



Submitted By
Jackie Debevec
Submitted On
2/15/2022 3:41:50 PM
Affiliation

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Address
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Alaska Department of Fish and Game Board,

I support Proposal 144 and for Trap-Neuter-Vaccination-Return programs in general. Sterilized cats who have lived outside for periods of time and know how to take care of themselves should be allowed back into the wild instead of being caged or euthanized. This TNVR program is good for the cats and good for the community.

Please exempt sterilized cats from the list of species prohibited from being released into the wild.
Thank you, Jackie Debevec

Submitted By
Aaron DeRose
Submitted On
2/18/2022 11:44:03 AM
Affiliation



PC052
1 of 2

I write to oppose Statewide Regulation Proposal #267, which seeks to restrict nonresident sheep hunting in Game Unit 19C so that only resident sheep hunting is allowed. Proposal #267 should be rejected for the following reasons.

(1) Proposal #267 is bad for Alaska's businesses, jobs, and economy.

I've operated as President of an Alaskan big game outfitter business in Unit 19C for years. Our outfitting business financially supports numerous guides, assistants, and other trades and businesses involved in the hunting and outfitting industries. Our outfitting business relies on nonresident sheep hunting in Unit 19C. If approved, Proposal #267 will shut-down our business, and hurt all the businesses, trades, jobs, and livelihoods that depend on our business. Plus, other outfitters also rely on nonresident sheep hunting Unit 19C. Proposal #267 will also hurt those other outfitters, along with all the businesses, trades, jobs, and livelihoods that depend on those other outfitters. Since Proposal #267 seeks to restrict nonresident sheep hunting in Unit 19C, it will hurt all the Alaskan businesses, jobs, and livelihoods that depend on nonresident sheep hunting in Unit 19C.

Even worse, the damaging effects of Proposal #267 will spread throughout Alaska to all those who financially depend on or benefit from nonresident hunters. Nonresident hunters visiting Alaska financially support vast sectors of Alaska's economy, including industries in tourism, travel, lodging, food and beverage, shopping, hunting, and guiding. From these vast sectors of Alaska's economy, a wide-range of Alaska businesses and jobs financially depend on or benefit from nonresident hunters, including aircraft transportation, motor vehicle rentals, gas stations, hotels, motels, bed and breakfasts, grocery stores, convenience stores, liquor stores, restaurants, bars, sporting goods stores, equipment stores, clothing stores, hunting guides, outfitters, and taxidermists. Since Proposal #267 seeks to restrict nonresident hunters, it will hurt Alaska's businesses, cut jobs, and damage the economy.

(2) Proposal #267 is bad for responsible sheep management in Unit 19C.

Proposal #267 will reduce the number of outfitters operating nonresident sheep hunting in Unit 19C. As everyone knows! Individuals who have vested interests in something not only manage but protect that resource. Outfitters in 19C have managed and protected the sheep as they are vital to the health of their businesses. The State of Alaska has managed sheep using the full curl or 8 year old method for years. Outfitters have built their business models around this method and offered outfitting services accordingly. Proposal #267 has nothing to do with increasing sheep numbers and has everything to do with wrongful entitlements by a small group of Alaskans. Sheep meeting the full curl or 8 year old test are the target of all hunters. If there is no full curl or 8 year old rams then no sheep will be taken during the season. The population of sheep will increase until a sustainable population of full curl or 8 year old rams exist. Keep in mind it was not nonresident hunters that caused the sheep decline but harsh winters. The outfitters operating in Unit 19C provide responsible sheep management because their businesses depend on it.

The individuals in support of Proposal #267 should consider their impact on sheep populations. When is enough, enough? How many sheep need to be on their wall? Nonresidents are required to wait 4 years between successful hunts, why is the concerned party not suggesting residents do the same to support sheep populations. As far as funding goes, here is another area the supporting parties of Proposal #267 fail to provide money where their mouth is. Increase the price of sheep tags to reflect every other state that offers opportunities to hunt Wild Sheep. This should go for both Residents and Nonresidents. The additional revenue generated from residents would greatly assist in management and preservation of a resource they consider their own. Everyone should pay to play when it comes to utilizing a resource.

(3) Proposal #267 is bad for all sheep management state wide.

Proposal #267 if approved will accomplish one thing and one thing only. Displacement of Outfitters and Nonresidents. The demand on this resource will not go away, and the need for Outfitters to provide for their families will not stop. If Proposal #267 passes you will see sheep populations in other areas of the state feel the impact. Both Outfitters and Nonresidents will move to areas where they can operate and hunt sheep thus compounding the problem. Proposal #267 is not the answer to a low sheep population it is simply the catalyst to more

areas in Alaska dealing with a similar problem if a bad winter should hit.





Submitted By
Alysha Edelman
Submitted On
2/14/2022 8:33:49 AM
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PLEASE IMMEDIATELY support Proposal 144 and for TNVR programs. WE ASK YOU TO IMMEDIATELY support Proposal 144 and to exempt sterilized community cats from the list of species prohibited from being released into the wild. THE TNVR programs are GOOD FOR CATS and GOOD FOR COMMUNITIES. I AM A LICENSED VETERINARY NURSE AND I HAVE PARTICIPATED IN TNR / TNVR CLINICS AND THEY ARE INCREDIBLE FOR ANIMALS AND ARE INVALUABLE!!! THIS MUST BE SUPPORTED!!! Thank you!



Submitted By
Ted Eischeid
Submitted On
2/18/2022 1:01:00 PM
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Dear BOG.

I'm writing to support the modified proposal 199. I feel this proposal is a moderate solution to a growing problem, accidental capture of dogs by lethal traps near popular trails. As a former trapper I support the activity. However, as a dog owner who enjoys hunting game birds with my Labrador, I fear encounters with conibear traps and snares, so I have stopped this activity. I believe prop 199 will allow me once again to enjoy certain trails knowing that an adequate safety buffer exists. I feel 199 is a modest proposal that addresses accidental kill of canines on our more popular shared trails. Let's not allow the bad publicity of tragic deaths of our canine pets on popular trails by kill traps damage legitimate trapping. Please support 199. Thank you.



My name is Brett Ekstrand. I am a lifelong Alaskan resident of 33 years ; I currently live in Anchorage. I am an avid outdoorsman who loves to hunt and impatiently waits for hunting season to roll back around every year. I am writing this letter to you in support of proposal 138 which broadens past proposal 207 to include the youth sheep season. I also fully support proposal 139 and hope that once there is a clear definition it will be enforceable.

I look forward to sheep hunting every year, after I get done sheep hunting for the season I can't wait to get back out there again. All year I'm glued to maps and reading over harvest reports, buying new light weight gear. I have changed my lifestyle to become a more effective sheep hunter. The thing I enjoy the most about sheep hunting is the solitude, being alone in such a beautifully amazing area. My father took me hunting as a child, he taught me about hunting ethics and fair chase. One of the elements to that is not ruining someone else's hunt, there is absolutely no way a pilot can tell if the rams he has spotted are already being watched and judged by hunters on the ground. Having spent a fair amount of time in the mountains I have watched buzzing airplanes push sheep out of their normal routine and move them off from their location, ruining my experience watching them and photographing. I have heard countless peers of mine experience the same things, while recreating and even during hunting season. There are a few bad apples out there that think they are above the law and know it's hard to prove someone is spotting sheep and do it anyway. I am hopeful that proposal 139 will pass, making people think twice about breaking the law.

There is ample time all year for pilots to fly around and spot sheep leading up to hunting season there is no reason to allow the spotting of sheep during hunting season. People opposing 207 hoping to get it overturned, claim the current law makes them fly unsafely, doing maneuvers they typically wouldn't if the law was different. This a sad excuse to get the law changed in their favor allowing them to spot sheep during the season. If your uncomfortable flying your airplane in the mountains during sheep hunting season stay home.

I support proposals 138 and 139 and oppose all other proposals trying to rescind 207.

Brett Ekstrand
32-year Resident hunter of Alaska

Submitted By
Richard Ervin
Submitted On
2/18/2022 5:24:31 PM
Affiliation



PC056
1 of 1

Dear Alaska Board of Game Members,

I am writing to ask you to please support Proposal 199 that requests a 50 yard trap setback from trails in the Matsu. I frequent these trails, have 2 dogs who occasionally head into the woods, and would be devastated if one of them were maimed or killed. This happened to a friend of mine whose dog was killed in a conibear trap. A large conibear trap is extremely difficult to open once it has closed. With a struggling animal it is extremely difficult even if you do have the right equipment to open the trap. It is difficult to get any struggling animal out of any trap for that matter. I was a trapper in the past and know the dangers. Please put a 50 yard setback per Proposal 199. Thank you.



Submitted By
Bronwen Evans
Submitted On
2/14/2022 1:05:21 PM
Affiliation

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I am writing in support of Proposal 144 and for TNVR programs. I please ask the Board of Game to support Proposal 144 and to 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.

Thank you

Bronwen Evans



Submitted By
Jackson farr
Submitted On
2/18/2022 4:59:55 AM
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Please oppose 123 and 124 allowing rangefinding sights on archery equipment, and please oppose 101 and 125 allowing the use of crossbows in archery season. I am not an Alaskan resident but bowhunting Alaska has been a dream of mine for a long time and I have been saving up for that for a long time. These proposals will discouraged me and many of non residents from hunting in Alaska. 123, 124,101, and 125 do nothing to further the sport of bowhunting and ethical fair chase hunting. Have equipment that makes shooting easier doesn't guarantee ethical shots if the hunter is willing to shoot farther to where that hunter is not accurate.

Please oppose 127, allowing air rifles into the general season. This again does nothing to better hunting but this is only marketing to sell hunter more equipment we don't need. Every state should be very careful about adding huge technological hunting equipment to hunting regulations. We risk so much adding these devices, what will the non hunting public see hunters as, people enjoying the outdoors with family and friends chasing animals or people with gadgets enjoying the killing animals.

Please support 138, no fly rule for scouting for sheep. This is common sense fair chase hunting that is good for hunting as a whole.

Submitted By
Nina Faust
Submitted On
2/16/2022 4:50:41 PM
Affiliation



PC059
1 of 1

RE: Proposal 199: **Areas closed to trapping.**

I support Proposal 199 which would prohibit trapping within 50-yards on either side of certain listed trails and trailheads. This proposal is in response to trail users' dogs being injured or killed after getting caught in traps set close to popular multi-use trails.

This is a commonsense solution to a problem caused by some trappers who are not following ethical practices by moving away from well-used trails before setting their traps. The danger to pets and potentially to children is very real when traps are set close to well-used trails. Fifty yards is not that much of an inconvenience to trappers, but could mean the difference between life or death or injury to dogs recreating with their people and may save a child from a tragic accident in a trap.

Please pass this reasonable proposal that will help resolve this contentious issue. I would like to see this type of regulation also be applied to popular trails in the Homer area and elsewhere on the Kenai Peninsula.

Sincerely,

Nina Faust



Submitted By
Galen Flint
Submitted On
2/18/2022 9:43:29 AM
Affiliation

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Proposal 199, Amended.

I write in support of Proposal 199, Amended. I support any proposal that would prevent trapping and trapping accidents close to trails used by people and their dogs. I would encourage the addition of the Nandy Lake Recreation Area and the Rabbit Slough and Palmer Hay Flats area to the list.

Galen Flint



Submitted By
Paul Forward
Submitted On
2/18/2022 11:12:23 PM
Affiliation

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Dear BOG,

I am a lifelong Alaskan and split my time between living and working in Kotzebue and Girdwood. I have been an avid traditional bowhunter since I was 12 years old and have subsequently filled my freezer with my bow for the past 30 years, hunting in a wide variety of GMU's. Thank you for the opportunity to comment on the following proposals:

Proposals 135, 136, 137, 139: **STRONGLY OPPOSE: WE MUST MAINTAIN PROPOSAL 207** (5 AAC 92.085(8))

The best decision the BOG has made in recent years is stopping the aerial scouting of sheep during the season. I am a longtime sheep hunter, have killed multiple rams with a longbow in various parts of the state and have never utilized aerial scouting in any way at all. It is completely contrary to the ethos of fair chase hunting. We go into the mountains to hunt sheep, not to find the most efficient way possible to kill them. There is no reason that a hunter cannot land in an area, put on a backpack and start hiking, looking for sheep. There are many maps and other resources available to identify good sheep habitat and there is no need to fly around looking for rams. Furthermore, most sheep hunters will admit that the most difficult thing, especially when rifle hunting is just locating a legal ram. If this is accomplished from the air, there is no way to justify the ensuing kill as fair chase. I've hunted sheep enough to understand that even for a novice hunter, it's not difficult to kill a ram with a rifle once it's been located and the vast majority of hunters who find a legal ram are easily able to get within rifle range.

In an era when all sheep biologists are telling us that sheep populations are at risk we do not need to be A) making sheep hunting even easier by allowing in season scouting and, B) further encouraging the general harassment of sheep by airplanes. In the Chugach, Talkeetna's and Brooks Range I've repeatedly witnessed guides and private pilots scouting for sheep both in and out of the season and it often does disturb animals. If anything we need more restrictive regulations to protect our delicate sheep populations in the interest of true fair chase hunting.

Furthermore, the argument of it being unenforceable is a false one. First, while it may be true that violations have not been successfully prosecuted, it is fairly easy to obtain video and tail numbers and report them to authorities. Furthermore, many Game regulations are difficult to enforce and many game violations of all kinds go unreported. For most ethical and legal hunters the law itself is an adequate impediment to unethical/illegal behavior. There will always be those who thwart the law and they must face severe consequences when caught. Second, the authors of these proposals, themselves illustrate how effective the current law is. Multiple of them cite examples of times when they did not engage in aerial scouting because they were worried about being found in violation. This is a perfect example of the law working as it should.

The author of proposal 137 illustrates this self-contradiction well in two consecutive paragraphs. First stating that he avoided scouting a new area from the air during sheep season because he did not want to violate the law and then in the next paragraph states that it should be repealed because it's unenforceable. Isn't the best law one that is adhered to without need for enforcement?

The existing law also creates equity in the hunting world between those who can and cannot afford their plane. Those who can only afford to access an area on foot or even via a commercial transporter can be easily thwarted in their attempts to find a legal ram by guides or private pilots who can cover vast areas of country and land as close as possible to the sheep they find. Eliminating aerial scouting levels the playing field.

If hunters are only able to enjoy sheep hunting if they can locate sheep from the air, they might consider re-evaluating their ability to truly hunt, cover ground and understand sheep habitat and their commitment to true fair chase hunting. Aerial scouting, especially during the season, is utterly unnecessary and inconsistent with the basic ethos of fair chase hunting. Furthermore, in a time when sheep populations are in widespread decline throughout most of the state, we certainly do not need to be making it easier to kill and harass sheep.



Proposals 101 & 125:

Oppose: Both of these proposals attempt to advance the status of crossbows as hunting weapons in Alaska. As a lifelong bowhunter I adamantly oppose any attempt to include crossbows in archery season. Crossbows are more akin to firearms in their basic use and have greatly expanded range over bowhunters. Allowing them in the few bowhunting seasons and areas currently available would fundamentally alter the experience of those hunts as well as creating much higher success rates. This would both adversely affect bowhunters with decreased game populations in those hunts but, more importantly would jeopardize existing and future archery opportunities. There is also no justification for expanding archery weapons hunts. Existing compound bows, with the extreme let off at full draw are very manageable for all but the truly disabled hunters. My father, for example, is almost 80 and is still able to hunt with a 50# recurve. And for those hunters who are truly disabled and truly unable to use a conventional bow, there are already provisions in place to get a waiver from a physician. Please do not jeopardize the existing archery opportunities. There is no valid reason that the vast majority of would-be cross-bow hunters can't just use a conventional bow to take advantage of existing archery seasons. Please reject these proposals.

102:

Oppose: Please oppose this proposal. Shotguns and crossbows have never been classified as "primitive" and certainly do not qualify as primitive weapons under any definition I've ever heard of. As a lifelong traditional bowhunter I am very aware of what should constitute "primitive" weapons and any firearm or crossbow would definitely not qualify.

123 & 124:

Oppose: Electronic range finding sights have no place in bowhunting. There has been a constant technological creep in archery hunting and we need to prevent archery equipment from becoming overly sophisticated. The purpose of archery hunting is provide for a great a challenge and lower success rates and allowing for these kinds of technological advancements in counter to the basic ethos of archery hunting.

130:

Oppose. CWD is a serious risk to all cervid populations and urine and other real animal products have been demonstrated to spread this terrible disease. Please keep them out of Alaska.

138:

Support: Spotting sheep from the air and then hunting them is in direct opposition to the basic principles of fair chase hunting. With the fixed dates, the existing regulation creates some inconsistencies such as during the youth hunt or during late season hunts that have subsequently been added. This is in the spirit of true fair chase hunting and would make sheep hunting more equitable with current regulations and with any new changes to sheep seasons that may occur in the future. There is no downside to extending the existing regulation to cover anytime there is an active sheep season.

156:

Oppose: It does not make sense to allow people to apply for a permit before they have the exemption that would allow them to legally undertake the hunt. There is no good reason why someone who feels they deserve an exemption cannot get it prior to applying for a hunt. Furthermore, if the permit awardee does not ultimately qualify for the hunt, the permit will either be wasted or there will need to be an additional and honorous process or finding an alternate permit winner. In addition, this could encourage more hunters to apply for limited archery permits, many of whom may not ultimately qualify, thus taking opportunity away from those who have put in the work ahead of time to either get an exemption or to get their archery qualification.

157:

As a physician and a bowhunter I support this position. It will streamline the process for everyone.



PC061
3 of 3

173:

Oppose. Like many bowhunters in Alaska, the Dalton Highway corridor is a rare roadside opportunity where we can safely bowhunt without worry of being shot over or at by rifle hunters. My family has been traveling to the Dalton highway area to bowhunt for over 30 years and my brothers and I learned to hunt here due to the ability to chase caribou and sheep without fear of rifle competition and the accompanying safety issues. The existing regulation has worked without confusion for decades and there is no need to change it. I and everyone else I know who hunts that area has no issues with local subsistence hunters employing other means of hunting. It is critical for the future of bowhunting in our state to maintain the archery corridor. This is one of the only non-draw archery hunts in the state and it must remain as is.

233: Oppose. As a lifelong bowhunter and as someone who has read hundreds of pages of research published by Dr Ashby on terminal arrow performance, I feel that the existing regulation regarding archery draw weight is adequate and does not need to be changed.

Thank you so much for taking the time to read these comments.

Submitted By
Todd Fritze
Submitted On
2/16/2022 10:33:07 AM
Affiliation



PC062
1 of 1

Thank you for taking the time to read my comments today . I am a subsistence hunter, trapper and one who has used positioning for wolves as an effective harvest management tool.

I am against the language submitted as a definition for positioning in proposal 271.

Positioning for wolves has been one of the most effective tools hunters have in the management of our wolf populations. The speed limits that the proposed definition would make it nearly impossible for a hunter to use snow machines to approach wolves in a manner that would allow them to harvest a wolf. Most times when following wolf tracks they hear you before you see them and they begin to run. As written once a hunter saw that a wolf or wolverine had begun to run he would have to disengage his hunt. Also the idea that a hunter can get to within 300 yards is much too far in that, by the time a hunter stops get there gun out and get ready to fire ,a wolf can cover 100 yards or more now making the shot fairly uncertain and in a lot of cases impossible. Many hunters are using firearms that have a realtively short range. This is done to avoid putting large holes that decrease dramatically the value of a pelt. To effectivley harvest more than one wolf from a pack repeated approaches are also needed . These are all important tools to help us manage our wolves in an area with declining moose and caribou populations. Also judging distances acuratly both by hunters and enforcement is very hard to do at any speed.

At no time do I think the hitting of any animal with a snow machine should be allowed.

I would like to ask the Board to do one or two things first ammend the language of the defintition of positioning to read that there be no speed limtis maximums or distance minimums and allow multiple approaches on wolves and wolverine.

I would also request that at the least the Board postpone coming up with this definition until all the statewide advisory committes have had ample opportunity to meet and discuss what is before you. This deffinition has far reaching implications that can greatly affect the harvest of wolf and wolverines in many areas of the state and may greatly affect the income of many rural people that rely on the harvest of the fur as a means of income. Further more, the need to protect our moose and caribou populations from the over abundance of wolves is of the utmost importance in todays economy where the cost of store bought meat is unacheivable by many rural families.

Thank you for your time.



Submitted By
Ray Gamradt
Submitted On
2/18/2022 12:47:10 PM
Affiliation

Proposals 135, 136, 137

I oppose the proposal.

Using an airplane to locate and then hunt sheep is an efficiency that puts additional strain on a resource that is presently in distress. Planes are fantastic tools in the production of killing sheep. As an avid hunter, I want every measure to be taken to preserve the *opportunity* to hunt sheep, not to improve the *likelihood of success* of those who have access to the technological advantage of an airplane. Dall sheep as a quarry deserve a more level playing field, even in years when their numbers are higher. Hunters on the ground deserve the experience of not having planes flying regularly over the heart of the mountains. And we all deserve the most ardent attempts at maintaining opportunity into perpetuity, rather than leveraging the success of some today at the expense of the resource and the hunting experience.

If the wording of 5 AAC 92.085(8) is cumbersome or not inclusive enough, as the proposal suggests, then I would favor amending the wording to be less cumbersome or more inclusive. To remove it altogether would be a step in the wrong direction. I see the existing language as being part of an iterative process of affecting positive change for the contemporary sheep hunting experience in Alaska.



Submitted By
Sabrina Garcia
Submitted On
2/17/2022 6:43:15 PM
Affiliation
Alaska Humane Society

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Dear Board Members,

I am submitting a comment in support of Proposal 144 which will exempt sterilized cats from the list of species prohibited from being released into the wild. Trap-Neuter-Vaccinate-Return programs have been shown to be successful in ultimately limiting the number of feral cats and limiting the number of unwanted cats/kittens entering local shelters, many of which are already at capacity.

Currently, feral cats can only be captured and housed in shelters and/or animal control facility until they are adopted or in some cases euthanized. Many of these cats are unable to be adopted out because they are not socialized. TNR is a non-lethal technique to managing unowned, free-roaming cat populations. The cats are humanely trapped, spayed or neutered by a licensed veterinarian, ear-tipped (a universal sign showing that they have been sterilized), vaccinated (to limit disease transfer among feral cats), and returned to where they were trapped.

If left unchecked, feral cats are able to continue reproducing and increase the feral cat population in a never-ending cycle. TNVR offers a humane way to slow the population growth of feral cats which will alleviate issues surrounding feral cat populations (e.g., harm to local wildlife). TNVR also gives local shelters, who operate solely on donations, an option. If feral cats are brought in that are unlikely to be adopted, they can be returned to where they were trapped to live out their life but not contribute to the feral cat population. If feral cats are adoptable, they could stay at local shelters until they find a home.

TNVR programs have been successful in other states and countries and I believe they would be successful here in Alaska. 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. Thank you for your consideration.



Submitted By
Ray Gilbertson
Submitted On
2/17/2022 10:35:19 AM
Affiliation

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I fully support Proposition 113



Submitted By
Greg Goemer
Submitted On
2/18/2022 7:15:40 PM
Affiliation

I would like to comment in support of proposal 199. While I am not against trapping there are too many traps being placed in areas adjacent to public trail heads, parking pullouts, state use cabins and even private property. There definitely needs to be a buffer and while 50 yds is a start it is not nearly far enough. I own two hunting dogs and even with an e-collar & GPS collar in thick snow & alders I can't keep them in sight while hunting grouse or snowshoe hares. When released they can cover that 50 yds in now time, in fact I found one of my dogs in a trap this winter because the GPS indicated she stopped moving & I followed it to her. It's time that more regulations be enforced with set backs and prohibited areas as respect for others and common sense no longer dictates in the outdoors and there are too many users that we need a buffer for everyone to be able to enjoy the outdoors. I highly urge you to consider passing this proposal at this time.

Respectfully,

Greg Goemer



Submitted By
Bruce R Gordon
Submitted On
2/13/2022 5:25:01 PM
Affiliation

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My name is Bruce R Gordon and I reside in Boise, Idaho.

I am writing in **support** of **Proposal #265** changing RM855 to DM855.

The current process was very confusing and frustrating. After purchasing a nonresident Hunting license number 21831999, I attempted to submit for a nonresident moose hunt #RM855 in unit 22 E. This was a first come first serve registration permit done by computer submission on July 7th, 2021 at precisely 9 a.m. Alaska time - the first moment applications were accepted for this hunt and I was at my computer prepared, 30 minutes prior.

For what ever reason, because of my computer system, speed of modem or WiFy, or too many other hunters trying to apply at the same moment, I was not successful.

I respectfully request that you change this process as outlined in Proposal # 265 to a lottery draw process to ensure an equal opportunity for everyone.

Along with my **support of Proposal #265**, I ask that you please take action for this current regulatory year and change it to a **draw system on July 7, 2022 so this will be in place for this year's 2022 moose hunting season.**

Thank you for your consideration.



February 15, 2022

From: Karen Gordon
Fairbanks

To: Alaska Board of Game
Alaska Department of Fish and Game

Dear Board of Game Members:

I urge the Board to reject Proposal 267 which is lacking in facts, is emotionally driven, biologically and constitutionally unjustifiable. The Department erred in supporting the ACR resulting in Proposal 267 on three fronts.

- 1) It is biologically inaccurate to suggest harvest of mature rams negatively affects the population. Harvest of mature rams, no matter what the population level is, protects the herd. The full curl harvest regime, in place for about three decades, protects sheep from overharvest.
- 2) Any consideration of the subsistence hunt as a factor inherent in the justification of Proposal 267 should be disregarded because it is biologically irrelevant and therefore moot. Harvest of "any sheep" is biologically risky while harvest of mature rams is not. Even so, subsistence harvest in 19C is insignificant and has no legitimate bearing in the justification or outcome of Proposal 267.
- 3) Finally, the Department erred in overlooking a potential violation of the Constitution by ignoring how this proposal would affect the economy and well-being of the State. The fiscal outcome of Proposal 267, if passed, would cause on average the loss of \$367,000 in annual revenue to the Fish and Game Fund from nonresident hunters who will be precluded from hunting in GMU 19C. To compensate for the predicted revenue loss just from nonresident 19C sheep hunters annually, an additional 2,042 resident hunting licenses must be purchased.

Board of Game Comments

Karen Gordon

Page Two



Please see the attached spreadsheet that describes the resident and nonresident harvest and success rate in GMU 19C. Also is described are the revenues with PR match that are at risk of being forfeited should Proposal 267 be passed.

The Department has found that at the end of every hunting season, on average, half of the legally harvestable rams that we know exist are left on the mountain because they are harvested in the following years. This means that nonresidents are in no way jeopardizing the sheep population in GMU 19C (or anywhere else for that matter) such that resident success is threatened, especially given the protective full curl management regime. There are plenty of mature rams for everyone. In fact, resident success in GMU 19C is amazingly high at 36%. On average statewide sheep hunting success historically has been 27%.

To sum up, Proposal 267 provides no benefit to the resource or the state. In fact, it full of fabricated threats with no justifying data behind them AND it would result in a huge loss to the Department of about \$367,000 per year. In the end, there is no biological need to either go to permits or preclude nonresidents from hunting in GMU 19C. Please do not pass Proposal 267. It offers no benefit biologically or economically and actually violates the Constitution.

Thank you very much for your service and consideration of these comments. I apologize for the landscape perspective, but to include the readable spreadsheet this was necessary.

Sincerely,

Karen Gordon
Fairbanks

*Board of Game Comments
Karen Gordon
Page Three*



GMU 19C Sheep Harvest Data 2015 through 2019

GMU 19C Sheep Harvest Data						Average GMU 19C Sheep Harvest Data 2015-2019					
Year	Status	Successful	%	Unsuccessful	Total Hunters	Status	Successful	%	Unsuccessful	%	Total Hunters
2015	Resident	34	35%	69	103	Resident	38	36%	61	73%	100
2015	Non Res	63	66%	25	88	Non Res	68	66%	23	27%	91
	Total	97		94	191	Total	106				190
2016	Resident	34	35%	51	85	Average Annual 19C Sheep Resident Fiscal Contribution		Average Annual 19C Sheep Nonresident Contribution			
2016	Non Res	62	66%	26	88	Hunting License \$ 45.00		Hunting License \$ 160.00			
	Total	96		77	173	Total \$ 45.00		Harvest Tag \$ 850.00		Total \$ 1,010.00	
2017	Resident	46	43%	60	106	100 x \$45 = \$ 4,500.00		91 x \$1010 = \$ 91,910.00			
2017	Non Res	61	66%	17	78	With P/R Match \$ 18,000.00		With P/R Match \$ 367,640.00			
	Total	107		77	184						
2018	Resident	39	33%	68	107	Total Contributions Resident and Nonresident		\$ 385,640.00			
2018	Non Res	79	66%	28	107	Resident % 5%		Nonresident % 95%			
	Total	118		96	214						
2019	Resident	39	34%	58	97						
2019	Non Res	75	66%	18	93						
	Total	114		76	190						

Note: For calculation purposes I have selected the annual hunting license fee for resident and nonresident, and for the nonresident I did not include any alien fees, so these figures underreport the actual nonresident contribution. I did not include the hunt seasons of 2020 or 2021 due to Covid likely skewing the harvest participation numbers.



Submitted By
Sawyer Guinn
Submitted On
2/18/2022 11:27:21 AM
Affiliation

Phone
7035093913
Email
sawyer9teen@gmail.com
Address
31 Pocahontas Rd
Front Royal, Virginia 22630

Proposals considered in comment: 101, 123, 124, 125, 127, 138.

I am in opposition of proposals 101, 123, 124, 125. I do not believe that crossbows or range finding sights have a place in pre-existing archery seasons. These seasons were established as a primitive weapon seasons and allowing these technologies will increase the efficiency with which hunter's harvest game and inevitably lead to decreased opportunity for all. In response to the ethics debate surrounding these technologies I believe that the increased range the proposed technologies will empower hunter's to attempt to take game at distances effectively nullifying any potential benefit. Weapon restrictions are to take pressure off game, not to give companies the opportunity to develop products to beat the system.

I am also in opposition to proposal 127. I don't believe the use of air powered weapons enhances the experience for hunters or increases ethical harvest rates. It strikes me as a "toe-in-the-door" to lobby for future incorporation of air weapons into established restricted weapon hunts and seasons. I.e. Air bows in archery seasons.

I am in support of proposal 138. I would like to see the air scouting restriction extended to cover all open dall sheep seasons. Additionally I would be in support of similar restrictions banning the use of aircraft for scouting of all game species during open seasons.

I am a non-resident who has never hunted, fished, or even been to Alaska. But, I certainly hope to do all of the above in my life. I believe that the above mentioned proposals will undoubtedly affect harvest rates and therefor directly affect, not only my chances, but the general public as whole will suffer a great loss of opportunity for tags that are in many cases already hard to come by. This not only takes a personal toll on individuals but will negatively affect eco-tourism revenues and conservation funding as well as establish poor precedents for future regulation changes both in and outside the state of Alaska.

Thank you for your service and consideration,

Sawyer Guinn



Submitted By
Sandra Halstead
Submitted On
2/18/2022 10:23:54 PM
Affiliation
Prop 199

Phone
9077267279

Email
Superstorm63@gmail.com

Address
23244 Lower Terrace st
Eagle River, Alaska 99577

This letter is intended for the Board of Game meeting on March 8, 2022. I am in favor of prop 199 which would require a 50 yard minimum setback from trailheads and specified recreational trails in the MatSu borough. I am not against trapping but believe it needs to be conducted in a responsible manner to not injure or kill a family pet.

I encourage the Board of Game to vote in favor of Prop 199.
Sandy Halstead, Eagle River AK



Submitted By
Nick Hamming
Submitted On
2/18/2022 1:17:17 PM
Affiliation

Phone
9078412340

Email
nickhamming@gmail.com

Address
16649 W Glenn Hwy
Sutton, Alaska 99674

Resubmission to include name and residence in comment

My name is Nick Hamming. I grew up in the Matsu Valley. I split my time between my home in Girdwood and my home at Sheep Mountain. I am in support of Proposal 199. I believe a 50 yard trap setback is a fair compromise and in general a positive step towards reducing user conflict on Mat-Su trail systems.



Submitted By
Mary Larene Hasenoehrl
Submitted On
2/9/2022 2:15:23 PM
Affiliation

My name is Mary Hasenoehrl and I reside in Lewiston, Idaho

I am writing in support of proposal #265 changing RM855 to DM 855

This proposal makes it easier and fair for all residents to apply for the permits. If a hunter lives in a remote area, their internet speeds are slower.

The current process favors hunters that are wealthier and live in more populated areas.

Submitted By
Lindsey Hawkins
Submitted On
2/17/2022 9:41:11 PM
Affiliation



PC073
1 of 1

I am in full support of proposal 199. I cannot believe this is not an already well established law. Seems like the most basic form of common sense.



Submitted By
Jennifer Heaton
Submitted On
2/14/2022 6:08:08 AM
Affiliation
Best Friends Animal Society

I support proposal 144 and TNVR programs and hope you will consider supporting it too!

TNVR programs are good for cats and good for communities. I have seen the succes of these programs first hand and we need to continue the amazing progress being made.

Thank you



Good evening,

After reviewing many of the proposals from 2020/2021, as well as those recently added, I would like to make the following comments:

Proposal 234 - Remote game cameras should not be allowed. Perhaps not as big of a concern here in AK (compared to limited watering holes in much of the lower 48 southwest), but it does serve further erode woodsmanship skills and removes the mystique of why many of us got into hunting in the first place.

Proposal 235 - Artificial light should not be permitted in a hunting situation, even if for no-closed-season small game animals. There should be a least a limited number of quiet hours out in the woods. Hunters will take poor shots and make bad shot decisions in low light and/or nighttime conditions.

Proposal 263 - Sea Otters should be remain protected. Early Russian and American settlers decimated them once; leave them alone. They aren't harming anything. Trappers have a plethora of alternatives to choose from here in AK.

Proposal 101 - Crossbows should NOT be included in the definition of a bow and arrow! Crossbow manipulation and operation (scope, trigger pull, shouldering the weapon, balance/stabilization) have far more in common with a modern rifle w/suppressor than they do with a bow and arrow. The effective range of a crossbow puts it in a league of its own, and aside from being powered by potential energy stored in displaced/bent limbs, a crossbow is NOT a bow and arrow.

Proposal 102 - Primitive weapons definition should not include crossbow. Lower-48 states erred when they allowed crossbows into the archery season.

Proposal 121 - Dogs should NOT be allowed to hunt big game in AK. AK does not have the densities or populations of bear/deer like there are in many lower-48 states where dogs are allowed for big game hunting. Dogs should be allowed for use in big game retrieval, when leashed, but hunters should not seek their use for finding and tracking big game. Again, this would further erode basic woodsmanship skills of tracking and familiarity with wild animal behaviors.

Proposal 122 - I agree with Mike Harris' comments about reducing the minimum draw weight for bow and arrow equipment. A well-tuned bow and arrow, with a razor-sharp broadhead is more than capable of passing through any large game species in AK, PARTICULARLY when there is a well-placed shot. Shot placement is the most important consideration in any big game harvest.

Proposal 123 & 124 - Electronics do not belong on archery tackle. Bow and arrow set-up should not include electronic rangefinders or laser-rangefinders. Ethical kills are not dependent on the latest electronic gadget. As with previous comments, this further erodes basic woodsmanship and archery skills. Archery hunting requires close-in shooting, and an



intimate knowledge of animal behavior, cover and concealment, wind direction, etc. Electronics will cheapen the "hunting" experience, and make archery all about the kill shot, not the effort leading up to it.

Proposal 125 - Crossbows should NOT be allowed in weapons restricted hunts. Including a steel bolt that can hit a bullseye at 100+ yds has no place in archery. Modern crossbows are on an equal playing field with modern muzzleloaders, only slightly quieter.

Proposal 138 - Restrictions on spotting aircraft for Dall Sheep should be extended to include all Dall Sheep seasons and hunts, not just the Aug 10 thru Sep 20 period.

Proposal 156 - Crossbows should not be included Methods & Means Exemptions with archery equipment.

Proposal 162 - Snowshoe hares should absolutely include salvage requirements. This is basic community relations and helps keep faith with the larger public who may view hunting in an unfavorable light if animals are killed and left in the field with no effort to salvage meat.

Public relations nightmare.

Proposal 163 - Wounded big game should ABSOLUTELY count towards your bag limit. I thought this was already included in the current regulations...

Proposal 169 - This needs to be re-written. I agree with the authors sentiments as they relate to Native heritage and culture. However, several species of "white animals" exist seasonally in AK...ptarmigan, snowshoe hare, polar bear, Arctic fox...there is too much room for ambiguity as currently written.

Thank you for your consideration.

Regards,

Alex Hedman
Eagle River, AK



Submitted By
Wayne Heimer
Submitted On
2/18/2022 9:50:23 AM
Affiliation
self

Phone
9074576847
Email
weheimer@alaskan.net
Address
2540 River Song Court
Fairbanks, Alaska 99709

I support proposals 135-139, removal of regulation banning flights associated with locating Dall sheep in hunting season.

The justifications for all these proposals make sense to me. The proposal (originally #207) never did. That proposal was Board-generated to "throw a bone" to the anti-guiding and anti-nonresident lobbies which had tied up Board process by "gaming" the public process Alaskans venerate so highly.

The original issue was not spotting from aircraft. It was banning nonresident hunting (and disadvantaging the guides who provide the legally required service. The whole business started over the apparent theft of 82 gallons of avgas (alleged to be by a guide) from a hunter who apparently intended to use it while sheep hunting (it doesn't take near that much gas to fly from the Northern Wrangells back to Fairbanks in a Super Cub). Even though everyone (including Wildlife Protection Officers) said the regulation was not enforceable, the Board of the day apparently thought the axis of process-savvy citizens who had buried the Board process with guide-negative proposals thought these Alaskans deserved something for their prolonged, passionate effort. I'm guessing the Board's assumption was that passing this ceremonial regulation wouldn't really do any harm. That was wrong.

As a result of #207, we got the Resident Hunters of Alaska (RHAK). That organization was originally formed by hunter/pilots to resist #207. It failed there, however the resulting NGO has been a legal and management distraction trading on skewed statistics and misinformation to lure resident hunters into supporting dozens of proposals and one lawsuit in the quest to disadvantage nonresident hunters (and their guides). Benefits to Alaskan resident hunters have been negligible. The original proposal (#207) was primarily ceremonial, has not positively affected management for anything, has tied up the Board process with special-interest proposals and the courts with a lawsuit over preference in trophy brown bear permits on federal land. Results have primarily divided hunters, which should be cooperators in management, to no benefit.

I recommend getting rid of the regulation because it never made any sense, has provided nothing in the way of conservation, has inconvenienced hunters, was easily circumvented by folks scouting before hunting season, and has gummed up the Board process unnecessarily. I hope that if this goofy regulation goes away, RHAK (originally formed to fight it) will follow. I support proposals 135-139.

Wayne Heimer



Submitted By
Josh Hejl
Submitted On
2/16/2022 5:37:36 PM
Affiliation
none

I support the trapping setback, proposal 199.

I live in the area and I am tired of people having to be afraid because of someone elses laziness.

Thank you.



Submitted By
Susan Helmericks
Submitted On
2/14/2022 2:12:35 PM
Affiliation
Mat valley kitties Rescue

Phone
9078417711

Email
susanhelmericks@gmail.com

Address
411 S Jerome Dr
Wasilla, Alaska 99654

I am in support of proposal 144 to allow TNR in the state of Alaska.
Please consider all the data being presented and allow sterilized cats
to live out their lives without adding to the problem. I run a cat rescue

and it would benefit the Community by having the cats sterilized and
vaccinated to stop the overpopulation problem. Please vote yes!

Founder of Mat Valley Kitties Rescue

Submitted By
Fred Hirschmann
Submitted On
2/18/2022 4:52:45 PM
Affiliation



PC079
1 of 1

Proposal 199 - Fifty-yard trapping setback from roads and trails in Matanuska-Susitna Borough

I strongly support Proposal 199 requiring a 50-yard setback for trap sets along Mat-Su multi-use trails, roads, pullouts and campgrounds. We live in Glacier View (mile 103 of the Glenn Highway) and we and many neighbors are very upset with unethical trapping methods happening in our community. These aren't local people, but roadside trappers driving up from Palmer, Wasilla and Anchorage. The past number of winters we have found leghold and conibear traps set a few feet from the driving portions of dirt roads like the AT&T Alascom Road accessing Tahnetta Pass. Trap sets placed just beyond the plowed portion of the road are extremely dangerous for dogs and people recreating along the road.

Many of the pullouts along the Glenn Highway in our community also have active trap sets just a short distance beyond the pullout. Visitors from Anchorage had their dog killed by a conibear trap set twenty feet off a Glenn Highway pullout east of Sheep Mountain Lodge last winter. During our community wide spring clean-up this past May, I personally found dozens of chicken and rabbit carcasses that had been used to attract game to a trap set less than 100 feet from another Glenn Highway pullout just east of Majestic Valley Lodge. The trapper left discarded scapple blades, I assume for skinning fur bearers, right on the edge of the pullout. It was fortunate that I cleaned up these dangerous blades before they were found by some child.

I know trappers don't like to sign their traplines, but it sure would make it safer for others to know a trap could be set further down a snowmachine or snowshoe trail. Even a dog on a leash or on a skijoring or dogsledding line can get caught in a trap alongside a trail. Wolf trappers often bury their trap under a thin layer of snow right in the trail. Trails are no longer multi-use but really are only safely available to the trapper who know where the traps are set.

Ethical trappers do not have a problem with placing their traps in locations that are far less likely to inadvertently trap a pet or child.

One hundred thousand people live in the Matanuska-Susitna Borough and another quarter million come recreating from Anchorage. It's high time to make the region safer for residents, visitors and pets by requiring reasonable setbacks for trap sets.

Respectfully submitted,

Fred Hirschmann



Submitted By
Randi Hirschmann
Submitted On
2/18/2022 11:41:44 PM
Affiliation

To: ALASKA BOARD OF GAME

RE: PROPOSAL 199

I strongly support the Board of Game's approval of Proposal 199, which would require a 50-yard trap setback from specific, maintained multi-use trails in the Mat-Su area. Currently there are no set-back regulations governing trappers, no signage requirements and trapping can take place on or near any trail, roadway, and public/recreational area except the 6 Borough trails that now have trapping restrictions. Ethical trappers will choose to trap well away from human activity but today there are unethical trappers that don't bother to take the extra effort to place their traps away from public use areas. How many I do not know, but with the increase of dogs being injured and killed in traps, I know the problems is getting worse with each additional trapping season. I live in Glacier View and I have seen several unmarked traps just off the Glenn Hwy pullouts and trails. In the winter we cannot hike or ski with our dogs to all the great places we hike to in the summer because we have seen traps along those trails (we see them only because we are really looking for them) and we never know where all the traps are located. With a 50- yard setback, we would be able to recreate with our dogs in the winter and have the right to use these multi-use trails like everyone else and not fear our dogs will be killed in a conibear trap or caught in a snare or leghold trap. We live in Alaska and if a dog is under voice control by its owner that is all that needs to be required. If a dog is lured off trail by bait a few feet away that is the responsibility of the trapper not the dog owner. Saying a trained dog needs to be leashed on our trails is an excuse not to deal with the real problem that trappers should NOT be trapping on or near many of our trails and roadways. These trails can be shared with trappers and recreational users if you institute a 50-yard set-back rule. You are managing with simply a Code of Ethics that is not working any longer. There are just too many recreational uses in Mat-Su who also recreate with their dogs. When people's actions cause harm to others and their pets, reasonable regulations are the answer. There is no harm or undue stress placed on a trapper to have them walk 50 yards before they set their traps. Yes, trapping has always been a part of Alaska's history and always will be. But history is constantly being made with each generation. The Board of Game needs to regulate trapping in the Mat-Su Valley, with the understanding the population has increased dramatically along with its recreational users. In the past giving trappers unfettered, unregulated use of shared lands was insignificant because the land was shared by so few. But today these multi-use trails and road systems are shared annually by thousands of Alaskans and tourists. The only responsible decision is for you to regulate these shared areas so people and their pets are protected from harm. It really is a good compromised, this 50-yard set-back regulation for trappers. It's a win-win for everyone.

Sincerely,

Randi Hirschmann. 02/18/2022



Submitted By
Donna Hollon
Submitted On
2/12/2022 11:49:59 PM
Affiliation

My name is Donna Hollon and my community of residence is Port Orchard, Wa. I am writing in support of proposal #265 changing RM855 TO DM855. The process for applying for a non-resident moose tag is NOT fair and it is overly complicated. I believe the process is a perfect example of inequality due to age and lower socioeconomic standing. As an older woman, I am not as adept at using a computer and own only one that is somewhat reliable. I will never be able to compete with those whom are using multiple computers and/or those who have assistants or other people they are able to pay to sit at multiple computers on July 7 at 0900. A "draw" system levels the playing, or in this case the "hunting field" for all. Please help me obtain my dream of hiking the Great State of Alaska with a fair shot! Stop the discrimination against older, poorer outdoor enthusiasts! Approve proposal #265 NOW! Change it to DM 855..a draw system is fair for all. Thank-you! Donna Hollon



Submitted By
Justin Horton
Submitted On
2/16/2022 7:36:49 PM
Affiliation

Phone
9072442993

Email
hhalaskanoutfitters@gmail.com

Address
47333 Anna Leah Ave
Soldotna, Alaska 99669

Justin Horton, RG #1332

I appreciate the board reviewing Proposal 265. I submitted this proposal and am in favor of it passing.

I have two requests for the board related to this proposal:

My first request is that the board also consider making RM855 a drawing hunt for this upcoming 2022 season. This would require a special onetime drawing of tags on or about July 7, 2022. I believe the non-resident hunters interested in this moose tag would appreciate the state overseeing a fair and equal distribution of these tags as soon as possible. This would also allow for families and friends to apply as a party tag. The system instigated last year, under a registration hunt, makes friends and family going hunting together almost impossible under the current registration hunt conditions. There are currently only 10 tags issued.

My second request would be for the board to omit the language in proposal 265 that states: **“That registered guides may only submit as many applicants as there are tags allotted for the upcoming season. A hunter/ guide contract must be submitted as well. That an alternate list be established should a hunter back out for medical or personal reasons and the next eligible hunter would be contacted. If there are no alternate hunters that the tag would become available on a first come first served basis upon request. Basically, similar to how nonresident brown bear tags are issued on Kodiak.”**

After reviewing this request, I believe it will only complicate things for the local F&G office, as well as enforcement. The current guides contracting hunts in 22E have registered guides working under or with them. They will continue to recruit these additional registered guides in order to increase the number of applicants under that one business umbrella. As for the hunters that do not use their tag, that will be no different than a majority of drawing hunts. In the end it would be one less mature bull potentially harvested that season.

In closing. The area biologist, Mr. Dunker, feels the moose population can support this non-resident moose hunt and harvest can still be controlled as a drawing hunt. He also has been working on a way where the local office could directly control a fair distribution of these tags on or about July 7 of this year. After which the tag would then be conducted with all other state-wide drawing applications, during Nov 1-Dec 15, 2022. Interested hunters would then find out in late February of 2023 if they were awarded a tag for hunt that is between Sep. 1-14, 2023. Giving them 6 months to prepare. DM855 will benefit the Non-Resident hunters trying to apply for these hunts by giving them a reasonable time to make travel and personal preparations; the ability to apply as a party tag. It would also avoid concerns and issues with perceived unfairness due to managing internet site/page difficulties, internet connections, and speeds. A drawing hunt will allow F&G to conduct the process where tags are randomly awarded to non-resident applicants. It also allows contracting guides a reasonable time to prepare for successfully drawn hunters.

Again, I appreciate the board for their time and thank you for your service.

Justin Horton, RG #1332

Submitted By
Anne Houseal
Submitted On
1/8/2022 6:02:06 PM
Affiliation



PC083
1 of 1

Drop Down menu did not reveal a selection for the Board of Game, 9 Jan 2022 deadline.

Reference public comments for Board of Game Proposal 199:

Regarding area 14A HUNTER CREEK: I am against including 14A Hunter Creek into this plan as a set back for trappers. This would eliminate trapping altogether up the canyon. This is not a legal trail, has never been codified, and passes through private property of at least two land owners. Historically, ice climbers venture back into the Hunter Creek canyon a few times a year. This is rarely traveled. If it stays on your list, no trapping would even be allowed in the canyon due simply its width. Please take this "trail" off the trail list altogether.

I personally do not trap, but I am a property owner, own dogs, and I do recreate in the Mat Su Borough.

Regarding many of the other "trails", of major concern with the set backs proposed is the trail definition. Will these always be defined by uniformed practitioners wherever they go... like a primitive trail...where exactly would the setback begin? Even on more defined trails, in the winter folks will trace on foot or bike atop whatever snow machine track they find...even those made by trappers.

The proposal would have more teeth and be more understandable if the proposal was limited to a handful of well used multi use trails like the one up Lazy Mountain where you can expect someone to take their dog hiking. But when the proposal extends to so many "trails" as this, it seems clear this is a big first step effort to eliminate trapping altogether.



Submitted By
Kerry M Howard
Submitted On
2/16/2022 1:10:04 PM
Affiliation

Phone
(907) 789-4351

Email
kmhejira@yahoo.com

Address
17355 Glacier Highway
Juneau, Alaska 99801

Please support Proposal 144, which would 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. I was successful involved in a small TNVR project in Colorado and ask for your support of this proposal.

Submitted By
Casandra Renee Hulse
Submitted On
2/17/2022 11:33:24 AM
Affiliation



PC085
1 of 1

Regarding Proposal 199 to the Alaska Board of Game (BOG) addressing popular multi-use trails in the Mat-Su region (Wasilla, Palmer, Big Lake, Willow, Chickaloon, Knik), I support traps being set back from these trails to protect people and pets from the current regulation which allows traps to be set on or near multi-use trails, campgrounds, roads, and pullouts from as early as September through May.

The Alaska Wildlife Alliance proposes 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.

This winter alone, at least seven dogs have been caught in traps, and two of them have been killed in Southcentral Alaska.

Please protect the safety of people and pets utilizing multi-use trails in Alaska. Thank you!



Submitted By
Gregory Hunt
Submitted On
2/14/2022 6:18:57 PM
Affiliation

Phone
907-317-2662

Email
kodiakgoat@gmail.com

Address
1647 Fairview Road
Columbia, Kentucky 42728

I am submitting this comment in support of proposal 265 which would change the current registration moose hunt in unit 22E to a draw hunt. I support this proposal because I believe that a draw hunt is a more fair system to administer the limited number of permits. Not everyone has access to the internet at the opening of the registration due to work responsibilities or family commitments. Alaska Department of Fish and Game already issues most permits on a draw system so I wouldn't think it would be an issue to change to a draw system. I think it would also give hunters that wished to hunt together a better opportunity to draw a party tag.



Submitted By
Sarah Johanson
Submitted On
2/16/2022 9:23:57 PM
Affiliation
trail user

Phone
503-507-4516

Email
swjohanson@gmail.com

Address
1150 S Colony Way, Ste 3, PMB 134
Palmer, Alaska 99645

Dear Alaska Board of Game members, I just wanted to express my support of Alaska Wildlife Alliance's proposal 199, which includes a 50-yard trapping setback on popular multi-use trails in and around my area of residence and outdoor recreation. It is a very reasonable step to help mitigate trail user conflict, while allowing all to continue their practices. Thank you for considering this proposal.



Submitted By
Barbara Johnson
Submitted On
2/18/2022 11:05:42 AM
Affiliation

Phone
907-229-6891
Email
barbj15@gmail.com
Address
PO Box 670874
Chugiak, Alaska 99567

February 18, 2022

To whom it may concern,

I am writing as a concerned citizen, retired teacher, and outdoor enthusiast. I fully support the amended Proposal 199 regarding trapping restrictions in the Mat-Su Valley on trails that are used heavily by the public. I worked as a teacher at Machetanz Elementary and continue to volunteer helping teachers with citizen science projects like Birds and Bogs in outdoor settings. I was relieved to know that Reflections Lake and the Wasilla Creek Trail are on the list, as well as others in the proposal, but I was dumbfounded that the Swan Lake Trail, which is very short, and the adjacent loop trail are not included in the list. These trails are regularly used by teachers, with their students, for outdoor science and cultural studies. The PE teacher also takes her students out there. I know that these trails are also used heavily by the growing population of residents who live in the adjacent homes. It does not seem appropriate or safe to have this trail open to trapping, especially considering that an elementary school regularly uses it with small children. Please include this trail, which also has a lot of culturally historic significance, in the amended Proposal 199.

I think there are other trails that also should be on the list because these areas are so heavily used by people. More and more people are getting outside and the population is increasing. It makes sense that the trapping regulations need to change to ensure safety for people and dogs. I am pleased with recognition that something needs to be done and so I am in complete support of the amended Proposal 199. Trapping is a traditional activity in Alaska, but it seems incompatible and should not be allowed in areas heavily used by the general public. The less conflict there is between trappers and other users, the less public outcry and the more we can all get along.

Respectfully,

Barbara Johnson



Submitted By
Steve Johnson
Submitted On
2/18/2022 4:58:42 PM
Affiliation

Phone
9072294041
Email
Sbejohn1@mac.com
Address
P O Box 670874
Chugiak, Alaska 99567

To whom it may concern,

I'm commenting on the "amended Proposal 199". I fully support this proposal.

Use areas the public recreates on a regular basis are not suitable for trapping and risk dog safety. I have personally had to remove a dog from a trap almost on the trail. There is more than enough state land to avoid these situations. Proposal 199 is a good start.

The one area that isn't included is Swan Lake. I highly recommend this area be included. With the adjacent neighborhood, School (Machetanz), and high visitation from the public and school field trips using the trails, trapping needs to be eliminated or with wide buffers in this area.

I appreciate the opportunity to comment,

Steve Johnson



Submitted By

Vera Johnson

Submitted On

2/18/2022 10:28:10 PM

Affiliation

I support proposal 199 of trap setbacks of at least 50 yards in the stated recreation areas.

Thank you.

Vera Johnson



KAWERAK, INC.



PC091
1 of 3

Tungwenuk Family Qupak Design, used with permission

January 3, 2021

REPRESENTING

Brevig Mission

Sitaisaq

Council

Akauchak

Diomede

Injaliq

Elim

Neviarcuarluaq

Gambell

Sivuqaq

Golovin

Chinik

King Island

Ugiuvak

Koyuk

Kuuyuk

Mary's Igloo

Iglaaruk

Nome Eskimo

Sitnasuami Inuit

Savoonga

Sivungaq

Shaktolik

Saktuliq

Shishmaref

Kigiqtaq

Solomon

Anjuutaq

St. Michael

Taciq

Stebbins

Tapraq

Teller

Tupqaꞗruk

Unalakleet

Uᅇalaqtiq

Wales

Kiᅇigin

White Mountain

Natchigvik

ATTN:

**Alaska Department of Fish and Game
Boards Support Section
1255 W. 8th Street
Juneau, AK 99811-5526**

Kawerak, Inc. is the regional nonprofit tribal consortium for the Bering Strait/Norton Sound region. We provide services to sixteen communities including advocating for subsistence hunting and fishing. We offer the following comments for the ADF&G; Board of Game consideration.

Kawerak is in support of the following proposal.

Proposal 190 Reauthorize brown bear tag fee exemptions.

The majority of Game Management Unit (GMU) 22 bear harvest by local residents is opportunistic. Moose and caribou are harvested as the main food source. The brown bear population across GMU 22 has risen according to ADF&G's latest bear population survey. The brown bear tag exemption fee for GMU 22 should remain in place to help offer incentive to hunters as well as to help increase harvest opportunity to an ever increasing bear population.

Kawerak is opposed to the following proposal.

Proposal 129 5 AAC 92.085. Unlawful methods of taking big game; exceptions.

Require the use of expanding (soft point) bullets for big game hunting, excluding wolf and wolverine.

Big game animals have been ethically and humanely put down with any of the various small caliber high velocity chamberings, with proper shot placement being the key to any hunting situation. Small caliber high velocity ammunition in full metal jacket (FMJ) such as a .223 Remington is more than capable of hitting the vitals of any big game animal. The kill zone on a bull moose is roughly eighteen (18") inches in diameter, bear and caribou slightly smaller. Yes, FMJ's do produce a narrow wound channel compared to expanding type ammunition, however, as long as the shot placement is in the vitals the animal will be humanely and ethically put down.

KAWERAK, INC.

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Documentation shows that all it takes to ethically put down any big game animal is no more than a one quarter inch (1/4") hole in the vital organs, which the .223 Remington in FMJ is more than capable of performing.

Documentation on small caliber high velocity ammunition, such as the .223 Remington in FMJ, shows that after entry into the target the bullet will often tumble or summersault thus increasing the wound channel (in some cases as much as 3/4"). The majority of rural Alaskan hunters prefer not to waste any meat (due to the high cost of store bought meat). The documentation on expanding bullets clearly shows that the use of this type of ammunition does in fact waste more meat. This is a major factor for rural Alaskan hunters when choosing what type of ammunition to use/purchase.

The proposer states there will be a slight increase in cost due to the change of bullet design. To the contrary, rural Alaskan hunters would have to switch to an entirely different higher caliber rifle in order to go hunting. In many rural communities, small caliber high velocity rifles are passed-down from either the grandfather or the father. New bigger caliber rifles would have to be purchased, and these rifles are substantially higher in cost than a smaller caliber rifle which most rural Alaskan hunters simply cannot afford. A .223 Remington in an expanding type bullet simply does not have enough weight behind the bullet to have any kind of penetration or complete pass through on any big game animal. The cost of living is very high in rural Alaska, however, small caliber high velocity ammunition is more affordable. On the opposite end, larger caliber ammunition in rural Alaska is very expensive.

This proposal as written raises a question of whether it is a simple proposal requesting a bullet change from FMJ to expanding bullets or is the proposal inadvertently requesting to restrict hunting calibers. If this proposal passes, it will inadvertently restrict big game hunting to the larger calibers as no one would use expanding bullets in the smaller high velocity calibers.

Over the years, the Board of Game has deliberated on caliber restriction numerous times and the decisions regarding proposals to limit big game hunting to the larger calibers have always failed. Bigger caliber rifles do not equate to humanely putting down any big game animal. Individual hunters can and do miss the vitals even with the bigger caliber rifles, hitting animals in other parts of the body except where they were intended.

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If you have any questions please feel free to contact VP of Natural Resources; Brandon Ahmasuk @ 907-443-4265 wk. or 907-434-2951 cell, or bahmasuk@kawerak.org. We thank you for your time and consideration.

Sincerely,

KAWERAK, INC.

M. Bahnke

Melanie Bahnke,

President

KAWERAK, INC.

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Submitted By
William Kays
Submitted On
2/18/2022 3:30:54 PM
Affiliation

Board of Game,

My name is Billy Kays and I am a resident of Wasilla, AK. I have lived in AK for 17 years and have guided and/or personally hunted sheep for approximately 15 yrs. I am currently a guide for Joey Klutsch of Aniakchak Guide Service and guide sheep in the Brooks Range. This letter is intended to voice my opposition to Proposal's 135,136,137 and 139. I can speak to my experience hunting sheep in the mountains pre and post prop 207. The differences are simply dramatic as far as quality of the hunt is concerned. More importantly, the example we are setting as it pertains to Fair Chase hunting standards.

The argument this is an unenforceable regulation is no argument at all as far as I'm concerned. The fact that it exists will keep your average law-abiding citizen honest about following this law. The bad actors that don't follow this law will continue to do so with or without 207 being in place. We don't gauge laws in this country on whether or not they are enforceable. If you feel so strongly that its unenforceable than you have nothing to worry about and spot away.

Trying to frame this as something that puts a pilot's safety in jeopardy due to worrying about someone reporting you spotting from the air, is in my opinion, ridiculous. It is clear to see it is simply an attempt to get back to the old ways of buzzing sheep and ruining countless hunts for other sheep hunters every year. There's no better way to have a hunt ruined, after walking countless miles, than to have a guy in a cub come and blow a group of rams you've set up on out of the country. I have personally had this happen three separate times and this law is the only thing keeping that at bay. The last couple years of peace and quiet in the mountains has been wonderful and I would love to have that continue. We hunt sheep for the solitude that only the sheep mountains can provide and to be in an area free of unnecessary cub traffic is a very special thing.

Then there's the argument of this being repealed due to there being no biological concern. I think with the current state of Dall sheep populations across the state there is a HUGE biological with doing anything that increases the odds of more sheep being harvested. I don't think it's any secret at this point that our sheep populations statewide are in a state we haven't seen since 1992. As I sit here and write this at my home in Wasilla it is currently raining. It doesn't appear things will be turning around anytime soon. Any help the sheep can get at this point is at an all-time high level of importance. If that just so happens to align with maintaining a much higher standard of what would be considered fair chase at the same time than all the better. This will be looked upon in high regard by the next generation of hunters as we lead by example in what fair chase truly means.

I would also like to include my support for Proposal 138 as I do think the verbiage should be rewritten to cover all seasons to make these restrictions fair across the board. This seems like a common-sense way to alleviate any future season changes.

Thank you for your consideration on this matter,

Billy Kays



Submitted By
Thomas Kirstein
Submitted On
2/18/2022 5:01:43 PM
Affiliation

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Proposal 151 - **OPPOSE**

There is long history of allowcating permits to Resident and Non-Resident hunters for Big Game in Alaska. Kodiak Bear permits have been issued by drawing since 1977 for Resident and Non-Resident hunters with the management input from the Alaska Department of Fish and Game, along with the Kodiak National Wildlife Refuge. This permit drawing process works well to allocat the permits as designed so many years ago!

I ask the Board of Game to oppose this proposal because it will harm professional guiding businesses on Kodiak Island, many of which are long established small guiding businesses. I for one would be harmed seriously should such selfish considerations take place. I operate a hunting camp on the Kodiak National Wildlife Refuge and have guided since the beginning of the permit drawing allocation for Kodiak Island. The allocation of permits for Kodiak Island works as designed to allocate permits.

Consideration: The author of this proposal sights that application fees are not being paid during the drawing application period. I would suggest to the Board of Game asking the Alaska Legislature to pass legislation to establish a fee for all registration permits and drawing permits, both online and over the counter permits for all Big Game in Alaska, Resident and Non-resident. This should apply to all hunters and any permit that is issued, anytime.

Thank you for your time and efforts serving on the Board of Game!



Submitted By
Joey
Submitted On
2/18/2022 10:51:09 AM
Affiliation
self

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Board of Game,

My name is Joey Klutsch. I am a lifelong resident (36 yrs) of King Salmon, AK and have served on the Naknek/Kvichak Advisory Committee for many years. I am a Registered Guide and have been guiding for 18 years, and hold 3 refuge special use permits, one in Arctic Refuge and 2 in AK Peninsula National Wildlife Refuge. I am a Bristol Bay commercial fisherman as well, during summer months. I would like to note, especially for the purpose of my comments, that in addition to being a hunting guide, I am also a resident hunter and subsistence user.

Proposals 135, 136, 137, 139: Oppose

I would like to address multiple proposals, starting with Proposals 135, 136, 137, and 139, all of which are very similar and in one way or another aim to repeal Proposal 207 [from Aug 10–Sept 20 aircraft may not be used by or for any person to locate Dall sheep for hunting or direct hunters to Dall sheep during the open sheep hunting season....]

As both a sheep guide/outfitter, working in the Brooks Range, and someone personally hunts sheep as a resident hunter going on almost 20 years (for both guiding and personal hunting), I can think of no single regulation that has more improved the quality of experience since I started. I remember, prior to the passing of 207, when it was common to see aircraft, mainly super cubs, droning around mountain tops aggressively looking for sheep, throughout the sheep hunting season. Often times I would hike on foot for 3 days, to get to a place where I wanted to hunt, or hunt with a client, only to have a pair of aircraft fly in the next day and buzz around the mountain tops, usually with complete disregard or at the fact that someone was or may be already hunting near there. In addition to disturbing the animals, it was just plain annoying and extremely detrimental to the quality of experience. And not just for guided hunters, but for other resident hunters as well, the majority of whom cannot afford their own personal aircraft to use on personal hunts. Since the passing of 207, I rarely see people flying sheep during season. Sure, it happens once in a while, but compared to pre-207, when it was common place, it is MUCH better now, and far more enjoyable for all user groups who chose to fair chase hunt.

Opponents of 207 all use unenforceability as the crux of their arguments. This same argument can easily be made against many of our regulations, and is not a valid. Since when is the enforceability of a regulation the determining factor on whether or not that regulation should be in place? The premise of unenforceability is simply flawed. Because something is difficult to enforce should not mean that we do not have it in regulation, and it does not mean that it is not the RIGHT thing to do. When something is written in regulation, the vast majority of people will abide by that regulation, because they want to do the right thing, and in fact you don't see nearly as many people searching for sheep with their aircraft during the hunting season as we used to prior to the passage of 207.

Another argument that many people use against 207 is that they will get wrongly cited for spotting sheep when they are in fact doing other perfectly legal activities. These include but are not limited to making multiple passes over a landing site or circling while looking for a safe place to land, flying through sheep country to get to a spot to hunt, or even that they will "get in trouble for looking out the window of the plane at game as they fly by, just to name a few. I don't believe this for an instant. It is obvious to tell the difference between someone flying up a valley looking for a landing place, or getting from point A to point B, and someone who is blatantly circling mountains at the elevation in which sheep are primarily found, blatantly looking for sheep. ***The people who are citing these reasons for repealing 207 are the very people who hunt sheep primarily by the use of aircraft to spot and find them. It is simple as that.***

Then there is the biological side of the equation. Right now, in Alaska sheep populations are struggling in many areas. Die offs have caused sheep populations to fall in several ranges, and it will be some time before they come back. These die offs are well known at this point. Why would we want to allow use of aircraft to spot sheep during season, which essentially makes sheep hunting much easier, when many sheep populations are struggling? We do not need to make sheep hunting easier. People should hunt them fair chase, and earn the mountain, which is part of what makes sheep hunting so great and special.

Finally, I would argue that 207 allows for great opportunity to harvest sheep for all users. You simply do not need to spot sheep from the air to hunt them. Myself, and the many other people I know who hunt sheep fair chase without spotting them from an aircraft, have great success harvesting rams. Furthermore, the quality of experience for all users has greatly improved, residents and guides alike.

Proposal 138: Support



I am in full support of proposal 138, which broadens the original 207 proposal to include ALL sheep seasons, notably season. 207 should have cover all sheep seasons. 207 creates a better quality of experience for everyone. I think it is also important to teach fair chase ethics to our youth hunters, and show them that you can hunt sheep without spotting them from an aircraft.

Proposal 271: Oppose

I would like to also address proposal 271. I am strongly opposed to 271. I hunt wolves in GMU 9, which is a predator management area where utilizing a snowmobile to “position” before shooting is legal and in fact the best method (the only effective method) to hunt wolves in winter. If 271 were to pass, the manner in which I (and everyone else) hunt wolves in the winter, utilizing snowmobiles to pursue and position, would no longer be legal. **It is impossible to approach a wolf within 300 yards while going 15 mph or less. SIMPLY IMPOSSIBLE.** While I believe the intent of 271 with regards to caribou is a good thing (running caribou on a snowmobile is most certainly bad), 271 absolutely should not apply to wolves. While you may be able to slowly put up to caribou on a snowmobile and eventually, they will stop, allowing for a clean shot, you certainly can never get away with this method with wolves. There is a big difference between positioning with the two species.

Wolves run (VERY FAST) when approached, as soon as they hear, see or smell you coming, often from a mile away or more. The only way to harvest them effectively is to cut their tracks, or spot them, and then to pursue them on the snowmobile as fast as possible, which often takes many miles before you can close within range, come to a complete stop, and shoot. Even then, the number of pursuits that end in a successful harvest are not high, and the number of hunting trips that end unsuccessfully are much more than the number that end with a harvest. It is simply very difficult to close within range even on a fast-moving snowmobile. I can attest to this, having spent countless thousands of miles over the course of the last 20 plus years, actively searching for and pursuing these predators, wearing out several snowmobiles in the process. I spend a great deal of time hunting wolves in this manner each winter in GMU 9, where it is legal to do so. If 271 passes, it will no longer be possible to effectively hunt them. The only other means to harvest wolves effectively in the winter will be trapping (which I also do), or hunting them with special permit in an aircraft in areas where it is legal to do so. In predator management areas such as GMU 9 and 17, where there is a large population or arguably an overabundance of wolves, and extremely liberal seasons and bag limits on them, there is no reason to take away the only truly effective means of hunting them, which is using a snowmobile to pursue them. Although I believe the intent of 271 is not aimed to take away this method of harvest, this is PRECISELY what it will do. **You absolutely cannot approach a wolf within 300 yards at only 15 miles per hour and have any hope of harvesting it.** There are many wolves, and it is very important for us to be able to harvest them, not only because it is the only truly effective way to hunt them in many areas, but because harvesting wolves helps the local caribou and moose populations. On good winters I have personally been able to take up to 7 -10 wolves in this manner, which helps the caribou and moose in no small way. Other hunters have been similarly successful.

I urge you to reconsider proposal 271 and exempt wolves in predator management areas where it is currently legal to pursue them with a snowmobile. While it may be possible to slowly approach caribou at under 15 mph, you simply can not get away doing the same thing with wolves. They are too smart, too wary and too fast.

Proposal 151: Oppose

Finally, I would like to comment of proposal 151. This is nothing more than another move by Resident Hunters of Alaska to reduce nonresident allocation and is a part of their concerted effort to pick away at and further restrict guided hunting. It does not benefit resident hunters. It only aims to hurt small guiding businesses.

If a guide has a hunter booked for a Kodiak bear hunt and that hunter has submitted his permit application, but then is forced to cancel due to something like a death in the family, or if the hunter gets ill or injured, a guide should be able to return that hunters deposit and book another hunter to take his place, as per the state required hunt contract. If he is not able to do this, then the hunter is out of his deposit, and the guide is short a client. It is bad for both the outfitter and the client. It is important, critical in fact, for guides to be able to replace hunters. If 151 is passed, then guides will no longer be able to do this, and it will be very detrimental.

The next reason is the pure economic benefit. On average, Kodiak brown bear hunts bring some of the highest hunt prices of any species in the state. Most of this goes back into the Alaskan economy, and the economy of Kodiak especially. Hotels, air taxis, sporting good stores, restaurants, you name it, derive income from Kodiak bear hunters. Furthermore, and most importantly, the vast majority of guides, outfitters, packers and other employees associated with a guiding operation are Alaskan Residents, especially on Kodiak hunts. This is a major source of income for them.

There is also the huge economic benefit to the State of AK, through sales of non-resident hunting licenses and tags, etc, and the Pittman-Robertson Act Funding. This is considerable and can not be ignored. The undersubscribed permits which go to guided non resident hunters provide a tremendous amount of money to the state of Alaska

Thank you for taking the time to consider my comments.

Joey Klutsch

Registered Guide 1277



PC094
3 of 3

Submitted By
John Koltun
Submitted On
2/18/2022 1:26:31 PM
Affiliation



PC095
1 of 1

I would like to express my support for proposal 199 limiting the setting of traps to outside a 50 yard corridor from established trails. I understand that most trappers are ethical and responsible. However there are those that cannot find it within themselves to consider other users of these trail systems and risk the lives of pets and children who may venture across traps that are set adjacent to or near trails. I do not believe the restrictions set forth will adversely affect any ethical trapper and therefore would not obstruct the pursuit of this traditional method of harvest.



Submitted By
Lance Kronberger
Submitted On
2/18/2022 12:48:29 PM
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Proposal 147 - Oppose: This proposal has very little upside and many negative unforeseen consequences that will occur.

Proposal 151 - Oppose: This proposal provides no benefit to anyone, and is a vindictive proposal from one user group toward another user group. If passed this proposal would do away with a system that has worked just fine for many years.

Proposal 241 - Oppose: Adds no conservation value what so ever.



Submitted By
Wayne Kubat
Submitted On
2/18/2022 9:24:27 PM
Affiliation
self

Proposal 130 – I support prohibiting commercially imported urine. I would like to see an amendment that would allow hunters in the field in Alaska to be able to use urine they collected themselves for locally harvested animals.

Proposals 135 – 137: I support proposals 135 - 137 to rescind the current restriction on spotting sheep from August 10th – Sept. 20th, that has been in effect since about March 2015. It goes way too far and is very punitive towards and singles out aircraft users. I 1000 % agree that anyone who uses aircraft to locate and access hunting areas, should be courteous and respectful to hunters on the ground. They should also maintain proper distances so as to refrain from harassing game. The definition of harass is: to repeatedly approach an animal in a manner which results in the animal altering its behavior.

Short of rescinding the current regulation, I would ask the board to consider the following language: 5AAC 92.085 (8) a person who has been airborne may not take or assist in taking a big game animal until after 3:00 a.m following the day in which the flying occurred, and from August 10 – September 20, aircraft or any mechanical powered equipment may not be used to make multiple, consecutive approaches near any sheep or group of sheep. [BE USED BY OR FOR ANY PERSON TO LOCATE DALL SHEEP FOR HUNTING OR DIRECT HUNTERS TO DALL SHEEP DURING THE OPEN SHEEP SEASON, HOWEVER, AIRCRAFT OTHER THAN HELICOPTERS MAY BE USED BY AND FOR SHEEP HUNTERS TO PLACE AND REMOVE HUNTERS AND CAMPS, MAINTAIN EXISTING CAMPS, AND SALVAGE HARVESTED SHEEP] This is similar to language in Big Game Commercial Services Board Regulation 12 AAC 75.340 (c) (10), that all guides have to adhere to for all species.

We already have harassment laws. Enforce them instead of just passing more regulations that are unenforceable. Multiple close passes are mostly what is disruptive to sheep and sheep hunters on the ground. Most hunters have cameras on their cell phones that can capture and document harassment. Proving whether you are looking at or are spotting sheep from further distances, is much harder, and perhaps unenforceable.

There has been substantial testimony that spotting sheep from aircraft is unethical. I think that depends largely on what your definition of spotting is. Small white dots that can most likely be identified as sheep, can be spotted from a plane while 2-3 miles away and further under good conditions. Even this is considered spotting and is forbidden from August 10 – September 20th under the current regulation. Many proponents of the current regulation are airplane haters who don't fly themselves and are jealous of those who do. Granted, some may have had bad experiences, but it seems pretty darn ridiculous and discriminating to me, that it can be ethical for one user group to cruise a bay or shoreline glassing for animals in a yacht with accommodations equivalent to a 5-star hotel, spotting something, and immediately pursuing it by dropping a skiff and maybe even unloading a 4-wheeler, when another group is unethical when they have to wait a day to even start hunting, and aren't even allowed to look for white spots a mile or two or even 5 miles away, during the entire general hunting season!! And how is it ethical for the Board of Game to treat one specific user group so punitive and differently?

Many pilots wear multiple hats at the same time; sheep hunters, moose hunters, goat hunters, bear hunters, tour guides and flight seeing, hauling supplies, ecotourism, trying to find a place to hunt and camp away from others, or just enjoying a fun day of flying and seeing new country. The current regulation casts much too broad of a net and makes any pilot operating in the mountains doing any of the above activities, suspect of spotting sheep. It's kind of like targeting king Salmon but using a small mesh gill net that catches everything. Because pilots have a large investment in a plane, it puts many pilots on the defensive, and takes away from an otherwise awesome outdoor experience. The current regulation also wastes wildlife trooper time investigating.

Mountain weather can be pretty nasty. Flying is largely contingent upon decent weather and many pilots like myself, pack our gear and gas our plane to have it ready for when a decent weather system arrives. If that happens to be after August 10th, why is it asking too much to expect to be allowed to do high level and distant reconnaissance to look for landing areas, other camps and distant sheep in the area, without having to constantly look over your shoulder for being suspect of a violation?

There has been substantial testimony that the current regulation has been effective at reducing flying activity in the mountains during sheep season and improving the overall experience of hunters. Maybe – but how can they prove this? Sheep populations have plummeted in many areas and that could also largely explain less flying activity. Some outfitters in areas that still have healthy sheep populations, are reporting more flying than ever. And, just because it works, doesn't make it reasonable, fair or right.

This regulation has caused a lot of division amongst the hunting community. Shortly afterwards and as a direct result of the passage of this regulation, a special interest resident hunter group formed that has caused more contention and conflict among various hunting and conservation groups, than I have ever before seen in Alaska in the 46 years that I have lived here. Currently, the Vice President of this group, with support from the group, are suing the state of Alaska and Board of Game on allocation of Kodiak Brown bear. Before the dust settles, multiple hundreds of thousands of dollars will have been spent dividing hunters, instead of promoting conservation. Is less activity in the mountains – if that is even in fact the case - worth that cost? Certainly not to me!

As a pilot, I fear the current regulation is just the start of further demonization of those who access remote areas by bush aircraft. All you have to do is look at testimony from some of those who oppose proposals 135-137. Please delete the current reg, and instead put some teeth into enforcing and educating the public concerning existing harassment laws. Maybe something could be added to the game regulations to accomplish this. Short of this, at least consider adopting proposal 139, or some other reasonable and common-sense definition for spotting.

Proposal 138: I oppose Proposal 138 for the same reasons that I support proposals 135 – 137.

Proposal 139: I support proposal 139, but prefer proposals 135 – 137. The new language in Proposed in 139 – "aircraft may not be used to make multiple, consecutive approaches near any sheep or group of sheep - is a much more common sense and reasonable alternative, than the current regulation.

Proposal 151 – I strongly oppose proposal 151. This is a RHAK proposal that is primarily punitive against guides and that improves

nothing.

Proposal 168 - I strongly oppose proposal 168. This is another RHAK proposal that is primarily punitive against guide



PC097
2 of 2

nothing.

Proposal 241 - I strongly oppose proposal 241. This is yet another RHAK proposal that is primarily punitive against guides and improves

nothing.

Proposal 247 – I oppose this proposal. Predation control is sometimes necessary to establish healthy prey populations by managing predator and prey ratios.

Proposal 267 – I oppose this proposal. It is strictly allocative and shouldn't have even been considered.



Submitted By
Tara Lampert
Submitted On
2/17/2022 11:03:39 AM
Affiliation

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I'm writing in support of Prop 199 to introduce a 50 yard set back for traps from high, multi-use areas.

Trapping in and of itself is quite harsh (live traps would be much more humane); however, if folks are going to trap wild game, it would be best to have these traps regulated a bit off further from areas where families and their pets recreate to experience the wilderness of Alaska. An innocent pet should never have to lose their life in a trap meant for wild animals.



Submitted By
Zachary Larsen
Submitted On
2/17/2022 4:57:11 PM
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Regarding proposals 123 and 124, range finding sites go well beyond the intent of what archery seasons are means to be and should be kept out of archery specific hunts.

Regarding proposals 101 and 125, crossbows absolutely should not be allowed in archery seasons for any hunters. They truly are not a bow and go well beyond the intended and necessary limits of archery equipment which are what supporters the logic for even having a separate archery season during key seasons and separate from general season hunts when a crossbow could be used along side rifles etc.

regarding proposal 138, a no fly rule during sheep hunts for the purposes of scouting or locating sheep is necessary to maintain fair chase and should be upheld.

Thank you very much for allowing the Oporto comment.

Sincerely,

Zachary Larsen, former Alaskan fishing guide and future archery season big game hunter in the great state of Alaska.



Submitted By
Anne Lee
Submitted On
2/18/2022 3:12:37 PM
Affiliation

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I am writing in support of Proposal 199. Though I live in the southeast, I have had one dog caught in a snare around her neck which I was successful in freeing her from within minutes to spare. I also came across a dog standing still in a neck snare which I was again successful in removing. Both of these instances were on a trail approximately 75 yards from the Blind Slough Rec Area.