

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

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

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

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



PC066
1 of 1

Board of Game Comments on Central Southwest Region

From:

Karen Gordon

Fairbanks

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

Proposal 86

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

Proposals 210 and 211

Please pass these proposals.

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

Karen Gordon

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



PC067
1 of 1

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



Submitted By
Lisa Green
Submitted On
1/5/2022 11:38:17 PM
Affiliation

Phone
9073016540
Email
Mtbnorth@yahoo.com
Address
24401 Hamann Rd Apt B
Eagle River, Alaska 99577

Hi, I support proposal 228 to make ti mandatory that all traps be labeled with the identification of the trapper.
thanks Lisa

Submitted By
Lisa Green
Submitted On
1/5/2022 11:34:51 PM
Affiliation

Phone
9073016540
Email
Mtbnorth@yahoo.com
Address
24401 Hamann Rd Apt B
Eagle River, Alaska 99577

Hi,

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

Thanks
Lisa



To: The Alaska Board of Game

January 7, 2022

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

Submitted by Wayne Hall, Anchorage

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

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

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

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

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

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

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

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



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

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

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

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

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

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

Year(s)	GMU	Method	Study area ^a	Area km ²	Abundance		Density		Source ^c
					estimate	range	/1000 km ²	range	
2003	9A	DCDS	9A	5,686	693	595-791	122	105-139	Quang 2005
		DCDS	9A	7,380	703	569-837	150	122-178	Olson and Putera (2007)
2003	9A	DCDS	LACL only	3,179	367	244-490	115	76-154	Quang 2005
		DCDS	LACL only	3,846	466	234-698	147	75-219	Olson and Putera (2007)
		BDS	LACL only	4,677	410	-	88	78-100	Schmidt et. al. (2017)

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



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

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

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

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



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

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

My Comments on Proposal 207

Overview

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



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

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

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

Size

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

Population Density

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

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

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

Year(s)	GMU	Method	Study area ^a	Area km ²	Abundance		Density		Source ^c
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2003	9A	DCDS	LACL only	3,179	367	244-490	115	76-154	Quang 2005
		DCDS	LACL only	3,846	466	234-698	121	60-181	Olson and Putera (2007)
		BDS	LACL only	4,677	410	-	88	78-100	Schmidt et. al. (2017)



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

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

Reported Harvests and Harvest Rates

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

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

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

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

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



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

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

Average Age of Harvested Brown Bears

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

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



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

Inadequate and Delayed Data

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

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

Other Pressure on GMU 9A Brown Bears

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



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

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

Valuable Alternatives to Brown Bear Hunting in GMU 9A

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

Respectfully submitted:

Wayne Hall, Anchorage

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



PC070
1 of 1

I am opposed to proposal 210 and 211.

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

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

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

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

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

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

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

Thank you for your time.

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



PC071
1 of 1

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

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

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

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

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

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



PC072
1 of 1

Commenting in **support** of Proposal 199.

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



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

Phone
9074576847
Email
weheimer@alaskan.net
Address
1098 Chena Pump Road
Fairbanks, Alaska 99709

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

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

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

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

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

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

The best to all as you do a tough job,

Wayne Heimer, Fairbanks

Submitted By
Amy T Henry

Submitted On
12/21/2021 11:09:26 AM

Affiliation



PC074
1 of 1

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

Thank you,

Amy Henry



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

Phone
9073718049
Email
hicks917@gmail.com

Address
305 Kody Drive
Fairbanks , Alaska 99701

For proposal 198.

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



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

Phone
907-252-4090
Email
brownbear10ft@hotmail.com
Address
PO Box 39865
Ninilchik, Alaska 99639

To Alaska Board of Game,

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

The following are my positions on the following proposals.

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

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

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

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

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

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

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

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

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

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



PC077
1 of 1

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



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

Phone
907-354-1934

Email
jimhoehn@mtaonline.net

Address
3608 w demaree cir
Wasilla , Alaska 99623

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



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

Phone
4438806423
Email
ch9191@yahoo.com

Address
50 Wiley Mill rd
New Park, Pennsylvania 17352

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



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

Phone
3179465089

Email
Jrhooley@gmail.com

Address
1321 p street #2
Anchorage , Alaska 99501

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



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

Phone
9077077428
Email
khopp@mtaonline.net

Address
10128 N Spike Fork Cr
Palmer, Alaska 99645

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



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

Phone
19077173317
Email
bob.hubble1@gmail.com
Address
1564 DYEA AVE
Apt C
Anchorage, Alaska 99505

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

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

Phone
9077173317
Email
bob.hubble1@gmail.com
Address
1564 DYEA AVE, APT C
APT C
JBER, Alaska 99505

Hello,

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



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

Phone
650-810-6531
Email
jingram700@gmail.com
Address
PO Box 1723
Seward, Alaska 99664

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

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

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

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



PC084
1 of 1

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

Committees:

House Finance Committee

•
Legislative Budget &
Audit

•
Finance Subcommittee
Chair of:

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

ALASKA STATE LEGISLATURE



PC085
1 of 2

*Serving Midtown,
University, and
East Anchorage
neighborhoods*

REPRESENTATIVE ANDY JOSEPHSON

7 January 2022

-Delivered by Electronic Transmission-

Dear Alaska Board of Game Members,

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

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

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

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

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

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

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

Rep.Andy.Josephson@akleg.gov



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

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

Sincerely,

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

Rep. Andy Josephson
State House District 17



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

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

To whom it may concern:

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

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

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

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

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

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

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

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

Sincerely,

Paul Keller



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

Phone
907-398-8856
Email
Huntermkeyo@hotmail.com
Address
7120 s yohn bay place
Wasilla, Alaska 99687

To Whom it may Concern,

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

Hunter Keogh

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

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



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

Phone
5187637764

Email
nkileybergen@gmail.com

Address
2228 Sunrise Drive
Anchorage, Alaska 99508

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

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

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



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

Phone
9077154421

Email
kinneca@conocophillips.com

Address
PO Box 874051
Wasilla, Alaska 99687

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



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

Phone
907-980-2815
Email
tkmmbean@gmail.com
Address
7821 Ladasa Pl
Anchorage, Alaska 99507

Dear Board Members,

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

Respectfully,

Tim Kirk

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



PC091
1 of 1

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



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

Phone
9074693033
Email
joeklutsch@gmail.com
Address
Po Box 313
King Salmon, Alaska 99613-0313

Members of the BOG:

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

Proposal 27

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

Proposal 28

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

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

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

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

Proposal 29

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

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

Proposal 30

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

Proposal 32



PC092
2 of 2

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

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

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

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

Thank you for your consideration.

Respectfully,

Joe Klutsch

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



PC093
1 of 1

I am opposed to proposal 199 for the following reasons:

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

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

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

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

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

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



Kodiak/Aleutians Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888, Fax: (907) 786-3898

In Reply Refer To
RAC/KA21049.KW

JAN 07 2022

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

Dear Chairman Hoffman:

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

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

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

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

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

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



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

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

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

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

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

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

Sincerely,



A handwritten signature in cursive script, reading "Della Trumble".

Della Trumble
Chair

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

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



PC095
1 of 1

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

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



PC096
1 of 5

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

Dear Board of Game Members,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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



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



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

Phone
907 748 0075

Email
krysta.kurka@gmail.com

Address
2802 Breezewood Drive
Anchorage, Alaska 99517

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

Thank you for your time and consideration.

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



PC098
1 of 1

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



Submitted By
Nathaniel Lagerwey
Submitted On
1/7/2022 4:52:10 PM
Affiliation
Outdoorsman

Phone
907 854-1489
Email
akfishcop@gmail.com
Address
17460 Beaujolais Cir
Eagle River , Alaska 99577

I am writing in support of proposals 199 and 288 to help protect trails and trailhead areas from traps. I have been a trapper myself and feel it is exceptionally important that trappers act responsibly and keep their traps separated from domestic animals and away from high traffic areas. This helps public perception of an important past time.

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

Nathan



Dear ADF&G Board of Game Members,

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

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

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

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

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

Thank you for your time.

Sincerely,

Laine W Lahndt

Master Guide/Outfitter

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



PC102
1 of 1

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

Phone
9077724610

Email
littleipperdogspa@hotmail.com

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

Phone
9072774068

Email
tocatin@gmail.com

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



PC105
1 of 1

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



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

Phone
3197594752
Email
jrmcculley@ducks.org
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



PC110
1 of 1

Please pass Proposal 199 in its entirety. Thank you!



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

Phone
907-346-1077
Email
tmeachm@gci.net
Address
9500 Prospect Drive
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 pubic 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 responsibilites. 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

Phone
9079822061

Email
kymillerak@outlook.com

Address
160 S Edinborough Dr
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



PC113
1 of 1

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



PC114
1 of 1

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



PC116
1 of 1

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 partisipation 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 resourse 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 5th 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.

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



PC119
1 of 1

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
651-491-8986
Email
newellchristym@gmail.com
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



PC121
1 of 1

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

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



PC122
1 of 1

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



PC123
1 of 31

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, 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 Aug. 1-Sep. 20
1 permit will be issued per household*

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

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 Aug. 1-Sep. 20
1 permit will be issued per household*

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

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

<i>Unit 16B-Redoubt Bay Drainages south and west of, and including the Kustatan River drainage—1 bull</i>	<i>Sep. 1-15.</i>
<i>Unit 16B-Denali National Preserve only—1 bull by Federal registration permit. One Federal registration permit for moose issued per household</i>	<i>Sep. 1-30. Dec. 1-Feb. 28.</i>
<i>Unit 16B, remainder—1 bull</i>	<i>Sep. 1-30. Dec. 1-Feb. 28.</i>

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

<i>No limit</i>	<i>Oct. 10 – May 15.</i>
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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, 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

<i>Unit 17A-1 bull by State registration permit;</i>	<i>Aug. 25 – Sept 25</i>
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OR

<i>1 antlerless moose by State registration permit;</i>	<i>Aug. 25 – Sept 25</i>
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OR

<i>Unit 17A-up to 2 moose; 1 antlered bull by State registration permit, 1 antlerless moose by State registration permit.</i>	<i>Up to a 31-day season may be announced between Dec.1 and the last day of Feb.</i>
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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/mi²) 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



PC124
1 of 1

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



PC125
1 of 1

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
Rachel Overby
Submitted On
1/5/2022 11:04:27 AM
Affiliation

Phone
9074144562
Email
rachelrosa@gmail.com
Address
P.O. Box 480
Sutton, Alaska 99674

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
Affiliation

Phone
9079789698
Email
vi.j.patil@gmail.com
Address
22535 Mirror Lake Drive
Chugiak, Alaska 99567

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



PC128
1 of 1

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 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

Phone
9713134536
Email
zach.plant32@gmail.com
Address
1792 5th street
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



PC131
1 of 1

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
Affiliation

Phone
4698795717

Email
bep132@gmail.com

Address
3112 Campbell Airstrip Road
Anchorage, Alaska 99504

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 matsua 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
Affiliation

Phone
9079034003
Email
jbirdreed@gmail.com
Address
13214 E Wycoff Dr
Palmer, Alaska 99645

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

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

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.

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.

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.

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.

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.

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.



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.		Residents no.	
	females % females		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 ^a	2020 ^b
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

^a Spring season open to residents only.

^b 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.

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.

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)
www.residenthuntersofalaska.org
info@residenthuntersofalaska.org



Submitted By
Bud Rice
Submitted On
1/7/2022 5:54:00 PM
Affiliation
Arctic Bird Dog Association

Phone
907-440-2676
Email
budr@mtaonline.net
Address
24331 Wilma Circle
Eagle River, Alaska 99577

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



PC137
1 of 1

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
Kristopher
Submitted On
12/15/2020 5:37:57 PM
Affiliation

Phone
Richard
Email
krichard1122@hotmail.com
Address
PO Box 1144
Kasilof , Alaska 99610

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

Phone
907-953-1567
Email
krichard1122@hotmail.com
Address
PO Box 1144
Kasilof , Alaska 99610

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

Phone
907-953-1567
Email
krichard1122@hotmail.com
Address
PO Box 1144
Kasilof , Alaska 99610

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



PC139
1 of 1

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

Phone
7192931059
Email
tavisrogers@msn.com

Address
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
Affiliation

Phone
9072304651

Email
renee.romsland@gmail.com

Address
17530 Baronoff Ave
Eagle River , Alaska 99577

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

Phone
907-903-5034
Email
mroster86@gmail.com

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

Matthew Roster

Submitted On

1/6/2022 9:46:17 PM

Affiliation

Phone

907-903-5034

Email

mroster86@gmail.com

Address

1181 E Dellwood St Apt 1
Wasilla, Alaska 99654

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



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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 should'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



PC144
1 of 1

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
Affiliation

Phone
907-301-9961
Email
Lianrene@yahoo.com
Address
PO Box 413
Palmer, Alaska 99645

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



PC146
1 of 1

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
Affiliation

Phone
5039131340

Email
riley@archerypast.com

Address
246 NE Ironcreek Ter
Hillsboro, Oregon 97124

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
Affiliation

Phone
9073439271

Email
charly@charlysavely.com

Address
4432 Campus St.
Anchorage, Alaska 99507

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



PC149
1 of 1

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
Affiliation
Trapper/hunter

Phone
907-401-0694
Email
craig.schwanke@yahoo.com
Address
PO Box 1267
Craig, Alaska 99921

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 do to regulation and a feeling that it wasn't fair chase. Wolves are wary and savvy of snommobile 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.



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 E 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
Affiliation

Phone
9076323552

Email
Bigtselmer@yahoo.com

Address
P.O. Box 4775
Palmer, Alaska 99645

Please vote YES on proposal 199!



Submitted By
Sergey Serebrennikov
Submitted On
12/20/2021 10:22:16 PM
Affiliation

Phone
9077078917

Email
sergey.serebrennikov@hotmail.com

Address
17765 E WILLIAMS CT
Palmer, Alaska 99645

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
Affiliation

Phone
907-223-1525
Email
mjshea1@gmail.com
Address
PO Box 533
Willow, Alaska 99688

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

Phone
907-745-3713
Email
Kelly.sidebottom@yahoo.com
Address
PO Box 2962
Palmer , Alaska 99645

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
Affiliation

Phone
641-530-1226

Email
Bob@bigstickarchery.com

Address
P.O. Box 607
Rockwell, Iowa 50469

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



PC159
1 of 1

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



PC160
1 of 1

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.



Southcentral Alaska Subsistence Regional Advisory Council



RC161
1 of 2

c/o Office of Subsistence Management

1011 East Tudor Road, MS 121

Anchorage, Alaska 99503-6199

Phone: 907-786-3888 Fax: 907-786-3898

Toll Free: 1-800-478-1456

December 22, 2021

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

VIA EMAIL ONLY: 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.

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
Amea 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
Affiliation

Phone
9077828105
Email
ben.spiess@gmail.com
Address
1015 H Street
Anchorage, Alaska 99501

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 experiencing 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



PC163
1 of 1

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
Affiliation

Phone
19073988895
Email
tedspraker@gmail.com
Address
49230 Victoria Ave
Soldotna, Alaska 99669

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



PC166
1 of 1

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



PC167
1 of 1

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

Alaska is made up 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
Affiliation



PC168
1 of 1

Phone
9076885288
Email
WILLIAMTAYGAN@YAHOO.COM
Address
PO Box 670252
Chugiak, Alaska 99567

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
Kneeland Taylor
Submitted On
1/6/2022 12:22:07 PM
Affiliation

Phone
9073820851
Email
kneelandtaylor@gmail.com
Address
2244 Loussac Drive
Anchorage, Alaska 99517

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
Affiliation

Phone
9492922143

Email
Meganlangford@gmail.com

Address
6118 Blackberry St
Anchorage, Alaska 99502

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
Submitted On
1/6/2022 8:13:30 PM
Affiliation

Phone
9072992855

Email
lthuskys@gmail.com

Address
17158 Frontier Circle
Cooper Landing, Alaska 99572

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
Charles Thompson
Submitted On
1/6/2022 3:21:36 PM
Affiliation
self

Phone
9072018031

Email
hans.thompson1@gmail.com

Address
1025 W 11th ave., 1025 W 11th ave.
1025 W 11th ave.
Anchorage, Alaska 99501

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
Submitted On
1/7/2022 4:19:17 PM
Affiliation

Phone
8437541767

Email
Rthur.comm@gmail.com

Address
1301 E Brant Cir
Wasilla, Alaska 99654

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



PC174
1 of 1

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
Quentin L VanPelt
Submitted On
1/6/2022 4:18:32 PM
Affiliation

Phone
(907)795-0799
Email
quentinvanpelt@gmail.com
Address
17495 E Plumley Rd
Palmer, Alaska 99645

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

Phone
(907)795-0799
Email
quentinvanpelt@gmail.com
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



PC177
1 of 1

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

Phone
9079522602

Email
akgrown215@gmail.com

Address
PO Box 685
Palmer, Alaska 99645

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

Phone
9077483393
Email
bowhuntak@yahoo.com
Address
13858 E Doc McKinley Ave
Palmer, Alaska 99645-7695

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 witenssed 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 Assiciation 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 opportunites 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

Phone
907-683-8610
Email
watkinsnp@hotmail.com
Address
PO. Box 147
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



PC181
1 of 1

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
Affiliation

Phone
9073553737

Email
weberdrew@hotmail.com

Address
3520
N Slaton St
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

Phone
5092511135

Email
Mariwelch89@gmail.com

Address
2715 west Marble Way
Wasilla, Alaska 99654

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 & Southwest Region

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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 & Southwest Region

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Proposal 53. **OPPOSE**. The number of caribou permits allotted under the CH program should be limited to the number provided at the time the CH program was initiated. As the human population in Unit 13 increases over time there will be continued pressure to increase the ~~aut~~ number of permits in the CH. 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 CH will eventually pit individual communities against each other. The CH 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 & 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 & 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 ~~or~~ 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 10th.

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

Phone
907-474-2270
Email
karen_deatherage@fws.gov
Address
1011 E. Tudor Road, MS 121
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.



PC185
2 of 2

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.

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



PC187
1 of 1

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
Affiliation

Phone
9077385000
Email
kurtjw99@yahoo.com
Address
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
Submitted On
1/7/2022 11:58:14 PM
Affiliation

Phone
9077385000
Email
kurtjw99@yahoo.com
Address
PO Box 388
Klawock, Alaska 99925

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



PC189
1 of 1

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
Submitted On
1/7/2022 9:34:28 AM
Affiliation

Phone
9077464566
Email
jedworkman@gmail.com

Address
POB 1223
17562 N Frisby Street
Chickaloon, Alaska 99674

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
Affiliation

Phone
907-822-7236
Email
wrst_subsistence@nps.gov

Address
PO Box 439
Mile 106.8 Richardson Highway
Copper Center, Alaska 99573

Wrangell-St. Elias National Park Subsistence Resource Commission
P.O. Box 439
Mile 106.8 Richardson Hwy.
Copper Center, AK 99573

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.



PC193
2014

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

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

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
9073179591
Email
byuknis@aol.com
Address
5035 N Flying Circus Circle
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
Email
heazim@gmail.com
Address
po box 952
talkeetna, Alaska 99676

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



Submitted By
Alexander dunn-shapiro
Submitted On
1/6/2022 8:36:48 PM
Affiliation

Phone
9079037707

Email
Alex@aklandex.com

Address
3875 Geist rd ste E278
Fairbanks, Alaska 99709

It's insane that this state is held hostage by trappers. I strongly disagree that their interests should trump everybody else's in the state. There should be no traps anywhere near established trails and all traps should be marked. It's significantly impeding our freedoms and rights to recreate in our state as we choose.



Submitted By
April Woods
Submitted On
11/19/2021 2:55:05 PM
Affiliation

Phone
9073387777

Email
ms.april.woods@gmail.com

Address
5716 Kennyhill Dr
Anchorage, Alaska 99504

I know two customers whose dogs were caught in a trappers trap. Both were out trying to enjoy the day and ended up in a life and death nightmare. I can't understand why we would set ourselves up for this distaster. Trappers don't own the land, they don't own the wildlife they kill, they should not be able to lay their traps anywhere. Killing animals should be out lawed, if we had any good in the human race it would have outlawed already but evil greed for more and more money rules our world and creates hell on earth.

Submitted By
Avery Caudill
Submitted On
1/7/2022 1:10:53 PM
Affiliation



PC199
1 of 1

This is inexcusable! I don't even live in Alaska (yet), but this is something so ridiculously simple it should have already been a law! I'm not against trapping but allowing them so close to trails is unnecessary and dangerous

Submitted By
Betsy E Young
Submitted On
1/6/2022 6:58:06 PM
Affiliation



PC200
1 of 1

Setbacks from established multi-use trails are a reasonable user compromise for trappers and other landuses to coexist. Further designating specific areas for this setback assists trappers in trapping ethically by defining many of the areas likely to catch nontarget dogs & persons. Currently all of the actual and legal burden of avoiding traps is placed on other user groups with little to no recourse when traps are placed inappropriately. The practice of secretly placing dangerous/deadly traps in common use areas should be discouraged by more than a non-binding and very general code of ethics.

Submitted By
Chayla Moser
Submitted On
1/7/2022 8:40:47 AM
Affiliation
Alaskan resident



PC201
1 of 1

I am of the belief that if someone directly feeds, or clothes their family through subsistence trapping, it should be allowed, however, this is arguably a very small percentage of trappers in Alaska. For the average Alaskan trapping is an unnecessary hobby that they use to make a few extra dollars, or spruce up their parka. The lack of restrictions and cruel nature of dispatching the animal make it so that many tax paying citizens have to tiptoe around common recreational areas with their pets, just to appease those few trappers. I would like to see trappers be made more responsible for their hobby, much like other big game hunters in Alaska. As a matter of personal opinion I would like to see trapping abolished completely due to its cruel and unregulated nature, however I think the middle ground is to set some practical regulations.

1. Restrict the areas used for trapping, much like big game hunts. Specific zones already exist for this purpose. They should be used for trapping, much like they are for hunting.
2. Specify minimum no trapping setbacks from all public use trails. These setbacks should extend past the distance domestic animals can smell bait in traps and be lured away from their owners.
3. Trappers should declare their trap lines (and type of traps) on a public platform such as a website, so recreational users and dog owners know the risk on the areas they visit. General descriptions would be encouraged to avoid tampering with or destroying traps. Ex: "Within the first mile of rabbit slough, _____ types of baited traps have been set 70 yards south from the water edge."
4. Traps should be checked by trappers at frequent and regular pre-determined intervals.

Failure to comply with trapping regulations should result in trappers losing their trapping license and having their traps seized.

Submitted By
Colton West
Submitted On
1/7/2022 5:54:53 PM
Affiliation



PC202
1 of 1

Hello,

reasonable trap setbacks should be done to preserve the safety of recreational outdoorsman and their pets such as dogs. I think by not increasing the setback and distance from proper trails is is negligent and inhumane. Please consider. Thank you

Submitted By
Cory Livingood
Submitted On
1/7/2022 10:41:27 PM
Affiliation



PC203
1 of 1

I don't think traps should be allowed near hiking trails. Dogs need to run and be dogs. They sniff and find smells and investigate and I shouldn't have to worry about a lazy trapper setting traps in trafficked areas, the same way none of us worry about hunters when in traffic. Trappers are hunters and a hunter is responsible for their actions. Some people are not capable of making safe decisions regarding others and laws are required. This is one of those circumstances. You do not discharge a gun around traffic. You do not set a trap where dogs traffic.



Submitted By
Courtney Shaffer
Submitted On
1/2/2022 1:07:40 PM
Affiliation

Phone
4848883287

Email
Courtney@talkeetnaair.com

Address
PO Box 167
Talkeetna, Alaska 99676

As a dog owner in Talkeetna, I fully support the 50 yard set back for trappers. While everyone has the right to recreate, it is important that we keep eachother & our pets safe. I would like to see this go into affect so that I can enjoy a walk with my dog knowing he will be safe from traps. Thank you for your consideration.

Submitted By
Dana Ahlin
Submitted On
1/7/2022 4:23:53 PM
Affiliation



PC205
1 of 1

It is extremely important to have trap lines moved further off high use recreational areas. They create a huge threat to outdoor users and pets. While dogs are the main concern of this initiative, it has huge impact on trail users as well. Stepping just off the trail to explore all that nature has to offer can leave people seriously injured or killed. Having this threat while enjoying the outdoors is a major deterrent. We need to consider who the majority of the trail users are and do what we can to protect them and their pets from easily preventable harm.



Submitted By
Daniel Davis
Submitted On
1/7/2022 12:45:47 PM
Affiliation

Phone
9075212888

Email
dakotahdavis@hotmail.com

Address
PO BOX 93
Sutton, Alaska 99674

Please change the trapping regulations to having the trap be at least 50 ft from established multiuse trails. I am an avid hiker, cross-country skier, and snowmachiner and request the assurance of this safety change for all Alaskans looking to keep themselves and their pets safe on our trails.



Submitted By
Dave Musgrave
Submitted On
1/7/2022 7:05:06 PM
Affiliation

Phone
9079827553

Email
fbksdave@gmail.com

Address
6176 E Altra Dr
Palmer, Alaska 99645

I support the proposal for a 50 foot setback on selected MatSu trails. At this point, there are no requirements to even keep a trap off the middle of a well-used, multi-purpose trails. This is egregious and needs to be changed.



Submitted By
denise c saigh
Submitted On
12/18/2021 9:43:18 AM
Affiliation

Phone
9073382238
Email
katmaien@gci.net
Address
5201 caribou ave
anchorage, Alaska 99508

NO TRAPS ANYWHERE...DOGS HAVE TRAVEL MORE THAN 50 YARDS

MY DOG GOT CAUGHT IN A TRAP AND IT TOOK 3 OF US TO RELEASE HIM AND THEN A VET BILL

NO TRAPS NEAR CITIES JUST IN VILLAGES

NO TRAPS STOP KILLING DOGS!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

Submitted By
Diana Saverin
Submitted On
12/16/2021 9:36:35 PM
Affiliation



PC209
1 of 1

We have two wonderful sled dogs that we like to enjoy hikes and skis with around Southcentral, but the fear of traps placed near the trail casts a long shadow on our time trying to recreate. The consequences of traps set too near trailheads are great, and this simple piece of legislation could protect tens and hundreds of dogs and families.

Submitted By
Dyan Ecklund
Submitted On
12/29/2021 12:18:33 PM
Affiliation



PC210
1 of 1

I along with probably 95 % of all alaskans support the 50 yard trapping set back from multiuse trails. It is a no brainer. The bigger question is why any agency is continuing to allow trapping in the present day. Slavery has been abolished, women suffrage is established, child labor is regulated- just to name a few things that had been accepted as the rights of us citizens (men) for decades but as the nation evolved it became evident that these practices were not unalienable rights and needed to be gotten rid of. The same is true of trapping in almost all circumstances. I hope the 50 yard set back is just the beginning of eliminating trapping once and for all. My own personal dog was caught in a snare on a public trail 20 yards from a subdivision last winter.



Submitted By
Emily Forstner
Submitted On
1/7/2022 3:17:57 PM
Affiliation

Phone
9073556469

Email
forstner@mtaonline.net

Address
PO 3942
Palmer, Alaska 99645

I am support of the proposed 50 yard setback for traps for the multi-use trails throughout the Mat Su. The Mat Su's trail activity has increased exponentially with the population. The proposed regulation for 50 yard trap setback is a necessary compromise as multi-use of trails becomes just that- multiplied.

I do not consider the counter argument of loose leash dogs being adequate. Without the set back, even a dog being trained on a long leash is at risk. The question that the regulation answers isn't is this a hardship on trappers, or is the lack of a regulation a threat to trail users. The question to be answered is, how do we regulate multi-use trails in an area that is increasingly populated. Leash laws are in place. That is one solution. Now, trapping regulations need to be in place for another solution.

Thank you.



Submitted By
Eugen Beutler
Submitted On
1/7/2022 6:42:36 AM
Affiliation

Phone
9074910440
Email
beutler.eugen@gmail.com
Address
307 Third Avenue
Seward , Alaska 99664

Dear board members, as an multi use trail recreationist I support the proposed 50 yard setback for traps to be placed on regularly and frequently used trails. I believe this enhances the experience for everybody, including the trappers who would have their traps less disturbed with by non taget animals or people.
Thanks for taking my comment into account.
Regards, Eugen



Submitted By
Gail French
Submitted On
12/18/2021 8:01:52 AM
Affiliation

Phone
9073510880
Email
gailpfrench@gmail.com
Address
685 Birch St
Anchorage, Alaska 99501

I request that a min of 50 yards set back for trapping be inacted. I bike with my dog, it is impractical and unsafe to have him tied to my bike, He stays near me but could be distacted if a humk of meat was right next to the trail.

Thank you Gail French

Submitted By
Heather Branvold-Faber
Submitted On
12/29/2021 12:43:19 PM
Affiliation



PC214
1 of 1

I am writing in support of the 50 yard trap setback from over 200 designated multi-use trails in the Mat-Su area. This is long overdue. Many non-target species, including domestic dogs, have been caught or killed in traps that have been set far too close to trails and trail heads. Just last week a dog was caught in a snare that was placed only 10-15 ft from the trail in the Moose Range area. Many people recreate in these areas with children and dogs under voice/electric collar control, and they should not have to fear their child or pet may get caught or injured in a trap so close to the trail. Please enact this proposal to prohibit trapping so close trials. Thank you.

Heather



Submitted By
Heather Pelletier
Submitted On
12/20/2021 5:11:33 PM
Affiliation

Phone
9079825138

Email
valleygirl907@outlook.com

Address
16699 Back Acres Rd
PO BOX 2268
Palmer, Alaska 99645

I am in full support of trapping setbacks on multi use trails in Mat-Su (and the rest of Alaska). This will somewhat mitigate the conflicts between trappers and other users on popular trails.



Submitted By
Heidi Knudsvig
Submitted On
1/2/2022 12:25:54 PM
Affiliation

Phone
970-305-6393

Email
heidi.knudsvig@gmail.com

Address
PO Box 203
Talkeetna , Alaska 99676

I am submitting a comment in support of the regulation requiring a 50 yard setback for traps and snares. As a dog owner and user of multiuse trails, I would like to have the piece of mind that if my dog steps off the trail and wanders into the woods, she will not accidentally set off a trap. I support trappers and their right to set traps in Alaska, but I would hope that the rights of recreationalists be considered, too. A 50 yard setback would not degrade the rights of the trapper, but that setback could save the life of a dog. Please consider implementing this setback for trapping on multiuse trails and give dog owners piece of mind while enjoying our beautiful trails.

Regards,

Heidi Knudsvig, Talkeetna



Submitted By
Jacob Gabriel Richards
Submitted On
10/31/2021 5:22:23 PM
Affiliation

Phone
5205374547

Email
jr6115007@gmail.com

Address
4900 East 5th Street Apt.1210
1210
Tuscon, Arizona 85711

Dear fish and game of Alaska. I heard that reports from the people on the trails are becoming a safety risk because of traps being put near frequently used trails buy people and pets and wildlife. And sometimes some people got killed and injured buy these illegal traps. Please do more to remove them from trails to keep people and pets safe. Thank you have a happy Halloween.



Submitted By
Jacob Owens
Submitted On
1/3/2022 5:14:20 PM
Affiliation

Phone
9072994954

Email
jakeowens1@gmail.com

Address
10821 Klutina Circle
Eagle River, Alaska 99577

As a dog owner, this is always a concern of mine. I support people being able to trap, but how close traps are to trails sometimes is incredibly concerning. Please consider the proposal to increase the setback from trails. It increases safety and reduces the risk of conflict over different user bases of our great outdoors



Submitted By
James Brian Mead
Submitted On
1/2/2022 3:34:59 PM
Affiliation

Phone
9072322264

Email
bmead66@gmail.com

Address
2601 W Hackamore Road
Wasilla, Alaska 99654

I am full support of trapping in Alaska as well as a 50 yard set-back along popular trails and access. There is plenty of room for everyone to share and support each other. The set back addresses a prime safety concern as outdoor hiking and biking gain popularity with more people and their dogs using these trail systems.

Submitted By
Jessica Klekka
Submitted On
1/5/2022 9:06:48 PM
Affiliation



PC220
1 of 1

I am a local veterinarian who practices in the matsu valley. I grew up out in Western Alaska around trapping and I very much respect responsible trapping. However since living in the matsu valley it has become apparent that we have a problem with irresponsible trapping. I have treated numerous patients who have been snared or caught in foot traps, many of these patients are maimed for life. Reasonable trapping setbacks are needed along our major multi-use trails. This winter I experienced a terrifying encounter with a trap placed too close to a multi use trail. When I am not practicing as a veterinarian I enjoy competitively racing sled dogs. I am also a 2x Iditarod finisher which means I spend alot of time out on our local trails. This winter I was running a dog team down a main trail that feeds into the historic Iditarod trail when my dogsled ran over something metal. I stopped the team and walked back to see what we had just ran over as it was in the middle of the trail and I suspected it had fallen off another snowmachine or dogsled. What I found was a closed foot trap in the middle of the trail. Thinking the trap was not where is was supposed to be I picked up the trap and found that it was in fact still tethered to a tree inches from the trail. So the trap was in fact where the trapper had placed it and in the trail where it was a danger to people and pets. As a veterinarian I know all too well how damaging this trap could have been had one of the dogs in my team stepped into it. I believe reasonable trap set backs and their enforcement will only encourage responsible trapping and also keep our local trails safe for all to enjoy. I am fully in support of responsible trapping and I believe enforcing trail setbacks in the matsu valley will encourage responsible trapping and create consequences for irresponsible trappers who pose a risk to humans and our pets.



Submitted By
Judith Masteller DVM
Submitted On
12/30/2021 7:57:41 AM
Affiliation

Phone
9073766275

Email
markjudy@mtaonline.net

Address
641 S. Lower Rd
Palmer, Alaska 99645

I support at least 50 yard trap set backs on multi- use trails in the Mat-Su area.



Submitted By
K. Ashmore Roberts
Submitted On
12/20/2021 3:03:09 PM
Affiliation

Phone
907-354-3596
Email
khsroberts53@gmail.com

Address
9520 N Wolverine Rd
Palmer, Alaska 99645-8734

Enacting these regulations will help to ensure that pedestrians and pets are not sharing public trail systems with trappers. To consider that this is an acceptable practice is beyond reasonable.

Submitted By
Katie Brown

Submitted On
1/7/2022 10:47:37 PM

Affiliation



PC223
1 of 1

Good Day, I am in support of both proposals. It's not too much to ask trappers to walk a little further from the trail for the safety of humans and pets. It's also not much to ask them to properly tag the traps, shouldn't be a problem if they aren't doing anything wrong. Personally I think it's outrageous that traps can be set literally on a trail with no identifying information...and if a person or pet gets caught up and were able to release, we have to then set the trap again. Do better.

Submitted By
Keith Robertson
Submitted On
1/7/2022 4:02:42 PM
Affiliation



PC224
1 of 1

This is a reasonable compromise between users of the trails. Responsible and ethical trappers are already at least 50 yards away from any of these trails. This should be supported by trappers as 50 yards is hardly and unbearable burden, and it reduces the risk of conflicts. Every time a dog gets caught in a trap and the tragic pictures flood social media, large groups of people call for much stricter restrictions or bans on trapping. Avoid the conflicts and avoid much more drastic regulations in the future with some sensible rules now.



Submitted By
Kelly Selmer
Submitted On
12/20/2021 8:15:46 PM
Affiliation

Phone
9077157144

Email
Kelly.selmer@yahoo.com

Address
PO Box 4775
Palmer, Alaska 99645

I urge you to make minimum setbacks on multi use trails in the MatSu. It's not right to have to worry about children and family pets being maimed or worse on "multi-use" trails. Finding evidence of trapping right next to the trail is scary and ruins the walk/hike. Trapping should be done off trail AWAY from others. Safety should be a priority.



Submitted By
Kelly Wells
Submitted On
1/6/2022 7:45:27 PM
Affiliation

Phone
503-593-2059

Email
kellyaswells@gmail.com

Address
141 Perryville Rd
Hampton, New Jersey 08827

I am Alaskan born and raised. In 2021, my friend's dog was killed in a trap while her family desperately tried to save her and she died in minutes, only a few yards off of a main trail. Regulating trapping will make it safer for pets and for people, and hopefully no family will have to go through this again.



Submitted By
ken green
Submitted On
1/7/2022 7:01:58 PM
Affiliation

Phone
9075951643

Email
kennkay@arctic.net

Address
19350 Rusty's Way
cooper landing, Alaska 99572

I support set back regulations for multi-use trails in Alaska. If the BOG and the Trappers Assoc. have issues with "trappers rights" I believe they should meet with groups wishing to establish setbacks for trails and come to agreements as to what setback distances are reasonable. The BOG simply votes down proposals like this without taking the time or effort to adjust them.

Submitted By
Laura Wright
Submitted On
1/3/2022 1:24:35 PM
Affiliation
Self



PC228
1 of 1

Greetings,

I am an avid Nordic skier and skijorer. I ski with my dogs. Often I have a small sled in front of me that the dogs pull. This means that the dogs are approximately 20 feet in front of me. It would be very easy for them to get into a trap were it near a trail.

I have had this happen before along trails when I skied with my dogs to Nome. I do not want the same thing to happen on my local trails in the MatSu Valley.

Last winter while skiing on an undeveloped Borough road I skied over "blind trap". It was very scary for me and I wondered why or how a trap could be there in the first place. I then learned that there are very few regulations for trappers and that it is about ethics.

I don't want to rely on the ethics of strangers.

A 50 yard setback for traps is a fair compromise and shouldn't hinder trappers' ability to maintain their traplines.

Thank you.



Submitted By
Leslie LaJeunesse
Submitted On
12/27/2021 11:26:20 PM
Affiliation

Phone
3042085726

Email
Lajeunessem@gmail.com

Address
401 N Main Street
874453
Wasilla , Alaska 99687

I support safe and mindful access to Alaska public land. This requires land uses to be mindful of the area and each other. Requiring traps be set back not only protects the public at large but also helps ensure traps are not disturbed. Both sides benefit.



Submitted By
Lisa RODERICK
Submitted On
1/2/2022 1:02:29 PM
Affiliation

Phone
9078418424

Email
alaskasunflower@gmail.com

Address
Po box 533
TALKEETNA, Alaska 99676

I would like to comment that I think the 50 yard set back for traps is a good compromise, as I dog owner in Talkeetna I worry my dog getting caught in a trap, a very scary thing to deal with. Thank you

Submitted By
Lori Ward
Submitted On
1/7/2022 12:09:46 PM
Affiliation



PC231
1 of 1

I support a 50 yard setback of any traps from all trails.

I support finding a reasonable compromise for recreational trail users and their pets, as well as trappers.

Submitted By
Lydia Furman Peter
Submitted On
10/3/2021 6:03:54 AM
Affiliation



PC232
1 of 1

I support the Alaska Wildlife Alliance proposal for a 50 yard set back as a minimum standard on proposed trails. I am categorically opposed to trapping which is inherently cruel.



Submitted By
Mark Rockwell
Submitted On
1/6/2022 8:32:31 PM
Affiliation
Self

Phone
907 388-4313

Email
rockwellmno@gmail.com

Address
1825 Woodbine dr
Fairbanks, Alaska 99709

Please prohibit trapping near trailheads and trails and driveways and section lines and everywhere else people pets can roam. Take the trapping to the most remote areas possible. Trapping isn't all that nessesary.

Submitted By
Mary Shannon Huber
Submitted On
12/22/2021 9:02:21 AM
Affiliation



PC234
1 of 1

- As a lifelong Valley resident and outdoor devotee, it is alarming to me that trappers are setting active traps along heavily used multi use trails. The population here has grown and ignoring the negative impact of trapping where so many people go has reached critical mass. We need to create enforceable laws about trapping along and in areas where families adventure. There are many posts on social media regarding aggressive trappers and their entitlement attitude about where they place traps, as if they are the only trail users. This is unacceptable. It is time to readdress the curent laws and apply limitations on trapping in multiuse areas.

Submitted By
Marybeth S Holleman
Submitted On
11/19/2021 7:08:44 PM
Affiliation



PC235
1 of 1

I urge the Alaska Board of Game to approve the Alaska Wildlife Alliance's proposal requesting **50-yard trap setbacks on over 200 multi-use trails in the Mat-Su Valley**. These are reasonable boundaries which will protect people and their pets from being caught and killed in traps, and provides for the safety of multi-use activities on the area's most heavily-used trails.



Submitted By
Maxine D Franklin
Submitted On
1/3/2022 3:47:44 PM
Affiliation

Phone
19073547204

Email
pinebird@mtaonline.net

Address
3051 E. Elderberry Drive, Wasilla, AK 99654
Wasilla, Alaska 99654

The issue of traps on trails has been brought before the Board of Game repeatedly over the past 20 years to no avail. The problem of trapping non-target animals (and injuring people) has not gone away, in fact it has increased.

The BOG has another opportunity to do the right thing for the community as a whole by regulating this largely uncontrolled user group, some members of which are responsible trappers and do the right thing. This proposal would only limit that small segment of irresponsible people who don't follow the admonition to trap only in such a way as to minimize catching non-target animals.

BOG members: just do it once and for all. Put this issue to rest. Vote yes for this proposal. Otherwise it will come up interminably, the result of which just makes you look like you don't care about the broad spectrum of trail users unless they are trappers.



Submitted By
Michael Bowles
Submitted On
12/20/2021 10:36:40 AM
Affiliation

Phone
9073551355
Email
mbowles13@gmail.com

Address
PO Box 2264
Palmer, Alaska 99645

Trapping in Alaska is a tradition and a means of income and lifestyle for many residents. I think everyone that wants to trap should be able to maintain that right however, there also needs to be consideration for those in the Matsu Valley that choose to use the established trail systems, to include along the Knik River, to hike and walk dogs. I ask that the board considers mandating a 50 foot area along all established trail systems in the Matsu Valley where trapping is not allowed in that 50 foot area, in an effort to protect both humans and dogs that utilize the trails regularly.



Submitted By
Michael Johndro
Submitted On
12/20/2021 3:04:16 PM
Affiliation

Phone
9073555800
Email
Pumba@yahoo.com
Address
21848 E Knik River Rd
Palmer, Alaska 99645

I am writing concerning the review and possible modification of trapping regulations. I live around Mile 4.3 of Knik River Rd. And have done so for 30 years. I recreate on several trails around my home and have witnessed sets at many places along the old roadbed trail as well as trails leading to this trail. In some cases the trap was right next to a footbridge that is used by myself, my children and grandchildren. That particular was a canaber but have seen leg hold as well as multiple snares. I am by no means against trapping but there needs to be common sense regulations on locating sets well away from established and well used trails. I have found neighbors pets in snares (fortunately not her deceased) and do not want anybody's pet to be killed. I understand the need for leash laws but there are times/places where it is appropriate to let your dog let off a little steam. I have read that you may be contemplating a 50 yard setback from established trails-that would be awesome!

Submitted By
Mike Amos
Submitted On
1/7/2022 11:34:47 AM
Affiliation



PC239
1 of 1

Trapping setbacks on Alaska trails, parking areas, etc. is a statewide issue that needs to be addressed and action taken. I'm writing in support of the setbacks being proposed for the Mat-Su valley area, the protection of our pets and safety to the users of these areas needs to be looked at seriously. It is stated in the Alaska Trappers Association "A Trappers Code of Ethics" #3 "Promote trapping methods that will reduce the possibility of of catching nontarget animals".

Alaska Dept of Fish and Game trapping regulations states (page 6) Act responsibly as a trapper and conservationist by trapping in ways to minimize conflict between trapping and other users, for example, avoid high recreational use areas. Avoid situations where you might catch a domestic dog or cat, such as near homes or trails frequently used by hikers, skijorers, dog mushers, or other people. Thank you for allowing me to show my support of trapping setbacks in the Mat-Su area.

Mike A.



Submitted By
Milissa Lewis
Submitted On
1/7/2022 9:19:27 AM
Affiliation

Phone
2074684608

Email
milissa.lewisdvm@gmail.com

Address
9693 N Little Otter Drive
Palmer, Alaska 99645

I am a veterinarian that has worked in the valley the past five years and I'm an avid trail user. I have seen what traps can do to dogs first hand and it is a tragic event that can be avoided. As a dog owner, I am always concerned that my dogs will accidentally get into traps that are set too close to the trail. I believe this trail setback regulation will allow trappers and trail users with dogs to safely recreate together and avoid unnecessary harm.



Submitted By
Nicole Stuemke
Submitted On
1/7/2022 1:36:34 PM
Affiliation

Phone
907-440-2466

Email
Nicolestuemke@hotmail.com

Address
3056 leighton st unit b
Anchorage , Alaska 99517

Alaska is big and loved by many. Multiuse trail show be maintained as safe for not only dogs but children. Children often run free around trails and are easy victims to these very dangerous and hidden traps that lay too close to trails. Leashed dogs are also victims of these traps. I do not wish to see trapping prohibited but any multiuse or widely used area needs to be safe for people and their leashes animals. I have had friends with small children and leashes dogs caught in traps on upper hillside trails often used for biking and skiing and these snares were just 2 feet in low brush off the very highly used trail. That weekend 9 snares were found. Please understand the desire for safe use for everyone, including trappers.

Submitted By
Olivia Pfeifer

Submitted On
1/7/2022 11:03:47 AM

Affiliation



PC242
1 of 1

I support the proposal to institute 50 yard trap setbacks from over 200 designated multi-use trails in the Mat-Su area. My perspective is that of a dog-owner with no trapping experience. I recognize the importance of trapping in Alaska and hope ADF&G is able to find a solution that continues to support the practice, while creating safe spaces for Alaskans to recreate without fear for their animals or themselves.



Submitted By
Peggy A Meisch
Submitted On
11/19/2021 2:28:29 PM
Affiliation

Phone
6122091259
Email
pmeisch@aol.com

Address
27828 Lyons St NE
North Branch, Minnesota 55056

As a frequent visitor to Alaska, I find it appalling that trapping is allowed near multi-use trails. I most certainly wouldn't want to inadvertently step into one of these traps, nor would someone's pet. Isn't wilderness for ALL to use, not just trappers and hunters?

Submitted By
Ray
Submitted On
1/6/2022 9:36:13 PM
Affiliation



PC244
1 of 1

I am writing in support of Proposal 199 because of the additional safety it provides out dogs. Local trails are used by a wide variety of people but our dogs are what are at risk. This measure is a reasonable buffer to reduce the number of dogs caught in traps.



Submitted By
Richard Brewer
Submitted On
1/6/2022 1:35:47 PM
Affiliation

Phone
9076026460
Email
prattcamp@gmail.com

Address
HC 60 Box 167
Copper center, Alaska 99573

I wish to nominate a trail next to my property at Mile 66 of the Richardson Highway for inclusion to the requirement setbacks for trapping.

The trail is at M66.3 of the Richardson Highway.

The trail is the only legal access to backcountry including Fourth of July Creek and Slate Creek flowing into the Little Tonsina River

Trap(s) for the first 600 yards of the trail accessing the South side if the Richardson Highway are Actually ON the trail

Years ago I testified before the Board of Game in Anchorage asking "Please institute some setback requirements for all trails especially the one adjacent to my property"

The Board told me I needed to speak to the trapper(s)

Did that Traps still ON the trail



Submitted By
Richard Kenshalo
Submitted On
1/7/2022 10:21:53 AM
Affiliation

Phone
907-354-3115
Email
rkenshalo@gmail.com

Address
17288 E. Lake George Drive
Palmer , Alaska 99645

The increase in setbacks for trapping are reasonable. I think most Alaskans agree that trappers don't need to trap right on or next to designated, maintained multi-use trails. Since most trappers behave ethically and don't place traps in multi-use corridors already, this proposal will not burden ethical trappers at all. This proposal only limits those who set "problem" traps.

Submitted By
Rob Earl
Submitted On
1/7/2022 7:08:15 PM
Affiliation



PC247
1 of 1

I support the 50 yard set back rule. In fact, I'd support outlawing trapping altogether.

Submitted By
Roger DuBrock
Submitted On
1/5/2022 10:08:25 PM
Affiliation
mat-su property owner



PC248
1 of 1

Responsible long time trappers have trapped near my home on the McCarthy Road for years. They are friends of mine and would never set traps in places where they might catch someone's dog. This winter, what I would call hobbyist trappers set a bunch of cat snares near pullouts on the road: places where the long time trappers would never set traps because they would be too likely to catch someone's dog. On top of that, they set the traps in November when cat fur would not be saleable. And on top of that, none of the local trappers are trapping cats this year, because the price is too low.

Real trappers, people who depend on the income from, trapping, are, in my experience very respectful of others and would not set traps where they are very likely to catch someone's dog. In addition to my place on the McCarthy road, I own property on the Petersville road, and I support a ban on trapping near multi-use trails, in the Petersville area, and statewide.



Submitted By

Russell Green

Submitted On

12/21/2021 10:46:23 AM

Affiliation

Phone

907414 7225

Email

Alaskamedic1911@yahoo.com

Address

1150 S Colony Way

Suite 3PMB 288

Palmer, Alaska 99645

Completely in favor of regulating to keep all traps away from trails. Alaska is a big state and there is no need to set traps on trails widely used by others.

Submitted By
RUSSELL Riddles
Submitted On
1/6/2022 8:08:24 PM
Affiliation



PC250
1 of 1

I'm a born and raised Alaskan. I'm not ant-trapping and have even trapped in the passed. However there have been far to many incidents in the last few year were dogs are getting killed and dogs and people are getting injured. We have far to many lazy road side trappers marking sets at and along trails, pullout and even on private property. This has been a ongoing issue for many years and thus far no changes have been made to address the problem. Are state is growing and we are going to have more ad more people on these trails and road ways. Let's start making the right changes now so everyone can enjoy what our state has to offer. I would hate to see another child get Thier arm broke by a conabear



Submitted By
Ryan Fisher
Submitted On
1/7/2022 9:16:31 AM
Affiliation

Phone
907-491-0552
Email
Fisher.wvu@gmail.com
Address
9693 n little otter dr
Palmer, Alaska 99664

Please enact a trail trapping setback on all public multi use trails. These trails are for multi use recreation, not harvesting game. There is more than enough land in alaska for trappers to access without relying on public maintained, multi use trails. If those are the only trails they can trap from then maybe they need to reevaluate why they are trapping. Traditional trapping heritage did not rely on public trails.

Thank you



Submitted By
Ryan peterson
Submitted On
1/5/2022 8:22:50 PM
Affiliation

Phone
9075706841
Email
Firstcast@gmail.com

Address
2000 hillcrest 99517
Anc, Alaska 99517

I support trapping. No responsible trapper traps near a multi use trail. Let's prevent irresponsible trappers from setting traps near them. I support the 50yard setback.



Submitted By
Sabrina Shaw
Submitted On
1/7/2022 4:37:10 PM
Affiliation
citizen

Phone
9072325224

Email
sssak@mtaonline.net

Address
4988 Danielle
Wasilla, Alaska 99654

- Trappers who follow the Trapper's Code of Ethics' third tenant, to "promote trapping methods that will reduce the possibility of catching non-target animals," already trap away from heavily used trails. This setback will likely not impact trappers who already avoid trap conflicts in multi-use areas.
-
- Having lived here 40 plus years assisting on traplines 1980's, I will state that no decent Alaska trapper would have an issue with this regulation. Only entitled trappers of today would take issue with this, In the past no trappers would think to set a trap along a trail used for other purposes, this would pose to many problems, wasting time and money.
-
- I will state that no decent Alaska trapper would have an issue with this regulation.
-

Submitted By
Sean Jensen
Submitted On
1/6/2022 7:31:06 PM
Affiliation



PC254
1 of 1

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

Submitted By
sherj musgrave
Submitted On
1/7/2022 6:56:45 PM
Affiliation



PC255
1 of 1

As a lifetime dog owner, I fully support a trapping setback off of multiuse trails. I am not against trapping. I support a persons right to earn a living. I am just against the trapping of pets.

Submitted By
Susan Vogt
Submitted On
11/19/2021 5:24:54 PM
Affiliation



PC256
1 of 1

Trapping should be totally banned on multiuse trails. My dog got caught in a trap and it made me want to trap the trapper! I am tired of their rights being more important than mine!



Submitted By
Sylvia Maiellaro
Submitted On
11/19/2021 3:33:21 PM
Affiliation

Phone
9077273499

Email
sylvia.maiellaro@gmail.com

Address
6412 E 15TH CT
ANCHORAGE, Alaska 995042503

PLEASE enlist the 50 yard set back for Trapping placements in Anchorage and the Mat-Su and frankly anywhere there is pedestrain/ Pet traffic.. I hike, with friends who have pets regularly all over Anchorage the Mat-Su.. It is incredulous to me that this is even an issue.. How can Traps/Snares etc co-exist SAFELY within Pedestrian Locale.

Amazing !!

Thank you



Submitted By
Teri
Submitted On
1/5/2022 4:43:56 PM
Affiliation
resident

Phone
9072447911
Email
ak2bucks@gmail.com
Address
PO Box 703
Palmer, Alaska 99645

I am writing in support of both Proposal 199 and Proposal 228. Thank you for your consideration.

Submitted By
Terry Cummings
Submitted On
11/21/2021 8:51:34 AM
Affiliation



PC259
1 of 1

Trapping should not be allowed in any proximity to trails and/or recreational areas nor to any nearby housing. Dogs frequently die causing emotional harm to families due to the allowance of traps near trails. They die a horrible death in front of their owners. Traps are also a risk to humans. This is not a recreational sport and it is an inhumane practice.

Submitted By
Tessa Shope
Submitted On
1/7/2022 3:44:54 PM
Affiliation



PC260
1 of 1

As an avid outdoors person and dog owner, I support the proposal of 50 yard setbacks.



Submitted By
Don Bumbalough
Submitted On
9/7/2021 7:58:06 PM
Affiliation

Phone
865-635-1977

Email
dbumbalough5@outlook.com

Address
214 Eisenhower Ln
Kenai , Alaska 99611

I don't feel like increased restrictions on trapping should be implemented because of possible conflicts with pets. Pets should be kept under control by the owners and it is them that shoulder the responsibility for they're pets safety. Thank you for your time.

Submitted By
Jeremy
Submitted On
9/8/2021 2:47:51 PM
Affiliation



PC262
1 of 1

I do not agree with making trappers change there trap lines because people that use trails (probably made by trappers) to hike or ski or recreational use cause they don't keep dogs on leash or under control, Alaska is a trapping state, trapping is a way of life for many hiking and skiing isn't,



Submitted By
John A Shaubach
Submitted On
12/20/2021 7:05:55 PM
Affiliation

Phone
9073013375
Email
johnshaubach@yahoo.com
Address
PO Box 874508
Wasilla, Alaska 99687

Vote NO.

This proposal goes against our state constitution which entitles all Alaskans access and use of state lands.

Trappers support Fish and Game financially through licensing as well as meeting and maintaining conservation goals.

If pet owners followed and abided to the leash law that has been on the books for years, not one of the incidents listed would have occurred.

Creating a law to appease people that break the law or that refuse to follow it is ludicrous.



Submitted By

Kim crandall

Submitted On

1/3/2022 9:54:48 AM

Affiliation

Phone

907-982-7470

Email

Flatbrokefarmak@hotmail.com

Address

7121 w silver dr

Wasilla , Alaska 99623

I do not support any restrictions imposed on trapper or setbacks, there are current rules for dogs that are not being followed but it's the trappers fault, no personal responsibility. This will impose to many restrictions on a already tough sport, like trapping

Submitted By
Ross Beal
Submitted On
12/31/2021 6:10:08 PM
Affiliation



PC265
1 of 1

I cannot support this blanket restriction to trapping.



Submitted By
Samantha Gibson
Submitted On
1/3/2022 10:02:28 AM
Affiliation

Phone
907-982-3285

Email
Flatbrokefarmak@hotmail.com

Address
7121 w silver drive
Wasilla, Alaska 99623

The setbacks are to restrictive and make trapping very difficult. The focus is on one group and not another making it to hard to trap and on trails that most don't even use with the exception of snowmobilers and hard core mushers. I think every dog should be required to have a bright orange vest when not on a lease and their owners should be required to take a trapper safety class if the decide to let their dogs run free



Submitted By

Scott Wade

Submitted On

12/23/2021 12:34:18 PM

Affiliation

Phone

7179820314

Email

Scottwade6490@gmail.com

Address

1684 Palomino Drive

North Pole, Alaska 99705

I do not support the restrictions on trappers. Dogs and trappers have long coexisted across Alaska. The proposal to limit trappers from trapping near trails and trailheads is flawed in its logic. I have been harrassed by dog owners on trails that I cut for trapping and even the trail I cut for a bear bait station for trapping there. The idea of restricting trappers and not holding handlers responsible for not have a control of their dogs is unfair and will lead to more and more restrictions on everyone.



Submitted By
Adam Gehrke
Submitted On
1/6/2022 11:12:46 AM
Affiliation

Phone
3034899572

Email
Tradslam@yahoo.com

Address
2681 s Teeland st
Wasilla , Alaska 99623

It's good to see the idea of traditional (longbow , recurve)only tags close to the valley. It would be an excellent tool to get people in the woods and let animal numbers bounce back after being hit by bad winters or predators.



Submitted By
Brad friend
Submitted On
1/6/2022 3:31:45 PM
Affiliation

Phone
9188071293

Email
Frien687@aol.com

Address
P.O. Box 2396
Sapulpa , Oklahoma 74067

I think the trad season is a great management plan and a win win for everyone!



Submitted By
Breck Dickinson
Submitted On
2/20/2021 6:52:16 PM
Affiliation

Phone
7609604252

Email
brecktaxidermy@sbcglobal.net

Address
247 N 8th st
El Centro, California 92243

Please consider increasing the number of Emperor Goose permits for non-residents. Surely the non-residents are not putting a strain on the goose population.



Submitted By
Cherryl Allen
Submitted On
11/16/2021 5:50:45 AM
Affiliation

Phone
441158789890
Email
cherryl.allen@btinternet.com

Address
34 Thistledown Road
Clifton
Nottingham, Other NG11 9DP

Why are you murdering the wolves why cant you leave the animals alone . They are needed they have been persecuted before . Why do you think you have the right to kill Gods creatures. Leave them alone. Go and lock up your morons use them for target practice. This is not 1860 come into the real world.I cannot believe how backward they are . You sure youve got electric lighting or are you still using oil lamps .

Submitted By
David & Lora Gray
Submitted On
1/7/2022 7:18:10 PM
Affiliation



PC272
1 of 1

To Whom It May Concern,

I'm writing to express our family's deep appreciation for CM300. Our Native way of life is being passed on to our children and they are learning the value of sharing what we harvest with our older generations who can no longer hunt for themselves. This heritage is a gift we hope our children will pass on to their children. Please help us to continue this way of life.



Submitted By
David Hahn
Submitted On
1/7/2022 5:49:15 AM
Affiliation

Phone
2244229377

Email
skulblakasven@yahoo.com

Address
Po box 650
Anchor Point, Alaska 99556

As a life member of Alaska Bowhunters Association I would like the opportunity to have an August 22-31 bow season for moose in unit 15c. Just like units 15a and b.



Submitted By
Douglas Bourland
Submitted On
1/6/2022 12:05:09 PM
Affiliation

Phone
9719409873

Email
bourlanddouglas@gmail.com

Address
14221 SE Lyon Crest St
Happy Valley, Oregon 96086

Please consider the longbow/recurve hunt it would create great opportunity for sportsman. With all the technology in bows rifles and muzzleloaders it would be nice to have a real traditional unit.



Submitted By
Dustin Newer
Submitted On
1/6/2022 8:30:28 AM
Affiliation

Phone
580-339-0771

Email
Dustinnewer@gmail.com

Address
6023 Callahan Way NE
Piedmont, Oklahoma 73078

Please consider a limited weapons season they restricts hunters weapon to recurves and or longbows they must be hand drawn and held to release without the aid of sights or draw aids while pursuing Dall Sheep. It has been proven that by limiting the weapon, the success rates will also be limited thereby allowing more hunters to participate in the season. This is a win win for everyone.

Thank you,

Dustin Newer



Submitted By
Indra Arriaga
Submitted On
1/7/2022 10:23:48 AM
Affiliation

Phone
9079521959
Email
iarriaga@yahoo.com
Address
1404 Karluk St
Anchorage, Alaska 99501

To whom it may concern,

My households relies on the Community Hunt for food security throughout the year. I would not be able to hunt or process on my own, I just physically cannot. The community hunt exemplifies and promotes true Alaskan values of community-building, caring for one another, respecting the land and the animals. We ensure that the animal is used in its entirety and that meat distributon is equitable. Please protect community hunts, an Alaskan way of life on which many of us rely, especially now that the pandemic has disrupted shipping lines, and food is even more expensive in Alaska. Do not end the community hunt.

Thank you



Submitted By
Jack Lander
Submitted On
1/6/2022 10:01:46 AM
Affiliation

Phone
5416980132
Email
Jacklander@corban.edu
Address
5843 Delaney Rd se
Turner , Oregon 97392

I would like to say thank you for all of the work that you do. I recently discovered that there is talk of a proposed traditional archery fall sheep hunt. I love the idea of this and hope that you can consider making it a possibility. It would offer some incredible opportunity for traditional archers to experience hunting those magnificent animals and hone their skills to try and get extremely close to an animal that is very difficult to get close to. I believe that offering traditional seasons will not only increase opportunity, but increase the number of sheep on the landscape because fewer sheep will be killed as compared to normal rifle seasons. This would be an incredible opportunity for so many people who truly love hunting and getting as close as possible to the game they seek.

thank you!



Submitted By
James Anthony Zastrow
Submitted On
1/7/2022 5:10:52 PM
Affiliation

Phone
9072508188
Email
Zastrowfamily@yahoo.com
Address
6472 N Farm Loop road
Palmer, Alaska 99645

CM-300 Community Moose Hunt

Cm-300

Moose group# 3768-96

Group name: Aksala

My name is James Anthony Zastrow. I've been hunting the CM – 300 moose hunt for several years now. This is been a very important hunt for me and my family and many many of our older ones in our group. We have been able to share our meat with families that wouldn't normally be able to moose hunt.

I can't express enough how much we have enjoyed Cm-300 hunt in unit 13. It's been something we can do as a family, it's been a critical way for us to have our moose meat for the winter. With the rising cost of red meat, we have been able to support our family, friends and elderly ones with this source of meat. We so appreciate the Alaska Department of Fish Game, please continue the cm-300 moose hunt.

James Anthony Zastrow

Submitted By
James Dickson
Submitted On
1/6/2022 4:17:38 PM
Affiliation



PC279
1 of 1

Please consider the traditional archery only Dall's sheep proposal. Opportunity and memories in the field without the aid of modern archery technology.



Submitted By
Jason Samkowiak
Submitted On
1/7/2022 1:50:53 PM
Affiliation

Phone
586.350.5837
Email
Jason@samko.com

Address
266 pheasant way
Prudenville , Michigan 48651

I believe the traditional bow only mountain hunt would be a great addition. The difficulty of traditional bows would mean very low success numbers, but very happy hunters! Us traditional bowhunters love the adventure and opportunities way more than the harvest. Giving us the opportunity has very low impact but could make happy hunters and bring more revenue to the state and local communities.



Submitted By
Jed Workman
Submitted On
1/7/2022 9:34:28 AM
Affiliation

Phone
9077464566
Email
jedworkman@gmail.com

Address
POB 1223
17562 N Frisby Street
Chickaloon, Alaska 99674

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
John Equitz
Submitted On
12/16/2021 11:44:18 AM
Affiliation



PC282
1 of 1

As with all First Nations with an inextricable connection to the land, there is no argument for restricting social/culture activities which are their foundation & lively hood.



Submitted By
Joseph K. Peyton
Submitted On
2/20/2021 7:00:43 PM
Affiliation

Phone
1-717-649-1824

Email
jpeyton1967@gmail.com

Address
20 Mackenzie Lane
Etters, Pennsylvania 17319

I would love to see way more opportunities for non resident waterfowl hunting permits for these birds. I really don't think the lottery system is fair when some have gotten a second chance to harvest a bird and others seem to never get that equal chance. It seemed liked the people with closet got pulled, taxidermists or big name people in the industry. Let's make it fair, and if the residence don't shoot what they are slotted, have a second lottery to allow for those that didn't get pulled in the first try. The state has a gold mine and should treat this as such, thank you again.



Submitted By
Justin Thomsen
Submitted On
1/6/2022 1:50:19 PM
Affiliation

Phone
480-737-2291

Email
Tradcroniesofaz@gmail.com

Address
3963 E Gable Avenue
Mesa, Arizona 85206

Would love to see additional opportunities to bowhunt Dall Sheep using traditional equipment. I am a traditional bowhunter and know the benefits of incorporating traditional archery seasons to increase opportunity while maintaining a relatively low success rate due to restrictions in technology. Thanks for your consideration!

Submitted By
Kendra Livingood
Submitted On
1/7/2022 8:25:18 PM
Affiliation



PC285
1 of 1

I would really like to be able to take my dog and toddler out on trails safely. I recently moved to Wasilla from other parts of Alaska and I've never had to worry about this. I've seen so many horror stories of what has happened to dogs and it would kill me if that happened to my boy. This shouldn't even be a question.



Submitted By
Leif Rinearson
Submitted On
1/7/2022 3:49:53 PM
Affiliation

Phone
541 961 4155
Email
leif.rinearson@gmail.com
Address
47930 Snipe Ave
Soldotna , Alaska 99669

I fully support all props that increase archery and youth opportunities. As a new resident of Alaska I was honestly surprised at the lack of youth and archery only opportunities in Alaska compared to other states I've hunted. Quality youth opportunities go a long ways to improve new hunter recruitment and can also generate more funding through applications. As someone who has worked in the archery industry I have first hand seen the explosion in popularity of bow hunting. Archery only opportunities increase interest in hunting, can generate more application dollars and can spread out hunting pressure. Being as archery hunting typically has a low success rate it can also increase opportunities while decreasing harvest rates. I know many people personally who would choose an archery only hunt over a rifle hunt, even with a lower success rate expected. Thank you for reading my input.



Keeping the CMU300Copper Basin Community Subsistence Hunt Active

1/5/2022

*THE FOLLOWING IS TO VOICE A STRONG OPINION FOR MANY
“ESTABLISHED MOOSE GROUPS’ WISHING TO KEEP THE “ANY BULL” IN
TACT : MY NAME IS STEVE MALNARICK, I AM THE GROUP LEADER FOR
“AKSALA”.*

*THE MALNARICK FAMILY ARRIVED IN WHITTIER ALASKA IN 1957 BY
BOAT. POPULATION 231,000 SPREAD OUT OVER THE ENTIRE STATE.*

*THE STATES’ HIGHWAY SYSTEM WAS BARE MINIMUM. THE ROADS WERE
WINEDY, STEEP, FOR THE MOST PART NO GUARDRAILS, 2 AND A HALF
FOOT SHOULDERS AND MAINTENANCE WAS SPOTTY. PICTURE THIS
PLEASE.....COMPARED TO TODAYS’ FEDERAL PALACIAL ROADS THAT
MILLIONS OF DOLLARS HAVE BEEN SPENT TO MAKE THINGS SAFER AND
FASTER FOR ALL 731,000 PLUS PEOPLE TODAY.*

*AS FOR UNIT 13 IT WAS ONLY APPROACHABLE BY RAILROAD OR BOAT
ON THE WEST AND THE GLENN HIGHWAY ON THE EAST UNTIL 1971 WHEN
THE PARKS HIGHWAY WAS FINISHED. THE REASON I AM MENTIONING
THIS TO BE QUITE BLUNT, IS THAT THE OLD ALASKA WAS TOUGH AND NOT
EASY GOING LIKE TODAY. FOR EXAMPLE A 1 MINUTE PHONE CALL WAS
\$3+: MOST EVERYTHING INTO ALASKA WAS SHIPPED IN TAKING 4 TO 8
WEEKS; AMENITIES ON THE ROAD SYSTEM WERE FEW AND FAR BETWEEN
AND THE TEMPERATURE WAS COLDER THAN NOW, 30 TO 50 BELOW ZERO
WAS COMMON IN UNIT 13. VEHICLES AND HUNTING RIGS WERE NOTHING
LIKE TODAY. ALL WE HAD WAS A CHAINED UP WILLYS JEEP WITH BIG
HEAVY WENCHES FRONT AND BACK WHICH BOTTOMED OUT ALL THE
TIME.....MANY OF THE TRAILS PEOPLE USE TODAY MY DAD HAD
PIONEERED FOR OTHERS TO FOLLOW, NOT IN BIG CLUMSY HEAVY JEEPS
BUT 4 WHEELERS, 6 X6’S, SNOW MACHINES, ARGOS; YOU NAME IT ITS OUT
THERE.....*



PAGE 2

WHAT IS MY POINT HERE? IT'S QUITE SIMPLE, OLD TIMERS LIKE THE AHTNA INDIANS OUR FAMILY AND OTHERS LIKE THEM WHO SURVIVED THE "OLD" ALASKA (PRE OIL PIPELINE DAYS) DEPENDED ON UNIT 13 FOR SUBSISTENCE FOOD.....NOT JUST MOOSE AND CARIBOU, BUT ALL OF IT, SOCKEYES, COHO, CHINOOK, PINK, CHUM, TROUT, GRAYLING, BURBOT....THEN THERE'S SMALL GAME, RABBITS, PTARMIGAN, GROUSE DUCKS AND GEESE,THE VEGATATION; THE BERRIES, FIDDLE FERNS AND MUSHROOMS.....AND FINALLY THE LAND IT SELF WITH VIEWS AND HIKES AND RIVER RAFTING, WHICH I LEARNED TO LOVE. THIS AREA BECAME OUR "BREAD BASKET". I LITERALLY GREW UP ON MOOSE AND CARIBOU JUST AS A NEBRASKAN WOULD GROW UP ON CORN.

EVERYONE ONE HAS HEARD OF HERITEGE AND GRANDFATHER RITES, WELL IT DEFFINITLY HAS EARNED ITS PLACE: THE CMU 300 IS QUITE FAIR REALLY,THERE WERE A FEW "BUGS" AT THE BEGINNING, ADDING CERTAIN RULES AND RESTRAINTS, A QUOTA PER EACH SUBUNIT; REPORTING KILLS WITHIN 24 HOURS AND SOMETHING VERY IMPORTANT, IS WHO QUALIFIES AND WHY: THERE IS NOW A POINT SYSTEM WHICH INDICATES A TIME LINE OF USAGE OF UNIT 13. TAKE FOR EXAMPLE OUR FAMILY...IT IS NOW 4 GENERATIONS; MY PARENTS, MY BROTHER AND I, MY TWO SONS, AND MY 3 GRAND CHILDREN (MY NEWEST GRANDCHILD IS ONLY 1YR, SO HE DOESN'T COUNT YET), THIS IS 65 YEARS OF OBTAINING FOOD FROM THIS AREA. MY OLDEST GRANDSON NOW ACCOMPANIES HIS DAD IN THE HUNTING AND PROCESSING OF THE MEAT. MY WIFE AND MY CHILDREN AND ALL 3 GRANDCHILDREN WERE BORN IN ALASKA. I FEEL THAT I'M AN ALASKAN NATIVE ALSO, AT 72YS OLD NOW, OVER HALF OF THE NATIVE POPULATION HAS NOT BEEN HERE AS LONG AS I HAVE....



P.3 LET'S CONSIDER THE MOOSE HUNT AND POPULATION OF MOOSE ITSELF. UNIT 13 IS UNDER MUCH SCRUTINY, THERE ARE ALL SORTS OF ENTITIES WANTING THIS RESOURCE; SPORTS HUNTERS, FEDERAL SUBSISTENCE, STATE SUSISTENCE, VEHICULAR DEATHS, MOTHER NATURE, AND DON'T FOR GET ~ PREDATION, YES BEARS AND WOLVES....DID YOU KNOW THAT THE AVERAGE BROWN BEAR (1) BEAR KILLS 12 CALVES PER YR AND WOLVES ARE NOT FAR BEHIND, ESPECIALLY SINCE THEY HUNT 365 DAYS A YEAR. SO THE MORE MOOSE THERE ARE AND SAVE THE MORE HAPPY HUNTERS THERE.....(MORE ON THIS IN THE CONCLUSION)

THE ALASKA DEPT OF FISH & GAME HAS QUITE A JUGGLING ACT TO TRY TO APPEASE ALL CONCERNS....OBVIOUSLY IT WOULD BE WONDERFUL IF ALL MOOSE HUNTERS GOT A MOOSE EVERY YEAR, TO MY KNOWLEDGE THIS HAS NEVER HAPPENED EVER IN ANY STATE AND NO DOUBT EVER WILL... SO THEY TRY TO APPORTION THESE BEAUTIFUL ANIMALS THE BEST THEY CAN....REMEMBER THE ALASKAN GOLD RUSH ? IF A GOLD MINER STAKED A CLAIM EVEN 5 MINUTES BEFORE ANOTHER MINER, THE FIRST MINER TO STAKE, IT WAS HIS. THE CMU 300 CAN BE LIKED TO THIS AND YET THERE IS FAIRNESS TOO, HOW, IN A SPECIFIC GROUP LETS SAY THERE IS A MEMBER WHO HAS THE POINTS TO GET AN "ANY BULL" TAG, HE THEN IS ALLOWED TO LET ANOTHER MEMBER TO USE HIS TAG. SO THE ANIMAL IS SHARED TO THE ENTIRE GROUP. THIS WHOLE CONCEPT HAS BEEN TRIED IN COURT IN ALASKA. REMEMBER, WE ARE TALKING ABOUT ONLY 100 MOOSE TO BE TAKEN IN ALL OF UNIT 13! (SPORT HUNTERS TAKE AROUND 700 IN UNIT 13) ONCE THIS QUOTA IS MET; ALL OF THE REST OF THE LICENSED HUNTERS BECOME AS EVERYONE ELSE.....THIS DOES SATISFY THE OLD ALASKANS WHO HAVE PUT THEIR TIME IN AND HAVE EATEN FISH AND GAME FOR MANY YEARS FROM UNIT 13, IT HAS BEEN MY FAMILIES LIFE AND MANY OTHERS. IT IS A RESOURCE THAT WE COUNT ON...



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IN CONCLUSION : THE POULATION OF ALASKA IS GROWING ESPECIALLY IN THE ANCHORAGE BOWL; OUTSIDE MONEY, HUGE LODGES AND DIFFERENT POINTS OF VIEW SPAWN OPINIONS THAT THIS SUBSISTENCE HUNT IS OLD FASHIONED OR UNNEEDED, WELL THERE ARE 1800 MEMBERS OF 72 GROUPS WHO DISAGREE WITH YOU.....IF YOU HAVEN'T BEEN LIVING OFF THE LAND FOR 65 YRS IN ALASKA AND TOUGHED IT OUT LIKE OTHERS HAVE, THEN YOUR POINT OF VIEW AND OPINIONS ARE UNNEEDED. FURTHERMORE, AFTER ALL OF THE EFFORTS OF THE AKdeptofFISH &GAME TO GET THIS PROGRAM UP AND RUNNING AND SEEING THAT IT IS WORKING FOR AHTNA AND NON AHTNA AK RESIDENTS ALIKE, IT IS A NICE BLENDING OF PAST AND FURTURE. LEAVE IT BE, IT IS FINE.

IF YOU WANT MORE MOOSE TO BE IN UNIT 13, SUPPORT THE F&GAMES EFFORTS ON SELECTIVE AERIAL WOLF HUNTS AND LOOSEN THE REGULATIONS ON THE TAKING OF BROWN BEAR. (JUST TEN MORE BEAR TAKEN OVER THE NORMAL HARVEST WOULD PRODUCE 120 MORE CALVES) OTHER SUGGESTIONS: 1) ALLOW BROWN BEAR BAITING TO QUALIFIED HUNTERS, and 2) SAME DAY AERIAL HUNTING FOR BROWN BEAR or 3) INITIATE BOTH, BEAR BAITING AND SAME DAY AERIAL HUNTING. THE BEAR POPULATION HAS REALLY BEEN INCREASING IN UNIT 13, A LITTLE THINNING WOULDN'T HURT.

RESPECTFULLY, BY A LONG TIME ALASKAN WHO WOULD LIKE TO SEE THIS STATE PROTECT AND UTILIZE OUR BELOVED RESOURCES AT THE SAME TIME, ~~~~ Steve Malnarick ~~~~



Submitted By
Melissa Shaginoff
Submitted On
1/7/2022 1:08:41 PM
Affiliation

Phone
9073986464
Email
mshaginoff@gmail.com

Address
2440 E. Tudor Rd.
PMB #185
Anchorage, Alaska 99507

This hunt takes place on Ahnna land. Over the years the community hunt honors this by giving percentage of their catch to Ahnna peoples. This is often the only way Elders and youth receive meat outside of cultural ceremonies. While every process could be improved upon, the role of the community hunt in creating food security for Indigenous peoples is crucial. The community hunt has had a personal effort on care for my tribe Chickaloon Village. I deeply appreciate the meat, the learning, and the experience the community hunt has provided me. Tsin'aen, thank you for your time.



Submitted By
Michael Arnette
Submitted On
1/6/2022 9:53:44 AM
Affiliation

Phone
9187246256

Email
talltinesarchery@gmail.com

Address
12701 west grant street
Wichita, Kansas 67235

Good morning Alaska, I am an avid bowhunter and hunt only with traditional equipment including longbows, recurves, and primitive selfbows. I am excited at the idea of increasing Hunter opportunity by decreasing and limiting equipment technology. I hope that the proposal to allow a season and tags for the traditional bow sheep hunt will be approved and that further opportunities may be allowed for those of us who now are forced to compete for tags that allow For equipment that is ethically effective at 500 or more yards. If this trend continues to other places people in their 30s like me may possibly be able to dream of drawing a sheep tag in the lower 48.



Sent: Wednesday, November 4, 2020 8:09 PM

Subject: moose in Unit 16A

Last winter we had over 19 feet of snow in Trapper Creek area. This caused a severe winter kill in our moose population. I know of only 3 moose taken this hunting season. With the illegal take and just shot moose there are no moose left. We need to take severe measures if its not to late already to regrow the herd. I would like to see a real count again to prove me incorrect please.

A wolf hunt in Unit 16A might help but coyotes are a big problem. A lot of the farmers in the area seem to complain about foxes being a problem with their chickens!

Thanks for your time looking into my concerns.

Neil DeWitt



Chugiak, AK. 99567

Sent via the Samsung Galaxy S10e, an AT&T 5G Evolution capable smartphone



Submitted By
Peter Van Steyn
Submitted On
2/20/2021 6:58:08 AM
Affiliation

Phone
Van Steyn

Email
Pmvansteynjr@gmail.com

Address
8133 Sherwood Forest Street SW
Lakewood, Washington 98498

I am sending correspondence in regards to the organization of the emperor goose hunt. I would like to draw attention to multiple issues within the organization of the hunt.

- first and foremost is the extremely low number of nonresident tags available. Nonresidents are frantically seeking opportunity to harvest these amazing birds and instead barely 2 dozen tags are drawn and then the rest go to residents who often will not even use all of the tags. Perhaps we increase the number of available tags for nonresident hunters.

- second is that if this is such a coveted tag, with only 25 available to nonresidents, why are we allowing those nonresident hunters who have successfully drawn and harvest emperor geese to reapply with some actually successfully being redrawn for the hunt. Why is this not a once in a life time tag, perhaps affording a higher chance of draw success for those that have not drawn previously. If this is such a at risk population requiring such tight management should hunters be able to harvest more than one in their lifetime?

- third point is the concept of preference points. Some have been applying since it's reopening with the hopes of drawing....only to find out others have been redrawn and that you yourself were unsuccessful. Creating a preference points system for this tag will help avoid those who've already drawn from repeating and afford those dedicated applicants who try year after year a better chance at drawing a coveted emperor tag.

thank you for your time and consideration on this matter.



Submitted By
Ron Mead
Submitted On
1/7/2022 5:41:02 AM
Affiliation

Phone
970 620 0870

Email
1longbow68@gmail.com

Address
238 Box Canyon rd.
Craig, Colorado 81625

Yes, let's have a Trad only season!



Submitted By
Roni Carmon
Submitted On
5/22/2021 4:58:28 PM
Affiliation
Nra

Phone
9079530238
Email
Dallasak789@hotmail.com
Address
51985arness rd
Kenai Ak
99611, Alaska 99611

I believe the hunting guides being licensed is a really good thing. But I believe the animals they shoot .

The price is too low. The moose, they need to take it all home,with them.

The [REDACTED] don't want the meat.

The hunter must take it home.

a 20,000 bear about right

a moose 15000.09

the resources of Alaska are then for free.

the salmon guides fish , are absolutely free to them.

Guides need to buy permits to fish.

Charter boats have taken 44 billion 310 million of revenue just off the Kenai peninsula alone.

They get there resources for free. Free fish ,300 days of fishing non stop.

The board of game, at least the guides are licensed,

Unlike the sports guides association,

The reap the fish , and leave alaaska with a pot of money



Submitted By
Stephen Wilber
Submitted On
4/21/2021 4:34:29 PM
Affiliation

Phone
8703212516
Email
srwilber@hotmail.com

Address
566 Northpointe Drive
Mountain Home, Arkansas 72653

This is in reference to Emperor Goose hunting regulations #32-50 I am a non-resident that hunts waterfowl and upland game each year in Alaska. I would very much like the opportunity to harvest 1 Emperor Goose in my lifetime. I would like to recommend that the Emperor Goose nonresident quota be expanded significantly. As far as I can tell, the amount of Emperors being harvested each year is far less than the numbers that were proposed (the numbers that the biologists felt were within the range that the population could handle). I would propose increasing the number of nonresident tags to at least 250 to 500. Thank you very much for your consideration!

Submitted By
Zach Manning
Submitted On
1/6/2022 11:06:54 AM
Affiliation



PC295
1 of 1

As a non resident, I fully support the traditional archery fall sheep hunting proposal. Limit the weapon, not the opportunity!