



My name is Michael Litzen owner and operator of Litzen Guide Service a guided hunting business and air taxi. My Master guide license number is 129 and my transporters license is 647. This coming August will be my 41<sup>st</sup> consecutive year of flying and guiding sheep hunters in the Western Alaska Range. I own a lodge and 5 acers in the Northeast corner of GMU 19-C. In addition to my guide work, I have been a F&G survey pilot for 38 years and have flown projects in many parts of the state for many Alaskan species. I have flown as a spotter plane for sheep captures and lambing mortality studies around Southcentral Alaska and trend counts for sheep GMU 19-C. Thank you for your service to the board and for taking the time to hear my comments.

I want to share my strong objections to the several proposals that seek to water down or repeal proposition 207. When proposition 207 was first being discussed, I had serious concerns. On the upside I did look forward to the more peaceful sheep hunting and better experience for the sheep hunters to not have Super Cubs buzzing around the sheep, but I thought I would be limited in how I might get my clients in position to have a good chance at harvesting a legal ram. After all, I had always been one of those “airplane guys”, how was I going to be able to manage it? After thinking it through and putting the first season with 207 into practice, I became a firm believer and supporter of proposition 207. In my area it cut the sheep scouting with planes during the season to nearly nothing. Over the years of living with 207 I have only had one incident of an airplane scouting sheep during the season that I could prove and that was by one of the founding members of RHAK. When I confronted him in the field about it, he was not very pleased with me and left the next morning. Proposition 207 has had the positive effect of an all-around better sheep hunting experience for all hunters that I had hoped and that it was intended to provide.

I’m however against any action to extend 207 into the youth or subsistence sheep season. Statistics show that the youth hunters have been small in numbers so I would not expect that some scouting then would significantly affect that hunt especially considering the more general surveys one would do days away from the general season. Resident hunters and guides need that time to do some looking around to see where they might do their sheep hunting. I THINK PROPOSITION 207 IS FINE JUST THE WAY IT IS.

The next proposal I would like to comment on is proposition 267. I’m strongly opposed to passing this proposal. I believe it seeks to take advantage of the lower sheep population that now exists in 19-C to advance a self-serving agenda. I started my guide career in 19-C in 1981. All through the 1980s sheep were very abundant. I was there in the early 1990s when extremely early and harsh winters crushed the sheep population all though the Alaska Range. No action by the F&G was taken then to close or change the season in any way and the population came back strong. These kinds of cycles happen throughout history and with a full curl management strategy no action by the F&G is needed.



To put 19-C on permits or to close it would not achieve any meaningful biological objective. Protecting some rams with a closure would not grow the population of sheep. All that would do is shift resident and guide sheep hunting pressure to other parts of the state that are already being fully utilized creating a problem there. The effect would be to limit resident sheep hunting opportunity.



Submitted By

Mark Luttrell

Submitted On

2/18/2022 3:44:53 PM

Affiliation

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I fully support proposal 199 which would create a 50 yard setback on popular MSB trails. I've had a dog caught in a snare and I recently watched the grief of a family who's dog was crushed in a connibear near me. It's horrendous. 50 yards is barely enough.

If trappers want to brighten their statewide image, supporting this is a good start.



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To whom it may concern,

I, Michael Makar, am a resident of the state of Alaska since 1974. I have hunted Dall Sheep every year that I have been able. Since my first sheep hunt, I have personally witnessed a substantial decline in sheep numbers. I have also witnessed an increase of hunting pressure to the general season Dall Sheep. Many years ago I recognized that there needs to be a limit on the number of non-resident sheep hunters allowed to hunt in Alaska. We all need to make compromises to make a healthy population again. I have not harvested a sheep since 2008 to do "My Part" and will continue to enjoy the hunt without the harvest with the hope that someday my kids and their children will have opportunities to hunt Dall Sheep.

I strongly support Proposal 267 to limit the non-resident hunting pressure on Dall Sheep.

I support Proposal 151

I support Proposal 241

Thank You, Mike Makar

Submitted By  
Anthony Marchini  
Submitted On  
2/16/2022 1:30:28 PM  
Affiliation



PC104  
1 of 1

I would like to take this time to comment on proposal #267. I am a born and raised Alaskan (growing up in Glennallen) I am apposed to this proposal for a number of reason. While I do guide in the falls most years I am first and foremost a hunter for myself, both to provide for my family and the enjoyment that I get from being in nature. 1) closing or making this area a draw only will just move the pressure that sheep hunting causes to different areas in the state. This will just drive more hunters into the Wrangell, Brooks, Whites ect. This does not fix the problem. The current population issues are that of nature and of timing. Record snow falls 8-10 years ago that had very low lamb survival rates coupled with recent hard winters that caused mature ram fatalities of a small number of animals in that age class already. If it is thought that hunting pressure is the reason that numbers are on decline then a more statewide approach must be made. Removing the bulk of the open area in the Alaska Range is going to have effects for the entire state. Nature and animals are cyclical, ebb and flow, up and down. There were large sheep declines in the 90's followed but large population spikes in the 2010's. A drastic change in management in my opinion would have downstream effects.

2). I believe that the statistics associated with this purposal are in some manners misleading. Most educated residents know that there has been a large mature ram die off in 19C and therefor have not hunted it the past few years. I know myself I have looked into other ranges to chase my quarry personally. I would hate to see even more pressure moved into other areas of the state when it is not necessarily needed currently. There has not been a population study done by F&G for two years. While it is known that numbers are down in some manner a true sense for what that looks like is not know as a sheep count hasn't been done since 2019.

3) closing or making 19C draw doesn't magically make more harvestable sheep. Lambs and ewes are not effected by sheep hunting season. This is just a temporary appearance of a fix that has no long term benefit. The past 3 years I have averaged 30-40 days in the field with the majority of those days spent in the mountains chasing sheep both for myself and clients. In 19c the past two years I have seen a large number of sub legal rams in the 5-7 age class and a tremendous lamb survival rate personally. Lamb survival in recent years from my observation is >75%. On average 3/4 ewes have lambs with them. Two years ago it was over 80% in my observation. While I am a hunter, I also like to look to my future and how the resource is fairing overall. If 19C was to close for 2 years and then open again in 2024 the madhouse and pressure that would happen over there would not make for a good experience for anyone resident or non.

Lastly and not directly related to prop 267 I would also like to **NOT** see the repeal of 207. I have a supercub and use it. I do however like the fact that while I am out sheep hunting I am not seeing any planes "pounding" the animals from the air during season. I have been impressed for the most part on how the air traffic has also gone to nil in the areas I frequent during open sheep season. This adds to the overal wilderness experience that I am looking to have while out in the woods



Submitted By  
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2/17/2022 9:45:58 PM  
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I express my full support for the trapping restrictions as described in Amamded Proposal 199. Please approve this proposal which helps to protect many ways of life of Alaskans who live off this great land. There are places for everyone, including trappers. But there are places where others should be free to enjoy our great spaces as well, without risk of losing their animal in a trap. Thank you for considering my comment and the values that are important to me, my family and my community.



Submitted By  
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Submitted On  
2/16/2022 8:31:23 AM  
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I'm commenting on proposal number 265.

I found it very difficult to obtain a moose hunt last year, specifically in Unit 22E. The current regulations made it impossible for me to acquire a non-resident moose tag. I live in a rural area in Alabama that does not provide fast internet service, so having slow internet service WAS NOT to my advantage. By the time I was in the first stages of the process, the tags were already taken. This was extremely frustrating.

I have planned accordingly for such a moose hunt but with it all ending because THE INTERNET was THE ISSUE. Really! There has to be a better way for non-residents to have the same access advantage to acquiring a moose tag. A "race to get a tag" should never be an option when everyone does not have the same speed of internet in the world. A drawing for a moose hunt allowing for a more logical time frame to apply for a draw would make more sense and be more reasonable than the existing registration process.

Internet advantage should never be a deciding factor in who gets a tag.

I appreciate the opportunity to express my concerns.

Thanks,

Joe Mathis

Submitted By  
Melissa McCombs  
Submitted On  
2/16/2022 12:09:15 PM  
Affiliation



PC107  
1 of 1

I am asking the Board of Game to support Proposal 144 and for TNVR programs; TNVR programs are good for cats and also for communities and my local area has had a lot of success when the program is supported. Alley Cat Allies is an organization that provides great information and resources of the importance of TNVR programs.





Submitted By  
Sari McConnell  
Submitted On  
2/14/2022 10:28:21 AM  
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Hi! I am writing to support Proposal 144 and TNVR programs. I ask that the Board of Game also supports Proposal 144 and to exempt sterilized community cats from the list of species prohibited from being released into the wild.

I have worked here in Los Angeles with TNVR/ Community Cat programs for a few years now, and they really work. One instance is of an elderly lady near me who was overrun with cats and kittens - a neighbor had dumped some cats that she fed, and of course they bred and grew in numbers very quickly. It was not a good situation until a local TNR group stepped in, fixed & vaccinated all the cats and kittens, adopted out the ones they could, and returned the older cats to the property. I go there every day to feed these cats. There has not been any bird killings so far as I am aware. The neighbors are happy that the situation has been resolved successfully in this way. No nighttime fighting or yowling. These cats are healthy and happy where they are. The alternative would have been to euthanize them all - which is horrifying.

So long as someone in the community is on board to feed and watch out for TNVRed community cats, it is absolutely an excellent way to deal with these cats, and I hope that Alaska will allow this to happen. It is win-win.

Submitted By  
Erin McDonald CVT  
Submitted On  
2/14/2022 6:52:53 AM  
Affiliation



PC109  
1 of 1

Make it a go for Proposal 144. Support trap neuter vaccinate return procedures for these felines. Scientifically proven to work.



Submitted By

Lauren McGough

Submitted On

2/15/2022 5:48:51 PM

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I would like to address Proposals 108 - 114.

**Proposal 108:** I support this proposal if amended to say: "Taking of eyases for non-residents statewide of any species of raptor legally allowed to be taken in Alaska, up to five permits for taking, transporting, or possessing a passage raptor for falconry; up to ten permits for taking, transporting, or possessing an eyas raptor for falconry legally allowed to be taken from May 1- July 20."

**Reason** Take by Alaska resident falconers is of no significance biologically for any species of raptor. Hence, take of up to 15 raptors by non-resident falconers would also be of no biological significance. Additionally, although the Alaska Falconers Association (AFA) claims that it is difficult to tell eyas peregrines and gyrfalcons apart, this is NOT the case in practice. Adult raptors aggressively defend their nests and adult birds would be seen on site defending the nest. The coloration on chicks also differs significantly. Gyrfalcon chicks have grey beaks, ceres (the fleshy area above the beak) and feet while peregrines possess very pink beaks, ceres and feet. Identifying gyrs and peregrines at any age is not an issue.

**Proposal 109:** I strongly disagree with this proposal

**Reason:** AFA falsely claims "Alaska raptors that are commonly used for falconry (except Gyrfalcons) are readily available to falconers in the continental United States"

Gyrfalcons are readily available to falconers in all states in this country. They are bred in captivity as commonly as peregrines, goshawks, harris hawks and a multitude of other species. In addition, multiple other states allow take of gyrfalcons including Washington, Oregon, Idaho, Montana, Wyoming, North Dakota, and others. Alaska is not the only state that allows take of this species that AFA claims to be "uncommonly available." They are wrong on this account both in terms of birds available for take in multiple states in the wild and from captive breeding projects.

**Proposal 110:** I strongly disagree with this proposal

**Reason:** AFA is using verbiage that directly contradicts what they are proposing. They propose to "extend" the non-resident season from Aug 15-Oct 31 to Sept 15-Nov 15. This season they are proposing would be 15 days SHORTER. If this proposal were to be adopted a non-resident trapper may be forced to trap in winter conditions, combating all the issues that may go with below freezing temperatures and snow. This proposal restricts a non-resident's chances of securing a bird after spending thousands of dollars to take such a trip in rural Alaska. Alaska is known for adverse weather conditions that can make trapping or traveling impossible. Shortening and pushing back the trapping season unfairly pushes non-residents into a shorter time frame for success and more likelihood of adverse weather. In the last seven years of non-resident take, only three gyrfalcons have been taken from natal territories by non-residents.

**Proposal 111:** I strongly disagree with this proposal

**Reason:** Only 13 non-residents applied for a permit to trap in 2021. The Alaska non-resident take has so far never met its quota. Only 37.9% (29 permits available over 7 years, 11 birds exported) of the total permits issued so far have resulted in the export of a raptor. The four year rule being proposed is pointless because the applicant pool is so low already and the odds of drawing the permit are so high already. With an already low number of people applying for a nonresident permit there is a high chance of any one of the applicants being successful in drawing a permit but not necessarily successful in capturing a raptor.

The big game hunts that this proposal references where successful applicants have to wait four years before applying again is comparing apples and oranges. Hundreds to thousands of people apply for big game hunts in Alaska for a handful of permits. Non-resident falconry permit applications thus far have never numbered more than 26. The average number of applicants when you divide the numbers by 7 years is 20.7. If this proposal were to go through and roughly 20 people applied per year, you would be out of applicants in short order. Additionally, this is an attempt to fix a problem that doesn't exist. The total number of individuals who have applied in the last seven years is 63. The number of people who have applied every year and won is 5 individuals. The number of people who have won more than once is 4 out of 63 individuals over 7 years. The number of people who have applied \*once\* and won is 6 individuals. Therefore, arguing that it is unfair to let someone apply every year when only 4 out of 63 individuals have won more than once in 7 years is baseless.

**Proposal 112:** I support this proposal

**Reason:** Alaska hosts healthy populations of all native raptor species found breeding there. In addition, the landmass is fifth the size of the entire lower 48 (per alaska.gov) with a very low number of resident falconers (less than 50, per ADFG). States in the lower 48 have much smaller resource availability and no limits (except for peregrines) on the numbers of non-resident falconers applying for take, including Texas, Kansas, Indiana, Wyoming, Minnesota, Wisconsin, Oklahoma, and Washington to name a few. Oregon, a state with a non-resident quota for example, allows 20 non-resident permits in a landmass incredibly small compared to Alaska. Biologically, Alaska would stay well below the threshold of significance in regard to raptor take if all residents and the average number (20.7) of non-residents took birds each year. Furthermore, not all residents will take birds every year and that holds very true with non residents as well. The quota for non-resident take has never been met in the 7 years of this program. In 2020 and 2021, zero birds were taken on non-resident permits. That wasn't from a lack of trying - my close friends that were drawn spent a lot of time and money those years in an attempt to trap a raptor and were unsuccessful. Alaska most certainly can biologically afford to allow unlimited take for non resident permits since the chances of success remain low.



**Proposal 113** I support this proposal as amended below. Rather than having three different drawings for peregrine, gyrfalcon and other species, take should be unlimited for reasons addressed above: the quota for non residents has never been met and the resource is healthy and stable enough to allow unlimited take at this time. If the above proposal were to be adopted, it would force a permit holder to decide which species they were targeting before knowing their travel plans, weather and seasonal influences on these species. Alaska has already determined that the season allowed for resident falconers is safe and biologically sound. Multiple states allow non-residents to trap the same numbers and during the same time as residents. I propose a change FROM "issue annually: up to 5 permits for a gyrfalcon (*Falco rusticolus*); up to 5 permits for a peregrine falcon (*Falco peregrinus*); and up to 5 permits for any other raptor species listed under (f) of this section."

TO: "Nonresident take permits for raptors shall have the same quotas as resident take. Take is limited to two raptors either eyas or passage, hatching- year-raptors; Include all raptors in section (f) for nonresidents."

I agree with all other portions of this proposal to clear up language and to extend the non resident trapping season to be in line with resident trapping season (Alaska Falconry Manual Part 34 - Taking of Raptors "An eyas or passage bird may be taken any day of the year.")

**Proposal 114:** I strongly disagree with this proposal.

**Reason:** If this proposal were to be adopted a non-resident trapper may be forced to trap in winter conditions while attempting to rent the correct gear (e.g. snow machine) and combating all the other issues that may go with below freezing temperatures and snow. This proposal restricts a non-resident's chances of securing a bird after spending thousands of dollars to take such a trip in rural Alaska.

The cost of trapping in a remote area of Alaska is extremely high and perhaps why there are low numbers of applicants for these permits to begin with. A proposal to push back and restrict trapping dates will only add to the cost of a non-resident's trip due to weather conditions. Shortening and pushing back the trapping season unfairly pushes non-residents into a shorter time frame for success and more likelihood of adverse weather.

Submitted By  
Grant McGregor  
Submitted On  
2/16/2022 4:11:04 PM  
Affiliation



PC111  
1 of 1

I oppose proposition 137. I believe that flying to locate sheep between August 10th and September 20th should remain restricted. I am a life long Alaskan, a sheep hunter, and pilot and having this restriction in place has not limited my harvesting or those I am associated with harvesting of sheep. In my opinion it promotes fair chase hunting. Since this measure was enforced I have personally watched the amount of air traffic reduce during hunting season which helps hunters who are in the field not have the sheep they are pursuing disturbed or spooked. It is incredibly frustrating to be in the middle of a hunt and have a pilot or multiple pilots spot and fly (possibly disturbing) the sheep you are stocking. As the writer of proposition 137 said, residents may only get one week to pursue sheep due to work restrictions and I personally am in that category. I get one opportunity to hunt sheep each year and my time off work is limited but I feel more confident in my ability to find sheep on the ground during season and not having to worry about the next plane that's going to fly around the corner and disturb and possibly spook the sheep I am after. The board made an excellent decision to pass this measure into effect years ago. Please leave it in effect for years to come.

Submitted By  
Grant McGregor  
Submitted On  
2/16/2022 5:13:27 PM  
Affiliation

I support proposition 213. Federal restrictions have reduced the area to hunt tier 1 caribou and moose. Those hunting tier 1 caribou should not be restricted to hunting moose in unit 13. As someone who had hunted the area for a decade I have personally see the caribou quota go down, the competition and number of hunters go up, and the huntable land go down. Please allow tier 1 hunters to hunt moose outside of unit 13.



Board of Game members,

My name is Wynn McKinnis and I am from Palmer, Alaska. I would like to address Proposition 199, which restricts trapping on certain Mat-Su Valley trails. I oppose this proposition. I have been trapping for seven years and have a small business related to this hobby. I desire that future generations are able to participate in this tradition with the freedom that I have had.

I do not support this proposition, not because of its restricting nature, but because of its origins. The Alaska Wildlife Alliance is anti-trapping and against "extreme forms of wildlife management." This includes effective management solutions such as aerial wolf hunting and other predator control programs. The motto for this group is to "Let nature run wild." As you no doubt already know, this approach to wildlife management results in dead zones and dramatic fluctuations in both predators and prey. Keeping predators and prey in check ensures that all Alaskans have the opportunity to utilize both groups to their maximum potential. That being said, I am greatly concerned that this proposition is a facade, exploiting public concern about pet safety to advance this anti-science approach to wildlife management.

To my knowledge, none of the trails listed in the revised proposition have had recent instances of pet/trapper conflicts. That says to me that this proposition should not be taken at face value. If pet safety was the real issue, this proposition would focus on the trails that have had past conflicts. I encourage the board to vote this proposition down and start fresh with a proposition drafted by a group without ulterior motivations.

If the Board of Game decides that it is in the best interest of the State of Alaska to approve this proposition, I do have one suggestion. Gold mint trail to mint glacier should be taken off the list of trails. I have trapped extensively for the last four years up this valley from November to May. I have never seen another person past mile 1.5. The trail typically ends at the first beaver pond on your right, with no defined trail from there on. Pet safety is not of concern on gold mint trail. Thank you for the opportunity to state my opinion. I hope you will consider my reasoning. I would've like to give my testimony in person but am unable to due to work.

Thanks again,  
Wynn McKinnis



Submitted By  
Tom Meacham  
Submitted On  
2/18/2022 10:25:19 AM  
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My wife and I support the adoption of Proposal 199. This proposal would resolve conflicts between trappers and other recreational users of identified public trails and recreational sites by establishing a "no-trap" buffer between these uses. Ethical trappers usually respect other outdoor users, but without an enforceable boundary, there will always be lapses. This proposal will enact minimal trapping ethics into law, and is long overdue. Please adopt Proposal No. 199. Thank you.



**Subject:** Comment on Proposal 199

I'm trying to submit this comment via your online form. However, there's a technical difficulty: for 15 minutes it has not been transmitted, nor have I received a confirmation email.

My name, address, and contact info are below. I am a retired biologist (I have no affiliation) and a user of trails.

I strongly support the proposal to keep traps at least 50 yards away from trails, campground premises, road pull-outs, and commonly used roads. At all times of year, these places are used by the public, including by their dogs. Dogs (and occasionally people) go into the brush or woods next to trails. The regulations need to protect people who are pursuing recreation in Alaska's outdoors-- not just our trappers!

Thank you for the opportunity to comment.

--Vivian

Vivian Mendenhall, PhD  
Anchorage, AK 99516, USA

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Submitted By

doretta miller

Submitted On

2/14/2022 8:01:21 AM

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please support proposition 144,the trap neuter release program for cats thanks



**Rebuttal to Proposal 144 which requests the Board exempt "sterilized community cats" from the list of species prohibited from release into the wild per 5AAC 92.029 (b). Comments below are to specific quotes (*italicized*, highlighted) in said proposal with page numbers appended to each quote:**

***"Based upon this section, there is evidence to suggest that cats: (1) is (are) capable of surviving in the wild in Alaska and (6) is captured from the wild for use as a pet." (p. 2)***

**Items (3), (4) and (5) from this section likewise apply to domestic cats, but Prop. 144's author didn't see fit to mention this for some reason. Refer to Prop. 145 or to 5AAC 92.029 (b).**

**Also, it seems unclear whether the author of Prop 144 understood that the aforementioned list is of domestic species which may NOT be released in the wild BECAUSE they meet the listed criteria--for example because (1) a species is capable of surviving in the wild in Alaska, releasing it is prohibited.**

***"Working with AACC, Mojo's Hope has helped rescue, rehabilitate, and rehome over 35 cats in one isolated area. Most of these cats were either trapped or caught, then vetted, spayed/neutered, rehabilitated, and rehomed..." (p.3)***

**"Most"--TNR practitioners tend to obfuscate the facts of this issue by omission and imprecision. Analyses/modeling of TNR efforts throughout the US and Canada found that TNR "success" rate was a mean of < 1% (range 0.7%-3.7%).**

The remaining 96.3%-99.3% of said "colonies" were neither trapped, vaccinated nor neutered.

<http://journals.plos.org/plosone/article?id=10.1371/journal.pone.0192139>

Another omission--an egregious one--is that the proposal makes no mention of invasive felines' deleterious impact on public health and native biodiversity. TNR practitioners seem to operate as if *Felis catus* is the only species that matters.

Secondly, the author of Prop. 144 admits the remaining cats in her example were illegally released:

*"Another area of town, 24 cats were trapped, all were vetted, spayed/neutered and out of the 24, 19 went up for adoption and five were returned to site." (p.4)*

Again, this is in direct violation of 5AAC 92.029. Should those who flout state regulations have a voice in modifying them? And as demonstrated in Prop. 145, those five unconfined cats will continue to destroy an estimated 400 native mammals and birds annually for the remainder of their lives.

Also, *"went up for adoption"* doesn't necessarily mean they were actually adopted.

*"...the term "community cats" reflects the reality that for these cats, "home" is within the community rather than in an individual household." p. 6*

*F. catus'* home is not North America--it was bred from an Old World species (*F. sylvestris*) and brought here by human agency. Interestingly, we don't call invasive common and Norway rats "community rodents". We call them *invasive species*, and rightly so. *Rattus* spp. are recognized by the IUCN as the only invasive terrestrial vertebrates more destructive than *F. catus*. It's highly illogical (to say nothing of irresponsible) to argue it's somehow our community's burden to perpetuate invasive, reflex-killing disease vectors in our environment just because a small vocal minority of people are "fond" of them. The responsible--and in Alaska the only legal--options are to keep them confined or eradicate them. That some people find them 'cuter' than rats isn't a viable basis on which to predicate public health policy and environmental stewardship.



***"They have three options:***

***"1. Trap-And-Remove (i.e., Catch-and-Kill): Cats are trapped, brought to a shelter, and, because most are not socialized to people and are unadoptable, killed. Any remaining cats in the area quickly breed to capacity, or new cats move in to take advantage of the newly available resources." p.6***

This is inaccurate and/or dishonest: it refers to the so-called "vacuum effect", which doesn't apply to artificial aggregations of animals subsidized by human feeding. The cats are there because they're fed. Stop feeding them and they disperse. An analogous situation has been observed near the pink salmon hatchery in Kitoi Bay (Kodiak). As long as returning hatchery salmon are present, large numbers of brown bears are attracted to the hatchery site. Once the salmon are gone, the bears disperse.

Also, cats are non-hierarchical, solitary predators, which means they're not really territorial--not with respect to food or to mates. They don't naturally form "colonies". If the "vacuum effect" had any validity with respect to these human-subsidized feeding aggregations, there would be no so-called "cat-colonies" to begin with. Where cats are not fed, there ARE no "colonies".

***"2. Trap-Neuter-Return (TNR): Cats are humanely trapped, spayed or neutered, vaccinated, ear-tipped, and returned to their outdoor home where they will continue to live while keeping newcomers at bay. Over time, TNR stabilizes or reduces community cat populations by stopping the breeding cycle and preventing unwanted litters of kittens." p.6***

Problem is it doesn't, and in six decades of TNR it never has. As mentioned earlier, "successful" sterilization rate in such colonies in North America ranges from 0.7%-3.7%. Mean population increase rate among feral cats (per PRO-TNR researchers F. B. Nutter and J. K. Levy) is 29% annually. A simple rate comparison demonstrates that population reduction via TNR is mathematically impossible.

To make matters worse, TNR practitioners ignore required post-inoculation quarantine periods which, depending on the anti-rabies vaccine used, are from 10 to 30 days. If inoculated animals are immediately returned to sites where they can be re-exposed after treatment, immunity is NOT effectively conveyed.

***"3. Do Nothing: Cats continue to live outdoors without being spayed or***



*neutered, vaccinated, or provided veterinary care if injured or sick. As a result, community cat populations are not managed, public health and resident concerns are not addressed, and animal welfare implications are not considered."* p. 6

Ironically, doing nothing would be an improvement, as TNR is far worse. Feral cat population increase directly correlates with the advent of TNR in the USA. Again, basic biology applies here--populations rise and fall according to food supply, whether we're talking yeast or elephants, and TNR practitioners invariably feed their colonies. See fig. 1, p. 2 in the link below:

[https://www.academia.edu/25382290/What\\_Conservation\\_Biologists\\_Can\\_Do\\_to\\_Return\\_Response\\_to\\_Longcore\\_et\\_al?email\\_work\\_card=view-paper](https://www.academia.edu/25382290/What_Conservation_Biologists_Can_Do_to_Return_Response_to_Longcore_et_al?email_work_card=view-paper)

*"The methods of catch and kill are not reducing the population and also has hindered the process of rehabilitating those with adoption possibilities."* p.6

A PhD dissertation by Inbal Brickner (Brickner/Yom Tov, Hebrew University of Jerusalem, 2003) including an unpublished study by the Israeli Natural Resources and National Parks Authority, found that a strategy of sustained hunting by NRNPA Rangers and licensed civilian hunters achieved 90% feral cat population reduction in one wildlife reserve in only five years (1997-2001). In more than six decades no TNR program on earth has come within two orders of magnitude of this success. In fact, TNR has never been scientifically proven to eliminate feral cat populations anywhere.

Some critics have characterized TNR as a "euthanasia avoidance scheme" rather than a cat population reduction scheme. As for eradication "*hindering the process of rehabilitating (cats) with adoption possibilities*", touting "adoption" as a solution for stray/feral cat overpopulation is as unrealistic as TNR itself. In the last two decades only one-third of US households owned even one cat.

On the other hand, the International Union for the Conservation of Nature has documented 87 successful cat eradication programs, mostly but not exclusively on islands.

[\(PDF\) A Review of Feral Cat Eradication on Islands \(researchgate.net\)](#)

*"TNR is recognized worldwide as the most effective, sustainable, and humane approach to community cat management."* p.6

The only organizations "recognizing" this are extremist advocacy groups and grifters like Animal Best Friends Society, HSUS and Alley Cat Allies. Conservationist and public health organizations condemn it. Even PeTA



denounces TNR as inhumane and ineffective.

In a time when false narratives are routinely foisted on the American public for fun and profit, it's hardly surprising that science denial and other absurdly false narratives are promoted by unscrupulous and/or misguided people. Despite four decades of TNR in North America the stray/feral cat population continues to increase by about 29% annually. After six decades of TNR in the UK the stray/feral cat population has more than doubled.

To tout TNR as "effective and humane" is to ignore the reality that it subjects cats to stressful handling and veterinary procedures followed by abandonment-post-spay/neuter protocols, such as monitoring for surgical infections, and quarantines after rabies vaccinations are almost never followed.

***"Cities and shelters across America have stopped using the Catch-and-Kill approach because it is expensive, time-consuming, and ineffective." p. 6***

Euthanasia injections cost from \$50 to \$150 per cat depending on region. Death from the injection is nearly instantaneous. The costs of sheltering, feeding and medically treating the animals don't apply. Cost of incinerating carcasses is minimal.

Euthanasia is far less "time-consuming" than TNR where associated costs continue for the life of the cat. Indeed, inefficacy of trap/destroy efforts reflects the trapping aspect, for the same reason TNR is itself ineffective. Cats tend to be trap-shy at best, particularly after being previously trapped. Live-trapping cats is time-consuming and often difficult--it forms a 'bottleneck' in any effort to "manage" stray/feral cat populations. This is why we advocate in Prop. 145 that cats be designated a deleterious exotic species and eliminated from our environment through sustained hunting per 5AAC 92.990 (21), 5AAC 92.029 (b), (d), (h) and AS 16.05.940. Indeed, nearly all the "negative" aspects of trap/destroy likewise apply to TNR with the exception that after a relatively painless injection the cats don't wake up.

***"The good news is this group regularly traps, sterilizes, and vaccinates cats and kittens who are good candidates for socialization and adoption, which does help reduce the number of breeding cats in the community." p.7***

Except that it doesn't. For some reason TNR advocates are quite willing to argue that euthanizing cats creates a "vacuum" whereby new cats can enter a population from elsewhere while simultaneously maintaining a clearly contradictory and illogical position that removing cats from the environment and socializing them for "pets" does not. Of course, they have never offered any evidence to support this specious claim.



***"Every animal impounded at a shelter requires expenses for housing, sanitation, comfort, medical care, and, especially for community cats, euthanasia. Once a shelter stops taking in feral cats, and their population is stabilized or reduced, fewer animals enter the shelter and fewer expenses are incurred." p.8***

Again, why does TNR supposedly reduce shelter expense and overcrowding, but euthanasia does NOT? The primary flaws in this argument are:

(1) After four decades of TNR, most shelters are still overcrowded with unwanted cats to where they can no longer accept more.

(2) The claim of "reduced shelter intake", long used by TNR advocates as "proof" of TNR efficacy, does NOT reduce feral cat numbers in our environment. Such "logic" is predicated on a tautology: *"Our shelter intake is reduced because we're no longer taking in cats."*

That Prop. 144 remains utterly SILENT on the issues of public health and biodiversity in its advocacy speaks volumes for the myopia and destructive irresponsibility of TNR generally, and this proposal specifically.

**[A Case of Letting the Cat out of The Bag—Why Trap-Neuter-Return Is Not an Ethical Solution for Stray Cat \(Felis catus\) Management \(nih.gov\)](#)**

In closing, the lack of scientific acumen in TNR arguments and claims has long been a problem in attempting to engage its proponents in reasonable discussion.

After decades of biologists and conservationists reminding TNR advocates there was no supporting science to their claims, two of the worst propagandists of their movement--Daniel Spehar and Peter Wolf--attempted to promulgate some "research", and with the help of "Animals Best Friends Society funding (and what passed for "peer review" by mostly anonymous reviewers) manage to get two "research papers" published in the journal "Animals". Note--neither Spehar nor Wolf are biologists.

Since Prop. 144's author included links to the aforementioned papers attached to, and in support of, her claims, we have included rebuttals to both Spehar/Wolf papers by Rick Sinnott, Certified Wildlife Biologist for the State of Alaska. Said rebuttals were first published by the American Bird Conservancy:

**<https://www.trapneuterenclose.com/static/img/tnr-study-review.pdf>**



[https://abcbirds.org/wp-content/uploads/2020/03/Sinnott-2019\\_Citizen-science-or-pseudoscience\\_Response-to-Spehar-and-Wolf-2018.pdf](https://abcbirds.org/wp-content/uploads/2020/03/Sinnott-2019_Citizen-science-or-pseudoscience_Response-to-Spehar-and-Wolf-2018.pdf)

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### Proposal I08:

Summary: Allow non residents "up to five permits for taking, transporting, or possessing an eyas Northern Goshawk for falconry statewide, and up to five permits for taking, transporting, or possessing an eyas Peale's Peregrine from units 1-4, for falconry by a nonresident"

- The AFA (Alaska Falconer's Association) has decided to offer us limited eyas take on one hand, but with very strict restrictions on both eyass and current passage take on the other that is laid out in Proposals 109,110,111.
- Only allowing units 1-4 in a small southern portion of the state, not exclusive to "Peale's Peregrines".
- Exclusion of Gyrfalcon take is based on unfounded claims and or proof by the AFA (Alaska Falconer's Association), which paints non-resident falconers in a negative and criminal light as referenced in their Proposal 110. The AFA maintains the reason for restriction of take to units 1-4, is due to the fact it is difficult for falconers to differentiate between Northern Goshawks, Peale's Peregrine, and Gyrfalcon eyries and eyasses. Experienced falconers can clearly tell the difference.
- We conclude that it is much more difficult to differentiate a Peal's peregrine and a Anatum Peregrine being both peregrines and much easier to see the difference between a Peregrine falcon and a gyrfalcon.
- This excuse to only allow take in units 1-4 is a very weak argument at best.
- Proposal 113 allows 5 Northern Goshawks 5 Peal's Peregrine..e and 5 Gyrfalcon"s either a eyass or a passage raptor statewide as is offered for residents.
- **We do not support proposal 108** and ask that you consider Proposal 113

### Proposal I09:

MICROCHIPPING. "All wild caught live gyrfalcons exported from the state by a nonresident must be microchipped and the microchip must be registered with an internationally recognized microchip registry such as (Petlink)"

- AFA claims that microchipping is "overburdensome", and should only be required for non-resident take.
- AFA shows great concern for protecting what they claim are "highly valuable" Gyrfalcons, yet only the ones taken by non-resident falconers.
- It is clearly stated that the entire lower 48 (Non Residents) can only export up to 5 Gyrfalcons annually, and being wild caught these birds cannot be sold/bartered. Said value of these birds is not monetary
- The AFA is using a poor excuse to exclude themselves from the microchip requirement, which is a regulation they brought onto themselves at the 2017/2018 Game Board meeting. If the microchip process is "overburdensome", as they say, it is a burden they wish only non-residents to endure.
- **We do not support 109** and ask that you continue to microchip all falcons required so they can be tracked inside and outside the state.

### Proposal 110:

Summary: Delay of Non-Resident Passage Take Season to a potentially dangerous time frame.

Currently the non-resident passage take time frame is from August 15-October 31st. The AFA is requesting a DELAY of that time frame (billed falsely as an 'extension') to the dates of September 15 - November 15.

In 2017/18, the proposed start date of September 5th, was denied due to deadly weather concerns and the dangers ii posed lo non-residents.

The AFA claims this is to "reduce the disturbance of nesting sites", and better align the time taking with the dispersal timing of Gyrfalcons from their "natal areas", but have no desire to change the current resident window, only non-residents.

It should be noted, currently an Alaskan resident can take up to 2 Gyrfalcons a season, within the current time frame.

They do not propose to restrict themselves out of these concerns.

Concerns for white Gyrfalcon harvesting is totally unfounded and backed with no facts since its only residents who are allowed to climb nest and hand pick a white gyrfalcon. Non residents do not climb or disturb nest.

Less than 5 while gyrfalcons have been taken for nonresident draw the first 5 years and most have been either Grey or Silver in color.

Concerns of disturbing the nest sites are overblown. In the last 5 years an average of 2 Gyrfalcons a year were taken by non-residents, and of the 10 total, only 3 were taken near the date of August 15th. No birds were taken direct from the nesting cliff. Non residents don't climb nest only RESIDENTS do!

Within the current timeframe starting August 15 the beginning of non resident lake, falcons are tully fledged and hard penned. There is no climbing of nests, or disturbing of nest sites by Non residents.

It should be noted Proposal 114, which is brought forward by the Alaskan Department of Fish and Game, mirrors AFA's Prop 110.

**WE DO NOT Support 110** it's not safe to start the season later as was discussed at the Game Board meeting In

2017/2018.

The AFA, without any proof, using the argument that illegal falconry trade is a reason for further restricting non-resident take. They do not show the same concern for the current resident take, which paints falconers from the lower 48 as being more likely to commit criminal

activities than themselves.

The AFA promotes a false narrative, that there is a specific interest in "white Gyrfalcons".

Captive breeding within the United States, and abroad, has significantly reduced any need or existence of illegal trade. Gyrfalcons are readily available and bred within the US every year, where white F2 generation Gyrfalcon's are regularly advertised for \$4,000 or less. The AFA has chosen to portray a false concern of "illegal falcon trade" activities, in order to restrict the already very minimal non-resident take, yet shows no concerns to restrict themselves for the same reasons. The message is clear, which is that the AFA is telling their Board of Game that non-resident falconers are more likely to commit criminal activities than themselves.

**WE DO NOT Support 110** it's not safe to start the season later as was discussed at the Game Board meeting in 2017/2018



### **Proposal 111**

AFA proposes to Limit non resident take of raptors to one every four years. And to limit unsuccessful permittees from applying the following year. The "one in four" management system used in other areas

does NOT apply for a very limited and small number of non resident applicants. The drawing has always had less than 30 non residents apply for the 5 permits and in 2021 less than 20. Applying

once every 4 years would greatly reduce the number of applicants to almost zero after a few years.

**We do NOT support Proposal 111**

### **Proposal 114 (Alaska Game and FISH)**

They propose to change season dates from August 15 start to September 15 start date

Proposal 114 is essentially the same as that offered by AFA's Proposal 114.

All my comments on proposal 110 apply to this proposal 114

As noted in my proposal 110 comments, the delay of take season makes it extremely hazardous

for a permittee which is why a similar proposal was turned down in 2017

**DO NOT Support 114** it's not safe to start the season later as was discussed at the Game Board

- It should be noted Proposal 114, which is brought forward by the Alaskan Department of Fish and Game, mirrors AFA's Prop 110. in 2017/2018.

### **Proposal 113 (California Hawking Club)**

- I ask that you pass Proposal 113 to allow the take of 5 Northern Goshawks, 5 Peal's Peregrines and 5 Gyrfalcons. For non residents statewide. Please refer to our proposal with facts to back our proposal for non resident take.
- Please consider proposal 113 as a common ground compromise which includes the 5 eyass take of Goshawks and Peales as the AFA is in support in proposal 108.
- **I SUPPORT PROPOSAL 113**



Submitted By  
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Submitted On  
2/17/2022 3:00:06 PM  
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Hello, my name is Ryan Moglich, a falconer in Nevada. I am writing in regards to the new proposed falconry regulations.

Starting with Proposal 108, proposed by the Alaskan Falconry Association (AFA). This proposal has been falsely advertised as a step in the right direction for Non Resident Take, specifically Eyass take. It needlessly prohibits Peale's Peregrine take to Units 1-4, an area where Peale's and Anatums both reside. It also excludes Non Resident eyass Gyrfalcon take, which is currently available to Residents who can each take 2 per year, every year. Non Resident Take has no impact on wild populations, the lottery system is already limiting enough.

Proposal 109, which is another Alaskan Falconers Association Proposal, requests all gyrfalcons caught by Non Residents be microchipped. The AFA believes that only Non Residents should have these falcons micro chipped, in what they claim in their own words, is a "overburdensome" requirement. There is no impact from Non Resident Take on the wild Gyrfalcon population. No information has been brought forward to prove otherwise. These falcons taken can not be sold or bartered, their value is in their genetics for the sport of falconry and the continuation of captive breeding efforts.

Proposal 110, proposed by the AFA, asks that the Non Resident Take of passage birds be DELAYED (which is falsely billed in their words as an "extension") to the dates of September 15-November 15. Previously in 2017, the start date of September 5th was denied by the board due to weather concerns and the dangers it posed to Non Residents. While the AFA claims that this change is to "reduce the disturbance of nesting sites", they are not making the same proposal for their own take period. The most disturbing claim within this proposal, is the AFA's insinuation that non residents are a severe threat to nest white gyrfalcons through illegal trade. Neither the Alaska Fish and Game or the AFA can show any evidence to back these allegations of illegal take or trade. In the history of non resident take in Alaska how many people have been arrested/charged? Less than 5 white gyrfalcons have been taken from non residents during this time period. Gyrfalcons are readily available through captive breeding in the lower 48. The worth of these birds is for the experience of the Alaskan Wilderness, and process of obtaining your own bird. A bird that hopefully will one day contribute to the genetics of mention captive breeding projects. It costs more for an individual to travel to Alaska and obtain a Gyrfalcon (via travel costs/ lodging/ permits/ ect.) than to buy one in the lower 48. However, without the access to new genetics, captive breeding of Gyrfalcons may be in a dire state generations from now. There is no need to restrict the already minimal access Non Residents have to wild take in Alaska, it should be encouraged and widened. It is disappointing and sad that Alaskan Falconers have backed a proposal that paints the falconers in the lower 48 as criminal, in order to keep certain resources only for themselves.

Proposal 111, an AFA proposal, seeks to employ a "one in four" management system. This does not apply for the very limited and small number of non residents applicants annually. The drawing has always had less than 30 non residents apply for the 5 permits, and in 2021 the number was less than 20 applicants. Applying once every 4 years management would greatly reduce the number of non residents applying to near zero after a few years. With a non resident take limit of 5 being so minimal, there is no point to further restrict such a low number of applicants.

Finally, I'd like to voice my support for Proposal 113.

### **Proposal 113 (California Hawking Club)**

*Summary: This proposal will amend and eliminate unnecessarily restrictive and complicated regulations by simply defaulting the non resident take conditions to those of all resident falconers as currently outlined in the Alaska Falconry Manual.*

Under the new proposed regulations:

A non resident falconer would be able to take a raptor under the exact same standards, procedures, and conditions as a resident falconer. This allows that an eyass or passage bird may be taken any day of the year.

The maximum annual number of permits would be increased from 5 to 15.

To better manage the take of the gyrfalcon and the peregrine falcon, the permits would be allocated in 3 separate groups:

5 permits for a gyrfalcon, 5 permits for a peregrine falcon and 5 permits for any other legally authorized raptor.

The benefits of these proposed regulations include:

An increased chance of obtaining a permit for the raptor of one's choice.

The full year opportunity for planning and making a trip to Alaska for capture.

Access for capture of passage raptors during times of the year that is not life-threatening to the permittee.

Access to eyass raptors.

Reduced bureaucracy for non residents.  
Reduced bureaucracy for enforcement.



PC118  
2 of 2

I believe Proposal 113 is reasonable to Alaskan Residents and Non Residents. Falconry is a "Non Impact" sport on the wild populations. So while it is regulated it certainly shouldn't be needlessly restricted, because a few individuals want to keep their playground all to themselves. There are already built in benefits for Alaskan Residents regarding Wild Take. The further restrictions being proposed are unfounded, and poorly backed. The United States has a great history of wild take, and conservation. I humbly ask the Alaskan Game Board consider this in their decisions going forward. Proposal 113, is not asking for every right the Alaskan Resident Falconers have in regards to Wild Take. We are asking for reasonable availability, the same courtesy Alaskan Falconers are afforded in many states within the lower 48. We are asking that we be given reasonable regulations that are based on facts, not unfounded claims.



Submitted By  
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2/14/2022 2:53:00 PM  
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I am a strong Proponent of Proposal 144 as it will facilitate the "return" portion of the trap-neuter-vaccinate-return (TNVR) and help control our wild cat population in Anchorage. It is so important that we do our part to humanely reduce the existing stray population and keep them healthy.

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



PC120  
1 of 1

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



Submitted By  
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I support Proposal 199 to have a "50-yard trap setbacks to increase public safety on popular multi-use trails, including those in: Nancy Lakes Recreation Area, Big Lake, Palmer Hayflats, Hatcher Pass, Jim Creek, Talkeetna, Sutton, Glacier, Mat-Su Valley Moose Range, Chickaloon, Government Peak, Knik, Settler's Bay Coastal Park, Willow, Nelchina, and more. Currently, it is legal for traps to be set on or near multi-use trails, campgrounds, roads, and pullouts from as early as September through May. " This September through May designation severely limits the safety of people using these spots to recreate with dogs and small children. I had a dog caught in a conabear trap in a rural housing area about 12 years ago. She was fortunate, that by a miracle, the trap did not kill her instantly and we were able to free her from it. I was on an abandoned oil well road that was used by the two housing developments that had sprung up after the well was abandoned and only one of hundreds of dog walkers who used this safe area to run their dogs off leash. This trap was baited and waiting for WHAT???? This was a housing area and we were visited by moose and an occasional porcupine. There was no way to find out who set this trap and no one to hold accountable so it just gets overlooked. Believe me, I am terrified of the hidden dangers that are allowed for no reasonable reason. It's a lazy trapper or an ignorant one that places traps in multi-use areas where people run dogs off leash. There are limited areas now to do that and we deserve a reasonable assurance that ADF&G recognizes our needs as well as the trappers. I would be interested to know if trappers have been surveyed to find out how many traps that they place in these multi-use areas have been successful in trapping anything besides a dog or small human. I am not against trapping but I am against the ignorant and dangerous use of traps that people and dogs can access so easily.

Submitted By  
John Morton  
Submitted On  
2/18/2022 12:40:01 PM  
Affiliation



PC122  
1 of 1

I support Proposal 199. It is absolutely a no-brainer to prohibit trapping within 50 yards of popular multiple use trails in the MatSu. The MatSu and Anchorage bowl is no longer the last frontier. More than half of all Alaskans live in this area with high use by tourists. Trapping by a few individuals who are too inconsiderate and unethical to move a few yards off a public trail should neither dictate the well-being of dogs out for a romp with their owners nor threaten the well-being of other trappers who are willing to put a little more effort into a recreational pastime. This proposed action is a very rational and pragmatic response to an urbanizing landscape.



Submitted By  
Michael Mraz  
Submitted On  
2/18/2022 3:11:25 PM  
Affiliation



PC123  
1 of 1

AK Board of Game Members, I am a Alaskan living in Anchorage, but recreate in Mat-Su and Kenai peninsula with friends and dogs all year long. **I am writing to support Proposal 199** which requests 50 yard trap setbacks on more than 200 multiuse trails in Mat-Su. This should be a bare minimum distance for setbacks in my opinion. I had a friend who lost her dog from a trap recently near a trailhead In Seward and it concerns me that this could happen in Mat-Su area too. I believe Prop 199 to be a more humane, safe and reasonable rule than what is currently in place for trapping in the Mat-Su region. Thank you for your consideration. Michael Mraz



I was unable to submit my comments on the online form so I am submitting them below:

I am a guide on Kodiak Island and have guided for 45 years and have lived on Kodiak Island for 65 years. I am strongly opposed to Proposal 151. There needs to be a mechanism in place to deal with unused or cancelled permits, and making these permits available on an over-the-counter basis is the only sensible and logical method to make sure all permits are used. When the permit system was first put in place, one of the basic tenets was to ensure as many hunting opportunities to as many hunters as possible. Thus, the restrictions on holding multiple permits in one year and the restriction on applying for a permit in the same area in consecutive years. It allowed for more hunting opportunities for more hunters. The over-the-counter registration system for filling unused or cancelled permits is simply another tool to fulfill that basic tenet. I am also opposed to Proposal 241. 2DK (2nd Degree Kindred) hunters should remain in the resident draw. Thank you very much.

--

Mike Munsey  
Munsey's Bear Camp



Submitted By  
WILLIAM MURPHY  
Submitted On  
2/17/2022 11:10:47 AM  
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Dear Board Members

Thank you for allowing me to comment on non-resident take of Alaskan raptors. I would like to endorse Proposal 113. First, I would like to point out that the number of raptors considered for capture is infinitesimally small, and that the number actually taken is even smaller. I also understand that there is concern expressed by some for the possibility of illegal activity. I believe that anyone breaking the law should be prosecuted to the full extent, but I would contend that anyone willing to go through the time and expense of traveling to Alaska to obtain a single bird is at very low risk for criminal activity. A simple solution to game management, once the number of available raptors is determined, is to have the same limitations for in-state and out-of-state falconers for the process of obtaining a bird. I imagine that most hunting and fishing seasons are identical for locals and non-residents, and procedures would be simplified if falconry were the same.

Thank you for considering my thoughts.

William Murphy



Submitted By  
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1/9/2021 1:46:24 PM  
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Dear Board of Game: My comments are for the 2021 Falconry Proposals, 108-114, on pages 115-131 in the proposal booklet. By way of introduction I was an Alaskan resident and falconer in your state between 1974-2001. I was a Univ. Prof. for the Univ. of Alaska, Anchorage-Mat-Su, retiring in 1995. I am a founding member and first vice-president of the Alaska Falconers Association which was established in 1979, and am now one of three Honorary members. Germane to my comments is the definition of falconry: "The hunting of wild quarry, in its natural state, via trained raptors." Additionally, that wildlife management is being conducted within, "The North American Model of Wildlife Conservation." Please recognize that the Alaska Falconers Assoc. is not asking for access to additional wildlife---and that the proposals that ask for additional raptors is done at the request of lower 48 falconers. I ask that the BOG keep in mind that the intent of the proposals that ask for additional raptors, is not solely about raptors---but is one of only a very few methods of taking live wildlife and turning it into profit (deer, moose, and bears are next). These proposals that ask for more raptors aren't solely connected to falconry, they are about breeding and selling Alaskan wildlife---turning Alaskan gyrfalcons into a, "A situation like in China, where baby tigers, bred in captivity, can be petted by eco-tourists; but when these baby tigers become too old and dangerous, they are killed and their hides sold." Also please note that the American Falconry Conservancy is a party to a federal lawsuit in California that's attempting to allow the commercial use of wildlife, especially raptors.>Many falconry related groups have, of late, been infiltrated by those commercial entities that wish to profit from the sale of wildlife, and the avenue for this wildlife (where money can be made) is by accessing Alaskan gyrfalcons, peregrines, and goshawks. Proposal 108---OPPOSE---the request for eyasses are because they are easier to breed, not because they are superior falconry birds. Proposal 109---SUPPORT---Peoposal 110---SUPPORT. Proposal 111---SUPPORT. Proposal 112---OPPOSE---this is an effort to take commercial numbers of wildlife for profit. Proposal 113---OPPOSE---Alaskan falconry raptors are ostensibly taken for hunting. But the BOG, once the wildlife has departed Alaska, has no way to determine whether a raptor taken for falconry is actually used as regulations intended. I am convinced that nine of the last ten raptors taken by non-resident falconers are not being used for hunting, but are kept secure (not hunted) for transferring to breeding permits two years after capture. The intent of this take is profit, not hunting with birds---please do not allow this. Proposal 114---SUPPORT---It only makes sense not to disturb nesting birds. Additional comments: The BOG may wonder why there is so much interest in falconry---the interest isn't in falconry, the interest is in making money by commercial breeding/trafficking of raptors. If these proposals are allowed, there will be more gyrfalcons in captivity, than in the Alaskan wilds---which is the same case with tigers in the US, a very sad commentary. I first commented to the AKBOG on falconry regulations, in person, in 1984. Since that time I've been impressed at how well the BOG watches out for Alaska's wildlife. Thank you for allowing me to comment.



# United States Department of the Interior

## NATIONAL PARK SERVICE

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

IN REPLY REFER TO:

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 Statewide proposals being considered by the Alaska Board of Game (Board). 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 108, 110- 113: NPS Recommendation: Oppose**

As we have commented in past letters to the Board, taking raptors is prohibited on NPS-managed lands (36 CFR 13.42 (j)). If the Board adopts any of these proposals, NPS lands should be excluded.

### **Proposal 121, 232: NPS Recommendation: Oppose**

Proposal 121 would allow the use of dogs to hunt big game. Proposal 232 would allow the use of dogs to recover wounded furbearers. Except for black bears, the use of dogs to hunt big game or fur animals is currently illegal under State regulations. The NPS continues to support the State's restriction on this activity to protect wildlife populations from disease, injury, and harassment. If the Board adopts any of these proposals, we request NPS lands be excluded.

### **Proposal 130: NPS Recommendation: Support**

We support this Alaska Division of Fish and Game (ADF&G) proposal to prohibit the use of urine from any species of the deer family as bait or scent lure. Adoption of this proposal will help prevent introduction of Chronic Wasting Disease (CWD) and keep Alaska CWD-free.

### **Proposal 133: NPS Recommendation: Oppose**

This proposal would add bow and arrow as a legal method for hunting beaver under a trapping license. NPS regulations define a trap as "a snare, trap, mesh, wire or other implement, object or mechanical device designed to entrap or kill animals other than fish." Free-ranging furbearers may not be taken on NPS lands under a trapping license with harvest methods that don't fall within that definition, such as a firearm or bow and arrow. Further, methods of harvest that cause pelt damage are not consistent with the



intent of trapping under a trapping license. If the Board adopts any of these proposals, NPS lands should be excluded.

**Proposal 162: NPS Recommendation: Support**

We support this ADF&G proposal to establish salvage requirements of the meat or hide for Alaska hare. Alaska hares warrant this increased level of protection given lack of reliable population data and concern for their population status. In addition, adoption of this proposal may help prevent overharvest.

**Proposal 173: NPS Recommendation: Oppose**

The NPS opposes this proposal which would repeal the Dalton Highway Corridor Management Area (DHCMA). While there is overlap between AS 19.40.210 and 5 AAC 92.530(7), there are significant differences. Of primary interest is that 5 AAC 92.530(7b) closes the corridor to hunting, except by bow and arrow. The Arctic has low productivity and the closure of the corridor to hunting with firearms has helped ensure population viability of numerous wildlife populations in the region. Repealing the DHCMA could be detrimental to big game populations in the area, as well as to the long-term hunting opportunities.

**Proposal 193: NPS Recommendation: Support**

We support this ADF&G proposal to establish a Muskox hunt in Game Management Unit (GMU) 26A. If passed, it would allow GMU 23 residents from Point Hope the opportunity to harvest muskox from the Cape Thompson population. The 2020 abundance census completed by ADF&G and NPS indicates that portion of the Cape Thompson Muskox population in GMU 26A can support this additional hunt. The other portion of the Cape Thompson population resides in GMU 23 and supports a limited number of NPS federal permits and State Tier II permits.

**Proposal 230: NPS Recommendation: Oppose**

This proposal would change the definition of “full-curl horn” for Dall Sheep, leading to increased harvests. NPS opposes this proposal due to a decline in sheep populations in many areas of the State, including in such NPS units as Gates of the Arctic National Park and Preserve, Yukon-Charley Rivers National Preserve, and Western Arctic National Parklands (WEAR). Park population estimates are and have been extremely low. Currently, harvest is completely closed in WEAR due to the low population in the park. Due to this population decline, it is not prudent or biologically warranted to liberalize hunting anywhere in the state. If the Board adopts this proposal, NPS lands should be excluded.

**Proposal 231: NPS Recommendation: Oppose**

Proposal 231 would change the definition of **edible** meat for cranes, geese, and swans. In 2017, the Native Caucus of the Alaska Migratory Bird Co-Management Council (AMBCC) submitted a proposal to increase salvage requirements on large game birds to reduce wanton waste. The proposal received wide support from multiple state and federal advisory councils. The proposal was adopted with modification by the Board. Proposal 231 would revert to minimal salvage requirements, increase the probability of wanton waste, and unravels the progress made by AMBCC to help conserve migratory birds and support local subsistence users. For these reasons the NPS opposes this proposal. If the Board adopts this proposal, NPS lands should be excluded.

**Proposal 234: NPS Recommendation: Oppose**



This proposal would allow the use of stationary game cameras that transmit photos wirelessly. Remote installations such as game cameras are illegal in NPS areas regardless of any change to State regulation. In addition, NPS opposes the use of wireless information to facilitate hunting as it violates fair chase principles. If the Board adopts this proposal, NPS lands should be excluded.

**Proposal 235: NPS Recommendation: Oppose**

This proposal would allow the use of artificial light while hunting in GMU's that have no closed seasons or bag limits for small game. The use of artificial light has the potential to negatively impact the natural abundance, behavior, distribution, and ecological integrity of all native wildlife, including small game, and violates fair chase principles. If the Board adopts this proposal, NPS lands should be excluded.

**Proposal 245: NPS Recommendation: Oppose**

NPS opposes this proposal that would eliminate the requirement to salvage rib meat on the bone of moose, caribou, and bison. If passed, this proposal would lead to wanton waste of rib meat and would be out of compliance with existing State salvage requirements. If the Board adopts this proposal, NPS lands should be excluded.

**Proposal 261 and 262: NPS Recommendation: Oppose**

Both Proposal 261 and 262 would reauthorize resident tag fee exemptions for brown bear. NPS has new research on the density and harvest of bears in and around Gates of the Arctic National Park and Preserve (GAAR) (Schmidt et al 2021, JWM). Notably, GAAR bears had the oldest average age of harvest, average harvest had increased from the period 1998-2007 to 2008-2017, and the density of bears was low and potentially decreased between the surveys. Considering the low productivity of the bear population in this area, NPS is opposed to this proposal, which would liberalize bear harvest in an area we have biological concerns.

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

Sincerely,

**JENNIFER  
PEDERSON  
WEINBERGER**

Digitally signed by  
JENNIFER PEDERSON  
WEINBERGER  
Date: 2022.02.14 12:22:52  
-09'00'

Jennifer Pederson Weinberger  
Acting Associate Regional Director, Resources

cc:

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



## NORTH SLOPE BOROUGH

### Department of Wildlife Management

P. O. Box 69  
Barrow, Alaska 99723

Phone: Central Office : (907) 852-2611 ext. 350  
or: (907) 852-0350  
FAX: (907) 852 0351  
Arctic Research Facility: (907) 852-0352



RAYNITA "TAQULIK" HEPA, DIRECTOR

18 February, 2022

Alaska Department of Fish and Game  
Boards Support Section  
P.O. Box 25526  
Juneau, AK 99802-5526

RE: Comments on proposal numbers: 172 & 173 before the State Board of Game (BOG)

To the Alaska Board of Game:

The North Slope Borough (NSB) Department of Wildlife Management would like to provide written comments to the Alaska Board of Game for the Statewide meeting on proposal numbers; 172 & 173. We have attached language using the BOG proposal format that we believe will provide clarification requested in Proposal 172. We oppose Proposal 173 and believe the codified regulation 5 AAC 92.530(7) is not redundant and is necessary to be included in the hunting regulations for public reference. The language provided by us will help to clarify any confusion that may exist.

Sincerely,

Brian Person  
Senior Wildlife Biologist  
Department of Wildlife Management



**ALASKA BOARD OF GAME  
REGULATION PROPOSAL FORM | 2020-2021 MEETING CYCLE**



PC128  
2 of 5

Send completed form by May 1, 2020 to:  
PO BOX 115526, JUNEAU, ALASKA 99811-5526  
FAX (907) 465-6094 or EMAIL [dfg.bog.comments@alaska.gov](mailto:dfg.bog.comments@alaska.gov)

**BOARD OF GAME REGULATIONS**

**Game Management Unit (GMU)**\_\_20 and 24, 25, and 26\_\_\_\_\_

X Hunting      X Subsistence

X Trapping      Other \_\_\_\_\_

**Does the proposed change affect residents or nonresidents?**

X Resident    X Nonresident

**Which meeting would you like to submit your proposal to?**

☐ **Central & Southwest Region** (GMUs 9, 10, 11, 13, 14A, 14B, 16 & 17)      ☒ **Statewide Regulations** – 5 AAC Ch. 92 provisions & 98.005 (see list on page 4).

**Please answer all questions to the best of your ability. All answers will be printed in the proposal book along with the proposer's name (address and phone numbers will not be published). Use separate forms for each proposal. Address only one issue per proposal. State the issue clearly and concisely. The board will reject multiple or confusing items.**

**1. Alaska Administrative Code Number 5 AAC: 92.0530 Regulation Book Page No:**

**2. What is the issue you would like the board to address and why?**

Clarification is needed, as there is confusion within state government and the public regarding which activities and methods of access are legal within the DHCMA. This proposal seeks to clarify those activities and methods, and to distinguish travel by non-hunting North Slope residents and others from prohibited uses by hunters within the DHCMA. It would eliminate law enforcement issues arising from the present confusion relating to resident use of the seasonal community access roads permitted and constructed by the North Slope Borough.

**3. What solution do you recommend? In other words, if the board adopted your solution, what would the new regulation say? (Please provide draft regulatory language, if possible.)**

[5 AAC 92.0530]

**5 AAC 92.540(XXX)**

The Dalton Highway **Controlled Use** [MANAGEMENT] Area:

(A) the area consists of those portions of Units 20 and 24, 25, and 26 extending five miles from each side of the Dalton Highway, including the drivable surface of the Dalton Highway, from the Yukon River traveling north to Deadhorse to the intersection at



Prudhoe Bay Closed Area.

- (B) the area within the Prudhoe Bay Closed Area is closed to the taking of big game; the remainder of the Dalton Highway **Controlled Use** [MANAGEMENT] Area is closed to hunting **and open to trapping**; however big game, small game, and fur animals may be taken in the area by bow and arrow only, and small game may be taken by falconry;
- (C) no **off-road** [MOTORIZED] vehicle, **as defined in 5 AAC 92.004(c)**, may be used to transport [HUNTERS] **individuals actively engaged in hunting** [,HUNTING GEAR OR PARTS OF GAME], within the Dalton Highway Corridor **Controlled Use** [MANAGEMENT] Area, except that
- i) **Off-road** [LICENSED HIGHWAY] vehicles may be used on the following roads: (1) Dalton Highway (2) Bettles Winter Trail during periods when the Bureau of Land Management and the City of Bettles announce that the trail is open for winter travel, (3) Galbraith Lake Road from the Dalton Highway to the BLM campground at Galbraith Lake, including gravel pit access road when the gate is open, (4) Toolik Lake Road, excluding the driveway to the Toolik Lake Research Facility, (5) **the Sagavanirktok River boat launch at the DOT camp at Dalton Highway milepost 305.6** (6) **Wiseman Village Road**, (7) **any constructed roads and Community Winter Access Trails to Anaktuvuk Pass, Nuiqsut, Utqiagvik, Atkasuk, and Wainwright during the periods when the Bureau of Land Management and the North Slope Borough announce the road or trail is open for winter travel** [THE SAGAVANIRKTOK RIVER ACCESS ROAD TWO MILES NORTH OF PUMP STATION 2, AND (6)] **and (8) any constructed roadway or gravel pit, within one** [ONE-QUARTER] mile of the Dalton Highway, **that does not have a locked barrier**; [(II) AIRCRAFT AND BOATS MAY BE USED;] [(III) A SNOWMACHINE MAY BE USED TO CROSS THE MANAGEMENT AREA FROM OUTSIDE THE MANAGEMENT AREA TO ACCESS LAND ON THE OTHER SIDE OF THE MANAGEMENT AREA]; [(IV) GAME MAY BE TRANSPORTED BY MOTORIZED VEHICLES UNLESS PROHIBITED BY STATUTE;]
- (D) any hunter traveling on the Dalton Highway must stop at any check station operated by the department within the Dalton Highway Corridor **Controlled Use** [MANAGEMENT] Area;
- (E) **a snowmachine may not be used for hunting within the Dalton Highway Corridor Controlled Use Area or to access areas outside the corridor to hunt big game or to transport big game hunters, big game hunting gear, or parts of big game, except that**
- (i) **a snowmachine may be used by a person who must traverse land in the highway corridor to travel to or from private property that has an established history of use as a homestead, or to a residence in Nuiqsut, Anaktuvuk Pass, Kaktovik, Utqiagvik, Atkasuk, Wainwright, Point Lay, or Point Hope**;
- (ii) **a snowmachine may only be used if that use begins and ends outside the corridor**;
- (F) **aircraft and boats may be used**.



P.O. Box 69

Barrow, Alaska

99723

**Address**

**City, State**

**ZIP Code**

**Home Phone**

(907) 852-0350

**Work Phone**

Brian.Person@north-slope.org

**Email**

92.051 Discretionary Trapping Permit Conditions & Procedures

**ALASKA BOARD OF GAME**  
**Statewide Regulations Schedule ~ 5 AAC Chapters 92 and 98**

**General Provisions & Definitions:**

- 92.001 Application of this Chapter
- 92.002 Liability for Violations
- 92.003 Hunter Education and Orientation Requirements
- 92.004 Policy for Off-Road Vehicle Use for Hunting and transporting game.
- 92.005 Policy for Changing the Board of Agenda
- 92.008 Harvest Guideline Levels
- 92.009 Policy Obstruction or Hindrance of Lawful Hunting or Trapping
- 92.990 Definitions

- 92.052 Discretionary Permit Hunt Conditions and Procedures
- 92.057 Special Provisions for Dall Sheep Drawing Permit Hunts
- 92.061 Special Provisions for Brown Bear Drawing Permit Hunts
- 92.062 Priority for Subsistence Hunting; Tier II Permits
- 92.068 Permit Conditions for Hunting Black Bear with Dogs
- 92.069 Special Provisions for Moose Drawing Permit Hunts
- 92.070 Tier II Subsistence Hunting Permit Point System
- 92.071 Tier I Subsistence Permits
- 92.072 Community Subsistence Harvest Hunt Area and Permit Conditions

**Licenses, Harvest Tickets, Reports, Tags, & Fees:**

- 92.010 Harvest Tickets and Reports
- 92.011 Taking of Game by Proxy
- 92.012 Licenses and Tags
- 92.013 Migratory Bird Hunting Guide Services
- 92.018 Waterfowl Conservation Tag
- 92.019 Taking of Big Game for Certain Religious Ceremonies

**Methods & Means:**

- 92.075 Lawful Methods of Taking Game
- 92.080 Unlawful Methods of Taking Game; Exceptions
- 92.085 Unlawful Methods of Taking Big Game; Exceptions
- 92.090 Unlawful Methods of Taking Fur Animals
- 92.095 Unlawful Methods of Taking Furbearers; Exceptions
- 92.100 Unlawful Methods of Hunting Waterfowl, Snipe, Crane
- 92.104 Authorization for Methods and Means Disability Exemptions

**Permits:**

- 92.020 Application of Permit Regulations and Permit Reports
- 92.028 Aviculture Permits
- 92.029 Permit for Possessing Live Game
- 92.030 Possession of Wolf Hybrid and Wild Cat Hybrids Prohibited
- 92.031 Permit for Selling Skins, Skulls, and Trophies
- 92.033 Permit for Science, Education, Propagative, or Public Safety Purposes
- 92.034 Permit to Take Game for Cultural Purposes
- 92.035 Permit for Temporary Commercial Use of Live Game
- 92.037 Permit for Falconry
- 92.039 Permit for Taking Wolves Using Aircraft
- 92.040 Permit for Taking of Furbearers with Game Meat
- 92.041 Permit to Take Beavers to Control Damage to Property
- 92.042 Permit to Take Foxes for Protection of Migratory Birds
- 92.043 Permit for Capturing Wild Furbearers for Fur Farming
- 92.044 Permit for Hunting Bear w/the Use of Bait or Scent Lures
- 92.047 Permit for Using Radio Telemetry Equipment
- 92.049 Permits, Permit Procedures, and Permit Conditions
- 92.050 Required Permit Hunt Conditions and Procedures

**Intensive Management and Predator Control:**

- 92.106 Intensive Management of Identified Big Game Prey Populations
- 92.110 Control of Predation by Wolves
- 92.115 Control of Predation by Bears
- 92.116 Special Provisions in Predation Control Areas

**Possession and Transportation:**

- 92.130 Restrictions to Bag Limit
- 92.135 Transfer of Possession
- 92.140 Unlawful Possession or Transportation of Game
- 92.141 Transport, Harboring, or Release of Live Muridae Rodents Prohibited
- 92.150 Evidence of Sex and Identity
- 92.151 Destruction of trophy value of game required in specific areas.



- 92.160 Marked or Tagged Game
- 92.165 Sealing of Bear Skins and Skulls
- 92.170 Sealing of Marten, Lynx, Beaver, Otter, Wolf, and Wolverine
- 92.171 Sealing of Dall Sheep Horns

**Use of Game:**

- 92.200 Purchase and Sale of Game
- 92.210 Game as Animal Food or Bait
- 92.220 Salvage of Game Meat, Furs, and Hides
- 92.230 Feeding of Game
- 92.250 Transfer of Musk Ox for Science and Ed. Purposes
- 92.260 Taking Cub Bears & Female Bears with Cubs Prohibited

**Emergency Taking of Game:**

- 92.400 Emergency Taking of Game
- 92.410 Taking Game in Defense of Life or Property
- 92.420 Taking Nuisance Wildlife

**Game Management Units:**

- 92.450 Description of Game Management Units

**Antlerless Moose Reauthorization:**

- 98.005 Areas of Jurisdiction for Antlerless Moose Seasons

Submitted By  
Kristin O'Connor  
Submitted On  
2/18/2022 11:06:38 AM  
Affiliation



PC129  
1 of 1

To Whom It May Concern,

I have been made aware of Proposal 199 Ammended. I support it, but would like to offer some insight into the useage of Swan Lake "Quggesh" Boardwald and Loop Trail located in Wasilla. This trail should be included in the proposal. The description of the trail from the Greatland Trust's website states "A trail to the north takes you on a 1-mile upland loop through a beautiful birch forest, with more views from the bluff out into the Refuge. The area is also the location of a former Dena'ina village site and holds cultural significance. The area is called *Quggesh*, which means swan." This trail is also located in a new subdivision and gets a lot of use from families in the neighborhood.

I am a teacher at Machetanz Elementary School. My class, and many others, use this trail on a weekly basis to extend our learning to the outdoors. Outdoor studies are an integral part of our school philosophy. We waited 7 years to get this trail built so that we could have access to a nature trail. The kids look forward to our weekly outings. They make observations, learn about the unique flora and fauna of our area, conduct nature studies, and enjoy just being in nature. There are borough supported archeological digs going on just off the main trails as well, and many more that have been identified but not excavated.

Please put the Swan Lake "Quggesh" trail on the list as part of this proposal.

Thank you,

Kristin O'Connor

K/1 Teacher

Machetanz Elementary School



## **RECOMMENDATIONS**

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

**Statewide Regulations**

**March 4-11, 2022**

**Fairbanks, Alaska**

**Office of Subsistence Management (OSM)**



United States Department of the Interior  
Office of Subsistence Management  
1011 East Tudor Road MS 121  
Anchorage, Alaska 99503-6199

In Reply Refer To:  
OSM.22016.LG

FEB 07 2022

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 March 4-11, 2022, to deliberate proposals concerning changes to regulations governing hunting and trapping of wildlife for the Statewide Regulations. We have reviewed the 125 proposals the Board will be considering at this meeting.

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

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

Sincerely,  
Sue Detwiler

Assistant Regional Director  
Office of Subsistence Management

Enclosure

cc: Anthony Christianson, Chair, Federal Subsistence Board  
Office of Subsistence Management



Chairs, Subsistence Regional Advisory Councils  
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





**PROPOSAL 193 – 5 AAC 85.050. Hunting seasons and bag limits for musk oxen.**

Establish a hunt for muskox within a portion of Unit 26A.

**Current Federal Regulations:**

**Unit 26A—Muskox**

*Unit 26A*

*No Federal open  
season*

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes, currently there is a wildlife proposal (WP22-55). WP22-55 proposes to establish a muskox hunt in Unit 26A west of Admiralty Bay and the Alaktak River following 155 west longitude south to the Unit 26A border with a harvest limit of 1 muskox and an open season of Aug. 1 – Mar. 15.

**Impact to Federal subsistence users/wildlife:** This proposal would provide Federally qualified subsistence users opportunities to harvest muskox. While it is not known what effect the harvest would have on the Unit 26A muskox population, the hunt is not expected to have a detrimental effect because the muskox population has been immigrating into and growing within Unit 26A. In 2020, the population of muskoxen was estimated to be 685, which is an increase from 342 muskoxen in 2011 (Hughes 2016, 2020 pers. comm., NPS 2017).

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 193 **with modification** to align the hunt area boundary with the proposed Federal hunt area boundary.

**Rationale:** This proposal provides additional harvest opportunity to Federally qualified subsistence users without risking the long-term viability of the muskox population. Alignment of the State and Federal hunt area boundary reduces regulatory complexity and user confusion.

**Literature Cited**

Hughes, L.J. 2016. Units 23 and 26A muskox. Chapter 3, Pages 3-1 through 3-19 [*In*] Harper, P., and L.A. McCarthy, editors. 2015. Muskox management report of survey-inventory activities 1 July 2012-30 June 2014. Alaska Department of Fish and Game. Species Management Report ADF&G/DWC/SMR-2015-2, Juneau, AK.

Hughes, L.J. 2020. Wildlife biologist. Personal communication: e-mail. Arctic Inventory and Monitoring Network. National Park Service. Nome, AK.

NPS. 2017. State of the park report for Cape Krusenstern National Monument. State of the Park Series No. 44. National Park Service, Washington, DC.



**PROPOSAL 230 – 5 AAC 92.990(a)(30). Definitions.** Change 5 AAC 92.990 “full-curl horn” of a male (ram) Dall sheep from “at least eight years of age” to “at least seven years of age” as determined by horn growth annuli.

**Current Federal Regulations:**

**§ 100.25(a) Definitions.** The following definitions apply to all regulation contained in this part:

*Full curl horn means the horn of a Dall sheep ram; the tip of which has grown through 360 degrees of a circle described by the outer surface of the horn, as viewed from the side, or that both horns are broken, or that the sheep is at least 8 years of age as determined by horn growth annuli.*

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

**Impact to Federal subsistence users/wildlife:** This proposal will increase harvest opportunity for Federally qualified subsistence users. However, if approved, this proposal would increase the hunting pressure on 7-year-old Dall sheep rams, potentially causing conservation concerns and hampering management. The existing regulation is based on a conservative approach suggesting once sheep are eight years old, their chances of surviving each additional year is much lower. Harvesting older, full-curl rams (8+ years old) allows younger rams in their prime to continue breeding (ADF&G 2017). This regulation is to assure that some older class and genetically robust rams are available for breeding each year. Some 7-year-old rams are likely already mistakenly taken due to reaching full curl earlier and miscounting of the horn growth annuli in the field. Adoption of this proposal would also misalign Federal and State regulations, creating user confusion.

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

**Rationale:** Maintaining the current regulation will help assure sustainable and continued harvest opportunity for Federally qualified subsistence users by assuring a good breeding population of rams and allowing for effective, conservative sheep management.

**Literature Cited**

ADF&G (Alaska Department of Fish and Game). 2017. Dall sheep hunting full-curl identification guide. ADF&G, Division of Wildlife Conservation.  
[http://www.adfg.alaska.gov/static/hunting/dallsheephunting/pdfs/dall\\_sheep\\_hunting\\_full\\_curl\\_identification\\_guide.pdf](http://www.adfg.alaska.gov/static/hunting/dallsheephunting/pdfs/dall_sheep_hunting_full_curl_identification_guide.pdf)



**PROPOSAL 239 – 5 AAC 92.050. Required permit hunt conditions and procedures.**

Require all resident registration permit hunts be available for application online.

**Current Federal Regulations:** None

**Relevant Federal Regulation:**

***§100.25(a) Definitions:***

***Registration permit** means a permit that authorizes hunting and is issued to a person who agrees to the specified hunting conditions. Hunting permitted by a registration permit begins on an announced date and continues throughout the open season, or until the season is closed by Board action. Registration permits are issued in the order requests are received and/or are based on priorities as determined by [50 CFR 100.17](#) and [36 CFR 242.17](#).*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal may decrease opportunity for Federally qualified subsistence users by increasing competition. Any resident of Alaska would be able to obtain any registration permit online rather than requiring a special trip to the area to receive some permits in person. Permits that are distributed in this manner are an attempt to limit the people who receive them to people who live within the hunt area. This is typically done because there is a conservation concern with the species being permitted.

**Federal Position/Recommended Action:** The OSM recommendation is to **oppose** Proposal 239.

**Rationale:** This proposal would increase competition for Federally qualified subsistence users. Conservation concerns exist for this proposal, as it precludes a method of reserving harvestable animals for local residents and limiting harvest without resorting to a Tier II permit hunt.

**PROPOSAL 245 – 5 AAC 92.220. Salvage of game meat, furs, and hides.**

Eliminate the requirement to salvage rib meat on the bone for moose, caribou, and bison.

**Current Federal Regulations:**

***§100.25(a) Definitions:***

***Edible meat** means the breast meat of ptarmigan and grouse and those parts of caribou, deer, elk, mountain goat, moose, musk oxen, and Dall sheep that are typically used for human consumption, which are: The meat of the ribs, neck, brisket, front quarters as far as the distal (bottom) joint of the radius-ulna (knee), hindquarters as far as the distal joint (bottom) of the*



*tibia-fibula (hock) and that portion of the animal between the front and hindquarters; however, edible meat of species listed in this definition does not include: Meat of the head, meat that has been damaged and made inedible by the method of taking, bones, sinew, and incidental meat reasonably lost as a result of boning or close trimming of the bones, or viscera. For black bear, brown and grizzly bear, “edible meat” means the meat of the front quarter and hindquarters and meat along the backbone (backstrap).*

***§100.26(h) Removing harvest from the field.***

*(1) You must leave all edible meat on the bones of the front quarters and hind quarters of caribou and moose harvested in Units 9, 17, 18, and 19B prior to October 1 until you remove the meat from the field or process it for human consumption.*

*(2) You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of moose harvested in Unit 21 prior to October 1 until you remove the meat from the field or process it for human consumption.*

*(3) You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of caribou and moose harvested in Unit 24 prior to October 1 until you remove the meat from the field or process it for human consumption. Meat of the front quarters, hind quarters, or ribs from a harvested moose or caribou may be processed for human consumption and consumed in the field; however, meat may not be removed from the bones for purposes of transport out of the field.*

*(4) You must leave all edible meat on the bones of the front quarters, hind quarters, and ribs of caribou and moose harvested in Unit 25 until you remove the meat from the field or process it for human consumption.*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would make it easier for Federally qualified subsistence users to harvest and transport wildlife under State regulations. This requirement was put in place so law enforcement could tell if all legally required meat was salvaged and to aid in keeping meat from spoiling in the field. Not having to pack the rib cage of a moose or caribou out of the field would make it much easier for Federally qualified subsistence users to transport their harvest, especially if any foot travel is involved. This proposal would have no impact on moose or caribou populations.

Adopting this proposal would misalign Federal and State hunting regulations for moose and caribou, increasing user confusion and regulatory complexity. Specifically, it would make Federal regulations more restrictive than State regulations in Units 19B, 21, 24 and 25. 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 245.



**Rationale:** This proposal would make it easier for Federally qualified subsistence users to transport their harvest out of the field with no impacts on the wildlife populations.

**PROPOSAL 249 – 5 AAC 85.045(a)(5). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C.

**Current Federal Regulations:**

**Unit 7 – Moose**

*Unit 7, that portion draining into Kings Bay - Federal public lands are closed to the taking of moose except by residents of Chenega Bay and Tatitlek*      *No open season.*

*Unit 7, remainder - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only*      *Aug. 10-Sep. 20.*

**Unit 14C – Moose**

*No Federal open season*

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

**Impact to Federal subsistence users/wildlife:** These comments apply only to Unit 7.

The harvest of cow moose would provide additional harvest opportunity for Federally qualified subsistence users, although opportunity would be limited as this is a drawing permit hunt. Reauthorizing the antlerless moose season provides management flexibility for ADF&G to manage the Unit 7 moose population at a sustainable level to reduce habitat degradation and moose-vehicle collisions. Limiting the number of permits issued based on current population metrics prevents overharvest in the Twentymile/Portage/Placer hunt area.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 249.

**Rationale:** This proposal would provide limited additional opportunity for Federally qualified subsistence users to harvest moose in Unit 7 and provides management flexibility to sustainably manage this moose population.



**PROPOSAL 252 – 5 AAC 85.045(a)(13). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose seasons in Unit 15C.

**Current Federal Regulations:**

**Unit 15 – Moose**

<i>Unit 15A - Skilak Loop Wildlife Management Area</i>	<i>No open season.</i>
<i>Units 15A, remainder, 15B, and 15C - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only</i>	<i>Aug. 10- Sep. 20.</i>
<i>Units 15B and 15C - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai NWR Refuge Manager is authorized to close the October-November season based on conservation concerns, in consultation with ADF&amp;G and the Chair of the Southcentral Alaska Subsistence Regional Advisory Council</i>	<i>Oct. 20- Nov. 10.</i>
<i>Unit 15C - 1 cow by Federal registration permit only</i>	<i>Aug. 10- Sep. 20.</i>

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Wildlife Proposals WP22-30/31 request lengthening the moose season in Unit 15 from September 15 to September 25, which would align with the recently changed State season.

**Impact to Federal subsistence users/wildlife:** The harvest of cow moose (mostly through DM549) would provide additional harvest opportunity for Federally qualified subsistence users and would help remove moose to reduce human-wildlife conflicts in the area. Reauthorizing the antlerless moose season provides management flexibility for ADF&G to manage the Unit 15C moose population at a sustainable level to reduce negative human-moose encounters and moose-vehicle collisions. The most recent population estimate concluded the moose density in Unit 15C is quite high at approximately 3 moose/mi<sup>2</sup>, indicating the moose population can withstand some cow harvest. OSM expects ADF&G will manage both the drawing and targeted hunts within sustainable harvest levels.

**Federal Position/Recommended Action:** The OSM recommendation is to **support** Proposal 250.

**Rationale:** This proposal would allow additional opportunity for Federally qualified subsistence users to harvest moose in Unit 15C. Since there is no conservation concern for this population and their density is high, cow harvest is warranted.



**PROPOSAL 253 – 5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.** Reauthorize the resident antlerless moose season in Unit 18

**Current Federal Regulations:**

**Unit 18 – Moose**

*Moose: Unit 18, that portion east of a line running from the mouth of the Ishkowik River to the closest point of Dall Lake, then to the east bank of the Johnson River at its entrance into Nunavakanukakslak Lake (N 60°59.41' Latitude; W 162°22.14' Longitude), continuing upriver along a line 1/2 mile south and east of, and paralleling a line along the southerly bank of the Johnson River to the confluence of the east bank of Crooked Creek, then continuing upriver to the outlet at Arhymot Lake, then following the south bank east of the Unit 18 border and then north of and including the Eek River drainage - 1 antlered bull by State registration permit; quotas will be announced annually by the Yukon Delta National Wildlife Refuge Manager*

*Sep. 1-30.*

*Federal public lands are closed to the taking of moose except by residents of Tuntutuliak, Eek, Napakiak, Napaskiak, Kasigluk, Nunapitchuk, Atmautlauk, Oscarville, Bethel, Kwethluk, Akiachak, Akiak, Tuluksak, Lower Kalskag, and Kalskag*

*Sep. 1-30.*

*Unit 18, south of the Eek River drainage and north of the Goodnews River drainage - 1 antlered bull by State registration permit*

*Sep. 1-30.*

*Unit 18, Goodnews River drainage and south to the Unit 18 boundary - 1 antlered bull by State registration permit*

*Or*

*1 moose by State registration permit*

*A season may be announced between Dec. 1 and the last day of Feb.*

*Unit 18, remainder - 2 moose, only one of which may be antlered. Antlered bulls may not be harvested from Oct. 1 through Nov. 30*

*Aug. 1-Apr. 30*



**Is a similar issue being addressed by the Federal Subsistence Board?** Yes. Proposal WP22-42, requesting the increase of the moose harvest limit from 2 to 3 moose in Unit 18 remainder is currently being considered by the Federal Subsistence Board.

**Impact to Federal subsistence users/wildlife:** This proposal will increase harvest opportunity for Federally qualified subsistence users. This proposal, if approved, could help reduce a moose population that far exceeds management objectives and is potentially surpassing the carrying capacity of its habitat.

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

**Rationale:** This proposal would allow for additional opportunity for Federally qualified subsistence users to harvest moose in this unit, provide management flexibility, and there are no conservation concerns due to the high density of moose in Unit 18 remainder.

**PROPOSAL 254 – 5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.**

Reauthorize a winter any-moose season during February in a portion of Unit 19D.

**Current Federal Regulations:**

**Unit 19D—Moose**

<i>Unit 19D—that portion of the Upper Kuskokwim Controlled Use Area within the North Fork drainage upstream from the confluence of the South Fork of the mouth of the Swift Fork—I antlered bull;</i>	<i>Sept. 1 – Sept. 30</i>
<i>OR</i>	

<i>Unit 19D, remainder of the Upper Kuskokwim Controlled Use Area—I bull;</i>	<i>Sept. 1 – Sept. 31</i>
	<i>Dec. 1 – Feb. 28</i>

*OR*

<i>Unit 19D remainder—I antlered bull;</i>	<i>Sept. 1 – Sept. 30</i>
	<i>Dec. 1 – Dec. 15</i>

*OR*

<i>Unit 19—Rural residents of Lime Village only—No individual harvest limit, but a village harvest quota of 28 bulls (including those taken under the State Tier I system). Reporting will be by a community reporting system.</i>	<i>July 1 – June 30</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 19D moose population. This proposal is consistent with the Unit 19 moose management plan (Peirce 2018), which states population management objectives are to maintain a moose population of 10,000 – 14,000 observable moose, providing for a harvest not to exceed 650-1200 moose each regulatory year.

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

**Rationale:** Cow harvest is warranted based on declining twinning rates. It also provides additional harvest opportunity to Federally qualified subsistence users without risking the long-term viability of the population.

#### Literature Cited

Peirce, Joshua, M. 2018. Moose Management Report and Plan, Game Management Unit 19: Report Period 1 July 2010–30 June 2015, and Plan Period 1 July 2015–30 June 2020. Pages 3-4. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018-22, Juneau, AK.

**PROPOSAL 255 – 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.** Reauthorize the antlerless moose seasons in Unit 20A

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

##### **Unit 20A – Moose**

*Moose: Unit 20A - 1 antlered bull*

*Sep. 1-20*

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

**Impact to Federal subsistence users/wildlife:** This proposal will increase harvest opportunity for Federally qualified subsistence users. There are no conservation concerns for reauthorizing the antlerless moose season since the current moose population is within management objectives.

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

**Rationale:** This proposal would allow additional opportunity for Federally qualified subsistence users to harvest antlerless moose in this unit and provide management flexibility. This proposal is not expected to create a conservation concern for the moose population.



**PROPOSAL 258 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.**

Reauthorize a winter any-moose season during March in a portion of Unit 21D.

**Current Federal Regulations:**

**Unit 21D—Moose**

<i>Unit 21D—Koyukiuk controlled Use area—1 bull by State registration permit; 1 antlerless moose by Federal registration permit (FM 2106) if authorized by announcement by the Koyukuk/Nowitna/Innoko NWR manager. Harvest of Cow moose accompanied by calves is prohibited. A harvestable surplus of cos will be determined for a quota.</i>	<i>Sept. 1 – Sept. 25</i>
<i>OR</i>	
<i>1 antlered bull by Federal registration permit (FM 2106) if there is no Mar. 1-5 season and if authorized by announcement by the Koyukuk/Nowitna/Innoko NWR manager and BLM Central Yukon field office manager.</i>	<i>Mar. 1 – Mar. 5 season to be announced</i>
<i>Unit 21D, that portion south of the south bank of the Yukon River, downstream of the upriver entrance to Kala Slough and west of Kala Creek—1 moose by State registration permit.</i>	<i>Apr. 10 – April 15 season to be announced</i>
	<i>Aug. 22 – Aug. 31</i>
	<i>Sept. 5 – 25</i>
<i>Antlerless moose may be taken only during Sept. 21-25 season if authorized jointly by the Koyukuk/Nowitna/Innoko NWR manager and the BLM Central Yukon field office manger</i>	<i>Mar. 1 – Mar. 31 season may be announced</i>
<i>Antlerless moose may be harvested during any of the winter seasons.</i>	
<i>Harvest of cow moose accompanied by calves is prohibited.</i>	
<i>OR</i>	
<i>Unit 21D remainder—1 moose by State registration permit. Antlerless moose may be taken only during Sept. 21 – 25 and the Mar. 1 – 5 season, if authorized jointly by the Koyukuk/Nowitna/Innoko NWR manager and BLM Central Yukon Field Office Manager. Harvest of cow moose accompanied by calves is prohibited. During</i>	<i>Aug. 22 – 31</i>
	<i>Sept. 5 – Sept. 25</i>
	<i>Mar. 1 – Mar. 5 season to be announced</i>



*the Aug. 22 – Aug. 31 and Sept. 5 – Sept. 25 season, a State registration permit is required. During the Mar. 1 – 5 season, a Federal registration permit (FM 2107) is required.*

**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 moose. It is expected to help stabilize the moose population in Unit 21D. This proposal is consistent with the Unit 21D moose management plan (Stout 2018), which calls for a population objective of 9,000–10,000 observable moose and providing for a harvest of moose not to exceed 700 moose or 7% of the annual moose population estimate each regulatory year.

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

**Rationale:** This proposal provides additional harvest opportunity to Federally qualified subsistence users without risking the long-term viability of the moose population.

#### Literature Cited

Stout, Glenn, W. 2018. Moose Management Report and Plan, Game Management Unit 21D: Report Period 1 July 2010-30 June 2015, and Plan Period 1 July 2015-30 June 2020. Pages 3-4. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018-5, Juneau, AK.

#### **PROPOSAL 259 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.**

Reauthorize a winter any-moose season during part of February and March in Unit 21E.

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

##### **Unit 21E – Moose**

*Unit 21E—1 moose; however, only bulls may be taken from Aug. 25 – Sept. 30. During the Feb. 15 – Mar. 15 season a Federal registration permit (FM2104 or FM2105) is required per household. The permit conditions and any needed closures for the winter season will be announced by the Innoko NWR manager after consultation with the ADF&G Area Biologist and the Chairs of the Western Interior Alaska subsistence Regional Advisory Council and Grayling Anvik Shageluk Holy Cross Advisory Committees. Moose may not be taken within one-half mile of the Innoko or Yukon River during the winter season.*

*Aug. 25 – Sept. 30  
Feb. 15 – Mar. 15*



**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 moose. It is not expected to have a detrimental effect on the Unit 21E moose population. This proposal is consistent with the Unit 21E moose management plan (Peirce 2018), which calls for a population objective of 9,000-11,000 moose and providing for a harvest of moose not to exceed 360 moose or 4% of the annual moose population estimate each regulatory year. Currently there is approximately 200 moose harvested every year.

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

**Rationale:** This proposal provides additional harvest opportunity to Federally qualified subsistence users without risking the long-term viability of the moose population.

#### Literature Cited

Peirce, Joshua, M. 2018. Moose Management Report and Plan, Game Management Unit 21A and 21E: Report Period 1 July 2010–30 June 2015, and Plan Period 1 July 2015–30 June 2020. Pages 2-3. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2018-21, Juneau, AK.

#### **PROPOSAL 260 – 5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in the western portion of Unit 26A.

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

##### **Unit 26A**

*Unit 26A—That portion of the Colville River drainage upstream from (and including) the Anaktuvuk River drainage—1 bull.* *Aug. 1 – Sept. 14*

*OR*

*Unit 26A—that portion of the Colville river drainage upstream from (and including) the Anaktuvuk River drainage—1 moose; however, you may not take a calf or cow accompanied by a calf.* *Feb. 15 – Apr. 15*

*OR*

*Unit 26A—that portion west of 156°00'W. Long. And excluding the Colville River drainage—1 moose; however, you may not take a calf or cow accompanied by a calf.* *July 1 – Sept. 14*

*OR*

*Unit 26A remainder—1 bull.* *Aug. 1 – Sept. 14*



**Is a similar issue being addressed by the Federal Subsistence Board?** Yes, currently there is a wildlife proposal (WP22-54). WP22-54 proposes to move the boundary for Unit 26A—that portion west of 156°00'W. longitude excluding the Colville River drainage, east to follow the Alaktak River from Admiralty Bay to 155°00'W. Longitude.

**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 26A moose population.

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

**Rationale:** This moose population is sparse in an area with marginal habitat. Many of the moose moving through the area are transient. Harvest of antlerless moose harvest within this area is minimal with only 5 being reported since 2005. This proposal provides additional harvest opportunity to Federally qualified subsistence users without risking the long-term viability of the moose population.

**PROPOSAL 261 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.** Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska

**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 262 – 5 AAC 92.015. Brown bear tag fee exemptions.** Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A

**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 269 – 5 AAC 85.025(a)(5). Hunting seasons and bag limits for caribou.**

Create a tiered hunt structure and open a hunt for the Unimak Island caribou herd.

**Current Federal Regulations:**

**Unit 10—Caribou**

*Unit 10, Unimak Island only—1 bull by Federal registration permit. Aug. 1-Sep. 30.  
Federal public lands are closed to the taking of caribou except by  
residents of False Pass*

**Is a similar issue being addressed by the Federal Subsistence Board?** Yes, currently there is a wildlife proposal (WP22-38b). WP22-38b proposes to close Federal public lands in Unit 10, Unimak Island only to caribou hunting except by Federally qualified subsistence users unless the caribou population estimate exceeds a population threshold.



**Impact to Federal subsistence users/wildlife:** The proposal will provide Federally qualified subsistence users continued opportunities to harvest caribou in Unit 10, Unimak Island. It is not expected to have a detrimental effect on the Unit 10, Unimak Island caribou, but may help stabilize the population within sustainable levels and prevent drastic population fluctuations, which have occurred in the past.

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

**Rationale:** A tiered hunt system can be used to help maintain the Unimak caribou herd population within sustainable levels and harvest opportunity for subsistence users. As of 2018, the estimated population for the Unimak Caribou Herd was 413, with a high bull:cow ratio (78 bulls:100 cows), indicating that there may be additional animals available for harvest (Crowley 2019, pers. comm.). This proposal provides additional opportunity to Federally qualified subsistence users without risking the long-term viability of the caribou population due to the tiered hunt structure. OSM hopes State and Federal managers will work together on administering this hunt.

#### Literature Cited

Crowley, D. 2019. Wildlife Biologist. Personal communication: e-mail: ADF&G. King Salmon, AK.

**PROPOSAL 270 – 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.** Open an antlerless moose hunt in a portion of Unit 20E.

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

##### **Unit 20E — Moose**

*Unit 20E, that portion within Yukon-Charley Rivers National Preserve - 1 bull* Aug. 20-Sept. 30.

*Unit 20E, that portion drained by the Middle Fork of the Fortymile River upstream from and including the Joseph Creek drainage - 1 bull* Aug. 20-Sept. 30.

*Unit 20E, remainder - 1 bull by joint Federal/State registration permit* Aug. 20-Sept. 30.

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

**Impact to Federal subsistence users/wildlife:** This proposal will increase harvest opportunity for Federally qualified subsistence users by allowing opportunities to harvest antlerless moose. This would increase the harvest pressure on a growing moose population. Moose densities along the Taylor Highway in southern Unit 20E have doubled since 2005 from .68 moose/mi<sup>2</sup> to 1.36 moose/mi<sup>2</sup>. The cow segment of the population grew at an estimated 5.8% per year while the bull segment of the population, which is limited by higher natural mortality and harvest, grew at half the rate.



Adoption of this proposal would further the misalignment of Federal and State regulation potentially increasing user confusion. 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** this proposal.

**Rationale:** This proposal would allow additional opportunity for Federally qualified subsistence users to harvest antlerless moose in this unit and provide management flexibility. The moose population in the southern portion of Unit 20E is growing. Having the management flexibility to control the cow segment of the population will allow for a targeted approach for maintaining a healthy population below carrying capacity of the habitat while allowing more harvest opportunities for Federally qualified subsistence users. Conservation concerns are mitigated as this would be a drawing permit hunt with a limited number of permits that could be adjusted annually based on population status.





# United States Department of the Interior

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



In Reply Refer to:  
FWS/IR11/20139

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 Statewide regulations governing hunting and trapping of wildlife. We have reviewed the 90 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, Office of Subsistence Management, State Subsistence Liaison, 907-317-2165 or [george\\_pappas@fws.gov](mailto:george_pappas@fws.gov), with any questions you may have concerning this material.

Sincerely,

Sue Detwiler  
Assistant Regional Director  
Office of Subsistence Management

Enclosure



cc: 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  
Subsistence Regional Advisory Council Coordinators,  
Office of Subsistence Management  
Chair, Southeast Alaska Subsistence Regional Advisory Council  
Chair, Southcentral Alaska Subsistence Regional Advisory Council  
Chair, Kodiak/Aleutians Subsistence Regional Advisory Council  
Chair, Bristol Bay Subsistence Regional Advisory Council  
Chair, Yukon Kuskokwim Delta Subsistence Regional Advisory Council  
Chair, Western Interior Alaska Subsistence Regional Advisory Council  
Chair, Seward Peninsula Subsistence Regional Advisory Council  
Chair, Northwest Arctic Subsistence Regional Advisory Council  
Chair, Eastern Interior Alaska Subsistence Regional Advisory Council  
Chair, North Slope 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**

#### **Statewide Regulations**

**March 12-19, 2021**

**Fairbanks, Alaska**

**Office of Subsistence Management (OSM)**

**PROPOSAL 130 – 5 AAC 92.080. Unlawful methods of taking game; exceptions.**

Prohibit the use of deer or elk urine as bait or natural scent lures.

**Current Federal Regulations:**

§ \_\_.25(a) *Definitions. The following definitions apply to all regulations contained in this part:*

*Scent lure (in reference to bear baiting) means any biodegradable material to which biodegradable scent is applied or infused.*

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

**Impact to Federal subsistence users/wildlife:** This proposal could benefit wildlife populations by preventing the infection and spread of chronic wasting disease (CWD). While CWD has not been detected in Alaska, preventing disease is much easier than mitigating its spread once detected. This proposal could burden subsistence users who would no longer be able to use cervid urine as a scent lure.

Of note, the definition for scent lure under Federal subsistence hunting regulations pertains only to bear baiting and contains no prohibition on any cervid urine. As such, cervid urine can be used as a scent lure under Federal subsistence hunting regulations. Adoption of this proposal would result in misalignment between State and Federal 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** this proposal.

**Rationale:** OSM supports preventing the transmission of disease to maintain healthy wildlife populations. However, to be truly effective, a similar proposal needs to be submitted to the Federal Subsistence Board.

**PROPOSAL 131 – 5 AAC 92.210. Game as animal food or bait.**

Allow the use of game bird wings and backs to be used for trapping bait.

**Current Federal Regulations:****§ 100.25 Subsistence taking of fish, wildlife, and shellfish: general regulations**

*(j)(1) You may not use wildlife as food for a dog or furbearer, or as bait, except as allowed or in §100.26, §100.27, or §100.28, or except for the following:*

*(i) The hide, skin, viscera, head, or bones of wildlife;*

*(ii) The skinned carcass of a furbearer;*



*(iii) Squirrels, hares (rabbits), grouse, or ptarmigan; however, you may not use the breast meat of grouse and ptarmigan as animal food or bait;*

*(iv) Unclassified wildlife.*

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

**Impact to Federal subsistence users/wildlife:** While the Board does not have authority over edible meat requirements for migratory birds, including swans, geese, and cranes, it does have authority over what can be used as trapping bait. Currently, Federal and State regulations do not permit using animal parts that are required for human consumption as bait. This proposal would result in misalignment of State and Federal regulations, which could result in user confusion and regulatory complexity. While using wing and back meat as bait may benefit some Federally qualified subsistence users by providing additional options for bait, others may view it as wasteful. No effects to wildlife populations are expected from this proposal.

Additionally, the edible meat salvage requirement under Federal migratory bird regulations recently changed to include the meat from the breast, back, thighs, legs, wings, gizzard, and heart of all migratory birds. While this requirement is more restrictive than State regulations, subsistence users supported restricting themselves to better align with traditional subsistence uses of migratory birds. Most subsistence users desire to utilize more of the bird for human consumption.

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

**Rationale:** This proposal requests allowing meat required to be salvaged for human consumption to be used as trapping bait. It would also misalign Federal and State regulations, creating user confusion and regulatory complexity.

**PROPOSAL 132 – 5 AAC 92.990. Definitions. 5 AAC 92.210. Game as animal food or bait.**

**5 AAC 92.220. Salvage of game meat, furs, and hides.**

Allow bird wings and parts to be used for trapping.

[See comments for Proposal 131.](#)

**PROPOSAL 170 – 5 AAC 92.450. Description of game management units.**

Modify the Unit 1C and Unit 4 boundaries.

**Current Federal Regulations:**

**§ 100.26 Subsistence taking of wildlife**

*(n)(1)(iii) Unit 1C consists of that portion of Unit 1 draining into Stephens Passage and Lynn Canal north of Cape Fanshaw and south of the latitude of Eldred Rock including Berners Bay,*



*Sullivan Island, and all mainland portions north of Chichagof Island and south of the latitude of Eldred Rock, excluding drainages into Farragut Bay.*

*(n)(4)(i) Unit 4 consists of all islands south and west of Unit 1C and north of Unit 3 including Admiralty, Baranof, Chichagof, Yakobi, Inian, Lemesurier, and Pleasant Islands.*

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

**Impact to Federal subsistence users/wildlife:** If this proposal is adopted, Federally qualified subsistence users would need to abide by the State Unit 1C regulations on Pleasant and Porpoise islands. However, as these islands are part of Tongass National Forest, Federally qualified subsistence users could continue hunting on these islands under the Federal subsistence hunting regulation for Unit 4. As Unit 1C has a black bear season, whereas Unit 4 does not, adopting this proposal would increase harvest opportunity for black bear by Federally qualified subsistence users on Pleasant and Porpoise islands under State regulations.

Adopting this proposal would result in more conservative State regulations for deer on Pleasant and Porpoise Islands. While ADF&G cites conservation concerns and unsustainable harvest for deer on these islands under the current Unit 4 regulations, including harvest by Federally qualified subsistence users under Federal regulations, Federal regulations and harvest would not be affected by this proposal.

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:** OSM is **neutral** on this proposal.

**Rationale:** This proposal would misalign State and Federal unit boundaries for Units 1C and 4, creating user confusion and regulatory complexity. A similar proposal would need to be adopted by the Federal Subsistence Board to fully address the conservation and overharvest concerns for deer stated by the proponent, ADF&G.

**PROPOSAL 171 – 5 AAC 92.450. Description of game management units.**

Divide Unit 19A into two subunits.

**Current Federal Regulations:**

**§ 100.26 Subsistence taking of wildlife**

*(n)(19)(i)(A) Unit 19A consists of the Kuskokwim River drainage downstream from and including the Moose Creek drainage on the north bank and downstream from and including the Stony River drainage on the south bank, excluding Unit 19B.*



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

**Impact to Federal subsistence users/wildlife:** No impact to Federally qualified subsistence users or wildlife is expected from adopting this proposal.

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:** OSM is **neutral** on this proposal.

**Rationale:** This proposal would misalign State and Federal unit boundaries for Unit 19, increasing user confusion and regulatory complexity.

**PROPOSAL 173 – 5 AAC 92.530(7). Management areas.**  
Repeal the Dalton Highway Corridor Management Area.

**Current Federal Regulations:**

**§ 100.26 Subsistence taking of wildlife**

*(20)(ii)(C) You may not use firearms, snowmobiles, licensed highway vehicles or motorized vehicles, except aircraft and boats, in the Dalton Highway Corridor Management Area, which consists of those portions of Units 20, 24, 25, and 26 extending 5 miles from each side of the Dalton Highway from the Yukon River to milepost 300 of the Dalton Highway, except as follows: Residents living within the Dalton Highway Corridor Management Area may use snowmobiles only for the subsistence taking of wildlife. You may use licensed highway vehicles only on designated roads within the Dalton Highway Corridor Management Area. The residents of Alatna, Allakaket, Anaktuvuk Pass, Bettles, Evansville, Stevens Village, and residents living within the Corridor may use firearms within the Corridor only for subsistence taking of wildlife.*

Note: The exact same regulation is found in: (24)(ii)(A); (25)(ii)(A); and (26)(ii)(B)

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

**Impact to Federal subsistence users/wildlife:** A repeal of the Dalton Highway Corridor Management Area (DHCMA) would have a significant impact on Federally qualified subsistence users living within the DHCMA and residents of Alatna, Allakaket, Anaktuvuk Pass, Bettles, Evansville, and Stevens Village, as they currently can use snowmobiles and firearms to take wildlife within the DHCMA. If this proposal is adopted, competition with other Alaska residents would increase and would likely result in lower success rates and decreased opportunity for local subsistence users.



Caribou populations from the Teshekpuk Caribou Herd (TCH), Western Arctic Caribou Herd (WCH), and the Central Arctic Caribou Herd (CACH) have ranges that overlap the DHCMA. Repeal of the DHCMA is not recommended as this would increase the disturbance from hunting pressure on caribou and other wildlife populations.

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

**Rationale:** Repealing the DHCMA may create a conservation concern for caribou and other wildlife due to increased access and disturbance from snowmachines and firearms. Retaining the DHMCA allows caribou to move more freely with less disturbance during migration, and provides better opportunity and a rural subsistence priority for Federally qualified subsistence users.

**PROPOSAL 174 – 5 AAC 85.045(a)(1). Hunting seasons and bag limits for moose.**  
Reauthorize the antlerless moose seasons in Unit 1C.

**Current Federal Regulations:**

**Unit 1C–Moose**

*Unit 1C—that portion south of Point Hobart including all Port Houghton drainages—1 antlered bull with spike-fork or 50-inch antlers or 3 or more brow tines on one side, or antlers with 2 brow tines on both sides, by State registration permit only* Sep. 15-Oct. 15.

*Unit 1C, remainder, excluding drainages of Berners Bay—1 bull by State registration permit only* Sep. 15-Oct. 15.

*Unit 1C—Berners Bay—1 bull by drawing permit* Sep.15-Oct. 15  
(will be

*Only one moose permit may be issued per household. A household receiving a State permit for Berners Bay drainages moose may not receive a Federal permit. The annual harvest quota will be announced by the USDA Forest Service, Juneau office, in consultation with ADF&G. The Federal harvest allocation will be 25% (rounded up to the next whole number) of bull moose permits* announced starting in 2019).

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

**Impact to Federal subsistence users/wildlife:** Both antlerless moose seasons in Unit 1C are by draw permit only and ADF&G has the management authority to determine how many permits to issue each year. As Unit 1C moose populations do not currently support any antlerless harvest, ADF&G has indicated no permits will be issued this year. Therefore, no impacts to Federally qualified subsistence users or wildlife are expected from adoption of this proposal.





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

**Rationale:** While the Unit 1C moose populations do not currently support any antlerless moose harvest, reauthorizing these draw permit-only seasons maintains management flexibility for ADF&G to provide more harvest opportunity in the event that populations increase to a level warranting antlerless harvest.

**PROPOSAL 175 – 5 AAC 85.045(a)(3). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose hunt in Unit 5A, Nunatak Bench.

**Current Federal Regulations:**

**Unit 5A–Moose**

*Unit 5A-Nunatak Bench—1 moose by State registration permit only. The season will be closed when 5 moose have been taken from the Nunatak Bench* Nov. 15-Feb. 15.

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users, although this hunt has not occurred in recent years due to a low moose population. If this proposal is adopted, Federal and State regulations would maintain alignment, decreasing regulatory complexity and user confusion.

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

**Rationale:** While the Nunatak Bench moose population does not currently support any antlerless moose harvest, reauthorizing this quota-managed hunt maintains management flexibility for ADF&G to provide more harvest opportunity in the event that the population increases to a level threatening habitat damage and warranting antlerless harvest.

**PROPOSAL 176 – 5 AAC 085.045(4). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in Unit 6C.

**Current Federal Regulations:**

**Unit 6C–Moose**

*Unit 6C—1 antlerless moose by Federal drawing permit only* Sep. 1-Oct. 31.  
*Permits for the portion of the antlerless moose quota not harvested in the Sep. 1-Oct. 31 hunt may be available for redistribution for a Nov. 1-Dec. 31 hunt.*



*Unit 6C—1 bull by Federal drawing permit only*

*Sep. 1-Dec. 31.*

*In Unit 6C, only one moose permit may be issued per household. A household receiving a State permit for Unit 6C moose may not receive a Federal permit. The annual harvest quota will be announced by the U.S. Forest Service, Cordova Office, in consultation with ADF&G. The Federal harvest allocation will be 100% of the antlerless moose permits and 75% of the bull permits.*

*Federal public lands are closed to the harvest of moose except by federally qualified users with a Federal permit for Unit 6C moose, Nov. 1-Dec. 31*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users, although this hunt has not occurred in recent years because the antlerless moose quota has been met under Federal regulations. As this hunt is closely managed by a joint State/Federal harvest quota, no impact to the moose population is expected if this proposal is adopted.

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

**Rationale:** Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users. While the Unit 6C moose population does not currently support additional antlerless moose harvest under State regulations, reauthorizing this season maintains management flexibility for ADF&G to provide more harvest opportunity in the event that the available antlerless harvest quota is not met under Federal regulations or if warranted by population or habitat conditions.

**PROPOSAL 177 – 5 AAC 85.045(5). Hunting seasons and bag limits for moose.**

Reauthorize the antlerless moose season in the Twentymile/Portage/Placer hunt area in Units 7 and 14C.

**Current Federal Regulations:**

**Unit 7—Moose**

*Unit 7, remainder--1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only* Aug. 10-Sep. 20.

**Unit 14—Moose**

*No Federal open season*

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

**Impact to Federal subsistence users/wildlife:** 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. These hunts are closely managed through permit numbers, which ensures sustainable harvests. These antlerless hunts also help reduce over-browsing of habitat and moose-vehicle collisions.

**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; these hunts also provide additional hunting opportunity.

**PROPOSAL 181 – 5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.**  
Reauthorize the resident antlerless moose season in Unit 18.

**Current Federal Regulations:**

**Unit 18–Moose**

*Unit 18—south of the Eek River drainage and north of the Goodnews River drainage—1 antlered bull by State registration permit*      *Sept. 1-30.*

*Unit 18--Goodnews River drainage and south to the Unit 18 boundary--1 antlered bull by State registration permit*      *Sep. 1-30.*

*OR*

*1 moose by State registration permit*      *A season may be announced between Dec. 1 and the last day of Feb.*

*Unit 18, remainder—2 moose, only one of which may be antlered. Antlered bulls may not be harvested from Oct. 1 through Nov. 30*      *Aug. 1-Apr. 30.*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The Unit 18, remainder moose population is very high, continues to grow and can support additional harvest. While the Goodnews River drainage moose population can support some additional harvest, the antlerless moose season can be closed by Emergency Order if needed, and the quota has not been met in recent years.

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

**Rationale:** Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users, and these moose populations can withstand additional harvest.



**PROPOSAL 182 – 5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.**

Reauthorize a winter antlerless moose season during February in a portion of Unit 19D.

**Current Federal Regulations:**

**Unit 19D–Moose**

*Unit 19D—that portion of the Upper Kuskokwim Controlled Use Area within the North Fork drainage upstream from the confluence of the South Fork to the mouth of the Swift Fork—1 antlered bull* Sep. 1-30.

*Unit 19D-remainder of the Upper Kuskokwim Controlled Use Area—1 bull* Sep. 1-30.

*Dec. 1-Feb. 28.*

*Unit 19D, remainder—1 antlered bull* Sep. 1-30.

*Dec. 1-15.*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The Unit 19D moose population is exhibiting signs of nutritional stress as evidenced by low twinning rates, warranting antlerless harvest to help stabilize the population and curtail over browsing of habitat.

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

**Rationale:** Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users, and this moose population warrants additional harvest.

**PROPOSAL 186 – 5 AAC 85.045(a)(19)(B). Hunting seasons and bag limits for moose.**

Reauthorize a winter any-moose season during March in a portion of Unit 21D.

**Current Federal Regulations:**

**Unit 21D–Moose**

*Unit 21D, that portion south of the south bank of the Yukon River, downstream of the up-river entrance of Kala Slough and west of Kala Creek—1 moose by State registration permit.* Aug. 22 - 31  
Sept. 5 - 25

*Antlerless moose may be taken only during Sept. 21 - 25 season if authorized jointly by the Koyukuk/Nowitna/Innoko NWR manager and BLM Central Yukon field office manager* Mar. 1 - 31

*Antlerless moose may be harvested during any of the winter seasons.* Season may be announced.

*Harvest of cow moose accompanied by calves is prohibited.*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The Kaiyuh Flats moose population is growing rapidly and can support additional harvest.

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

**Rationale:** Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users. A harvestable surplus of moose exists in Kaiyuh Flats area of Unit 21D, and additional cow moose harvest may help this population grow at a more sustainable rate.

**PROPOSAL 187 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.**  
Reauthorize a winter any-moose season during part of February and March in Unit 21E.

**Current Federal Regulations:**

**Unit 21E–Moose**

*Unit 21E—1 moose; however, only bulls may be taken from Aug. 25-Sep. 30 Aug. 25-Sep. 30.*

*During the Feb. 15—Mar. 15 season, a Federal registration permit is required. The permit conditions and any needed closures for the winter season will be announced by the Innoko NWR manager after consultation with the ADF&G area biologist and the Chairs of the Western Interior Regional Advisory Council and the Middle Yukon Fish and Game Advisory Committee as stipulated in a letter of delegation. Moose may not be taken within one-half mile of the Innoko or Yukon River during the winter season Feb. 15-Mar. 15.*

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. The moose population in Unit 21E is growing, beginning to show signs of nutritional stress, and can support additional harvest.

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

**Rationale:** Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users. A harvestable surplus of moose exists in Unit 21E, and additional harvest may help stabilize the population and prevent overutilization of the habitat.

**PROPOSAL 188 – 5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.**  
Reauthorize the antlerless moose season in the western portion of Unit 26A.



**Current Federal Regulations:**

**Unit 26A—Moose**

*Unit 26A—that portion west of 156°00' W longitude excluding the Colville River drainage—I moose, however, you may not take a calf or a cow accompanied by a calf* July 1-Sep. 14.

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

**Impact to Federal subsistence users/wildlife:** Adopting this proposal would maintain harvest opportunity for Federally qualified subsistence users. However, Federally qualified subsistence users would still be able to harvest antlerless moose under Federal subsistence regulations if this season is not reauthorized under State regulations. While the moose population is very sparse in this area, hunting pressure and harvest is extremely low, minimizing conservation concerns.

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

**Rationale:** Reauthorizing the antlerless moose season maintains harvest opportunity for Federally qualified subsistence users, and low harvest pressure minimizes conservation concerns.

**PROPOSAL 189 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.**

Reauthorize resident grizzly/brown bear tag fee exemptions throughout Interior and Northeast Alaska.

**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 190 – 5 AAC 92.015. Brown bear tag fee exemptions.**

Reauthorize the current resident tag fee exemptions for brown bear in Units 18, 22, 23 and 26A.

**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.

Submitted By  
Nicholas Orr  
Submitted On  
1/5/2021 10:07:41 PM  
Affiliation



PC131  
1 of 1

I am against proposal #170 as it creates yet another area of unequal hunting rights among Alaskans. The proposal suggests that potential harvest under current regulations is unsustainable, but since ADFG cannot limit federally qualified users—who can essentially harvest unlimited deer by using designated hunters—they instead suggest that non-federally qualified subsistence users bear the conservation burden instead.

ADFG suggests that low recent (RY2014 – RY2018 ) harvest numbers indicate that Pleasant Island belongs in Unit 1 and that mild winters are causing deer to disperse to the mainland. I disagree, as the harvest numbers from RY2009 – RY2013 were much better (and I suspect that harvest numbers prior to the severe 2007 winter were also robust). Furthermore, the low harvest numbers are likely due to a significant wolf presence on Pleasant Island. I would say it's common knowledge among trappers who target wolves in northern southeast (or at least among Juneau wolf trappers) that Pleasant Island has experienced a dramatic increase in wolf numbers during the same time period (RY2014 – RY2018). The same dramatic decrease in harvest -- coincidentally during the same time period -- has occurred on Douglas Island (Juneau) for precisely the same reason: a dramatic increase in wolves.

If a sustainable harvest of deer on Pleasant Island is the goal, lowering bag limits or moving Pleasant Island from Unit 4 to Unit 1 isn't going to have any effect since the current harvest is already close to or equaling zero in recent years. Instead, encourage and support Gustavus based wolf trappers. As for the reclassification of Pleasant Island opening a black bear hunt in Unit 4, this can be addressed by adding black bear regulations to Unit 4 during the next cycle for southeast Alaska.

Submitted By  
Nicholas Orr  
Submitted On  
1/7/2021 10:50:20 PM  
Affiliation

I support the passage of proposal 161. There is limited meat in between deer ribs. I have weighed trimmed strips from deer that I have taken and the weight comes out to less than 1lb. There is more meat in each of the following (salvage of which is not required): the diaphragm, the heart, the stomach lining (flank). The proposal is correct in that this would help limit time at a kill site in areas with brown bears, which is common sense and a reasonable trade off for the limited meat that would not be salvaged. I would also point out that rib meat is not required to be salvaged by any other state.





Submitted By  
Sarah M Osborne  
Submitted On  
2/18/2022 1:32:50 PM  
Affiliation

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Hi I'm writing in regards to trapping on MatSu area trails. I think that the State should disallow trapping on popular trails. Trapping is a long time Alaska tradition and should be allowed, but the trappers should not expect to have carte blanche to place traps anywhere they like, without consideration of the impact on other trail users. Aside even from the leash law debate (and concern over traps killing pets) traps can catch people and children too, when they become covered by snow or are unattended by their owners for long periods of time. I think it's kind of ridiculous that you can pretty much set up a dangerous trap wherever you want, without regard to human or animal life! I don't think trapping should be banned, but like other uses of public land, it should be regulated such that all users can have a share in the resource.

Typically, users of the close to town popular trails are using the trails to exercise, and thus by the nature of human powered endeavors, are somewhat limited in the distances they can travel. Trapping, on the other hand, is a way of life, and (though it makes little actual economic sense in the current age) is a way of earning income. It has been historically practiced by the rural or remote Alaskan as a way to fund a particular lifestyle, or earn a living. Because most trappers used motorized vehicles to set and monitor their trap lines, they don't need to have trails that are close to town or close to a trailhead. At 30mph on a snowmachine you can get beyond where most recreationalists travel in a matter of minutes. Therefore, human powered users should have priority for closer trails, while trappers can have their run of areas that are farther away and less populated.

Perhaps in addition to a regulation, the State could start a public education campaign, wherein trappers are educated on what is considered ethical and appropriate and why they should follow rules and/or ethical trapping practices. I have a neighbor and good friend who used to run a trapline near our house. He would always tell us when he baited, post signs, and start his line well beyond where our property was and where our dog would wander. Another local trapper in chickaloon trapped on the popular King River and Permanenti Trails, and put up signs right along the trail warning users that traps were nearby. My dog never got into any of their traps because I knew there were traps there and could keep my dog safe. But trapping in super popular residential areas like Wendt Road and GPRA, without any signs or warnings, that should not be allowed! I don't know the ins and outs of borough code and state law, but I do know that things are not working as they are.

Seems a shame for the two user groups to be so in conflict with each other, when the dog human partnership is as ingrained in Alaska culture as trapping is...especially since prior to the common availability of snowmachines (and the birth of the "urban trapper" who does it for fun and identity) traplines were set and maintained by teams of dogs.

Specific areas that should be disallowed:

GPRA

Archangel Rd

Moose Range from Wendt to Jonesville

Hunter Creek Access to Knik River/Glacier (this area is huge and open, so a setback of half mile from the main trail would probably save most dogs)

Crevasse Moraine/Kepler Bradley/Kin Win

Matanuska River Park

This still leaves a huge area of Southcentral Alaska for trappers to use (Willow side of Hatcher Pass, Purinton Creek, Permanenti/Kings River, Ruby Lake, Pinochle/Victory, all of the drainages near Eureka/Sheep Mountain. On the south side they could have Jim Creek, Maud Road, Maud Plumley, Matanuska Peak trail, and drainages east such as Carpenter and Coal). These areas are more often used by motorized users who tend to not bring pets, they are generally on the road system so the 'urban trappers' can trailer their snowmachines/sideby side trail destruction machines there, and are also close to rural communities where trappers can live an anachronistic lifestyle if they should choose.



I don't really see why this is such a hard decision, as opposing user groups share turnagain and hatcher passes (snow backcountry skiers)...Also, on a separate tangent- the State regulates subsistence hunting and fishing, with specific areas where these activities occur, and who can participate, based on their residence and living style. Why couldn't trapping be the same? if you are living a subsistence lifestyle in a subsistence area (such that trapping isn't just a hobby-ie sport trapping vs subsistence trapping) then you can trap wherever you want within your area. if you are "sport trapping" then you can't trap in the recreational areas and have to follow setback and signage rules in others...it doesn't seem like rocket science to just divide up the competing non compatible uses into user areas!!

I think the real answer is politics and the fact that Alaska is very politically conservative and dividied on party lines, so I don't know why I'm even wasting my time writing this letter but I'm tired of plowing and needed a break anyway. PS in terms of demographics I live off grid in the back of beyond and am surrounded by trappers and motorized users and we all get along because we are not total [REDACTED].  
(insert shrug here)

Submitted By  
Jennifer Padelford  
Submitted On  
2/18/2022 2:52:32 PM  
Affiliation



PC133  
1 of 1

Please please pass proposal 144 and allow cats who have been spayed/neutered to return to their outside homes. This type of program, (TNR) has been successful in Minnesota since 1972, and other U.S. states and countries. There is no need to murder innocent animals because we have a people problem, not an animal problem. Thank you.



Submitted By  
Sylvia & Marius Panzarella  
Submitted On  
2/18/2022 1:42:49 PM  
Affiliation  
Self

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We are writing in support of Proposal 144 TNVR. It is such a wonderful proposal that is a compassionate and common sense approach. It encourages knowledgeable people to help the situation right itself. If you really want to improve things, pass this proposal.  
Sylvia & Marius Panzarella



Spencer Pape

Proposal 267 (ACR-4)

Limit or restrict all non-resident sheep hunting in 19C

Strongly oppose

The way the proposal is written favors one user group. A more detailed and more recent population survey should be taken before limiting or restricting sheep hunting opportunities.

Please excuse the extensive use of article quotations, but I believe it is all salient information and applicable to this topic. I spend over 50 days a year in 19C and have since 2012. I believe 19C is experiencing an event similar to that in the western Brooks Range in 2013. From the article 'Dall's Sheep News' from 2017 on the ADF&G website: "The western Brooks Range population, which is at the very edge of Dall's sheep range on this continent, has experienced a recent, rapid and significant decline in sheep numbers. The weather plays a major role in driving sheep populations, and severe winter conditions in 2013 persisted into May where snowpack in some areas was three times the average. The western Brooks range sheep population experienced significant mortality across age and sex classes (including mature rams)."

Also from the article: "Current management strategies have maintained a consistent, long-season, general-harvest sheep hunt in Alaska for many decades. Issues do exist, but long-term data sets indicate that sheep populations are doing well, and hunters are largely successful. The Alaska Department of Fish and Game (ADF&G) hopes the current broad opportunities for sheep hunting will continue well into the future.

Sheep hunting opportunities are stable from a biological standpoint, sheep harvest management in Alaska has been successful. In Interior Alaska (the area with the majority of Alaska's sheep range and the largest percentage of the sheep), sheep managers' report that, by and large, the way hunts have been structured and managed has resulted in stable opportunities and hunter success. In 2016, 2,345 hunters reported hunting sheep in Alaska, with a reported harvest of 797 animals. The majority of this take was from the general season hunt which has been in place for decades and provides all hunters with an opportunity to harvest a sheep.



Hunting management and regulation are needed to prevent harvest from exceeding the recruitment of new animals into a population. When areas have heavy hunting pressure and face increased limitations, one way to keep opportunity open for more people is for managers to limit the sex or age class of the animals available for harvest. For example, the spike/fork-50-inch regulation for moose hunting has allowed more people to hunt moose for a longer season, while keeping harvest at sustainable levels. **Full-curl management is a similar approach to preserve sheep hunting opportunity while conserving sheep. Limiting harvest to older full-curl rams ensures that the population's productivity is not affected by harvest. Compared to the harvest of other ungulates, the harvest rates of sheep in Alaska are low and expected effects of human take on sheep populations is accordingly, negligible (emphasis added).**

Some people refer to the good old days of sheep hunting as though there were significantly more sheep in the past. However, sheep populations fluctuate both over the long term and within the short term. There were times when the various sheep populations in Alaska were higher and lower than they are now. A timeline history of sheep season lengths presented on page seven reflects those fluctuations. It may surprise some people to know that there were three sheep season closures – no sheep season at all – in the early 1940s."

The Dall's sheep resource should be available to all user groups. Without non-resident hunters the state of Alaska will lose out on necessary funds. The Federal Aid in Wildlife Restoration Act, often referred to as the Pittman-Robertson Act, provides funds to state fish and wildlife agencies and territories for wildlife management and research, and funds projects to restore, conserve, and enhance wildlife populations and their habitats. This is one of the biggest assets to helping regulate and maintain Dall's sheep populations. The amount of dollars available through this matching program is greatly increased by allowing nonresident hunting. Dall's sheep populations are cyclical. Since the early 1900s record keeping has proven that. Studies have shown that when sheep numbers are high more hunters go to the field and when sheep numbers are low fewer hunters go to the field. If and when surveys prove that the sheep population is on the brink, then close the season completely. Don't limit it to one user group. This is precisely the decision that was made in the 1940s, when this issue was raised. Per the information on the ADF&G website, 'Dall's Sheep News', paragraph 3: "From a biological standpoint, sheep harvest management in Alaska has been successful." In this management plan a full curl regulation exists that helps preserve sheep hunting opportunities. With the current management plan and a stretch of mild winters, the Dall's sheep population will rebound. Time has proven this.

Respectfully,  
Spencer Pape

*Spencer Pape*



[www.lakeclark.com](http://www.lakeclark.com)

Submitted By  
Tyann Payne  
Submitted On  
2/17/2022 7:09:26 PM  
Affiliation



PC136  
1 of 1

I support proposition 199, for safe trails for all.



Submitted By  
Mary Pemberton  
Submitted On  
2/16/2022 9:19:47 AM  
Affiliation

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To the Board of Game:

I am writing in support of Proposal 199 requiring a 50-yard setback for certain multi-use areas of the Mat-Su, particularly the Rabbit Slough area, which has become far more used by people looking to recreate in recent years. Years ago, one of my dogs sniffed out a snare that was perhaps 30 feet off the road going to the boat launch. My dog was not injured but this left me wary of the area. Please approve these setbacks. These areas in recent years are becoming more heavily used, especially the Reflection Lake area, and need to be tailored to a wider variety of users.



Submitted By  
Chris Perry  
Submitted On  
2/18/2022 10:22:37 PM  
Affiliation



PC138  
1 of 1

BOG proposal 199 public comment

Please enter my public comment

on Board of game proposal 199 accepting a trapping trail setback distance for easements and existing high use trails.

I have lived in Alaska for 39 years and enjoy the backcountry and wilderness of the state. Please support BofG proposal 199 pertaining to trail setbacks for trapping in Matsu and all other parts of the state. My dog was trapped within 20 feet of a trail side (within the 60' centerline easement) of a summer road and winter trail. I have used this road/trail for 39 years for summer and winter recreation. 2 weeks later another dog was trapped about 200 feet from the same location by a different trapper. That dog spent three days in the trap before being released. There was a 3 foot deep recess in the snow where that poor dog lay waiting for help. After the dog's release and return home, the dog's owner waited for the trapper to return to his truck, where he screamed at her to keep her dog home. Her property line was less than 100 yards from the trap location. My dog has very good voice control, and the fact that my dog can't be 20' away from me on any public use trail without a chance of dying in a conibear trap is unacceptable. I don't think this was the intent of the trappers' code of ethics. Furthermore, for me not to be able to identify whose trap did this to my dog is also unacceptable. There was trespass trapping in the area with traps set and abandoned on private property, again by an unidentified owner. Again a misinterpretation of the code of ethics is all I can presume. Two of these dogs were trapped on private property abutting my property with large parcels in this subdivision. I have to assume that traps can be put within the easement and up to the very start of my property without any signage. I have trouble understanding how 1 trapper can, with his interpretation of "code of ethics" is allowed to close an entire trail system to traditional users for potentially 8 months of the year and then abandoning armed traps in the area with no possible way to be held responsible.

Since the beginning of 2021, there have been 7 dogs trapped, that I know of, within 5 miles of my place, including the 2 dogs already mentioned. Four of these dogs were trapped within 20 feet of the trailside. One of the trappers only checks his traps once a week. When does this become cruelty to animals? Clearly there is a different understanding of the trappers' code of ethics than my understanding here. Clearly the trappers' code of ethics is open to one's own interpretation, and the rest of the residents of Alaska have to live with it. Yes, there are very responsible trappers and many people around the state who are solely dependent on the trade for subsistence and livelihood. I don't want Alaska to "turn into California" either, but does that mean we have to live with fear of losing our pet's life if we step off the trail anywhere in the state, because someone interprets ethics differently than most people do?

I try to compare and rationalize some of this, for instance: for me to put subsistence crab pots in Kachemak Bay, I need to register them, mark my gear with name and address, and adhere to strict reporting requirements. I wish we had only a code of ethics to adhere to. If I should leave a pot after season closure or out of legal area, be sure I will be ticketed and fined accordingly. I don't think I am endangering anyone by putting my gear where it is, but I am held to much higher standards and regulation.

I met a trapper in the area last week. I would estimate he had around \$75,000 worth of equipment: truck, a couple snogos, trailer and sleds to get him to his trapping location, it's sad he couldn't go just another couple hundred yards to get off public use trails to set his gear. I do understand, nowadays, with fat tire bikes and extreme backcountry athletes, a snogo trail is a highway to the wilderness. We are not asking for all of Alaska be trap free, just an ethical setback distance from existing easements and higher use backcountry trails. Marking ownership of traps is the only way to demand trappers are held to a code of ethics and ethical trapping, and all trappers should be held to these standards.

Please vote to establish at least 100 yard setbacks from easements and existing higher use trails and trailheads. This seems like a reasonable request to help reduce conflicts between user groups.

thank you for your time and consideration.

Chris Perry

Submitted By  
Colleen M Peterson  
Submitted On  
2/17/2022 1:10:43 PM  
Affiliation



PC139  
1 of 1

I fully support Proposal 199 trap setback from trails in the Mat-Su Region. I have been running my hunting dogs on the local trails for over 30 years and although I personally have never encountered a trap or snare, many of my friends have. This subject came up before Matanuska Borough a couple years ago and they banned trapping within 50 yards in Cravasse, Lazy Mtn and other local multi-use trails.

It is time for the BOG to do the same. Trapping should not be allowed in populated areas period.

I would like to see a 1/4 mile setback. But 50 yards is a start. There also should be a sign that indicates traps are set in /near the area.

Thank you for your consideration

Colleen Peterson



Submitted By  
Candace Paige Petr  
Submitted On  
2/18/2022 4:35:31 PM  
Affiliation

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Alaska Board of Game Members:

My name is Paige Petr. I moved to Anchorage almost 20 years ago thinking I would stay for "a couple years." I love Alaska, it is my home. I'm writing to support Proposal 199 which requests 50-yard trap setbacks on more than 200 multi-use trails in the Mat-Su area. I understand this distance is considered a "reasonable compromise" between user groups in other areas of Alaska.

Trail-users with dogs are a large stakeholder group for Mat-Su area trails, which is why it's difficult to understand how it is legal for traps to be set on or near multi-use trails, campgrounds, roads and pullouts. The Mat-Su Valley (and Southcentral Alaska generally) is growing rapidly. There are many more people (including tourists) and dogs using these trails, campgrounds, roads and pullouts and the consequences are too great to not set traps back at least 50 yards.

I am a dog owner and have covered hundreds of miles on foot, bike and skis with my various dogs over the last 20 years. This issue became deeply personal when a dear friend lost her pet in a deadly conibear trap last month on a trail in Seward. The trap was not far from a well used trailhead and was baited by a scent that proved irresistible to her dog. Losing essentially a family member in such a horrific way has been traumatic to say the least.

Please approve Proposal 199 and 50-yard trap setbacks on more than 200 multi-use trails in the Mat-Su area. I believe this is a more humane, safe and reasonable rule than what is currently in place for trapping in the Mat-Su area.

Thank you for your consideration.

Respectfully,

C. Paige Petr

Submitted By  
Paula Phillips

Submitted On  
1/9/2022 11:51:25 AM

Affiliation



PC141  
1 of 1

I support the 50 yard setback for trapping. Prop 199



Submitted By  
Amanda Piatt  
Submitted On  
2/18/2022 1:27:18 PM  
Affiliation

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My name is Amanda Piatt. I am a lifelong Alaskan and grew up in Palmer. I split my time between my home in Girdwood and at Sheep Mountain. I am in support of Proposal 199. While I don't personally trap, I come from a family that does. I believe a 50-yard trap setback is a fair compromise between trappers and those of us that enjoy these trails with our children and pets. Proposal 199 is a positive step towards public safety and reducing user conflict on Matsu trail systems.

Submitted By

Denise Piatt

Submitted On

2/18/2022 1:49:55 PM

Affiliation



PC143  
1 of 1

My name is Denise Piatt. I was raised in Anchorage and have lived in Palmer/Wasilla for the last 30 years. I am in support of Proposal 199. I am not against trapping but believe current regulations fall short of protecting all trail user groups. A 50-yard trap setback on Matsu trails is a fair compromise and important step towards public safety.

Submitted By

Michael Piatt

Submitted On

2/18/2022 1:45:37 PM

Affiliation



PC144  
1 of 1

My name is Michael Piatt. I am a lifelong Alaskan and have lived in Palmer/Wasilla for the last 30 years. I am in support of Proposal 199. I've trapped throughout my life. I believe a 50-yard trap setback on Matsu trails is a fair compromise and important step towards public safety.

Submitted By  
Cabot Pitts  
Submitted On  
2/18/2022 6:45:48 AM  
Affiliation  
Resident



PC145  
1 of 2

Dear Board of Game Members,

My name is Cabot Pitts, I am a resident and currently reside in Palmer, Alaska. I have been a resident of Alaska since 2010 and run and operate Alaska Wild Wind Adventures a big game hunting outfit that operates on the Alaskan Peninsula and within the Wrangell St. Elias mountains. I currently hold commercial operating concession permits with the National Park Service in both areas, along with other stateland and BLM operating permits in surrounding areas. Since 2007, I have had the opportunity to personal hunt and big game guide all over the state. In these comments I would like to address my concerns with a handful of current proposals regarding to what the Board of Game has referred to in the past as "proposal 207 – making it illegal to spot and locate Dall Sheep during the dall sheep hunting season of August 10- September 20"; specifically proposals 135, 136, 137, 138 and 139. Proposals 135, 136, 137 are referencing the repeal of the current "207" restrictions and proposal 138 is broadening "207" coverage, proposal 139 is rewording the current "207". I will explain my concerns below.

I have averaged over 250-270 days a year in the field personal hunting and guiding since I first came up to Alaska in the early 2000's. This has given me a great perspective on the effort level of hunters (resident and nonresident) on the mountain and the quality level of the hunts that take place in the areas that I frequent in the state, in this case referring specifically to Dall Sheep hunting prior to and after proposal 207 was enacted in 2015.

I am a pilot and have held my pilots license since 2010 and use my airplane and other part 135 operators in my guiding operations to access the back country and support my operation, guides and hunters in the field. I can easily say that proposal 207 has not affected my personal hunting, guiding or outfitting business in any negative way. It has actually had the opposite effect while out hunting, by making it more enjoyable for all user groups in the mountains, where I have noticed less disturbance of light aircraft buzzing the hillsides while dall sheep season is open.

I would define myself as an ethical fair chase hunter, yet also use airplanes to access the back country, but I do not use aircraft to locate game during any open season. I know that the definition of fair chase can be interpreted differently across the spectrum depending on the hunter, but in my opinion this term fair chase has been stretched over the years, specifically by the majority of hunters that seem to have to use their airplanes to spot and locate game during any hunting season.

Current proposal 135 and 137 have similar statements saying that there are supposed caveats to the current 207 ruling; "that make a pilot act in unsafe ways they may not normally over fears of being turned in for spotting sheep(proposal 135)" OR "we do not need to restrict or limit the way a pilot should be able to fly and cause unnecessary risks to be placed upon them creating more danger than they already face(proposal 137)". These statements made are just false, as when one is going through basic pilot training, we are taught at this beginning level to maintain all control of your airplane when it comes down to making decisions on safety, maneuverability, and safe areas to land. The pilot is in control and makes the decisions. The missed issue that "207" has addressed, is the simple fact that the people in support of resending proposal 207 are not the only user groups in the field. There are boaters, rafters, hikers, subsistence users and non-hunting parties that have also taken the time off to access the mountains and are utilizing the same resources. Access is a privilege we take for granted and the opportunity to be able to hunt in Alaska is priceless and to simply say that 207 is unenforceable and creates safety risks is a front to hide behind. Not all but a big handful of specific people in this aircraft user group that are against 207 use these excuses simply because they are doing just that; **using their aircraft to spot game during season.**

The statements made in proposals 135, 136 and examples in 137 veers far from what 207 is helping enact. 207 is creating an atmosphere that is more enjoyable for everyone in the backcountry and keeping the harassment of game to a minimum (even though there are already harassment rules in effect and certain people still abuse them). Not once in the current 207 proposal is there anything stating that a pilot should alter or restrict the way one flies, especially in the terms of safety. It simply states that you cannot scout and look for dall sheep during season. So during dall sheep season instead of flying at high sheep levels, making multiple passes in back drainages, or continually doing touch and goes in areas, one simply has to take a slightly limited approach to their normal flying antics and realize that 207 is in place to increase the enjoyment and solitude of the backcountry making it better for everyone, not just one user group.

Therefore, I am in full support of proposal 138 which broadens the past proposal 207 to include all open sheep seasons. The dates of 207 should be amended to include the youth season August 1-5 and any other open season during the year. This would help with making 207 a universal blanket coverage during any open sheep season or future season and not single out a certain timeframe. The youth season is a perfect example of why 207 should be extended, as this is a time where basic fundamentals of ethical hunting are being taught and taking place. It is important to instill these ethical practices in our youth, as they are our future leaders and ambassadors of our hunting community. By allowing and teaching these unethical practices as acceptable will just make our problem worse down the road.

Since proposal 139 is looking to take away the current 207 wording, I am not in favor of it as it totally takes away the purpose of what is now in effect. I think that you can add the proposed wording of "aircraft may not be used to make multiple, consecutive approaches near any sheep or group of sheep" to proposal 207, to strengthen the current law. There has to be some sense of personal accountability when it comes to these issues in the field and dealing with different user groups.



In conclusion I would like to point out the purpose of having a Board of Game is to put the welfare of wildlife first. The s be to enact rules and regulations that benefit all user groups, resident & non-resident hunters alike, hikers and sightse both these goals by putting the welfare of wildlife first, in this case dall sheep, by reducing harassment and fulfilling the use meaning of "chase hunting", all while creating a more enjoyable experience in the outdoors for every user group in Alaska. Lastly I would like to thank the entire board for your devoted time serving and taking the time to read my concerns with proposals 135, 136, 137 and 139; along with understanding my support for proposal 138. Let us work together to keep our heritage of ethical hunting practices moving forward in Alaska for future generations to come, thank you for your consideration.



Sincerely,

Cabot Pitts

Alaskan Resident

Submitted By  
David Polashenski  
Submitted On  
2/17/2022 5:30:04 PM  
Affiliation



PC146  
1 of 1

1. I support proposal #267, limiting the number of Dall Sheep permits available to nonresidents on state land in Unit 19C. I would like this proposal to be extended state land in Unit 20A as well. In many lottery draw sheep hunts throughout the state, such as in the Tok Management Area and Delta Controlled Use area, the number of permits available for nonresidents is capped at 10%. It is long past due to implement nonresident restrictions in the general season sheep hunts in Units 19C and 20A, BEFORE conservation concerns require all hunters in these areas become limited to draw hunts.

Submitted By  
Jamie Polczynski  
Submitted On  
2/14/2022 8:12:34 AM  
Affiliation



PC147  
1 of 1

Please support Proposal 144 and TNVR programs. Please exempt sterilized community cats from the list of species prohibited from being released into the wild. TNVR programs are good for cats and good for communities. Humans are the cause of the unwanted pet population and they need to be the solution.

Submitted By  
Craig Price  
Submitted On  
1/8/2022 5:37:01 PM  
Affiliation



PC148  
1 of 1

Regarding Proposal 199 50 Yard setback for traps on all trails listed in this proposal. This is an ever growing contentious issue that needs to be made regulation for all trails listed. I have personally experienced my dogs walking close by my side getting caught in once a Conibear trap and another time a snare set right next to trails. I have read of this happening ever increasingly occurring with not just dogs but now humans getting caught in these traps. Going forward wiith more and more people recreating on these MULTI! use trails it becomes imperative to follow through with this regulation. Any trapper that has an ounce of ethical integrity and common sense would know to follow this practice in proposal 199. Sadly since this is not the case as recently noted. An exchange with a boy on a snow machine being asked if he knew he was trapping right next to a multi use trail and would he please consider marking them replied, [REDACTED] I don't give an [REDACTED] what you think and there is not an [REDACTED] thing you can do about it. I don't have to identify or mark my traps and I can put them anywhere I [REDACTED] want to. When confronted with this type of mentality, or the recreational wanna be weekend trappers that read absolutely nothing regarding the easy to find information about ethical trapping. Common sense points to this type of trapping regulation is far overdue to be enacted.



Submitted By  
Judy Price  
Submitted On  
2/14/2022 5:47:17 PM  
Affiliation  
Clear Creek Cat Rescue

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I am asking that the Board of Game change state regulations to support Proposal 144. Sterilized colony cats need to be removed from the list of species prohibited from being released into the wild so that Alaska has a chance to get a handle on the increasing population of homeless cats. If the goal of the State's regulations is to protect and preserve the native lands and species, then this Board must act now while there is still a chance.

I have been Rescue Coordinator of Clear Creek Cat Rescue for 14 years. In that time we have rescued more than 5000 cats, the majority of which were found outside, strays and ferals. We operate primarily from the MatSu Borough to the Kenai Borough, as well as taking cats in from villages around Alaska. We are one of the few rescues who will purposely rescue feral cats. And I would like to assure you that we have never been contacted to rescue cats from any wild area of Alaska. All of the cats were living in populated areas where the habitat has been drastically changed by people and is currently heavily populated by people.

In Anchorage as well as Wasilla and Soldotna, colonies of feral cats are found primarily in areas like trailer parks, industrial sites, and apartment complexes. They are not living in the wilderness where any native species other than voles and shrews would be heavily impacted by their presence. They are residents of land where humans have created total disruption of habitat and the sensitive native species have fled long ago. These cats are the victims of human irresponsibility and dependent upon the workings of man to survive.

The reality is that there are many thousands of homeless cats in Alaska because humans have brought them here and have been irresponsible with their care; and that needs to be dealt with in an educated and humane way. To ignore that problem or to believe that we can kill our way out of it is naive and irresponsible. Shelters all over the state have been euthanizing cats for decades and we are nowhere closer to controlling the population than we were 50 years ago. In fact, the number of homeless and feral cats has greatly increased. Although there are more cats being rescued, taken to public shelters or taken in by rescue groups, this problem gets worse every year and will not go away by killing. The only humane and rational method of moving toward control is to allow trap-neuter-vaccinate-return (TNVR).

Because TNVR has been outlawed through the State Board of Game regulation, there are few humane ways to deal with feral cats. Which means that most feral and stray cats are left in place to continue to produce thousands of kittens a year. A few will be trapped and taken to local shelters to be killed, but generally people would rather not rescue a cat whose outcome is certain death. So they do nothing. Most rescue groups also avoid cats who may be feral because without the TNVR option, ferals are not easy to adopt out and they become long term residents, taking up foster space for months or even years. So the feral cats, along with the lost and abandoned ones who have sought refuge with the ferals, are left to continue to reproduce and create yet more feral cats. If Rescue groups have only the near impossible option of finding family homes for the feral cats or killing them, they will choose to do nothing. And so the maddening cycle continues.

On the other hand, if TNVR was a tool that Rescue groups and shelters had to work with, the whole dynamic could change. I will try to explain how that would work in the real world.

If we knew that we had the option to return ferals to their homes after being altered and vaccinated, we would be free to trap and rescue whole colonies of cats that otherwise would be ignored. In my experience, approximately 80% of cats that are trapped outside who are perceived to be feral are actually friendly family cats who have been abandoned or lost. Knowing this, we can take the chance of trapping the whole colony because we know that most of the cats will be adoptable to family homes. With that majority of non-feral cats removed from the group, the remaining true ferals could be sterilized, vaccinated, microchipped and returned to their home area. This return to the colony would be an option only if the area is suitable for the community and a good place for the cats to live, which would never be on wild lands. (Although our Rescue has taken in many hundreds of feral cats, I personally have never encountered a colony of cats on State public wild lands.)

The colony cats would have a designated caregiver to provide food, water and shelter. The caregiver would be aware which cats belonged to the group and could alert rescue groups to any new cats coming in who would then be trapped, thereby removing any unaltered cats before they had time to breed. The colonies would be strictly managed, and with oversight could gradually be diminished as the cats pass away. This technique has worked successfully in many areas of the country and can work here. We just need to be allowed the option, and the resources, to make it happen.

Although cat colonies exist primarily, if not exclusively, in human populated areas, the State's regulation--to not release cats into the 'wild'--has stalled all efforts to try to help solve the homeless cat problem where it primarily exists, in cities and towns. Some cities and boroughs have used this to do nothing but kill cats and to refuse to allow others to work toward a humane resolution.

If the regulation was originally written to protect native lands and creatures, TNVR as it would operate in Alaska would TNVR advocate is talking about taking feral or any other kind of cats and releasing them to live on their own in some way from people. The purpose is to release the cats back into their friendly home territory when it is suitable, such as managed colonies in trailer parks and subdivisions and industrial sites where they already have been living. Managed cat colonies can be a great benefit in areas where introduced rats and mice have taken up residence and multiplied.



Adding TNVR to the options that shelters and rescues have for managing homeless cat populations would make a huge difference in controlling feral cat numbers. It would also help save the lives of lost and abandoned cats now living on the streets, and take them out of the breeding population. This would be a huge step forward in decreasing the number of unwanted cats.

I hope that this Board will choose to be realistic and responsible. Give the shelters and the Rescue groups a chance to act in a humane way to control the homeless cat problem. People created the problem and now we need a chance to try to fix it. Please don't ignore it. Please don't pretend there is nothing that can be done. Because there is a method that has worked in many places and can work here. For the sake of the cats, our communities, and our native lands, please choose to give TNVR a chance by removing sterilized cats from the list of species that cannot be released into the wild. Please support Proposal 144.

Thanks for your time!



Submitted By  
Karen Procter  
Submitted On  
2/17/2022 6:30:55 PM  
Affiliation

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Anchorage, Alaska 99517

Dear Board Members,

I am writing in support of Proposal 144, and of trap-neuter-vaccinate-return programs in general. Proposal 144 will exempt sterilized cats from the list of species prohibited from being released into the wild, *i.e.* the "return" part of trap-neuter-vaccinate-return (TNVR). Rule changes that do not impede TNVR programs will be better for the cats, better for public health, and better for the wildlife we all want to protect.

I have long studied TNVR programs, and I believe their benefits far outweigh any adverse effects. Our community cats must be sterilized and vaccinated to control the size of the communities and to ensure that each individual cat lives as healthy a life as possible. I am sure you will find that support for community cat colonies is immense, particularly once citizens have educated themselves about TNVR.

I appreciate your consideration. Thank you for helping the cats of our Alaska community.

Karen M. Procter