
ALASKA BOARD OF GAME
Southeast Region Meeting
Ketchikan | January 20-24, 2023

On-Time Comment Index

Alaska Outdoor Council (AOC).....	PC1
Alaska Trappers Association	PC2
Alaska Wildlife Alliance	PC3
Alaskan Bowhunters Association	PC4
Joseph Anselm	PC5
Karl Ashenbrenner	PC6
Gwen Baluss.....	PC7
Travis Bangs	PC8
Bryan Barrett.....	PC9
Megan Bauman	PC10
Megan Bauman	PC11
David Beebe	PC11
Lavern Beier	PC12
Patrick Bendon	PC13
Nick Bendon	PC14
Cody Bennett	PC15
William Bergmann.....	PC16
Mike Bethers.....	PC17
Rachel Biggs	PC18
Robert Birk	PC19
Arthur Bloom	PC20
Bob Bourland	PC21
Forrest Bowers.....	PC22
Barry Brokken	PC23

ALASKA BOARD OF GAME
Southeast Region Meeting
Ketchikan | January 20, 2023

On-Time Comment Index

Mark Buchkoski.....	PC24
John Burick.....	PC25
Bryan Burkhardt.....	PC26
Olcay Caf	PC27
Olcay Caf	PC27
Ben Case	PC28
Dorothy Chapman.....	PC29
Wade Chappell.....	PC30
Joe Cisney.....	PC31
Jeremy Collison	PC32
Amanda Compton	PC33
Miguel Contreras	PC34
Douglas Corl	PC35
Jonas Crabtree	PC36
Victoria Curran	PC37
Richard Currnan.....	PC38
Phillip Dalrymple.....	PC39
Atlin Daugherty.....	PC40
Dylan Davis.....	PC41
John Der Hovanisian.....	PC42
Bjorn Dihle	PC43
Luke Dihle	PC44
Andrew Dilley.....	PC45
Robert Dilley	PC46

On-Time Comment Index

Levi Dow IV	PC47
John Dupree	PC48
Tamara Eastaugh.....	PC49
Stuart Eddy.....	PC50
Daniel Epperson	PC51
Luke Fanning	PC52
Stephanie Farac.....	PC53
Randall Ferguson.....	PC54
Friends of Admiralty.....	PC55
Thomas Gagnon	PC56
Lucas Gieseey.....	PC57
Dave Gordon	PC58
Grateful Dogs of Juneau.....	PC59
Jared Gross.....	PC60
Charlie Hamley	PC61
Alex Hedman	PC62
Anthony Heil	PC63
Ben Higdon.....	PC64
Bruce Hoch.....	PC65
Mark Hofstad	PC66
Jim Holder	PC67
Deidra Holum	PC68
John Howard	PC69
Bryan Hum	PC70

ALASKA BOARD OF GAME
Southeast Region Meeting
Ketchikan | January 20, 2023

On-Time Comment Index

Sharon Hunter.....	PC71
Gerald Hunter	PC72
Deborah Hurley.....	PC73
Mark Idone.....	PC74
Eric Indreland	PC75
Timothy Ison	PC76
Robert Jahnke	PC77
Cole Jensen	PC78
Chris Kalil.....	PC79
Justin Kamps	PC80
Joshua Keller	PC81
Stacee Kleinsmith.....	PC82
Rebecca Knight.....	PC83
Bob Koenitzer.....	PC84
Courtney Kreis.....	PC85
Michael Kreis.....	PC86
Mary Larson	PC87
Jordan Lavigne	PC88
Cody Ledoux.....	PC89
Ryan Littleton.....	PC90
Rodney Littleton.....	PC91
Rocky Littleton	PC92
Donald Long	PC93
John Longworth	PC94

ALASKA BOARD OF GAME
Southeast Region Meeting
Ketchikan | January 20, 2023

On-Time Comment Index

Joey Ludlam	PC95
Eric Lund	PC96
Brian Lynch.....	PC97
Robert MacKinnon	PC98
Ken Madsen	PC99
Kevin Main	PC100
Casey McConnell.....	PC101
Karin Mccullough	PC102
Margaret McGinnis	PC103
Shaun McGraw	PC104
Chris McMurren	PC105
K J Metcalf.....	PC106
Ryan Miller	PC107
Trevor Miller	PC108
Ronald Miller.....	PC109
Martin Morris.....	PC110
Mark Mow	PC111
Lucas Mullen	PC112
Kelly O'Connor Demko	PC113
Office of Subsistence Management (OSM, US F&WS)	PC114
Craig Olson.....	PC115
Nicholas Orr	PC116
Corey Ostrander.....	PC117
Steve Ott	PC118

ALASKA BOARD OF GAME
Southeast Region Meeting
Ketchikan | January 20, 2023

On-Time Comment Index

Aaron Overton	PC119
Exor Padro.....	PC120
Bruce Parker.....	PC121
Dustin Phillips.....	PC122
Richard Phillips.....	PC123
John Plett	PC124
Joshua Plis.....	PC125
Aaron Powell.....	PC126
Ed Rauterkus	PC127
Ryan Reeves	PC128
Resident Hunters of Alaska	PC129
Beverly Richardson.....	PC130
Tavis Rogers	PC131
John Roseland	PC132
Rosey Roseland	PC133
Jesse Ross.....	PC134
Blake Rothschild.....	PC135
Mark Rowenhorst	PC136
Katherine Russell.....	PC137
John Ryan.....	PC138
Sterling Salisbury.....	PC139
Bryce Saviers	PC140
Glenn Saviers	PC141
Sam Sawyer.....	PC142

ALASKA BOARD OF GAME
Southeast Region Meeting
Ketchikan | January 20, 2023

On-Time Comment Index

Fred Schuman	PC143
Mark Schwan	PC144
Craig Schwanke	PC145
Linda Shaw	PC146
Sitka Tribe of Alaska (STA).....	PC147
Victoria Smith.....	PC148
Martha Smith	PC149
Southeast Alaska Conservation Council	PC150
Southeast Alaska Subsistence Regional Advisory Council	PC151
Paul Southland	PC152
Randy Steverson	PC153
Geoffrey Stokes.....	PC154
Mark Stopha.....	PC155
Michael Stainbrook	PC156
Adrianne Swan	PC157
Brenton Taft.....	PC158
Jerry Taton	PC159
John Taylor.....	PC160
Christopher Thalacker	PC161
Steve Thomassen	PC162
Donald Thompson	PC163
Brad Thomsen	PC164
Kris Thynes	PC165
Tim Travis.....	PC166

On-Time Comment Index

Charles Tripp	PC167
Craig Vanarsdale	PC168
Mike Vaughn	PC169
Paul Vice	PC170
Brian Watkins.....	PC171
William Webb	PC172
David Wellman.....	PC173
Jon Wendel	PC174
Kathleen Wendt	PC175
Trygve Westergard.....	PC176
Charles Whitwam.....	PC177
Gordon Williams	PC178
Mary Willson	PC179
James Wondzell	PC180
Kaden Wren	PC181
Brenda Wright.....	PC182
Jonathan Wunrow.....	PC183
Jason Yoder	PC184
Archie Young	PC185
Marvin Zieser	PC186
Comments not discussing proposals or with incomplete information	PC187-PC188



Submitted by: Alaska Outdoor Council (AOC)

Community of Residence: Palmer, Alaska

Comment:

Alaska Outdoor Council (AOC) comments on Alaska Board of Game (BOG) proposals for SE Region

January 2023

The Alaska Outdoor Council (AOC) is a statewide federation of 47 Clubs and thousands of individual Alaskans who hunt, trap, fish, and recreate on public lands/waters in Alaska. AOC supports sustained yield manage of game to provide the opportunity for Alaskans to harvest a wildfood sources for themselves, family, and friends.

Proposals #10 and #11. AOC recommendation Do Not Adopt.

The Alaska Department of Fish & Game (Department) has determined from the best data available that the Sitka deer population in GMU 4 is currently high for the available habitat.

Making deer available for humans to harvest whenever the harvestable surplus will support high harvests fulfills the constitutional mandate found in Article 8, Natural Resources of the Alaska State Constitution.

Proposal #36 and #37. AOC recommendation Do Not Adopt.

AOC appreciates that the individual who submitted these proposals understands and respects the importance of making easily accessible small game hunting opportunities available to new hunters. AOC prefers that education of local hunters to accommodate new, young and experienced hunters by hunting grouse and ptarmigan further afield is advantageous to the continuing of our hunter heritage.

Burdening the BOG with regulating who can hunt on public lands only infringes on the Common Use clause Article 8, Section 3 enshrined in Alaska's State Constitution. AOC would not like to see a proliferation of these types of proposals across the state.

Proposal #41. AOC recommendation Adopt.

AOC supports predator/prey management systems that allows hunters to harvest game under the Sustained Yield principal Article 8, Section 4 of the Alaska State Construction. Managing for one prey species is inconsistent with predator/prey management. Repealing the Douglas Island Management Area will allow for game management consistent with current statutes.

Proposals #48 through #54. AOC recommendation Do Not Adopt

AOC supports the current wolf population and harvest data estimates based on the best science available to the Department for GMU 2. The Department has a long standing record of providing adequate population and harvest data to the BOG for decades. No unrecoverable decline in wolf populations have occurred statewide under the Alaska Department of Fish & Game.

Adoption of proposals #48 through #54 by the BOG would only benefit anti-predator/prey advocates working to stop regulated wolf hunting and trapping in Alaska.

AOC thanks the board members for their time familiarizing themselves with current proposals up for deliberations in January 2023.

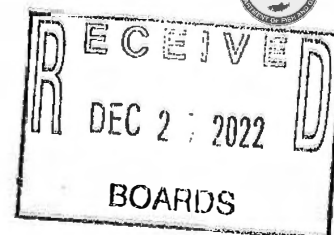
Rod Arno

Public Policy Director

Alaska Outdoor Council



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



ATTN: BOG COMMENTS

December 22, 2022

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

Dear Chairman and members of the Board:

On behalf of over 1100 members of the Alaska Trapper's Association, we wish to share our opinions on several proposals you will be considering at your January. Southeast Region meeting in Ketchikan.

PROPOSAL #6

ATA supports the standardization of seasons between adjacent units and the expansion of harvest opportunity but, for the sake of primeness, defers to the expertise of the Department and the discretion of the Board regarding the dates.

PROPOSAL #7

Again, ATA supports the standardization of seasons between adjacent units and the expansion of harvest opportunity but, for the sake of primeness, defers to the expertise of the Department and the discretion of the Board regarding the dates.

PROPOSAL #8

Since the resource will support the additional harvest opportunity and, since primeness would not be an issue, ATA supports this proposal.

PRPOSAL #9

ATA supports the standardization of seasons between adjacent units as well as the expanded harvest opportunity.



PROPOSAL #27

The ATA opposes this type of regulation. It would unnecessarily eliminate a lot of legitimate opportunity and would be difficult to enforce. It is normally a small number of people in a small number of locations that cause a problem. Rather than imposing an onerous, excessive closure, educational and signage efforts should be implemented to avert problems in public use areas.

PROPOSAL #41

Since the Douglas Island Management Area is neither unique nor isolated, and requires no special protection, ATA supports this proposal to eliminate it.

PROPOSAL #46

ATA sees no reason why the wolf hunting season in Unit 2 cannot be extended as long as trapping continues to be the primary method of harvest.

PROPOSALS #45 and #s 47 – 54

All of these proposals are for the simple purpose of further restricting the harvest of wolves in Unit 2. They would over-complicate wolf management and would set up a system that could forever be challenged with litigation. Wolf management in Unit 2 is really no different than game management statewide. ADF&G and the Board of Game should manage Unit 2 wolves in a manner which is consistent with other management around the state.

ATA appreciates the opportunity to participate in the regulatory process.

Sincerely,

A handwritten signature in black ink that reads "Randy Zarnke". The signature is written in a cursive, flowing style.

Randy Zarnke, president



Submitted by: Alaska Wildlife Alliance

Community of Residence: Anchorage, AK

Comment:

Please see attached.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 3: Oppose

Proposal 4: Oppose

Proposal 23: Oppose

Proposal 27: Support

Proposal 33: Oppose

Proposal 41: Oppose

Proposal 45: Support

Proposal 47: Support

Proposal 48: Support

Proposal 49: Support

Proposal 50: Support

Proposal 51: Support

Proposal 52: Support

Proposal 53: Support

Proposal 54: Support

See attachment on the following page.

Alaska Wildlife Alliance comment on Proposal 3



PC3

AWA is OPPOSED to this proposal. The data collected during sealing (skull measurements, teeth age, and sex) are the primary means for assessing whether harvest is excessive (skull measurements and teeth aging).

Alaska Wildlife Alliance comment Proposal 4



PC3

AWA is OPPOSED to this proposal.

Changing brown bear harvest from 1-in-4 to 1- in-2 is one of the ways that bear harvest has been increasingly “liberalized” in Alaska since 2012 without the safeguard protocols that Alaska Department of Fish and Game (Department) requires of formal Intensive Management (feasibility assessments, statement of objectives, and monitoring of outcomes) (Sterling Miller et al. 2017 - Trends in brown bear reduction efforts in Alaska, 1980-2017). Furthermore, brown bears are NOT increasing in Unit 1, at least in 1D. Quite the opposite in fact. According to the Department “The level of human-caused brown bear mortality in 2020 exceeded sustainable yield, and without conservation measures would result in a long-term decline in sustainable harvest opportunity. Population modeling indicates that recovering the bear population and future hunter harvest opportunity requires limiting mortality, particularly for adult female bears, for about 5 years [2021–2025]” ([2022 Brown Bear Management Plan For Game Management Unit 1D](#)).

Alaska Wildlife Alliance comment Proposal 23



PC3

Alaska Wildlife Alliance is OPPOSED to this proposal.

The Board previously tried to get rid of the two non-motorized hunt areas off the Denali Highway (Unit 13). There was a lot of public pushback and that effort was dropped. This proposal to introduce e-bikes is yet another way to undermine non-motorized hunting opportunities in Alaska. The whole point of designating non-motorized hunt areas is to provide hunters the opportunity of a human-powered hunt. Electric motors (at any wattage) are still motors, and make it much easier to access the backcountry for hunting than human-powered means.

Alaska Wildlife Alliance comment Proposal 27



PC3

Alaska Wildlife Alliance SUPPORTS this proposal.

- A setback does not shut down trapping, and we do not believe it is the intent of the author to stop trapping in this region. This proposal simply aims to provide safe recreational corridors on prominent public routes (maintained roads and established hiking trails).
- Trappers can still use these areas as an access point for trapping.
- Trappers will still have the opportunity to trap where harvestable surplus exists.
- We believe the trapper code of ethics is compatible with reasonable setbacks. For example, Code of Ethics, number 3: “Promote trapping methods that will reduce the possibility of catching non-target animals.” Presumably this means ethical trappers are *already* voluntarily trapping away from highly used areas where non-target animals (dogs) could be caught. Since this is already part of the code of ethics, a regulated setback would not burden ethical trappers who are already enacting voluntary setbacks. This regulation would only limit trappers who are not following the code of ethics and trap on/near high-use areas.

AWA recommends the following amendment:

Provide an opportunity for the proposal author to clarify which roads and trails they seek setbacks.

Alaska Wildlife Alliance general comments on Proposals 45 and 47-54

**PC3**

Alaska Wildlife Alliance SUPPORTS these proposals

On behalf of our Alaska-based membership, Alaska Wildlife Alliance (AWA) submits the following comments in support of Proposal 45 and Proposals 47 through 54. The AWA proposals have been submitted to improve upon the 2019 (proposal 43) Board of Game (Board) wolf management framework implemented in Game Management Unit 2 (GMU 2). The 2019 management framework (Framework) for wolves in GMU 2, which relies exclusively on season length to control harvest, is inconsistent with sound wildlife management practices when trying to sustain a genetically distinct, vulnerable and isolated population of wolves. The implementation of the Framework resulted in an immediate unsustainable wolf harvest, a petition for listing the species as threatened or endangered, and a lawsuit by AWA to ensure the population is managed sustainably relative to the Alaska State Constitution. Furthermore, the Framework has now morphed into an ill-defined public process that frustrates trappers and hunters and continues to put the GMU 2 wolf population at risk for listing as an endangered or threatened species.

To understand the importance of why these proposals were submitted, it is essential to review recent events that demonstrate how far the Alaska Department of Fish and Game (Department) has veered from the 2019 management framework. The fall population estimate and season length scale that was outlined in the Framework has been abandoned. Subsequently, this has led to an unpredictable, convoluted and non-transparent public process to set seasons and control harvest. The current ad hoc method of setting varied season lengths to control harvest is now decided by the Department without clear disclosure to the public and without identifying what harvest levels are acceptable pre-season. This is a risky management framework to impose on such a vulnerable population. Providing transparency, by actually setting a harvest quota as done prior to 2019 (AWA Proposals 51/52/53) and establishing tighter reporting requirements (AWA Proposal 47) are minimum steps to ensuring sustainable management of this population. AWA Proposals 45, 49 and 50 provide precautionary approaches to identifying and setting appropriate population objectives until research is completed to determine a viable population objective (AWA Proposal 48). Finally, AWA Proposal 54 offers an alternative management concept the Department could explore that is based on establishing protected areas.

In October of 2022, AWA representatives attended a deer summit meeting on Prince of Wales Island (POW). The goal of the meeting was to foster an understanding and dialog among a diverse array of experts regarding the challenges of deer management on POW. Fundamentally acknowledged during the 3-day workshop was that habitat loss was the primary limiting factor for sustaining a healthy deer population. Other important factors influencing deer populations included overharvest of deer, overharvest of doe deer, climate change, wolf and bear predation, and disease. It was an amazing 3-day meeting that brought together the most knowledgeable people to candidly and respectfully discuss the diverse and challenging issues facing wildlife management on POW. It was acknowledged

that predators (wolf and bear) influence the deer populations on POW but they should not be considered the most important factor to control when trying to manage POW deer populations. Restoration of habitat, reducing future old growth timber harvest, and control of deer harvest were higher priorities.

**PC3**

In closing, the goal in submitting nine proposals is to provide the Board with a range of options to improve the wolf management program in Unit 2 and ultimately ensure the population is not listed but remains sustainable and genetically viable into the future. Another goal is to request the Board adopt more transparent methods that can provide predictability on how seasons will be set and what factors are being used by the Department to establish seasons and trigger emergency closures when warranted. We acknowledge the difficulty in estimating this wolf population and we commend the Department, partners, trappers and hunters for their continued efforts to gather data that are critical to formulating the best possible population estimates. We sincerely hope the Board adopts many of these proposals as a means to provide a transparent management framework that works effectively to sustain the unique wolves of POW and is clearly understood by the public.

Alaska Wildlife Alliance comment Proposal 45

**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal.

Proposal Goal

- Manage for a unit wide wolf population that is sustainable into the future and reduces the possibility it will be listed as threatened or endangered.
- Raise the population objective from 150-200 wolves to 250-350 wolves and raise the threshold for closing the season from 100 to 200 wolves.

What is the Problem

- The current minimum population threshold of 100 wolves is very low, along with the current population objectives of 150-200 wolves.
- The Board should not have been tasked with identifying the minimum population threshold needed to maintain a genetically distinct and vulnerable population of wolves. That is the job of professional biologists that can analyze and model historic and current data.
- When the Board decided to set 100 wolves as the minimum viable population they did not include consideration of a multitude of factors like: the genetic diversity needed to sustain this isolated, genetically distinct population; genetic bottlenecking; susceptibility to rabies and disease; changes in habitat conditions due to logging/climate change, etc.
- The Department conducted no population viability analysis to support the Board's decision to set 100 wolves as the minimum acceptable level.
- At a public hearing in Prince of Wales on November 9th, 2021, the Department representative stated, that "new genetic data raises questions about genetic diversity to prevent inbreeding" in Unit 2 and that the agency was keeping the trapping season short (one month) because, "the population objective might not be genetically sustainable."
- A small residual population of 100 wolves could be feasibly extirpated or seriously compromised genetically due to inbreeding.

Why is the proposal important

- Until a biological viability analysis has been completed as proposed in AWA's Proposal 48, the Board and Department should take a precautionary approach to managing the Unit 2 wolves to ensure they remain off the Threatened and Endangered species list.
- Raising the Unit 2 population objectives and minimum population objective would be a good and simple precautionary step to ensuring that the genetic diversity of the population is



protected until more rigorous data analysis has been completed to establish these parameters.



PC3

- History indicates this wolf population has likely hovered around 250 -300 wolves while maintaining a harvest of 30%. Raising the population threshold and objectives is a step towards sustainable management.

Alaska Wildlife Alliance comment Proposal 47


PC3

Alaska Wildlife Alliance SUPPORTS this proposal

Proposal Goal

Ensure that the risk of overharvesting Unit 2 wolves is minimized.

What is the Problem

A shorter reporting period is needed to ensure overharvest does not occur. With a seven-day reporting period there is a much greater risk of overharvesting wolves in Unit 2.

Potential Management Example

7 Day Reporting Requirement: Season opens Nov. 15 and Closes Dec 15 and trappers can record their harvest 7 days after harvest. There are 3 trappers. Department quota for the year is **20 wolves**. We understand that the State is not officially managing this population with a quota, but we assume the State has an internal harvest goal that is used to determine when the season is closed or shortened by emergency order.

Season Day	Trapper 1	Trapper 2	Trapper 3	Wolves Trapped/day	Cumulative Wolf harvest
Day 1 Nov 15	2	1	3	6	6
Day 2 Nov16	0	4	2	6	12
Day 3 Nov17	2	1	1	4	16
Day 4 Nov18	4	0	2	6	22
Day 5 Nov 19	2	2	0	4	26
Day 6 Nov20	0	0	2	2	28
Day 7 Nov 21	1	1	2	4	32
Total Day 7				32	
Harvest that could happen from Nov 22- 25	4	6	4	14 (for a 4 day period)	46
What does the State Know based on 7 day reporting requirement					
On Day 8 (Nov 22) The total reported to State as per regulation.				6 wolves reported on Day 8 (Nov 22) as only those harvested on day 1(Nov 15) need to be reported.	
On Day 9 (Nov 23) Total reported to State as per regulation.				12 total wolves now reported to State	
On Day 10 (Nov 24) Total reported to State as per regulation.				16 wolves reported total	
Day 11 (Nov 25) STATE STOPS HUNT as they know 22 wolves have been harvested Between Nov 15-18.				22 wolves reported total	

In this scenario by Day 11 (Nov 25) of the season, 22 wolves have been reported harvested and the State shuts down the season. However, in reality the Department will need to add 24 more wolves

that were harvested between Day 5 (Nov 19) – Day 11 (Nov 25) of the season that had yet to be reported. Thus the Department will realize that 46 wolves were actually harvested when they shut the season down on Day 11 (*26 wolves/230% over their quota*).


PC3

2 Day (48 hr) reporting requirement: Same harvest as above scenario

Season Day	Trapper 1	Trapper 2	Trapper 3	Wolves Trapped/day	Cumulative Total
Day 1 Nov 15	2	1	3	6	6
Day 2 Nov 16	0	4	2	6	12
Day 3 Nov 17	2	1	1	4	16
Day 4 Nov 18	4	0	2	6	22
Day 5 Nov 19	2	2	0	4	26
Day 6 Nov 20	0	0	2	2	28
Day 7 Nov 21	1	1	2	4	32
Total Day 7				26	
On Day 3 (Nov 17) Total reported to State as per regulation.				6 total wolves reported on Day 3 (Nov 17) as only those harvested on day 1 (Nov 15) need to be reported.	
On Day 4 (Nov 18) Total reported to State as per regulation.				12 (add in 6 from day 2 harvest) etc.	
On Day 5 (Nov 19) Total reported to State as per regulation.				16	
On Day 6 (Nov 20) Total reported to State as per regulation.				22 – State STOPS HARVEST	

In this scenario the Department knows by Day 6 (Nov 20) of the season they have harvested 22 wolves and stop the Season. However, the Department would realize an additional 6 wolves were harvested from Nov 19-20 (Days 5-6). Thus, they would stop the harvest season with 28 wolves harvest (*8 wolves/125% over the quota*).

Why is the proposal important

- As indicated by the examples above, the Department can be much more effective at monitoring harvest and meeting a potential harvest quota by implementing a shorter reporting requirement. The example clearly shows that a 7-day reporting requirement allows for a much greater risk to overharvest (over harvest of 28 wolves from their objective of 20) than a 2 day reporting requirement (over harvest of 8 wolves from their objective quota of 20).
- Unit 1D has a 48 hour reporting requirement for wolves indicating this is feasible and the Department has a system in place that can work



-
- The number of individuals required to follow this simple reporting requirement is small
 - We suggest a cell phone call to a recorded Department line within 48 hours of recovery – a minimal burden.



PC3

Alaska Wildlife Alliance comment Proposal 48

**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

Proposal Goal

Establish a Scientifically based minimum population objective for Unit 2 wolves

What is the Problem

- The Board's calculation and adoption of a spring population objective between 135-180 wolves, and setting 100 wolves as the lowest acceptable limit of wolves for Unit 2, is not based on a scientific analysis.
- The Board is not the appropriate group to develop the minimum viable population objectives for this vulnerable population. The Department has access to the technical experts that should formulate the population objectives and identify the minimum viable population objective.
- These population objectives pose a credible threat to the sustainability of this vulnerable and genetically unique population that is under review to determine if it should be listed as a threatened or endangered species.

Potential Management Example

- The Board of Game's main role is to conserve and develop Alaska's wildlife resources. This population of wolves has been petitioned for ESA listing multiple times. It is also an island population, which is more vulnerable to overharvest and inbreeding. We respect the Board's role in determining allocative issues, but the minimum viable population of these wolves is not an allocative question, or one that should be made on feelings or public opinion. It is one that must be determined by scientific and TEK review. If the agency is unwilling to provide a recommendation, we encourage the Board to ask questions, like "what is the minimum number of wolves that could ensure enough genetic diversity for a healthy population?" ; "what percentage of wolves could be taken from this population each year to maintain that genetic diversity?" ; "What other factors, aside from human harvest, contribute to wolf mortality?" to determine a biologically responsible minimum population objective.
- The Board has a depth of knowledge about a diversity of wildlife populations and issues but they are not biometricians capable of synthesizing and modeling years of Unit 2 wolf population data to determine the minimum viable population and appropriate population objectives for Unit 2 wolves.

Why is the proposal important

- In conjunction with AWA Proposal 45, which requests a change to the wolf population objectives for Unit 2, this proposal would allow the Department to initiate the steps to set up a



research project to determine the appropriate minimum viable population goal.



PC3

- At a public hearing in Prince of Wales on November 9th, 2021, the Department indicated “new genetic data raises questions about genetic diversity to prevent inbreeding” in Unit 2 and that the agency was keeping the trapping season short (one month) because, “the population objective might not be genetically sustainable.”
- Time is of the essence to take immediate steps to ensure a viable and sustainable wolf population is protected in Unit 2. The consequences are high given the species could be listed as threatened and endangered.

Alaska Wildlife Alliance comment Proposal 49

**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

Proposal Goal

To develop a conservative and precautionary population estimate to ensure a sustainable wolf population is maintained in Unit 2.

What is the Problem

Current population estimates have been extremely variable and their accuracy questionable.

Real Examples of how this would adjust population estimates

- In 2020 the pre-season population estimate was 386 with 95% confidence limits of (321-472). If this proposal was adopted, the pre-season population estimate the Department would have adopted to set their season length would have been 321, which is 56 fewer than the point estimate of 386.
- In 2021 the pre-season population estimate was 286 with 95% confidence limits of (216-332). If this proposal was adopted, the pre-season population estimate the Department would have adopted to set their season length would have been 216, which is 52 fewer than the point estimate of 268.

Why is the proposal important

- This population is very vulnerable and currently being evaluated by the U. S. Fish and Wildlife Service to determine if it will be listed as a threatened or endangered species. This is the third time this population has been submitted for listing. Hence, it is appropriate to take a very precautionary and conservative approach when identifying the initial population size that will form the bases for establishing harvest seasons.
- The Department is still refining their population estimation models and techniques. There have been noticeable swings in population estimates and the confidence intervals surrounding the estimates over the past 4 years. As the Department, their partners, and harvesters continue to gather important population data, the stability of estimates will hopefully improve.
- Until the Department refines their models, sample collection standards, etc. it is appropriate to be precautionary on identifying the baseline population number from which annual management will be based.

Alaska Wildlife Alliance comment Proposal 50

**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

Proposal Goal

To establish the best pre-season wolf population estimate so an accurate wolf harvest quota can be established annually

What is the problem

- The current pre-season population estimate calculated by the Department overestimates the wolf population because it assumes that all habitat in Unit 2 has equal ability to support wolves.
- Most outer islands in Unit 2 likely have no wolves as they are not accessible by wolves or have no food to support wolves. They likely cannot support the same density of wolves as those found on Prince of Wales Island.
- Extrapolating wolf density estimates from the most productive wolf habitat (POW = 60% of Unit 2) to the remaining 40% of the Unit, that are primarily islands, is problematic and results in an inflated population estimate for Unit 2. Estimates of the wolf population for Unit 2 are based on samples almost exclusively from POW (99% of samples come from POW). There is little sample data (<1%) from islands to know if they are occupied and at what density.

Example Scenario for Unit 2

- Assuming all lands in Unit 2 can support wolves equally:
 - The State estimates there is 1 wolf per 1,000 acres in Unit 2 based on their research.
 - Entire Unit 2 lands = 500,000 acres
 - Pre-season population estimate for GMU 2 is 500 wolves (500,000 acres/1,000 acres per wolf = 500 wolves).
- Assuming all lands in Unit 2 cannot support wolves equally and only POW lands are suitable wolf habitat.
 - The state estimates there is 1 wolf per 1,000 acres in Unit 2.
 - Only POW (300,000 acres) is suitable wolf habitat
 - Pre-season population estimate for GMU 2 is 300 wolves (300,000 acres/ 1,000 acres per wolf = 300 wolves).
- Assuming that all the islands in Unit 2 can support wolves automatically results in a situation that overestimates the pre-season population (in this example by 200 wolves) and thus creates the immediate potential for an overharvest of the number of wolves available for harvest.



- Given the vulnerable state of the Unit 2 wolves it makes sense to take a more conservative approach to estimating the pre-season population.
- For another example, we would not extrapolate the average population density in Anchorage to Glennallen to determine Glenallen's population.



Why this Proposal is Important

- This proposal corrects the potential to overestimate the pre-season wolf population by limiting the pre-season population estimate to only lands that can actually support wolves.
- Not all lands in Unit 2 support wolves equally, and creating a population estimate that assumes otherwise is inappropriate and puts the Unit 2 wolves of overharvest.
- The Department has very limited data from harvest records to justify outer islands are occupied by wolves in the same density at Prince of Wales. They have no data within GMU 2 that justifies their assumption that wolf densities on the outer islands are similar to that on Prince of Wales.

Alaska Wildlife Alliance comment Proposal 51

**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

Proposal Goal

Provide a transparent wolf harvest framework in GMU 2 that will ensure a sustainable wolf population and provide harvesters with a predictable harvest quota and reasonable reporting requirements.

What is the problem

- The current management framework adopted by the Board of Game (Board) in 2019 cannot adequately and predictably control wolf harvest as it relies only on controlling season length to control the number of wolves harvested. Because of this, the Alaska Department of Fish and Game (Department) has modified its approach to setting the wolf season length since 2019 to shorten seasons based on internal discussions and facts that are announced in the fall when they establish the final season length. The Department is concerned with potential overharvest and subsequently is not following the 2019 Framework passed by the Board.
- Under the current 2019 Framework there is no harvest quota/limit established for the pre-season and thus hunters/trappers have no idea how many wolves they can harvest in the season. Hunters and trappers are provided a set season length that is announced early fall, based on the recent preseason population estimate and internal Department discussions.
- The Department has virtually no idea how many wolves might be trapped per season regardless of the season length they set. The number harvested in a season will depend on weather, number of trappers and number of hunters pursuing wolves. The State does not require wolf trappers or hunters to pre-register so they have no idea of the effort that may occur during that season.
- There is no Quota (limit) “publicly announced” on numbers of wolves that trappers can take although they are required to call in a wolf harvest within 7 days and seal the animal within 15 days. Hunters can take 5 wolves per season with similar call in and sealing reporting requirements as trappers.
- The Department is not following the 2019 framework that is supposed to set a season length based on the pre-season population. Why? The Department knows the current framework does not work to maintain a sustainable wolf population and thus have adopted an internal management scheme that is based on an unknown framework. The AWA is thankful to see the more conservative seasons, but greater transparency is needed for both trappers and non-trappers.

Example Scenario for Unit 2

- In 2019 the Board adopted a new Management scheme (Proposal 43) for wolves in Unit 2 and established a fall Unit 2 wolf population objective of 150–200 wolves.



- The new framework relies on season length based on pre-season population estimates to determine the length of the season.
 - If the population is 100 or below = no season
 - Population of 100-149 = up to 6 week season;
 - Population 150- 200 = up to 8 week season,
 - Population >200 = up to 4 months.
- The framework does not use in-season harvest data nor does it set a harvest quota like the old framework.
- 2019 Season: The pre-season population estimate was 187 wolves (2018 fall estimate). When the population estimate is above 150 the 2019 framework allows for up to an 8 week season and thus an 8 week season was allowed. An unsustainable harvest of 165 wolves happened in 2019.
- Season 2020: The pre-season population estimate was 316 (fall 2019 estimate). The trap season was set conservatively from Nov. 15- Dec 5 due to the 2019 season unsustainable harvest. Hunting was allowed Dec 1-5. Technically the 2019 management framework would have allowed for up to a 4 month season. 68 wolves were harvested in 2020.
- Season 2021: The pre-season population estimate was 386 (fall 2020 estimate). Technically this would allow for up to a 4 month season based on the original 2019 framework. However the State wanted to take a more conservative approach based on the uncertainty of former population estimates and set the season from Nov 15- Dec 15. 66 Wolves were harvested.
- Season 2022. The pre-season population estimate was 268 (fall 2021 estimate). Based on the original framework this would have permitted up to a 4 month season. However, the State announced a one month trapping season from Nov 15-Dec 15. The number of wolves harvested has not been announced.

Why this Proposal is Important

- The current management framework adopted by the Board in 2019 is not being followed because it does not work. The Department has discretion to set a season “up to” the maximum amount, but the factors going into their determination are a complete mystery.
- There is not a transparent process for the trappers, hunters or public to follow- the Department is managing based on internal discussions and data.
- AWA Proposal 51 speaks to the management framework only, and adopts the same method that was used to manage wolves in Unit 2 from 1997 through 2018. Returning to that method, with the benefit of annual population estimates, a population objective, more convenient in-season reporting requirements, and a transparent public process represents a significant improvement over the current system.
- This proposal provides a path forward to a more transparent method of informing how wolf management can be improved by setting quotas based on the best available population estimates. It also ensures data is reported in a timely manner in-season so the quota may not



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be exceeded, or exceeded to a minimal extent. This provides conservative but transparent forward framework to manage a very vulnerable species with hopes of keeping it off the endangered species lists.



PC3

Alaska Wildlife Alliance comment Proposal 52

**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal.

Proposal Goal

A harvest quota between 20% - 35% of the estimated population of wolves in Unit 2 is established by the Board of Game (Board) based on conservation concerns.

What is the problem

- The Board and Alaska Department of Fish and Game (Department) have not established what percentage of the annual Unit 2 wolf population can be harvested each year so that the population remains sustainable into the future.
- Without developing a standard sustainable harvest level, the population may be overharvested leading to a population that is no longer sustainable and vulnerable to becoming threatened or endangered.
- The State has the data that has established the potential percentage of mortality that the wolf population can sustain which is 30- 35%. We recommend 20-35% until population models and harvest management is stabilized.

Example Scenario for Unit 2

- If, for example, the Department determines the pre-season population estimate is 350 wolves in Unit 2 and hypothetically the Department population objective is to maintain a minimum 200 wolves to ensure a sustainable population. Thus in total no more than 150 animals should be removed (harvest (legal/illegal and natural mortality) from the population.
- If there is a standard range of harvest mortality established like 20-35% this would equate to human harvest allowed of between 70-122 wolves. Leaving a sustainable estimated population of 228 (350-122) to 280 (350- 70) animals. Given there is illegal harvest and natural mortality that will occur during the year the population post season and into the spring breeding period is likely lower but still within an acceptable limit of likely 200 animals entering the next harvest season.

Why this Proposal is Important

- This Proposal provides flexibility for the Department in setting harvest quotas and predictability for the trappers and hunters on how quotas will be set each year. Transparency in the process is increased for all interested parties while ensuring a sustainable future population of wolves continues to reside in Unit 2.
- When the preseason population estimate is large enough to allow for a harvest of wolves providing a harvest quota range of 20-35% of the population allows the Department to be



conservative (use a 20% quota) if the pre-season estimate is near the population objective or to be a bit more liberal (35%) if there appears to be a healthier population.

- This proposal links with Proposal 53 that requests that mortality factors beyond harvest are factored into the equation to create an overall more transparent, conservative, and predictable management framework to wolf management in Unit 2.



Alaska Wildlife Alliance comment Proposal 53

**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

Proposal Goal

An estimated unreported mortality rate of 35-50% shall be utilized in establishing an annual harvest quota of wolves in Unit 2 to ensure there is a continued sustainable wolf population in Unit 2.

What is the Problem

- The current methodology ignores mortality resulting from natural and illegal harvest despite research indicating such mortality is happening.
- Ignoring that other mortality is happening beyond legal harvest results in less accurate population estimates and ultimately more instability when trying to maintain a sustainable wolf population objective.
- The legal take of wolves in Unit 2 underestimates the total mortality in the wolf population, and thus leaves the Department vulnerable to overharvesting a genetically distinct, isolated wolf population. Wolves die from any number of causes, including legal harvest by trapping and hunting, wounding loss, illegal harvest (wolves killed but not reported or sealed per regulations), and natural mortality.

Management Example

Preseason population estimate is 285 wolves. The Board's sustainable post- harvest season Population Objective is 200 wolves.

- Current method, if the Department sets an actual harvest quota as recommended by AWA and the Department only accounts for harvest mortality:
 - Department allows for 35% (harvest quota) of 285 animals to be harvested $.35 \times 285 = 100$ animal harvest allowed. At the end of the season, the harvest quota of 100 animals is met and there are now 185 animals ($285 - 100 = 185$). This is below the objective sustainable population the Department wanted of 200 and they have yet to account for any other mortality that may happen in winter and next year. Thus, the population is starting below the sustainable population objective of 200 going into the winter and breeding season just based on legal harvest. IF additional mortality (illegal and natural) of 35% happens, another 65 animals are lost ($.35 \times 185 = 65$; $185 - 65 = 120$). There are now only 120 + animals that may be available preseason the following year. New pups will be born but may not allow the population to rebound to the population objective of 200 animals.
- A better approach:
 - The Department gets a preseason fall estimate of 285 wolves. They account before setting the legal harvest quota that there may be a 35 % mortality that may occur due to illegal harvest and natural mortality going into the next year = 100 animals. Subsequently the next year's population may already be as low as 185 ($285 - 100$) animals just based on non-legal harvest and natural mortality. They know there will likely be some new pups born but accounting for the non-harvest mortality up

front they may opt to not have a season or they may opt to have a very low harvest quota to ensure they keep the population at their 200 objective level.

**PC3****Why is the proposal important**

- The Department argues that the preseason population estimate they provide each year accounts for all mortality. This assumption is flawed in the sense that we know how many animals there are in the preseason (at one point in time), but when you set your fall harvest quota you do not account for other mortality that will also influence the breeding population and ultimately your next preseason population estimate.
- The Department knows there are both new pups and other mortality happening in a population. Why would the Department not account for other mortality to create a better management framework and overall model? The research has been done and there are estimates of non-harvest mortality that could be used to improve the management of this population.
- This proposal echoes a recommendation made by the Interagency Wolf Technical Committee that recommends that harvest quotas continue to be adjusted annually for unreported kill.

Alaska Wildlife Alliance comment Proposal 54

**PC3**

Alaska Wildlife Alliance SUPPORTS this proposal

Proposal Goal

- Provide a potential alternative spatial methodology for managing wolves by using area closures
- Task the Department and the U.S. Forest Service with identifying 2/3rds of Unit 2 land area for protected status for wolves. Work to ensure the protected areas are large enough to be buffered from trapping pressure and have suitable habitat resources to maintain wolf packs.

What is the Problem

The Board and the Department have wrestled with creating a sustainable wolf management scheme in this Unit for years, so we offer a different approach for consideration. This system may sustainably manage wolves in GMU 2 and maintain the genetic diversity

Example Scenario

If the wolf population can sustain ~30% annual mortality, then open ~ 1/3rd of the unit to wolf trapping each year and close the remainder. The areas subject to closure, and those that are open, could be established permanently by the Board of Game, or rotated on a long-term schedule.

Why is the proposal important

- This proposal simply provides another mechanism for the Department to evaluate for the management of unit 2 wolves.
- The proposal relies on spatial closure to control potential harvest and increase the ability to maximize genetic diversity in the population that is currently showing signs of stress.
- Partial closures of game units have proved effective in protecting wildlife populations in AK and elsewhere.



Submitted by: Alaskan Bowhunters Association

Community of Residence: Anchorage, AK

Comment:

See Attached

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support

Proposal 24: Support

Proposal 30: Support

Proposal 19: Oppose

Proposal 29: Support

See attachment on the following page.



The Alaskan Bowhunters Association
Comments to the Alaska Board of Game
Southeast Region
Ketchikan, AK. January 20-24, 2023
Submitted January 6, 2023

To the Alaska Board of Game,

The Alaskan Bowhunters Association (ABA) is a membership 501C-4 nonprofit organization representing bowhunters from all over the nation who choose to pursue game in Alaska with the bow and arrow. Our mission is "To foster and perpetuate fair chase hunting with the bow and arrow". We thank the Board of Game for the opportunity to comment on proposals in advance of the upcoming meeting.

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

Most states have recognized that the limitations of equipment of bowhunting result in greater opportunity for hunters to spend time in the



field with lower impact on the game resources. As a result, nearly every state has established long archery seasons both before and after their general seasons.

The following comments reflect our stance on upcoming proposals for the Southeast meeting. We hope that the Board of Game seriously considers what our organization and membership have to say regarding these matters.

Proposal 16 - *SUPPORT*

Proposal 16 asks to lengthen an already existing archery only hunt within the Petersburg Management Area with the season opening August 1st instead of the existing opener of October 1st. This earlier season opening mirrors several other deer seasons in the state. The bag limit for this hunt is currently 2 bucks and this proposal would not change that. Allowing for an earlier season opening in this area would allow more bowhunting opportunity for pursuing early season deer in the alpine of the management area. This proposal would benefit all bowhunters who choose to utilize this hunt but would be of most benefit to local residents of Petersburg who choose to enjoy chasing velvet bucks with a bow. This area is already limited to bow and arrow only with a bag limit of two buck deer and the only change this proposal would bring is added days of season to hunt. This hunt is already of extremely low impact to the deer population, and we do not believe that the proposed lengthening of the season would change that. For these reasons, we ask that you vote **To Adopt** proposal 16.

Proposal 19 - *OPPOSE*

Proposal 19 calls for cutting the Etolin Island archery elk season (DE318) from one month to two weeks while also creating an any weapon drawing permit hunt in the two weeks taken away from the archery season. This proposal also would advocate for cutting 35 drawing permit hunts from October which brings less revenue to The Alaska Department of Fish and Game (ADFG) and allows for less opportunity to apply and draw an Etolin Island elk permit. If adopted, this proposal would cause the number of drawing permits for the month of September to go from 25 to 50 with half of that number being available to firearm hunters during the peak of the rut.



There are already two existing any weapon drawing permit elk hunts on Etolin during the month of October (DE321 & DE323) and a registration hunt (RE325) in November. Harvest Data shows that currently, the any weapon hunts yield over 50% more harvest than the additional archery hunt. The beauty of the current regulation is that it allows a longer season with more hunting opportunity in September due to the low impact of archery equipment. This proposal would take away from that opportunity while also potentially having a negative effect on the elk herd of the Island. The Ketchikan Advisory Committee cites under utilization of the archery hunt as a reason for this proposal, but they are using harvest rates to determine utilization rather than hunter days and effort. If adopted, this proposal would also allow potentially twenty-five firearm hunters to hunt elk during the peak of the rut. Those choosing to use a firearm to hunt elk already have the choice between DE321 and DE323 to apply for and DE321 already affords them with hunting during a portion of the rut. If those advocating for this proposal have such a high desire to hunt in September, they already have the opportunity to apply for DE318 and hunt with archery equipment. ADFG opposes this proposal and has very detailed comments as to the negatives of adopting this it. We urge the Board **NOT** to adopt proposal 19 which would lead to less bowhunting opportunity and less general hunting opportunity overall.

Proposal 24 - *SUPPORT*

Proposal 24 advocates for opening a registration archery only hunt for black bear in the Petersburg Creek drainages of Kupreanof Island. There would only be up to 10 permits available for this hunt which would only be available in person at the Petersburg ADF&G office. This permit would only be available to residents of Alaska and would have a bag limit of one bear per regulatory year. The season for this hunt would be from April 15th – June 30th and these dates were purposely chosen by the proposer in order to be the least likely time for any user conflicts in the area. Proposal 24 would afford residents of the Petersburg area a great opportunity to pursue black bear locally with archery equipment. Again, this would be a spring only hunt in order to minimize conflicts between seasonal user groups. We ask the Board to strongly consider **SUPPORTING** the adoption of proposal 24.



Proposal 29 - **SUPPORT**

Proposal 29 would expand the hunt area of the RG014 archery goat hunt in Unit 1C. This would afford more hunting opportunity to bowhunters and would not cause any population concerns according to comments submitted by ADFG. The proposed expansion of the hunt area should not negatively affect goat populations in the area as RG014 has a strict reporting requirement and ADFG could close the hunt by emergency order if needed. We ask the Board to vote in favor of added opportunity by **SUPPORTING** the adoption of this proposal.

Proposal 30 - **SUPPORT**

Proposal 30 would open a fall archery goat hunt in Unit 1C, the southern end of the Chilkat Peninsula from August 1st – September 1st. If adopted, this hunt would afford more hunting opportunity while also having a low impact due to the limitations of archery equipment. According to ADFG, there are no biological concerns. We ask the board to consider **SUPPORTING** the adoption of this proposal thereby adding additional opportunity for bowhunters with no negative impact.

Respectfully,

Mike Harris - Legislative Vice President, Alaskan Bowhunters Association



Submitted by: Joseph Anselm

Community of Residence: Sitka, Alaska, 99835

Comment:

I propose that we leave the bag limit in Unit 4 alone, I've lived in Unit 4 my whole life and have been hunting since I was 11 years old in 1968 and all of a sudden people who do NOT live and hunt in Unit 4 want to lower our bag limits? Hogwash....

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose

Proposal 11: Oppose

Proposal 21: Oppose



Submitted by: Karl Ashenbrenner

Community of Residence: Juneau

Comment:

Having lived in Juneau my entire life, hunting Douglas Is. for decades (since 1970) the idea to protect wolves on the island is appalling considering what they are doing to the deer population the last decade on Douglas. I am also against having a 6 deer limit, the 4 deer limit worked great with 6 deer being available to rural residents who rely more on venison for their dietary use.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Support

Proposal 11: Support

Proposal 12: Support

Proposal 13: Support

Proposal 14: Support

Proposal 21: Support

Proposal 36: Support with Amendment

Proposal 37: Support

Submitted by: Karl Ashenbrenner

Community of Residence: Juneau

Comment:

i support the idea of reducing the deer bag limit to 4 from 6 deer. The bag limit was 4 for many many years and was just fine. As far as reducing the bag limit on sooty grouse from 5 to 3, in my opinion there is not enough pressure to justify the reduction.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Oppose

Proposal 2: Oppose

Proposal 3: Oppose

Proposal 4: Oppose

Proposal 5: Oppose

Proposal 6: Oppose

Proposal 7: Oppose

Proposal 8: Oppose

Proposal 9: Oppose

Proposal 10: Oppose

Proposal 11: Oppose

Proposal 12: Oppose

Proposal 13: Oppose

Proposal 14: Oppose

Proposal 15: Oppose

Proposal 16: Oppose

Proposal 17: Oppose

Proposal 18: Oppose

Proposal 19: Oppose

Proposal 20: Oppose

Proposal 21: Oppose

Proposal 22: Oppose

Proposal 23: Oppose

Proposal 24: Oppose

Proposal 25: Oppose

Proposal 26: Oppose

Proposal 27: Oppose

Proposal 28: Oppose

Proposal 29: Oppose

Proposal 30: Oppose

Proposal 31: Oppose

Proposal 32: Oppose

Proposal 33: Oppose

Proposal 34: Oppose

Proposal 35: Oppose

Proposal 36: Oppose

Proposal 37: Oppose
Proposal 38: Oppose
Proposal 39: Oppose
Proposal 40: Oppose
Proposal 41: Oppose

Proposal 42: Oppose
Proposal 43: Oppose
Proposal 44: Oppose
Proposal 45: Oppose
Proposal 46: Oppose

Proposal 47: Oppose
Proposal 48: Oppose
Proposal 49: Oppose
Proposal 50: Oppose
Proposal 51: Oppose

Proposal 52: Oppose
Proposal 53: Oppose
Proposal 54: Oppose



PC7

Submitted by: Gwen Baluss

Community of Residence: Juneau, AK

Comment:

see attached

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Support
Proposal 2: Support
Proposal 3: Oppose
Proposal 5: Oppose
Proposal 6: Oppose
Proposal 7: Oppose
Proposal 8: Oppose
Proposal 9: Oppose
Proposal 10: Support
Proposal 11: Support
Proposal 12: Oppose
Proposal 13: Oppose
Proposal 14: Oppose
Proposal 15: Support

Proposal 16: Support
Proposal 17: Support
Proposal 18: Support
Proposal 19: Support
Proposal 20: Support
Proposal 21: Support
Proposal 22: Support
Proposal 23: Support
Proposal 26: Support
Proposal 27: Support
Proposal 28: Support
Proposal 29: Oppose
Proposal 30: Oppose
Proposal 31: Oppose

Proposal 32: Support
Proposal 33: Support
Proposal 34: Oppose
Proposal 35: Oppose
Proposal 36: Support
Proposal 37: Support
Proposal 38: Oppose
Proposal 39: Support
Proposal 42: Support
Proposal 43: Support
Proposal 44: Support
Proposal 48: Support

See attachment on the following page.



January 6, 2023

Dear Alaska Board of Game,

I would like to register my support for PROPOSAL 36 (5 AAC 85.065. Hunting seasons and bag limits for small game. Reduce the bag limit for grouse for drainages that cross the Juneau-Douglas Road system in Unit 1C as follows: Reduce the grouse bag limit to three per day for the drainages that cross the Juneau-Douglas Road System. If anything, it may be prudent to reduce limits even further.

Sooty Grouse is recognized by Boreal Partners in Flight, the primary working group for experts on landbird populations in Alaska, as an important stewardship species, particularly for Southeast Alaska, with an estimated 30% of the continental population in Alaska. (<https://www.usgs.gov/centers/alaska-science-center/science/boreal-partners-flight>)

There are concerns that Sooty Grouse have declined across their range: according to the North American Breeding Bird Survey (<https://www.mbr-pwrc.usgs.gov/bbs/spec15.html>), populations declined by about 1.8% per year between 1968 and 2015, resulting in a cumulative loss of 57% over that period.

These concerns have landed Sooty Grouse on the Audubon Alaska Watchlist (https://ak.audubon.org/sites/default/files/2017_akwatchlist_final_panels_highres.pdf).

While hunting is not implicated in grouse decline, the increasing scarcity of this species requires responsible and informed management.

As an avid bird-watcher who has been in Juneau for over 20 years, with training in estimation of bird distance and density, I suspect that local grouse densities in the accessible areas around Juneau likely cannot support a level of harvest in the current regulations should the popularity of grouse hunting increase.

I suggest taking a close look at the spring grouse acoustic surveys that have been conducted by ADF&G, perhaps requesting analysis as needed, for further insight into both the density and trends within Juneau and other communities in Alaska when setting realistic bag limits. (http://www.adfg.alaska.gov/static/research/programs/smallgame/pdfs/carroll_merizon_status_grouse_ptarmigan_hare_alaska_2019_2020.pdf)

I also support PROPOSAL 37 (5 AAC 85.065. Hunting seasons and bag limits for small game. Reduce the bag limit for ptarmigan for drainages that cross the Juneau Douglas Road system in Unit 1C as follows: Reduce ptarmigan bag limit to five per day for the drainages that cross the Juneau-Douglas Road System.)

Like the Sooty Grouse, Boreal Partners in Flight recognizes that Rock and Willow Ptarmigan and important stewardship species in Southcoastal Alaska. Ptarmigan declines have not been noted to the same extent as for Sooty Grouse, but this may be a function of little monitoring across much of these species' range. As climate change reduces habitat for these cold-adapted species, Alaska may continue to grow in importance as refugia habitat.

I agree with the proposer Mr. Robertson that "the current regulation of 20 birds per day gives the illusion that the species is extremely bountiful". There is not local monitoring data to support this



assumption. In fact, I think that limiting the take to 5 birds per day would still give the impression of abundance that may not be supported by data, and that perhaps the number should be lower.

Rock Ptarmigan form flocks in the late fall, making them potentially vulnerable to having a significant portion of the local population being decimated by a single hunter.

Thank you for your consideration.

Sincerely,

Gwen Baluss

Gwen Baluss

**PC8****Submitted by:** Travis Bangs**Community of Residence:** Wrangell alaska**Comment:**

Deer are being displaced by elk. Prop 17/18

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support**Proposal 18:** Support**PC9****Submitted by:** Bryan Barrett**Community of Residence:** Juneau, Alaska**Comment:**

No comments

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Oppose**Proposal 14:** Support**Proposal 36:** Support**Proposal 48:** Oppose**Proposal 2:** Oppose**Proposal 21:** Oppose**Proposal 37:** Support**Proposal 49:** Oppose**Proposal 3:** Support**Proposal 28:** Support**Proposal 38:** Support**Proposal 50:** Oppose**Proposal 4:** Support**Proposal 29:** Support**Proposal 39:** Support**Proposal 51:** Oppose**Proposal 10:** Oppose**Proposal 30:** Support**Proposal 40:** Support**Proposal 52:** Oppose**Proposal 11:** Oppose**Proposal 31:** Support**Proposal 41:** Support**Proposal 53:** Oppose**Proposal 12:** Support**Proposal 34:** Support**Proposal 46:** Support**Proposal 54:** Oppose**Proposal 13:** Support**Proposal 35:** Support**Proposal 47:** Oppose**PC10****Submitted by:** Megan Bauman**Community of Residence:** Juneau, AK**Comment:****PROPOSAL 10: OPPOSED**

Based upon ADFG studies, the deer population in Unit 4 is currently at, or near, carrying capacity. This puts the deer population at high risk of a population crash from a hard winter (as seen in 2006/2007), which could happen in any year. The best use of resources for both deer & people (as well as serving as the best cushion for the deer) is to keep the bag limit at 6. This will help reduce pressure & competition among the deer for resources, & will hopefully help reduce the severity of impact on the population when the next hard winter happens (due to too many deer & not enough resources). I am a Juneau resident who solely hunts Unit 4 & in the last 5 years have not encountered any “competition” issues either from federally qualified hunters or non-federally qualified hunters. In my observations & conversations with Unit 4 residents, the limiting factor appears to be more of not dedicating sufficient time and/or effort to hunting. As a Juneau resident, I dedicate 10 days of vacation time to hunt Unit 4 annually and there is an enormous amount of deer there if you’re willing to put in the effort.

PROPSOAL 11: OPPOSED

Based upon ADFG studies, the deer population in Unit 4 is currently at, or near, carrying capacity. This situation puts the deer population at high risk of a population crash from a hard winter (as seen in 2006/2007), which could happen in any year. The best use of resources for both deer & people (as well as serving as the best cushion for the deer) is to keep the bag limit at 6. This will help reduce pressure & competition among the deer for resources, & will hopefully help reduce the severity of impact on the deer population when the next hard winter happens (due to too many deer & not enough resources). In addition, this proposal is worded in a way that makes it sound like bag limits are permanent, which is patently untrue. ADFG bases annual bag limits off of their regular assessment of population trends; emergency closures are an additional tool they use to protect populations mid-season. So for years when the population is at carrying capacity, the limit should be 6, for years when the population isn't as high it should be less. In regards to the proposer's opinion about 4 deer being sufficient to feed a family, that has no basis on proper wildlife management tactics (which are based upon population and environmental factors). Deer meat also keeps well for years (if packaged properly), for years when populations are high, a bag limit at 6 will allow hunters to have a small cushion for the following year should the hunter be unable to hunt for unforeseen reasons or a hard winter happens & hunting is rightfully shut down. While populations are at carrying capacity, a 6 bag limit will also help ensure those deer killed are put to good use vs. having a high number of deer die via winter kill (which provides much less "value", as they will most likely only be consumed by birds or small game).

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose
Proposal 11: Oppose

Proposal 21: Oppose
Proposal 36: Oppose

Proposal 37: Oppose

Submitted by: Megan Bauman

Community of Residence: Juneau, AK

Comment:

I mistakenly missed addressing the following proposals in my earlier submission (radial buttons not duplicated):

PROPOSAL 13: SUPPORT

As a regular hunter in north east Chichagof, I have grown increasingly uncomfortable with the large and growing number of brown bears and increased interactions that I have with them. Allowing a controlled and conservative thinning of the population would be a great benefit to both the bears and people.

PROPOSAL 14: SUPPORT

As a regular hunter in north east Chichagof, I have grown increasingly uncomfortable with the large and growing number of brown bears and increased interactions that I have with them. Allowing a controlled and conservative thinning of the population would be a great benefit to both the bears and people.

PROPOSAL 39: SUPPORT

PROPOSAL 40: SUPPORT

Eliminating invasive species is vital to the preservation of native Alaskan flora and fauna

PROPOSAL 41: SUPPORT

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 13: Support
Proposal 14: Support

Proposal 39: Support
Proposal 40: Support

Proposal 41: Support



PC11

Submitted by: David Beebe

Community of Residence: Petersburg

Comment:

I Oppose the proposals of #24 & #25 to open Petersburg Creek to Black Bear sport hunting. They present highly problematic consequences to existing permitted activities. This includes the prospect of an arrow-wounded black bear encountering tourists and residents alike.

These proposals occur in an area which is literally a 10 minute skiff ride from town and an important international tourist destination supporting the local economy.

The negative consequences to hikers, canoe/kayaking (guided and unguided), recreational sport fishing, wildlife viewing, public safety, wildlife conservation, are seemingly self-evident to the majority of residents and visitors who recreate there.

These activities all occur within a narrow wildlife corridor at the base of a steeply sloped valley adjacent to a congressionally-recognized wilderness area.

Petersburg Creek provides an opportunity for bear viewing and peace of mind which is every bit as important to the residents of Petersburg as its visitors. The popularity of bear and other wildlife viewing of Annan Creek and Pack Creek demonstrate the importance of these conditions to the local and regional economy, as well as to the international tourists who seek an accessible, high quality, and fulfilling experience.

The rationale suggesting the opening of the creek to black bear hunting will somehow reduce the incidence of black bear pre-hibernation hyperphagia resorting to town garbage cans is misplaced reasoning.

Bears foraging town garbage is already widely recognized as a consequence of failed salmon runs resulting from land mismanagement and other drivers of anthropogenic climate disruption.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose

Proposal 25: Oppose



PC12

Submitted by: Lavern Beier

Community of Residence: Juneau, AK

Comment:

see attached

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 12: Oppose

See attachment on the following page.



I'm a retired non-permanent seasonal ADF&G Southeast Wildlife Research Technician from 1973-2016 and a former seasonal GMUs 1, 3 and 4 Guide, 1979-2017.

I'm submitting comments pertaining to Proposal 12-5AAC:92.510. Areas Closed to hunting.

Based on my long history and knowledge from different perspectives of the brown bears not only on Admiralty Island but throughout Southeast Alaska.

From 1973 to 2016 I was involved with a variety of wildlife research projects from Misty Fiords National Monument at the south along the mainland to Wrangell St. Elias National Park Preserve to the north of Southeast Alaska including most of the large islands that makeup the Tongass National Forest of Southeast Alaska. Primarily known as a brown bear expert having accumulated over 1000 bear captures radio-collared and tracked. I've captured and radio-collared more brown bears utilizing foot snares than anyone on the planet.

I also invented a single-catch DNA hair trap for brown bears as a tool for conducting population estimates. This methodology proved that by deploying these single-catch hair traps on any riparian stream in Southeast Alaska we could get the minimum number of bears utilizing any stream in Southeast. This brown bear DNA single-catch hair trap has been utilized in conducting population estimates in several locations on Chichagof Island and along the mainland of Southeast Alaska from Misty Fiords to Yakutat Forelands. Not to mention I traveled to Mongolia's Great Gobi Desert with a team of scientist to where this single-catch hair trap was utilized to gather DNA information on the Gobi Bears, the most endangered bears on the planet.

In addition, I have extensive experience safely capturing and radio-collaring and tracking Sitka black-tailed deer, wolves, wolverines and black bears that inhabit the temperate rainforests of Southeast Alaska and the only person to successfully capture and radio collar elk on both Etolin and Zorembo Islands, in addition I participated in the captures of mountain goats in Misty Fiords to trade for the Etolin elk and captured mountain goats for the Revilla Introduction plus I captured mountain goats for Mount Juneau reintroduction.

From 1979 to 2017 as a seasonal Guide in GMU's 1, 3 and 4, I have likely skinned out over 100 bears. No hunts were ever conducted where wildlife research studies were being conducted

ADF&G Wildlife Division conducted brown bear research on Admiralty Island from 1981 to 1999. Utilizing foot snares as a capture method in August of 1981 I fitted the first VHF radio-transmitter on a brown bear in Southeast Alaska on Admiralty Island in Hawk Inlet. During this Admiralty brown bear study I captured and fitted and radio-tracked over 300 brown bears with VHF radio-transmitters while simultaneously conducted population estimates and gathered basic brown bear ecology, home-range size, den sites etc. radio-tracking some individual bears for up to 13 years.

It also happens that in 1996 I safely captured a 2 year old brown bear on Killisnoo Island adjacent to the village of Angoon and relocated that bear. I also happen to own land on Killisnoo Island. And in July of 1999 with the urging and aide of the Village of Angoon and Department of Public Safety I safely captured a sow brown bear and her 4 coy female cubs in the village of Angoon and safely relocated the family group to another Admiralty location.



In September 2001 again utilizing foot snares I captured and fitted a NE Chichagof, Game Creek brown bear with the first GPS/VHF transmitter utilized in Southeast Alaska. Ever since GPS/VHF radio-transmitters have become the standard.

Between the combination of guiding and having been the primary brown bear capture person for any brown bear research project in Southeast from 1973 to 2016 I've pretty much slogged up nearly every one of 55 salmon streams on Admiralty Island and all of those on NE Chichagof and many of the mainland streams from Misty Fiords to Yakutat Forelands and Wrangell/St. Elias Preserve. While doing this work, I've survived 5 brown bear attacks.

This proposal appears to be thinly veiled as a "bear control" method that would somehow benefit the village of Angoon. I would argue that this proposal makes an assumption with no data to support it by making the suggestion that the bears that might stumble into the nearby village of Angoon are also the brown bears that have traveled exclusively from the Mitchell Bay Closed Area. There are only two salmon streams of any significance in Mitchell Bay, in recent years it's been well documented by ADF&G Commercial Fisheries that salmon escapements on numerous Admiralty salmon streams have been in decline or failed which in turn forces bears to roam and search more widely in other lesser valued habitats for other foods to forage on.

I would make the argument that there is plenty of data across Alaska and North America that a more probable cause is as well documented across rural Alaska and North America and if it is perceived that there are higher numbers of bears visiting Angoon more frequently, the village of Angoon which is essentially located on a peninsula, more often than not these bear visits might be more associated with the village landfill and villagers solid waste while fewer salmon and natural foods are scarce. Contrary to perception, it is well documented with some radio-collared brown bears utilizing rural landfills in Southeast Alaska those bears often travel to and from a landfill from a much greater distance in search of alternative foods.

And to add to the complexity of that, it's also well documented across North America within bear populations that female bears will bring their cubs closer to humans or human development as a survival strategy to keep their young from male bears. In times of food shortages among bear populations such moves may become more frequent.

Home range size of brown bears are driven by food quality and sex. The home range size of an adult female brown bear on Admiralty Island is 12 square miles. The home range of an adult male brown bear on Admiralty Island is 40 square miles. These are the smallest home range sizes for brown bears in North America. A female brown bear on Admiralty Island may live to be 30 years old, if one observes a female on a specific stream she likely grew up there on that stream or nearby and she will likely die there. Brown bears are the second slowest reproducing big game animal in North America, moreover, the female brown bears that inhabit Admiralty Island are the oldest female brown bears in North America to breed at the age of 6 years old plus they may keep their cubs for up to 4 years.

As an individual who has captured over 1000 bears, and radio-tracking over 300 hundred on Admiralty having been involved with plenty of brown bear food habit analysis and stable isotope analysis from 1981 to 1999 the presence of deer in an Admiralty brown bear diet is not unusual to occur from winter killed deer but a rare event for an Admiralty brown bear to actually stalk and kill deer.



I also would make the point that by opening the Mitchell Bay Closed Area as a hunting area, that area would be only utilized by a handful of the elite but simultaneously creating additional strife, conflicts and confrontations among other user groups in “the one way in and one way out” of Mitchell Bay, in addition in my view opening the Mitchell Bay Closed area would rob the local Angoon residents of the opportunity to explore a fledgling Mitchell Bay “Bear Viewing Area” business combined with the long existing since 1937 Across Admiralty Canoe Route, which would benefit far more locals than a few of the far away hunting elite.

Thank you for the opportunity to comment,

LaVern Beier

Juneau, Alaska



Submitted by: Patrick Bendon

Community of Residence: Tacoma, WA

Comment:

Proposal 10: I do not support this proposal

Proposal 11: I do not support this proposal.

Proposal 28: I do not support this proposal

Proposal 30: I support this proposal

Proposal 33: I support this proposal

Proposal 34: I support this proposal

Proposal 36: I do not support this proposal

Proposal 37: I do not support this proposal

Proposal 41: I support this proposal

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose

Proposal 11: Oppose

Proposal 21: Oppose

Proposal 28: Oppose

Proposal 30: Support

Proposal 34: Support

Proposal 36: Oppose

Proposal 37: Oppose

Proposal 41: Support



Submitted by: Nick Bendon

Community of Residence: Buckley, WA

Comment:

Proposal 10: I do NOT support this proposal

Proposal 11: I do NOT support this proposal

Proposal 28: I do NOT support this proposal

Proposal 30: I support this proposal

Proposal 36: I do NOT support this proposal

Proposal 37: I do NOT support this proposal

Proposal 41: I support this proposal

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose

Proposal 11: Oppose

Proposal 21: Oppose

Proposal 28: Oppose

Proposal 30: Support

Proposal 36: Oppose

Proposal 37: Oppose

Proposal 41: Support



Submitted by: Cody Bennett

Community of Residence: Juneau

Comment:

I oppose the following proposals to reduce the bag limit for deer:

Proposal 10 (Kevin Maier)

Proposal 11 (Paul Johnson)

As noted in ADFG response, this change does not provide biological benefit. Should adverse impact be noted in future years, this proposal could be reintroduced.

Thank you,

-Cody



Submitted by: William Bergmann

Community of Residence: Petersburg, Alaska

Comment:

I oppose Proposals #22 and #23 which would allow motorized vehicles in Section 1B, essentially Thomas Bay/Muddy River area.

I started hunting in that area more than 30 years ago. Now that I'm 75, I still like to walk or ride a bike while moose hunting there. I think it is a wonderful way to hunt moose rather than riding a motorized vehicle.

Please don't pass proposals #22 and #23. Thank you. William Bergmann

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 22: Oppose

Proposal 23: Oppose

Proposal 33: Oppose



Mike Bethers
PO Box 210003
Adelce Bay, AK
99821

12/14/22

ADFG Board Support
Attn: Board of Game Comments
PO Box 115526
Juneau AK 99811-5526

Please provide to Bd for upcoming
Bd meeting

Dear Board of Game

- Please oppose Proposal 10, which
proposes to reduce the Unit 4 deer bag
limit from 6 to 4. This Proposal is
totally unfounded and cannot be justified.
- The population is at or near carrying capacity
with no conservation concerns
 - The claim that Juneau deer hunters are
preventing Fed Qualified hunters from getting
their deer is totally bogus. Subsistence harvest is
down because subsistence hunting effort is down
50%. They need to hunt to get deer. Refer
to ADFG harvest data.
 - The JDAC ~~Does~~ ^{Does} not support this
proposal submitted by the chairman of
the JDAC

The
Mike Bethers



PC18

Submitted by: Rachel Biggs

Community of Residence: Klawock, AK

Comment:

Proposal #202

I oppose #202

I believe closures should be utilized to maintain healthy wolf populations.

Please also see optional Proposal survey below.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 42: Oppose
Proposal 43: Oppose
Proposal 45: Support

Proposal 46: Oppose
Proposal 47: Support
Proposal 48: Support

Proposal 49: Support
Proposal 50: Support
Proposal 51: Support

Proposal 52: Support
Proposal 53: Support
Proposal 54: Support

Submitted by: Rachel Biggs

Community of Residence: Klawock

Comment:

Please see optional survey below.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 45: Support
Proposal 46: Oppose
Proposal 47: Support

Proposal 48: Support
Proposal 49: Support
Proposal 50: Support

Proposal 51: Support
Proposal 52: Support
Proposal 53: Support

Proposal 54: Support



PC19

Submitted by: Robert Birk

Community of Residence: Saranac, New York

Comment:

Bowhunting is an effective and popular way to harvest game. It is a lot harder to harvest game but it is very popular way to hunt. To shorten the archery season is a disjustice to bowhunting especially to shorten it during the rut season and to put gun hunting during that time. Opening more archery seasons is a great ideal and would promote more bowhunters coming to Alaska.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support

**PC20****Submitted by:** Arthur Bloom**Community of Residence:** Juneau/Tenakee Springs, AK**Comment:**

I am opposed to opening the Mitchell Bay Closed Area to bear hunting. Over 95% of Admiralty Island is already open to bear hunting and there is no need to open a traditionally closed area, especially in the vicinity of Angoon. The proponents logic concerning food security and bear/human conflicts is questionable. High quality bear viewing opportunities on private lands should be encouraged.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 4: Oppose
Proposal 5: Support

Proposal 10: Oppose
Proposal 11: Oppose

Proposal 12: Oppose
Proposal 21: Oppose

**PC21****Submitted by:** Bob Bourland**Community of Residence:** Damascus, oregon**Comment:**

Oppose proposal 19 to shorten archery elk season on the island. There is not enough archery only opportunities in Alaska, don't recommend changing this one.

I also support the other proposals by the Alaska Bowhunters, proposals 16, 24,29,30.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support

**PC22****Submitted by:** Forrest Bowers**Community of Residence:** Juneau, Alaska**Comment:**

See attached.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 36: Oppose

Proposal 37: Oppose

Proposal 41: Support

See attachment on the following page.



Forrest R. Bowers
2904 Simpson Avenue
Juneau, Alaska 99801

January 3, 2023

Mr. Jerry Burnett
Chair, Alaska Board of Game
P.O. Box 115526
Juneau, AK 99811-5526

Comments on Proposal 36

Dear Mr. Burnett:

I oppose Proposal 36 seeking to reduce the bag limit for sooty grouse on the Juneau road system from 5 birds per day to 3 birds per day. There is no conservation concern for sooty grouse in the Juneau area. Current regulations and hunting practices provide considerable conservation buffer for sooty grouse in the Juneau area. Much of the sooty grouse habitat on the Juneau road system is inaccessible to hunters because of steep topography and remoteness, creating natural refugia for grouse. Most of the harvest is comprised of male birds and many hunters choose to only harvest male birds. Even in terrain that is accessible to hunters, not all birds present are hooting on a given day and some birds are positioned in areas where they can't be spotted or a clean shot is not possible.

Weather conditions likely play a larger role in grouse population size than does hunter harvest. The Juneau area has experienced several consecutive wet, cold springs recently, likely driving the downturn in grouse numbers observed in 2021 and 2022. Alaska Department of Fish and Game survey data suggest that sooty grouse cycle through periods of high and low density. While the 2022 density estimate is the lowest in the 8-year time series presented in staff comments, it is similar to estimates from prior years. Since sooty grouse are relatively short-lived birds, I expect grouse numbers to rebound quickly after a year or two with favorable weather conditions during the hatch.

Proposal 36 cites concerns over methods hunters use to access grouse habitat. Lowering the bag limit is not the tool to address this concern. Bag limits are a conservation measure and there is no conservation concern for sooty grouse in the Juneau area. Social concerns such as methods and means are better addressed through other restrictions. One option for the Alaska Board of Game to consider, if they felt compelled to act on social concerns raised in Proposal 36, would be to limit the use of motorized vehicles to boats and highway vehicles when grouse hunting in the Juneau area.

Thank you for considering my comments and for your service on the Alaska Board of Game.

Forrest R. Bowers



Submitted by: Barry Brokken

Community of Residence: Juneau

Comment:

Proposal 41:

As a Juneau resident, hunter, and trapper, I would like to see this issue addressed for what it is. I sat on our regional advisory committee when this "management area" was proposed, and heard plenty from all sides.

Some thought a "local, viewable" wolf pack was a wonderful thing, with great commercial potential. Others liked the idea of "living amongst the wolves!".

Deer hunters were rightfully concerned, and I voted against the proposal.

Alas, it, and hunter's fears, came true.

As a Douglas Island deer hunter for 35+ years, I have seen the ups and downs of that population, have taken many dozens of deer there, but none, zero, in the last 6 years. I quit looking 3 years ago, as it is abundantly clear they need all the help they can get.

There is a robust black bear population on the very small island that undoubtedly preys on fawns, but the presence of wolves on top of that is over the top.

The mainland has a very robust wolf population, and some of those animals move freely between the mainland and Douglas Island.

I see no reason to have any special regulations pertaining to wolves on the island.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 41: Oppose



Submitted by: Mark Buchkoski

Community of Residence: Juneau Alaska

Comment:

Support of Prop1. Only makes sense and safety should always come first

Support of Prop 10. Limiting deer harvest in Unit 4 from 6 to 4 deer is a good start to finding a compromise w the federal subsistence push to ban non-rural hunters from hunting in much of Unit 4. Again a good start.....

Support of Prop 41. I have lived in Juneau since 1987.....hunted deer on Douglas every year. Built a primary residence on the island in 2010. The wolf issue in my opinion is one that regulates itself(r & K species) Seems the special management plan came about from public outcry more than an actual need to help protect a wolf population I'd be suspect to believe public dollars and department time can be spent better elsewhere



PC25

Submitted by: John Burick

Community of Residence: Juneau, AK

Comment:

Proposal 29:

I support this proposal if adopted, however a map with the designation of the additional hunting area needs to be included/provided for individuals registering for the hunt as well as to the public in an effort to eliminate harassment to hunters and false accusations to law enforcement (the public needs to know the area is now open for hunting). I saw no map included with the proposal.

Proposal 30:

I support this proposal which would open and offer additional hunting grounds for those interested in Archery.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 29: Support

Proposal 30: Support



PC26

Submitted by: Bryan Burkhardt

Community of Residence: Clarkston, Michigan

Comment:

I support proposals 16,24,29 and 30.

I strongly oppose proposal 19.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support

Proposal 24: Support

Proposal 30: Support

Proposal 19: Oppose

Proposal 29: Support



PC27

Submitted by: Olcay Caf

Community of Residence: Juneau

Comment:

Proposal 41. Too many wolf on Douglas island. harvest a deer almost a miracle... We can't eat wolf

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose

Proposal 41: Support

Submitted by: Olcay Caf

Community of Residence: Juneau

Comment:

I like to keep bay limit the way.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 36: Oppose

Proposal 37: Oppose



PC28

Submitted by: Ben Case

Community of Residence: Petersburg, Alaska

Comment:

Re: Proposal 5; change the waterfowl season....

Dear Board of Game Chairman and board members,

Thank you for the opportunity to comment and all your hard work.

I'm in opposition to changing the waterfowl season in Units 1-4 as proposed in #5, and strongly support addressing the issues related to this proposal by changing the proposal to a consistent waterfowl season of September 15-December 31.

As an avid waterfowl hunter of Southeast Alaska for 27 years I feel there is much more value in having the season open through November and through all of December, especially the holiday breaks when younger hunters have the opportunity to hunt. I've lived and hunted places in the lower 48 that split their seasons. While I realize there's good rationale in some places for split seasons it does create problems for hunters to keep track of mid-season closures. I also feel bird migrations in SE make it more challenging compared to places in the lower 48 to time it right. Thus, a mid-season closure here would be counter productive and frustrating because inevitably there will be times when the birds and weather align but the season is closed mid season. Also, opening the season September 1 is not appropriate for SE. It's my experience that fewer hunters pursue birds the first two weeks of September as compared to later in the season. Besides being too early in the migration for

consistent hunting, there are a plethora of other hunting and fishing opportunities during the first two weeks of September when the weather is milder.

Best regards,

Ben Case

Petersburg, AK

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 5: Oppose
Proposal 15: Support

Proposal 16: Support
Proposal 17: Support

Proposal 22: Support
Proposal 25: Oppose

Proposal 26: Support



PC29

Submitted by: Dorothy Chapman

Community of Residence: Juneau, AK

Comment:

Prop 41) The wolves on Douglas Island are hurting the deer population that we rely on for food, more steps need to be taken to reduce their population.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Support
Proposal 2: Support
Proposal 3: Oppose
Proposal 4: Support
Proposal 5: Support
Proposal 6: Support
Proposal 7: Support
Proposal 8: Support

Proposal 9: Support
Proposal 10: Oppose
Proposal 11: Oppose
Proposal 12: Support
Proposal 13: Support
Proposal 14: Support
Proposal 17: Support
Proposal 18: Support

Proposal 19: Support
Proposal 21: Oppose
Proposal 26: Support
Proposal 28: Support
Proposal 29: Support
Proposal 30: Support
Proposal 31: Support
Proposal 32: Support

Proposal 34: Support
Proposal 35: Support
Proposal 36: Support
Proposal 37: Support
Proposal 38: Support
Proposal 39: Support
Proposal 40: Support
Proposal 41: Support



PC30

Submitted by: Wade Chappell

Community of Residence: Juneau, Alaska

Comment:

There is no need to reduce the bag limits on sooty grouse and/or ptarmigan in the Juneau area. ADF&G has stated that the populations are healthy and hunting has little impact on the population.



Submitted by: Joe Cisney

Community of Residence: Petersburg

Comment:

My name is Joe Cisney. I'm writing in opposition of proposition 22.

I am a resident of Petersburg and an occasional user of the Thomas bay road system.

I use the road system for recreational purposes which include hiking, fishing and hunting.

I do not see the need to change the hunting regulation to allow hunting from a Motorized vehicle. With the obvious decline of the moose population in that hunting area I feel it would put unnecessary pressure on the moose population.

Joe Cisney

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 22: Oppose



Submitted by: Jeremy Collison

Community of Residence: Petersburg, AK

Comment:

My name is Jeremy Collison, I live in Petersburg, AK. I am writing in support of proposal 16. To further expound on the reasons for this proposal I would like to point out that the vast majority of the existing Petersburg Management Area is mountainous with very little lowlands. This often results in being buried in snow by early november which leaves only a very small percentage of the area accessible. Two of the 3 main roads with access outside of town are not plowed in the winter further limiting access to even more of the lowlands.

Thank you for your time and service.

Submitted by: Jeremy Collison

Community of Residence: Petersburg, AK

Comment:

My name is Jeremy Collison, I live in Petersburg and I am an avid hunter. I am opposed to proposal 22 for the following reasons. We have watched a fairly steady decline in moose harvest numbers in the Thomas Bay/Pt. Agazi area over the past decade. I believe that opening up vehicle access to this area will only exacerbate the issue. This protection has been in place for a very long time and it is my belief that, if lifted, there will be a flood of new vehicles and hunters from the surrounding communities pouring in. With stringent antler restrictions already in place and the existing limitations on access, what other population controls are left, short of going to a draw hunt. As a secondary effect, I believe that this will also negatively impact the deer population. The amount of deer shot while road hunting for moose would, in my opinion, be a significant factor

for the surrounding areas. I would also like to point out that there are driving permits available to disabled hunters for use in non-motorized vehicle areas.

Thank you for your time and service.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support

Proposal 22: Oppose



PC33

Submitted by: Amanda Compton

Community of Residence: Juneau, AK

Comment:

Re: Proposal 10

Position: Oppose

Rationale: There is no logic behind a reduction of the bag limit in this area. Why reinvent the wheel when ADF&G has illustrated deer populations are near habitat carrying capacities in Unit 4 and there is an adequate population to support hunting interests. Hunting deer is a healthy hobby that if populations are high enough to support, should be encouraged. It supplements our food costs which are notably escalated. Please oppose proposal 10.

Submitted by: Amanda Compton

Community of Residence: Juneau, Alaska

Comment:

Re: Proposal 36

Position: Oppose

Rationale: I see no logic behind a reduction of the grouse bag limit over the entire Juneau road system. The area is a substantial portion of land with a robust enough of a population to support hunters willing to put in the effort. Please oppose this proposal.

Submitted by: Amanda Compton

Community of Residence: Juneau, AK

Comment:

Re: Proposal 37

Position: Oppose

Rationale: I see no logic in a reduction of the ptarmigan bag limit for the entire Juneau road system area. This region is substantial enough to support all interested hunters of which there just don't exist enough to warrant this proposition. All it does is reduce the amount of affordable and approachable hunting opportunities for residents without boats; it skews the access to supplement our food costs which are notably substantial. Hunters target limited areas and there exist many areas to effectively hunt ptarmigan. Additionally, the effort to access

many of these birds is a natural management of bird kills; most people aren't going to climb 3K'. This low pressure hunt - combined with ADF&G's wisdom that it's weather conditions through the birds' nesting season that drives ptarmigan numbers - suggests a more effective approach is to change the weather. In other words, I think Proposition 37 is an ineffective population tool and I encourage opposition to the Proposal.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose

Proposal 36: Oppose

Proposal 37: Oppose



PC34

Submitted by: Miguel Contreras

Community of Residence: Hoonah, Alaska

Comment:

Decrease the deer bag limit in unit 4 from 6 down to 4. Don't use deer poop counting as a data collector because its clearly inaccurate.

If you are not going to decrease deer bag limits, then limit the amount of does allowed per season from an open season down to 1 or 2 per season.

If you dont do either of those, limit to a minimum size bucks only per season. No shooting fawns does.

Don't group Admiralty, Baranof, and Chichagof islands into one unit. Hunting pressure is significantly different for each island and data becomes inaccurate when pooling some of the largest islands in Alaska.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Support with Amendment

Proposal 2: Support with Amendment

Proposal 3: Oppose

Proposal 4: Oppose

Proposal 5: Oppose

Proposal 6: Support

Proposal 7: Support

Proposal 8: Support

Proposal 9: Support

Proposal 10: Support

Proposal 11: Support

Proposal 12: Support

Proposal 13: Support

Proposal 14: Support

Proposal 15: Support with Amendment

Proposal 16: Oppose

Proposal 17: Support

Proposal 18: Support

Proposal 19: Support

Proposal 20: Support

Proposal 21: Support

Proposal 22: Support

Proposal 23: Support

Proposal 24: Support

Proposal 25: Support

Proposal 26: Support

Proposal 27: Support

Proposal 28: Support

Proposal 29: Support

Proposal 30: Support

Proposal 31: Support

Proposal 32: Support

Proposal 33: Support

Proposal 34: Support

Proposal 35: Support

Proposal 36: Support

Proposal 37: Support

Proposal 38: Support

Proposal 39: Support

Proposal 41: Support with Amendment

Proposal 42: Support with Amendment

Proposal 43: Support with Amendment

Proposal 44: Support with Amendment

Proposal 45: Support

Proposal 46: Support

Proposal 47: Support

Proposal 48: Support

Proposal 49: Support

Proposal 50: Support

Proposal 51: Support

Proposal 52: Support

Proposal 53: Support

Proposal 54: Support



Submitted by: Douglas Corl

Community of Residence: Petersburg, AK

Comment:

Proposal 16- I am opposed to the proposed lengthening of the bow hunting season for deer in the Petersburg Management Area for the following reasons:

- 1) As the regulation stands now, bowhunters enjoy double the length of the open season that rifle hunters do.
- 2) Bowhunters are allowed twice the legal possession limit that rifle hunters are.
- 3) Bowhunters are able to hunt deer for the entirety of the rut. Rifle hunters are cut short halfway through.

Being allowed to hunt 2 1/2 months to be able to harvest 2 deer is more than enough time; There really is no reason to modify the existing regulations.

Proposal 24- I oppose hunting for Black Bears anywhere within the Petersburg Creek drainage. While it is true that there are many other uses currently in effect for the area including deer and moose hunting, many locals and nonresidents-both hunters and nonhunters alike- enjoy being able to venture up the creek and see Bears all spring and summer into the Fall just about any day.

There are no shortage of Black Bears in Southeast Alaska. Hunters have many places to go to harvest bears. But there are not too many places people can go within a very short distance from a community and see Bears on a daily basis. The BOG has maintained a

longstanding precedent to allow Bears to roam the Petersburg Creek drainage unmolested. I hope this board continues to do so.

Proposal 5- This Department generated proposal is perplexing. The author(s) state

the current regulation is a "regulatory burden" because of "inconsistent interannual season dates" and that it creates a "complexity for hunters, enforcement", etc. I have trouble believing this because clearly one opening and closing day is half as complex as 2 opening and 2 closing days. And if there was an enforcement problem we would have heard about it by now, but we have not.

Furthermore, a split season will definitely disenfranchise young hunters home from school over the Thanksgiving holidays. Because that mandatory 2 week closure will in all likelihood fall around that time. Many families have customarily and traditionally hunted during the Thanksgiving holidays for generations for waterfowl. It does not seem right to take that opportunity away from them.

The Waterfowl Hunter survey that was conducted in either 2006 or 2008 by the department-and the data that was gleaned from that survey, helped set the new Regulation put in place at the 2019 SE Alaska BOG meeting, namely, the alternating annual starting date for Waterfowl hunting. Back then the BOG evidently chose to disregard the final tabulated data from that survey that indicated that 35% of the total hunters surveyed supported a September 1st opening, while 41% favored a September 15th opening and 24% wanted an October 8th starting date.

I hope the board will note this and return the opening day of Waterfowl season back to September 15th with a December 31st closure, which is clearly the best compromise.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 5: Oppose

Proposal 16: Oppose

Proposal 24: Oppose



Submitted by: Jonas Crabtree

Community of Residence: Wrangell, AK

Comment:

Jonas Crabtree

Proposal 17- Support

I've lived in Wrangell since 2015 and have spent over 60 days on and around the shores of Zarembo Island for personal pleasure and for work as a field guide. On several occasions I've seen large herds of elk (10+) grazing on the island. In my opinion, every elk I've spotted on Zarembo has looked healthy. In addition to seeing a good number of elk on Zarembo, I've also stumbled upon a lot of elk sign around the shoreline of Zarembo. If there is additional evidence of a health population of elk then I believe a properly managed elk drawing each fall is appropriate and fair for our community and for the sustainability of the natural resources on the island. I fully support proposal 17.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support



Submitted by: Victoria Curran

Community of Residence: Sitka, Alaska

Comment:

see attached

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose

Proposal 25: Oppose

Proposal 45: Support

Proposal 46: Oppose

Proposal 47: Support

Proposal 48: Support

Proposal 49: Support

Proposal 50: Support

Proposal 51: Support

Proposal 52: Support

Proposal 53: Support

Proposal 54: Support

See attachment on the following page.



Support: 45, 47, 48, 49, 50, 51, 52, 53, 54
Oppose: 46, 202, 24 and 25

Dear Chairman and Board Members:

I implore the Board of Game to take meaningful, immediate steps to protect Alexander Archipelago wolves on Prince of Wales Island. These wolves are genetically distinct and are now being wiped out because of mismanagement by the Alaska Department of Fish and Game. Prince of Wales Island is home to the genetically distinct Alexander Archipelago wolves. The solution to a reduction in Sitka Black-tailed deer is habitat restoration, not increased wolf trapping.

In 2015, when the wolf population was below 90 animals, the Board took action to reduce harvest. This management was beginning to succeed but in the fall of 2019, the State estimated that the 2018 wolf population was about 170 wolves, so they opened a two-month season with **no limit** on the number of wolves a trapper could kill and **no limit** on the number of trappers who could trap that season. This, predictably, resulted in the almost complete slaughter of the wolf population – ADFG estimates 165 of the 170 wolves were killed. Although the population estimate is not exact, it is clear that the number of wolves killed is under reported.

How can you let this stand? I hope these wolves will soon be listed as the endangered species they are. Wolves belong in Southeast Alaska and it is infuriating to me that the Department tasked with protecting this species for sustainability instead is overseeing their rapid demise. It is a failure of leadership.

I have lived in Southeast Alaska for over 40 years. My family hunts and fishes and we make our living commercial fishing. We strongly believe that wolves should be protected. There are very few wild places left with healthy wolf populations. We should be protecting the remaining wolves here, not slaughtering them.

At this meeting I urge you to **support** the following proposals:

Proposal 45: Raise the population objective from 150-200 wolves to 250-350 wolves in Unit 2, and raise the threshold for closing the season from 100 to 200 wolves;

PROPOSAL 47 Require wolf harvest information be reported within 48 hours of recovery and sealing within 14 days in Unit 2

Proposal 48: The minimum population objective for wolves in Unit 2 shall be based on a biological population viability analysis, using available demographic data. Recommend that ADF&G contract with a qualified researcher to conduct a population viability analysis for wolves in Unit 2 using available demographic data.

Proposal 49: Utilize the lower confidence interval of the wolf population for estimating the population in Unit 2

Proposal 50: Establish a population estimate and harvest limit based on Prince of Wales Island wolf population that excludes extrapolation from outer islands in Unit 2



Proposal 51: Establish a percentage of the Unit 2 wolf population that can be harvested on a sustainable basis, develop a harvest quota each season, require in-season reporting, provide the harvest to the public in real time, and allow three days' notice before closing the season by emergency order

Proposal 52: Establish a harvest quota for wolves, between 20% and 35% of the estimated wolf population in Unit 2

Proposal 53: Establish an estimated unreported mortality rate for Unit 2 wolves to be used for establishing the harvest quota

Proposal 54: Identify an area in Unit 2 for protected status for wolves as follows: Task the department with identifying 2/3rds of Unit 2 land area for protected status for wolves. Work to ensure the protected areas have relatively high deer carrying capacity and are large enough to be buffered from trapping pressure.

The Alaska Wildlife Alliance has done a very thorough job of providing background, data and rationale to support their proposals. Other than the emotional connection of a resident of Southeast I have nothing to add to their information.

I am strongly opposed to proposals 46 and 202.

I am also strongly opposed to proposals 24 and 25 which would open black bear hunting in the Petersburg Creek drainage to resident and nonresident hunters, and eliminate the Petersburg Creek Closed Area. My understanding is that this closed area was implemented specifically to provide bear viewing opportunities close to town for both residents and visitors. There are plenty of other places for people to hunt black bear, leave this area closed.

It is hard to overstate the value to residents and visitors alike to see bears and wolves in the wild here. Hunting and trapping are not the only human use of these species, they have intrinsic value, and economic value, living and breathing and going about their business as they have for thousand of years. My husband, who has spent the last 45 years on the ocean and in the woods throughout coastal Alaska ranks seeing wolves on the beach in Chatham and running along a river bank in Yakutat as the most breathtaking and memorable experiences he has had. Visitors who have the good fortune to hear or see a wolf will be telling that story the rest of their lives.

Please protect the Alexander Archipelago wolf population.

Support: 45, 47, 48, 49, 50, 51, 52, 53, 54

Oppose: 46, 202, 24 and 25

Thank you for your time and consideration.

Victoria Curran



Submitted by: Richard Curran

Community of Residence: Sitka

Comment:

I support proposals 45 and 47-54. Please adopt these scientifically based and reasonable proposals for wolf management. I do not support increased harvest of wolves and do not support current management - limit trappers not wolves. I oppose proposals 24, 25, 46 and 202 (which is not in your vote list below for some reason).

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose
Proposal 25: Oppose
Proposal 45: Support

Proposal 46: Oppose
Proposal 47: Support
Proposal 48: Support

Proposal 49: Support
Proposal 50: Support
Proposal 51: Support

Proposal 52: Support
Proposal 53: Support
Proposal 54: Support



Submitted by: Phillip Dalrymple

Community of Residence: TUCSON, ARIZONA

Comment:

I am an active bowhunter that has traveled to Alaska big game hunting on multiple occasions. I am commenting on the proposals specifically related to bowhunting opportunities in Alaska.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



Submitted by: Atlin Daugherty

Community of Residence: Juneau, Ak

Comment:

Hello my name is Atlin Daugherty I am 38 years old a third generation life long Alaskan born and raised in Juneau. I commercial fish and own and operate a big game hunting guide service operating in Units 1 and 4 here in Southeast Alaska.

10-11) Support, Four deer has been the Juneau bag limit before statehood. I think it would be wise for the state to try and work with and compromises with Federal Substance Board. A four deer bag limit is a lot better than what they have in their proposals.

12,13,14) Oppose, these three proposals go against The Brown Bear Management Plan . There was a tremendous amount of work put into the BBMP and people and organizations from across the board agreed to this plan and it is important to stay true to it and do not start altering it for our personal gains. My guide use areas are within Proposals 13 and 14 and would allow more opportunities for my self and business, I am still opposed due to the reasons stated above. We have a great stable system working in southeast please don't mess with it.

28) Support, Having an obvious land mark such as the one proposed in any hunt area is always a good idea. The current one in this particular hunt area is very vague when actually standing on the mountain in the hunt area. Due to the braiding of little sheep creek and try to decipher which braid is actually the right one to follow is very difficult. GPS malfunction and there should be a distinct land mark that does not leave a person guessing if they are with in the hunt area or not . With the proposed line change any guessing will be eliminated.

32) Support, Putting an emphasis on harvesting Billys is a good idea and I believe this proposal should be adopted region wide.

36) Support, This would slow and spread out the harvest on the Juneau road system. Another way to do this would be limit motorized accesses with in the Juneau road system. Increased accessibility due to snow-machines being able to access more country has increased harvest and has also increased access to grouse that were historically not accessible and were your breeding stock.

37)Support, Ptarmigan that are flocked up are very susceptible to multiple birds getting shot. Growing up I limited out many times. I have since realized that was probably a bit much. I have also observed a decline in the number of birds observed in areas I have hunted for the last 30 years. Going up and getting 5 per person is a lot more responsible.

41) Support, Why we are micromanaging these wolves has been a mystery to me ever since it started. Since when does the state do that!? Now with food security concerns and a documented decline of the deer population on Douglas Island and more restrictions of deer hunting on Douglas island, this proposal needs to be adopted.

5)Oppose, This really complicates things. Why mess with a season that has been in place for generations. There will be unnecessary confusion and more citations due to this proposal.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 5: Oppose
Proposal 10: Support
Proposal 11: Support
Proposal 12: Oppose

Proposal 13: Oppose
Proposal 14: Oppose
Proposal 21: Support
Proposal 28: Support

Proposal 32: Support
Proposal 36: Support
Proposal 37: Support
Proposal 42: Support



PC41

Submitted by: Dylan Davis

Community of Residence: Juneau, AK

Comment:

See attached

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 36: Oppose

See attachment on the following page.



Regarding Juneau area proposal #36

My name is Dylan Davis. I was born here in Juneau and have been a grouse hunter since 6 years old all the way up to my 34 years of age. Grouse hunting being my favorite type of hunting as well as my favorite outdoor activity is of great importance to me and I believe reducing the daily bag limit in the Juneau area is unnecessary, arbitrary and unfair. Snowmobiles and advanced backcountry ski setups have been in use for decades and while they are useful in some capacity when it comes to grouse hunting their utility and overall effectiveness in terms of the sport is quite situational. Snowmobiles, while dominant in areas above the timberline are ill suited for old growth forests and drainages of the lower elevations. Maintained trails are required for them to access more open terrain where their superior mobility comes into play. Juneau only has 2 such trails that permit these machines, these being the Dan Moller trail and the Lake Creek trail to Spaulding Meadows. This limits the hunting area accessed by snowmobile to certain parts of central and south Douglas island and a small corridor of terrain above the Spaulding plateau. Backcountry ski sets, while versatile in proper terrain are downright frustrating to use in 85% of available grouse hunting terrain in the Juneau area. They cannot be used without snow and must be carried to their usable altitudes in spring when much of the lower level snow has melted. Travel with skis is extremely difficult and dangerous when attempting a steep, straightline climb and their bindings and traction skins must be reset constantly in uneven terrain requiring amounts of uphill and downhill travel. They as well as snowmobiles are often foiled by the steep grades, stream gullies and dense fingers of trees which the targeted males of the species prefer to call from. Arguably the most effective tools for covering ground and trying to take a daily limit in the least amount of time and travel are simple snowshoes. The main advantage yielded by the two offending modes of transport highlighted first and foremost in this proposal is the ability of fast travel once in their area of influence allowing access to better and more productive grouse habitat at such distances to be unfeasible or unreachable by travel on foot. These areas are located on the west (backside) and south sides of Douglas and do not receive high hunting pressure by multiple user groups. If this proposal is directly or indirectly aimed at reducing the number of birds taken by skiers and snowmobilers, it will do no such thing as the Juneau road system does not intersect any of these drainages. This will, ironically allow those with the means to afford and possess these tools the ability to still make 5 bird takes while limiting the hunter on foot accessing from somewhere, for example, above the Methodist camp out the road to 3. A large part of what makes grouse hunting so special and unique is it's extremely low cost in both money and time when compared to other types of hunting and only allowing a daily limit of 5 to those with expensive ski setups, snowmobiles, boats and other motorized transport all but required to get away from all the road system drainages is an exclusionary decision. There are only 2 places in the Juneau area where these different user groups have the potential to out compete inexperienced, novice hunters and these are the Dan Moller trail and the greater Eaglecrest area. These most accessible and heavily used areas make up but a fraction of the productive grouse habitat accessed via the Juneau road system. Even if these situations existed



in multiple other areas of town a few contested areas should not be locations on which a rule of this type which affects the entire Juneau road system should be modeled. As for young or new grouse hunters there exists a vast amount of strategic options. From hills above Echo cove to the drainages of Lemon, Salmon, Lawson and sheep creeks as well as Thane road. Essentially anywhere a tall hillside can be climbed, there exist strong populations of grouse. Grouse hunting is fun and unique, but it is by no means easy, nor is the terrain that it takes place in. It is not something that everyone is capable of doing. Aside from physical endurance and fitness being a component the essential attributes required are force of will, determination and mastery over one's sense of quit. The daily limit currently stands at 5 but seldom is this number reached. The majority of my own outings have ended with a number fewer than this. To shoot a limit is an experience to be savored and to be proud of and if someone so chooses to push their day's take to 5 even if they out compete me they should still be allowed to regardless of location.



Submitted by: John Der Hovanisian

Community of Residence: Shelton, WA

Comment:

Proposal 5. I currently live in WA, but lived in AK for 30 years and continue to return to SEAK to hunt deer and waterfowl. I OPPOSE this proposal, but would favor a late November - late December split (say, close after the Thanksgiving weekend, reopen before the Christmas break) because most of the northern migrants I pursue pass through the areas I hunt late October - early November.



Submitted by: Bjorn Dihle

Community of Residence: Juneau, Alaska

Comment:

This comment is submitted by Bjorn Dihle to address the following: PROPOSAL 12 5 AAC 92.510. Areas closed to hunting. Open the Mitchell Bay Closed Area in Unit 4 to brown bear hunting as follows: It is proposed to open: "Mitchell Bay Area: Kootznahoo Inlet, Kanalku Bay, Favorite Bay and all land within 660 feet of mean high tide within that area; area open to the taking of brown bears".

I, Bjorn Dihle, a lifelong resident, hunter and bear guide of Southeast Alaska, am opposed to open these areas to bear hunting for the following reasons.

1. The vast majority of Unit 4 is open to bear hunting. There are only a few areas closed to bear hunting and only one, Pack Creek, that offers enough of a closed area to encompass the home range of some bears. These closed areas are vital for numerous reasons, including the skyrocketing demand of bear viewing tourism.
2. The village of Angoon's corporation Kootznoowoo is working to develop bear viewing in these areas and create a number of sustainable jobs for Angoon residents. Opening these areas to hunting would negatively affect bear viewing and lose Angoon a lot of potential economic benefits.
3. All Angoon residents I talked to are opposed to bear hunting in these areas. The Proclamation establishing Admiralty Island National Monument recognizes the importance of protecting the interest of Angoon and Alaska Native culture.
4. Bear hunting will not help resolve subsistence issues; it will cause more conflict and issues between sport and subsistence users. Elsewhere in the state bears can be significant predators of ungulates, but there are no studies and little to no observational data in Unit 4 that bears prey much on deer. Nor will it cut down on human and bear conflict. It will make things more tense.
5. The Proclamation establishing Admiralty Island National Monument declares the island is an outdoor living laboratory for the study of the bald eagle and Alaska brown bear." The few closed to hunting areas on the island support bear populations across the island and are useful laboratories for studying bears. These closed areas should and will become more useful economic drivers for bear viewing, photography and other non-lethal industries.

Thankyou,

Bjorn Dihle

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Oppose
Proposal 2: Oppose
Proposal 3: Support
Proposal 4: Oppose
Proposal 6: Oppose
:

Proposal 8: Oppose
Proposal 9: Oppose
Proposal 10: Oppose
Proposal 11: Oppose
Proposal 12: Oppose

Proposal 13: Oppose
Proposal 21: Oppose
Proposal 32: Support
Proposal 34: Oppose
Proposal 35: Oppose

Proposal 36: Support
Proposal 37: Support
Proposal 40: Oppose
Proposal 41: Support



PC44

Submitted by: Luke Dihle

Community of Residence: Juneau, AK

Comment:

I'm a lifelong Alaskan. I live in Juneau.

Proposal 10 & 11 I vote against. Winters are the major drivers of deer population. If we are concerned about hunting impact limit the number of does or limit out of state hunters. I don't believe limiting the bag limit to 4 will make any difference to the group who wants to limit non rural residents from hunting on public land.

Proposal 12 I'm against. This seems like a really good way to deepen the divide and increase hostility between rural and non rural residents and is unnecessary

Proposal 31 I support. I have hunted goats a number of times in this area. Seems safer to let people hunt earlier. If the quota is met then it will be shut and shouldn't harm numbers

Proposal 32I support. I support some sort of penalty like being unable to hunt for a certain period if you kill a nanny in all areas. Goats are vulnerable and this is a good incentive to make your most honest effort to kill a billy. Seems to really be working on Baranoff

Proposal 36 and 37 I support. As an avid grouse hunters numbers seem to have plummeted the last several years and taking some pressure off seems like a good idea

Proposal 41 I oppose. Douglas should not be treated the same as the ABC island. It's deer population is under a lot more pressure and therefore more vulnerable

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose
Proposal 11: Oppose
Proposal 12: Oppose

Proposal 21: Oppose
Proposal 31: Support
Proposal 32: Support

Proposal 36: Support
Proposal 37: Support
Proposal 40: Oppose



PC45

Submitted by: Andrew Dilley

Community of Residence: Juneau, Alaska

Comment:

After looking at the ADF&G provided data, I believe that all three of the proposals are unnecessary. I have grown up hunting the woods around Juneau including Douglas, Admiralty, and Chichagof. If anything I have seen deer more frequently over the past couple of seasons than any other years. The Juneau hunters that I know of that hunt any areas near Angoon, Hoonah, or Gustavus are few and far between. To suggest that Juneau residents are causing a problem for deer populations around any of those areas is absurd. I completely disagree with these proposals and I don't think I am alone or wrong. It has been backed by SCIENCE, I don't know what else we need to do to prove that we are not having a negative effect. As far as the proposed grouse and ptarmigan regulation changes, I know of very few upland bird hunters in Juneau and those that I do know probably do not kill a single bag limit all season. Please to not back these proposals.



PC46

Submitted by: Robert Dilley

Community of Residence: Juneau

Comment:

I am not in favor of any of these proposals. There are no shortages of grouse, ptarmigan, or deer in the Juneau area. ADF&G does not support these changes and they are the experts. Do not enact these proposed changes please. If a grouse or ptarmigan hunter takes the time to hike their butt off to get to the needed elevation to find these birds, good on them. I have rarely ran into anyone upland bird hunting when I have been out. In regards to the deer hunting, there is plenty of sign whenever I go out. I like having the option of taking 6 deer, as I can share meat with my extended family and we all can enjoy the harvest. Thank you for hearing my thoughts. Please deny the proposed changes.



PC47

Submitted by: Levi Dow IV

Community of Residence: Wrangell, Alaska

Comment:

17 I would like to be able have a chance to a elk someday.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support



PC48

Submitted by: John Dupree

Community of Residence: Petersburg Alaska

Comment:

Oppose proposal #5... No alternating season... No split season.. leave season at Sept 16 to Dec 31... Thanksgiving is a traditional family waterfowling opportunity as well as X-Mas vacation... for kids on school vacation... college and local alike ..ADFG has no skin in the game to bring this proposal to the table

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 5: Oppose



PC49

Submitted by: Tamara Eastaugh

Community of Residence: Wrangell AK

Comment:

Please open up elk hunting on zarembo island



PC50

Submitted by: Stuart Eddy

Community of Residence: Petersburg Ak

Comment:

I have been a Petersburg resident my entire life and have hunted Pt. Agazi for many many years. I'm opposed to any changes to the existing laws already in place.

My wifes family are property owners and have a cabin at Pt. Agazi and it's never been an inconvenience too hunt on foot or by bike from there or to drive and set up a tent and hunt out of that.

All other areas around Petersburg you are able to drive and it's nice that we have one area out of it all that's strictly walking or bike riding. Give's something for everyone.

Stuart Eddy

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 22: Oppose



PC51

Submitted by: Daniel Epperson

Community of Residence: Ione, Ca

Comment:

Please support prop 16, 24,29,30

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support

Proposal 24: Support

Proposal 30: Support

Proposal 19: Oppose

Proposal 29: Support



PC52

Submitted by: Luke Fanning

Community of Residence: Juneau, AK

Comment:

I am writing in opposition to proposal 36, which would reduce the bag limit for sooty grouse in drainages crossing the Juneau road system. I have been hunting grouse in the Juneau area for nearly 30 years. While I seldom feel the need to take the full limit of five birds, the proposed limit of three birds per day is unnecessarily restrictive and does not address or alleviate a conservation concern. It will also lead to confusion in many popular hunting areas, where hunters are either accessing hunting grounds from one drainage in order to hunt another, or where drainage status on a ridge line is not easily determined.

My understanding is that there is not a conservation issue that must be addressed, and that the Department of Fish and Game believes the birds stock is healthy. Additionally, grouse populations are impacted to a much greater degree by natural conditions, including weather.

This proposal will be cumbersome and confusing for both hunters and enforcement. The Juneau area has numerous prime hunting areas which can be accessed via drainages that cross the road system, but where some of the best hunting area faces drainages that do not cross the road system. For example, Douglas Island includes numerous access points on the East side of the island, which hunters often use to access ridge lines above the West side of the Island.

Imagine a grouse hunter who begins at Eaglecrest, and then hikes to a ridge line to find birds on a ridge above a West facing drainage, which either drains on the other side of the island, or where the drainage line is unclear. That hunter could be legally allowed five birds, but would then have to walk back to through a drainage where the bag limit is only three birds to access their vehicle. An enforcement officer would then have to determine where the birds were hunted, and where that location would have drained, in order to ultimately establish whether a bag limit was exceeded.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose

Proposal 21: Oppose

Proposal 37: Oppose

Proposal 11: Oppose

Proposal 36: Oppose

Proposal 41: Support

Submitted by: Luke Fanning

Community of Residence: Juneau, AK

Comment:

I am writing in opposition to proposal 37, which would reduce the bag limit for ptarmigan in drainages crossing the Juneau road system. I have been hunting ptarmigan in the Juneau area for nearly 30 years. While I have never taken a full limit of 20 birds, the proposed limit of five birds per day is unnecessarily restrictive and does not address or alleviate a conservation concern. It will also lead to confusion in many popular hunting areas, where hunters are either accessing hunting grounds from one drainage in order to hunt another, or where drainage status on a ridge line may not be easily determined (particularly if there are clouds).

My understanding is that there is not a conservation issue that must be addressed, and that the Department of Fish and Game believes the birds stock is healthy. Additionally, ptarmigan populations are impacted to a much greater degree by natural conditions, including weather.

This proposal will be cumbersome and confusing for both hunters and enforcement. The Juneau area has numerous prime hunting areas which can be accessed via drainages that cross the road system, but where some of the best hunting area faces drainages that do not cross the road system. For example, some of the best hunting areas are on ridge lines that ultimately drain into Taku Inlet, but which are commonly accessed from drainages and routes that cross the Juneau road system.

Imagine a grouse hunter who begins at Sheep Creek, and then hikes to a ridge line to find birds on a ridge high above, which either drains on the other side, or where the drainage line status is unclear. That hunter could be legally allowed 20 birds, but would then have to walk back to through a drainage where the bag limit is only five birds to access their vehicle. An enforcement officer would then have to determine where the birds were hunted, if they were all hunted in the same regulatory area/drainage, and where those locations would have drained, in order to ultimately establish whether a bag limit was exceeded. This proposal should be reasonably expected to result in confusion, and it does not stem from a conservation concern, as the ptarmigan population is very healthy.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose
Proposal 11: Oppose

Proposal 21: Oppose
Proposal 37: Oppose

Proposal 38: Oppose
Proposal 41: Support



PC53

Submitted by: Stephanie Farac

Community of Residence: Novato, CA

Comment:

Hello Board members,

I support all proposals pertaining to the wolves on Prince of Whales Island and against any proposal increasing brown bear harvests. Tourism is very important to the community, and wolves and bears are vital for the ecosystem. These wolves and bears are on public Lands and belong to all Americans. An unsustainable number of wolves were harvested in past years and allowing this again will cause a collapse in the ecosystem and bring ESA protections. These animals are worth more alive than dead. I spend thousands to see them in the wild. You were brought into this position to protect our wildlife, wild lands and manage it responsibly. Majority of us are not hunters and want our wildlife protected, but I understand the need to manage for all sides.

What inclined me to comment was seeing on Facebook a trapper bragging about trapping over 10 wolves in one weekend in Ketchikan. The picture was horrifying. My first thought was this is illegal. After finding out it was not, I was compelled to speak up. I am not a resident of Alaska, but I spend my hard-earned money to visit this beautiful place every year. Wildlife, especially wolves bring me there. There needs to be a bag limit for wolves everywhere in the state. It is not sustainable for any individual to be able to kill as many as possible. I am sure many kills go unreported. Also, the disrespect for wildlife is worrisome. Every hunter and trapper should have to participate in a workshop about the animal that they plan to kill and learn about their value in the environment. I do not have a problem with ethical hunting for food, but trophy hunting is barbaric. Alaska's ongoing war on predators is really about our own struggles to smartly coexist respectfully with nature.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Support	Proposal 14: Oppose	Proposal 27: Support	Proposal 41: Support
Proposal 2: Support	Proposal 15: Support with	Proposal 28: Oppose	Proposal 42: Oppose
Proposal 3: Support with	Amendment	Proposal 29: Oppose	Proposal 43: Oppose
Proposal 4: Support	Proposal 16: Oppose	Proposal 30: Oppose	Proposal 44: Oppose
Proposal 5: Oppose	Proposal 17: Oppose	Proposal 31: Oppose	Proposal 45: Oppose
Proposal 6: Oppose	Proposal 18: Oppose	Proposal 32: Support	Proposal 46: Oppose
Proposal 7: Oppose	Proposal 19: Oppose	Proposal 33: Oppose	Proposal 47: Support
Proposal 8: Oppose	Proposal 20: Oppose	Proposal 34: Oppose	Proposal 48: Support
Proposal 9: Oppose	Proposal 21: Support	Proposal 35: Oppose	Proposal 49: Support
Proposal 10: Support	Proposal 22: Oppose	Proposal 36: Support	Proposal 50: Support
Proposal 11: Support	Proposal 23: Oppose	Proposal 37: Support	Proposal 51: Support
Proposal 12: Oppose	Proposal 24: Oppose	Proposal 38: Oppose	Proposal 52: Support
Proposal 13: Oppose	Proposal 25: Oppose	Proposal 39: Oppose	Proposal 53: Support
	Proposal 26: Support	Proposal 40: Oppose	Proposal 54: Support



PC54

Submitted by: Randall Ferguson

Community of Residence: Sitka, Alaska

Comment:

Proposal #5 I have had outstanding duck hunting in the first 2 weeks of November. Please don't close it then. Thanks

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 5: Support with
Amendment



PC55

Submitted by: Friends of Admiralty

Community of Residence: Juneau, Alaska

Comment:

Friends of Admiralty opposition to Proposal #12

Friends of Admiralty is a Juneau-based organization that has advocated for land and wildlife habitat protection of Admiralty Island since 1990. A group priority is the utilization of a wide range of the Brown bear resource in the interest of all Alaskans. Our members include a broad range of recreational users, including hunters. We were one of the members of the Unit 4 Brown Bear Management Team in 1999.

We believe that certain relatively small, accessible areas lend themselves best to wildlife viewing, recognizing diverse public use of public resources. We oppose opening The Mitchell Bay Closed Area because:

- (1) it has been in place for decades, with wide acceptance from the public and governmental agencies;
- (2) it was originally designated by the BOG as part of an agreement to open the then existing Thayer Lake Closed Area on Admiralty Island;
- (3) Angoon, whose private lands exist within the Closed Area, has always supported the closure, and is currently exploring the economic potential of bear viewing there. If the area is opened, there will likely be user conflicts;
- (4) over 96 % of Unit 4, Admiralty Island, is open to bear hunting. Retaining the closure is not an unreasonable burden on bear hunters when there are many good alternate hunting opportunities nearby;
- (5) the Unit 4 Brown Bear Management Team agreed that Agencies should encourage high quality bear viewing opportunities on private lands (see P.6 of the 1999 Report).

John Neary

President, Friends of Admiralty Island



PC56

Submitted by: Thomas Gagnon

Community of Residence: Juneau, Alaska

Comment:

I'm opposed to decreasing the number of deer allowed to be harvested each year in the Juneau area!



PC57

Submitted by: Lucas Giese

Community of Residence: Juneau, AK

Comment:

My girlfriend and another friend hunted together. See attached Word document for our experience and proposed regulation changes.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 4: Support
Proposal 6: Support
Proposal 7: Support
Proposal 10: Support
Proposal 11: Support

Proposal 12: Support
Proposal 21: Support
Proposal 23: Oppose
Proposal 26: Oppose
Proposal 27: Oppose

Proposal 28: Support
Proposal 29: Support
Proposal 30: Support
Proposal 33: Oppose
Proposal 34: Support

Proposal 52: Oppose
Proposal 53: Oppose
Proposal 54: Oppose

See attachment on the following page.



Game & Fish Unit 3 Moose Regulations Proposal

This past fall, two friends and I hunted moose on Kupreanof Island. We spent 26 days on the island and had incredible hunting nearly the entire time. However, out of nearly 30 bulls we called in, only two were confirmed legal. We hunted with archery equipment, so the bulls we called in, we called in close. Getting good looks at their antlers was not an issue. All of the non-legal bulls were mature bulls (we didn't call in a single spike or fork) that had 1x1 or 1x2 brow tines. Most, if not all, of which will probably never grow more, keeping them illegal their whole life and passing on those genes to future calves. Of the two legal bulls we did find, our party shot one of them. The only reason his bull was legal though was because his left side was goofy. It was much smaller than the right, and had a single brow tine with a roughly 14-inch ladled palm with no points, thus making him a fork. His right side was a full paddle and single brow tine, much like the others we called in.

We met and talked with many other hunters while on the island, and some of them did not see one single legal bull during their entire hunt. We also talked to a couple Game & Fish biologists who said that bulls of all ages are being shot, so the antler restrictions meant to protect the prime breeding class, are not working. This year, too, less moose were harvested in Unit 3 than in previous years. One of our party members did this same hunt in 2019, and from what he could tell, the moose numbers had definitely not decreased. If anything, they had increased, which we think could be a sign of more illegal bulls.

We have brainstormed multiple potential solutions to this problem in Unit 3. Obviously, it cannot become an any-bull hunt, because that would draw too many hunters to the island. Doing an any-bull draw would also not be ideal, because it's a meat hunt for people on the island and close surrounding areas, and that would take away much of their opportunity. So, we propose that a draw for a set amount of Any-Bull permits is added. We think this could help in the long run, in that Any-Bull hunters might take some of the 1x1 and 1x2-browed bulls out of the gene pool. Another potential solution could be reducing the 50-inch and over width down to 40 inches and over. Not one bull we saw was over 50 inches, and we doubt very many bulls ever get that large. We did see three huge bulls that were close to 50 inches though, and would definitely have been over 40.

Please consider our proposals, or another one that may help the problem. We strongly believe that regulations need to change in Unit 3, both to reverse this trend of genetic selection for bad brow tines and so that hunters in the unit have a population of moose that are legal to harvest.



Submitted by: Dave Gordon

Community of Residence: Sitka, Alaska

Comment:

Dave Gordon Sitka Resident.

Proposal 5. Splitting the waterfowl season. I would support a split season only if the closure dates begin no earlier than November 15. A preferred date would be Dec 1 to allow for hunting opportunities over Thanksgiving weekend. If a split season is not to be provided I prefer the Season opens September 1.

In most years Waterfowl migrations through SE Alaska begins by September 1 and continues through mid-November. Opportunities to hunt waterfowl that are migrating through SE Alaska might be missed if there is a closure before November 15. After mid-November the population of waterfowl in SE Alaska is largely mallards and Canada geese that over-winter in SE Alaska

Thanks for the opportunity to comment

Dave Gordon



Submitted by: Grateful Dogs of Juneau

Community of Residence: Juneau

Comment:

Grateful Dogs of Juneau

PROPOSAL 40 – 5 AAC 92.520(a) Allow the take of deleterious exotic wildlife in the Mendenhall Wetlands State Game Refuge.

OPPOSED.

The Grateful Dogs of Juneau opposes PROPOSAL 40 due to the danger that the proposed action poses to the public who uses the Mendenhall Wetlands State Game Refuge. Between waterfowl hunting seasons, large numbers of the public utilize the refuge for wildlife viewing and outdoor recreation. Hunting for starlings and related wildlife would create conflicts with other users of the refuge. Grateful Dogs of Juneau concurs with the position of ADF&G on this proposal.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 40: Oppose



PC60

Submitted by: Jared Gross

Community of Residence: Wrangell, AK

Comment:

Greetings to the board.

My name is Jared Gross, I am commenting on proposal 17 and I am in favor of this proposal. I reside in Wrangell Alaska and I am an avid hunter who knows the difference between elk and deer sign.

I hunt Zarembo Island every year and have noticed a heavy increase of elk on the island. There are elk tracks, rubs, beaten down trails, and droppings everywhere you look. I have had multiple sightings of the animals every year over there. I strongly believe there is a sustainable population of elk for a hunt on the island. I would like to see the board approve this proposal. This is a thriving resource that could potentially provide meat in the freezer for whoever gets a tag.

I hope the board considers my comments in their decision on proposal 17.

Thank you,

Jared Gross

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support



PC61

Submitted by: Charlie Hamley

Community of Residence: Wrangell, Alaska

Comment:

Support proposal 17

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support



PC62

Submitted by: Alex Hedman

Community of Residence: Eagle River, AK

Comment:

Proposal 16 - Support. Extends bow season by two months, while retaining the existing bag limit; affords more hunting opportunity for bowhunters and community members.

Proposal 19 - Oppose. Essentially cuts archery season and lengthens "any weapon" (rifle) season, increasing harvest rates, and allowing rifle hunting during peak of the rut when elk can't think straight and are most vulnerable.

Proposal 24 - Support. Creating a registration-only archery hunt that requires in-person registration in Petersburg supports the local community (either through community harvest, or hunter spending on the local community).

Proposal 29 - Support. Extends goat season to archers (historically low harvest percentage), with minimal estimated impact to local goat population.

Proposal 30 - Support. Similar reasoning to my support for proposal 29; increased hunt opportunity/days to hunt, while maintaining relatively low harvest rates.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



PC63

Submitted by: Anthony Heil

Community of Residence: Wausau, WI

Comment:

I am supporting the use of archery in Alaska and the hunting opportunities for archers

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



PC64

Submitted by: Ben Higdon

Community of Residence: Juneau, AK

Comment:

Douglas island has seen a marked decrease in harvest numbers this year and while I completely agree with the one doe policy to help boost population numbers I believe if that's the goal then we also need to address the wolf situation. Yes the wolves travel between the mainland and Douglas and are an important part of the ecosystem that we all belong to and benefit from so I don't believe it should be attempted or proposed to try and eradicate them. However the balance seems to have tipped in favor of the wolves. I'm not a close to the road hunter and each season am on all peaks, ridges, valleys and drainages of the northern part of Douglas where most people wouldn't go because of access/time/amount of work to get a deer out of if you are successful in harvest and I believe that wolves are one of the more important factors in the decrease of deer sightings/harvests/even just sign that we have seen. Douglas is a great place to take new hunters where there are harvest opportunities in a relatively safe environment(as safe as AK can be) as well as a place where non boat owners like myself can go and spend a reasonable amount of time to find a deer to harvest. I expect to spend 3-5 days to find one with an ethical shot but that has turned into 8-10 the last few years while I'm seeing much more wolf sign. I do understand there are many factors (weather, hunter pressure, luck and predation from others like bears) so I appreciate your time listening. I do believe that to improve the deer numbers though we need to address the annual wolf limit at the same time as limiting/adjusting what the deer bag limits can be. We have a wonderful resource that could provide and sustain a healthy deer population and harvest if we look at it from as many vantages as possible. Thank you for your time. Ben

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose
Proposal 11: Oppose

Proposal 21: Oppose
Proposal 41: Support



PC65

Submitted by: Bruce Hoch

Community of Residence: PAGOSA SPRINGS CO.

Comment:

Keep up

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support
:



PC66

Submitted by: Mark Hofstad

Community of Residence: Petersburg Alaska

Comment:

Hello committee,

I would like to comment on proposal #22. I would like you to remove the special use condition regarding the prohibition on the use of land vehicles during the 1B moose hunt. There is absolutely no reason to have this rule in effect. I have a cabin in the area and I can drive my truck to a nearby bay and get into my skiff and hunt legally but if I spot a moose on my way to or on the way back to the cabin I am prohibited to pursue the moose. Unit 1B is not a special or conditional use area and this special rule needs to go away since it serves no management purpose. The only way I can hunt from my cabin is by either foot or bicycle, I believe this is the only area in SE Alaska or anywhere where such a rule exists. Since this rule serves no management purpose it's time to eliminate it. Thank you, mark hofstad

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 22: Support



PC67

Submitted by: Jim Holder

Community of Residence: Petersburg Alaska

Comment:

I support this hunt 100% it is sustainable there are multiple herds on the island I have personally seen up to 30 cows in one group multiple bowls ranging from spikes to massive six points at the department is not going to issue tags for these invasive species that they have transplanted on this island they need to explain this to the local population and what their intentions are with these animals thank you



Submitted by: Deidra Holum

Community of Residence: Ketchikan, Alaska

Comment:

Dear Chairman and Board Members:

Drones, Animal Cams, Night Vision Goggles, ATV's, Snowmobiles, Helicopters and more. With all these advantages for hunters and trappers what chance do other predators have for survival? How can they live their lives helping maintain healthy ecosystems when their sole purpose is to be hunted and destroyed?

I was born in Ketchikan before statehood and SE Alaska remains my home. Over the years I have hiked the mountains, explored bays and inlets and made trips up the gorgeous river systems in this area. To date the only wolf I have seen in the wild was Romeo of Mendenhall Glacier fame. This was a lone wolf in the Juneau area who was attracted to people bringing their dogs out to the glacier to play with him. Eventually Romeo was trapped in nearby mountains by someone who fantasized about fame and fortune by killing him. It was a sad day in Juneau when news of Romeo's death was announced.

Please stop the massacre of the unique but dwindling group of wolves that live on Prince of Wales Island. Give these animals protection and help their numbers return to sustainable levels based on the data provided to the board by the scientific community. Please help maintain the balance in nature brought about by top predators like wolves and bears. My hope is to see these animals in the wilds of SE Alaska and not as trophies on someone's wall.

I strongly support and urge your support of proposals: 45, 47, 48, 49, 50, 51, 52, 53 and 54.

I am strongly opposed to proposals: 24, 25, 46 and 202.

Thank you for including my input in your consideration.

Deidra Holum

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose
Proposal 25: Oppose
Proposal 45: Support

Proposal 46: Oppose
Proposal 47: Support
Proposal 48: Support

Proposal 49: Support
Proposal 50: Support
Proposal 51: Support

Proposal 52: Support
Proposal 53: Support
Proposal 54: Support



Submitted by: John Howard

Community of Residence: Juneau ak

Comment:

Proposal 36&37 need to keep ptarmigan daily limits the same

Proposal 41 needs to happen so the deer population can rebound for deer hunting



PC70

Submitted by: Bryan Hum

Community of Residence: Poland, OH

Comment:

Archery only hunting opportunities are dying in some states. With the decrease in hunting license sales nationwide, many states are expanding gun hunting opportunities to combat this and try to increase license sales. Please keep providing archery opportunities in Alaska. I haven't hunted Alaska yet, but hope to very soon. Thanks.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



PC71

Submitted by: Sharon Hunter

Community of Residence: PETERSBURG

Comment:

I do not support proposals 24 and 25 to allow black bear hunting in the Petersburg Creek area. The viewing of bears so close to town is a great pleasure to local residents and an attraction to our visiting tourists. The bears in this area are able to behave in a natural manner allowing great viewing pleasure as they have not been hunted which would change their reaction to people in the area. This is a rare benefit for those of us who enjoy the experience of seeing the bears. Please vote no on this issue.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose

Proposal 25: Oppose



PC72

Submitted by: Gerald Hunter

Community of Residence: Decorah

Comment:

I support the Pope and Youngs decisions

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Support

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



Submitted by: Deborah Hurley

Community of Residence: Kupreanof, Alaska

Comment:

Proposal 24 and 25

I am opposed to hunting of black bear in the Petersburg Creek Wilderness area, by bow, gun, or any other method.

As a 40 year resident of Kupreanof I feel Petersburg creek is a special place and we fought to have it designated as a Congressional designated wilderness area. Let's keep it a safe haven for all creatures.

The reason there are bears in the wilderness area is because there is no hunting allowed. We have traveled Southeast waterways for 40 years and have noticed a definite decline in bear numbers. In the past you would see enough bears to make it common, now it is a wow moment.

Wounded bears are aggressive and present a real danger to other users of the area. Shooting towards trails and waterways without clear sightings could injure or kill others.

Most bear hunters do not eat the meat. Especially in the fall when bears taste like the tide flat smells, i.e

Rotten fish. Every spring we are offered poorly dressed bear meat from out of town hunters that are required to salvage the meat.

Hunters want to open the Petersburg Creek wilderness area to bear hunting because they have killed all the other bears.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 23: Oppose

Proposal 25: Oppose

Proposal 24: Oppose

Proposal 33: Oppose



Submitted by: Mark Idone

Community of Residence: Juneau, Alaska

Comment:

I don't not agree with these proposals

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose

Proposal 21: Oppose

Proposal 37: Oppose

Proposal 11: Oppose

Proposal 36: Oppose

Proposal 41: Oppose



PC75

Submitted by: Eric Indreland

Community of Residence: Juneau AK

Comment:

See survey below

Oppose 1,10,11,36,37

Support 1-9 28-31 & 41

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Oppose
Proposal 2: Support
Proposal 3: Support
Proposal 4: Support
Proposal 5: Support

Proposal 6: Support
Proposal 7: Support
Proposal 8: Support
Proposal 9: Support
Proposal 10: Oppose

Proposal 11: Oppose
Proposal 21: Oppose
Proposal 28: Support
Proposal 29: Support
Proposal 30: Support

Proposal 31: Support
Proposal 36: Oppose
Proposal 37: Oppose
Proposal 41: Support



PC76

Submitted by: Timothy Ison

Community of Residence: Columbus , Indiana

Comment:

I am an archery hunter that has hunted Alaska before.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



PC77

Submitted by: Robert Jahnke

Community of Residence: Ward Cove

Comment:

proposal #4 I Oppose, It creates a more complex season when taking two weeks out of the middle. Just back the ending date to 12/15 every year. The only hunters at that time are targeting local seabirds that are not migratory for trophy value and not to put on the table. proposal #6 I Oppose , Nov. 10th is too early in unit 1a for prime pelts. Proposal # 7 I oppose, Not prime that early, [Nov.10th.] Proposal # 8, Support , are still prime until end of Feb. Proposal # 9, I support, In 2009 the trapper lost 74 days of our season when two years prior the hunt gained 71 days in the fall season. I've trapped since 1972 and never caught a Wolverine pregnant or with milk, they den in high country like wolves do, unit 1a has few road systems on the mainland, most of us trap the beaches. Proposal # 27 Oppose, no reason for this. We learned that here in Ketchikan when the trail buffers were eliminated a few years ago with the help of Senator Dan's office. Proposal # 42 Oppose, It's a buck only season here in 1a currently for 4 months and they are run down by Dec.1st. along with the fact that the antlers begin to shed in the beginning of Dec. .Please protect the residents right to feed their family and not turn this into a trophy hunt. ADF&G should not support this. Proposal # 45, I oppose, Proposal # 47, I oppose, Proposal

48, I oppose, Proposal # 49, I oppose, Proposal# 50, I oppose, Proposal # 51, I oppose, Proposal # 52, I oppose, Proposal # 53, I oppose, and Proposal # 54 I really oppose because it shows the Alaska Wildlife Alliances true colors, that they are against wolf control. Thank you for this opportunity.



PC78

Submitted by: Cole Jensen

Community of Residence: Juneau, AK

Comment:

DO NOT CHANGE WATERFOWL SEASON!! It's necessary to prevent the over hunting of certain species and a split season would damage migrations and returns.

On top of this, I know tons of families with the tradition of hunting for duck to eat for Thanksgiving dinner. A split season would ruin century-old traditions.

A split season would be bad for duck and bad for the hunters.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 5: Oppose



PC79

Submitted by: Chris Kalil

Community of Residence: Middletown

Comment:

I wish to approve and oppose the following

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support

Proposal 24: Support

Proposal 30: Support

Proposal 19: Oppose

Proposal 29: Support



PC80

Submitted by: Justin Kamps

Community of Residence: Jenison, MI

Comment:

Looking to continue to expand opportunities for archery hunting

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support

Proposal 24: Support

Proposal 30: Support

Proposal 19: Oppose

Proposal 29: Support



Submitted by: Joshua Keller

Community of Residence: Havre, Montana

Comment:

I oppose proposal 19.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support

Proposal 24: Support

Proposal 30: Support

Proposal 19: Oppose

Proposal 29: Support



Submitted by: Stacey Kleinsmith

Community of Residence: Chugiak, Alaska

Comment:

For Proposal 16, I ask for your SUPPORT. This proposal asks to lengthen an existing archery only hunt with the bag limit (2 bucks) to remain the same. This would allow more opportunity for pursuing early season deer in the alpine. This proposal would benefit all bowhunters who choose to utilize this hunt but would be of most benefit to local residents of the hunt area. This area is already limited to bow and arrow only with a bag limit of two buck deer and the only change this proposal would bring is added days of season to hunt.

For Proposal 19, please consider OPPOSITION. This proposal calls for cutting the Etolin Island archery elk season by half, and add a new any-weapon season with an additional 25 elk permits which would take place in what is currently the last 2 weeks of the archery season and the peak of the elk rut. In a nutshell, this proposal would cause the number of drawing permits for the month of September to go from 25 to 50 with half of that number being available to rifle hunters during the peak of the rut. There are already 2 existing any-weapon drawing permit elk hunts on Etolin during the month of October. Harvest Data shows that currently, the any-weapon hunts yield over 50% more harvest than the additional archery hunt. The elegance of the current regulation is that it allows a longer season with more hunting opportunity in September due to the low impact of archery equipment. This proposal would take away from that opportunity while also potentially having a negative effect on the elk herd on the Island.

For Proposal 24, I ask for your SUPPORT. This proposal advocates opening a registration archery only hunt for black bear in the Petersburg Creek drainages of Kupreanof Island.

There would be a maximum of 10 permits available for this hunt which would only be available in-person at the Petersburg ADF&G office. This permit would be available only to residents of Alaska and would have a bag limit of one bear per regulatory year. The season for this hunt would be from April 15th – June 30th. Proposal 24 affords residents of the Petersburg area a great opportunity to pursue black bear locally with archery equipment.

For Proposal 29, I ask for your SUPPORT. This proposal would expand the hunt area of the RG014 archery goat hunt in Unit 1C. This would avail more hunting opportunity to bowhunters and would not cause any population concerns according to ADFG.

For Proposal 30, I ask for your SUPPORT. This proposal would open a fall archery goat hunt in Unit 1C, the southern end of the Chilkat Peninsula from August 1st – September 1st. If adopted, this hunt would afford more hunting opportunity while also having a low impact due to the limitations of archery equipment.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support

Proposal 19: Support with
Amendment

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



PC83

Submitted by: Rebecca Knight

Community of Residence: Petersburg, Alaska

Comment:

See attached

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose

Proposal 25: Oppose

Proposal 26: Support

Proposal 45: Support

Proposal 46: Oppose

Proposal 47: Support

Proposal 48: Support

Proposal 49: Support

Proposal 50: Support

Proposal 51: Support

Proposal 52: Support

Proposal 53: Support

Proposal 54: Support

See attachment on the following page.



**Comments of Rebecca Knight
Southeast Region Proposals
Alaska Board of Game Meeting
Ketchikan, Alaska
January 20-24, 2023**

Hello Alaska Board of Game Members,

My comments regard **PROPOSAL 24**. I oppose this proposal.

The Proposal would abolish the Petersburg Creek Closed Area by opening black bear hunting in the Petersburg Creek drainage with an exclusive, certified bow hunter, 10 permit, resident only hunt. According to ADF&G, the area has been closed to black bear hunting since 1975, likely due to safety concerns and to provide for a prime and local black bear viewing area.

My family and I are long term users of the area including various forms of boating, hiking, fishing, and wildlife viewing. Black bear viewing is an integral part of our experience, especially during the Spring when bears are out on the grass flats feeding and into the summer/fall when they bulk up on salmon. It is a very popular and easily accessible destination for Petersburg residents.

- *As I understand*, if the Petersburg Creek drainage is opened to *any* black bear hunting, it would be the first time a such a closure was reversed by the BOG—a precedent setting consideration;
- Carving out this exclusive exception to the closure would be further precedent setting by allowing a foot-in-the-door to open black bear hunting in the drainage—one piece at a time;
- During the Dec. 3 Petersburg Advisory Board meeting, various board members expressed opposition to this proposal since small exceptions to the regulations could create confusion and new conflicts. They voted in opposition based on that consideration;
- There has been no hue and cry from area residents to open the area to black bear hunting in the 47 years since the closure was established; nothing is broken;
- The Petersburg Creek Drainage is near the communities of Kupreanof and Petersburg and is easily accessible to all for black bear viewing, and requires no limited viewing permit. This unique opportunity is unlike other areas in SE Alaska—like Anan and Pack Creek where viewing opportunities are heavily regulated. Let's keep it that way;
- Proposal 24 would conflict with long established and existing recreational uses like wildlife viewing and photography, hiking, boating, and including the very popular spring steelhead and fall coho sport fish seasons. It would create safety issues amongst user groups due to increased hunting activity;



- There are no shortage of Unit 3 acres available to hunt black bear. The Petersburg Creek Drainage, comprises only about 1.5% of the total Unit 3 area. As *I understand*, it is the only area closed to the taking of black bear in Unit 3 other than minimal closures around municipalities, roadways, etc.;
- Black bear in the area seem somewhat inured to human presence. I have kayaked (at a safe distance) right past them as they feed on the grass, and often they just keep feeding or slowly amble away. Granted, if downwind they may not smell me or see me, but nonetheless this experience is exceptionally enjoyable. Hunted populations would become wary;
- Black bears would be sitting ducks, especially for those out on the grass flats, for the first few hunters in nearly five decades to use the area for this purpose. While there “may” be a trophy bear in the mix due to the long time closure, it is unwise to open the season for that possible underlying motivation at the expense of the rest of the public;
- There is no commercial use up Petersburg Creek proper with the exception of a few guided hikers from the Kupreanof dock, across a muskeg, and to the lower creek shoreline and return. Opening the area to black bear hunting would invite bear guide activity and would dramatically change the character of the drainage from a local to a commercial flavor, and once again another special place in SE Alaska will be lost to consumptive, for-profit use.

For the above reasons, I urge the Board of Game reject Proposal # 24.

Thank you,

Rebecca Knight
Petersburg, AK



**Comments of Rebecca Knight
Southeast Region Proposals
Alaska Board of Game Meeting
Ketchikan, Alaska
January 20-24, 2023**

Hello Alaska Board of Game Members,

My comments regard **PROPOSAL 25**. This proposal would open black bear hunting in the Petersburg Creek drainage to resident and nonresident hunters, and eliminate the Petersburg Creek Closed Area. I oppose this proposal.

Many of my following comments mirror those that I submitted for Proposal #24, which is specific to a proposed, exclusive black bear bow hunt.

According to ADF&G, the area has been closed to black bear hunting since 1975, likely due to safety concerns and to provide for a prime and local black bear viewing area.

My family and I are long term users of the area including various forms of boating, hiking, fishing, and wildlife viewing. Black bear viewing is an integral part of our experience, especially during the Spring when bears are out on the grass flats feeding and into the summer/fall when they bulk up on salmon. It is a very popular and easily accessible destination for Petersburg/Kupreanof area residents.

- *As I understand*, if the Petersburg Creek drainage is opened to black bear hunting, it would be the first time such a closure was reversed by the BOG—a precedent setting consideration;
- There has been no hue and cry from area residents to open the area to black bear hunting in the 47 years since the closure was established; nothing is broken;
- There are no shortage of Unit 3 acres available to hunt black bear. The Petersburg Creek Drainage, comprises only about 1.5% of the total Unit 3 area. *As I understand*, it is the only area closed to the taking of black bear in Unit 3 other than minimal closures around municipalities, roadways, etc.;
- In fact, according to ADF&G, “The allowable harvest of black bears on Kupreanof Island is 80. Over the last five seasons an average of 69 bears have been harvested on the island.” Clearly, there is no shortage of black bear for human use, that makes opening this closed area necessary.
- The Petersburg Creek Drainage is near the communities of Kupreanof and Petersburg and is easily accessible to all for black bear viewing, and requires no limited viewing permit. Let’s keep it that way. This unique opportunity is unlike other areas in SE Alaska—for instance, Anan and Pack Creek where viewing opportunities are heavily regulated;



- Proposal 25 would conflict with long established and existing recreational uses like wildlife viewing and photography, hiking, boating, and including the very popular spring steelhead and fall coho sport fish seasons. It would create safety issues amongst user groups due to increased hunting activity;
- Black bear in the area seem somewhat inured to human presence. I have kayaked (at a safe distance) right past them as they feed on the grass, and often they just keep feeding or slowly amble away. Granted, if downwind they may not smell me or see me, but nonetheless this experience is exceptionally enjoyable. Hunted populations would become wary;
- If approved, for the first few hunters in nearly five decades to use the area for this purpose, black bears would be sitting ducks, especially for those out on the grass flats. While there “may” be a trophy bear in the mix due to the longtime closure, it is unwise to open the season for that possible underlying motivation at the expense to the rest of the public;
- There is no commercial use up Petersburg Creek proper with the exception of a few guided hikers from the Kupreanof dock, across a muskeg, and to the lower creek shoreline and return. Opening the area to black bear hunting would invite bear guide activity and would dramatically change the character of the drainage from a local to a commercial flavor—and once again another favorite and special place in SE Alaska will be lost to consumptive, for-profit use.

For the above reasons, I urge the Board of Game reject Proposal # 25.

Thank you,

Rebecca Knight
Petersburg, AK



Submitted by: Bob Koenitzer
Community of Residence: Juneau

Comment:

Regarding proposal #5, a change to a split waterfowl season. adopting a split seasons will overall reduce opportunities for waterfowl hunters. I have been hunting waterfowl all over Southeast for almost 40 years. The best season to allow for the most opportunity is 9/16-12/31. The number of birds available in the first two weeks of September are very limited. A mid-season closure would result in reduced opportunity at a time when more birds are available. The best waterfowl hunting in SE is roughly from late September through November with Oct the peak. ADF&G should ditch every other year early start, this is not a well-conceived plan and likely an administrative burden. Even though hunting is harder, there are way more opportunities to take waterfowl in the last 2 weeks of December than the first two weeks of September. Please do not split the season and return to 9/16-12/31. this will provide the most opportunities for waterfowl hunters.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 5: Oppose

Proposal 28: Support



Submitted by: Courtney Kreis
Community of Residence: Juneau, AK

Comment:

There are many talented and well-educated biologists working for FNG who know far more about wildlife, ecology, and population carrying capacity than I and the general public do. Matters of policy should not trumped by the armchair expert. Public involvement is a crucial step in our government, and I appreciate this opportunity. But I support FNGs opposition to proposal 10, 11, 36, and 37. Especially for 10 and 11, my anecdotal evidence is that the deer population is not declining in unit 4 to warrant a reduction in harvest tickets.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose

Proposal 21: Oppose

Proposal 37: Oppose

Proposal 11: Oppose

Proposal 36: Oppose



Submitted by: Michael Kreis
Community of Residence: Juneau/Douglas, Alaska

Comment:

I do not support proposals 10/11, 36, and 37, lowering deer, grouse, and ptarmigan limits, if ADF&G doesn't support these changes. What is the scientific backed conservation reasoning for these proposed changes?

Thank you

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose

Proposal 21: Oppose

Proposal 37: Oppose

Proposal 11: Oppose

Proposal 36: Oppose



Submitted by: Mary Larson

Community of Residence: Anchorage, AK

Comment:

Thank you for the opportunity to comment on the proposals that affect the archery community in SE Alaska

Sincerely,

MJ Larson

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



Submitted by: Jordan Lavigne

Community of Residence: Juneau, AK

Comment:

Proposal 28- Please do not support this proposal. Changing these boundary lines will do nothing except hurt our goat population by giving easy access to goats from a private road. Easy and fast access to this area will increase goat harvest while pushing goats out of a designated safe zone that is used for breeding and wintering grounds.

Proposal 30- Please support this proposal. This hunting area doesn't open until September 1st which is when storms and rain are very frequent. Opening this hunt in august will give better hunting opportunities during a month with statistically better weather and longer days. The logistics of getting to this location are enough of a deterrent that it's unlikely goat harvest in this area will dramatically increase.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 4: Support
Proposal 10: Oppose
Proposal 11: Oppose
Proposal 13: Support

Proposal 21: Oppose
Proposal 28: Oppose
Proposal 29: Support
Proposal 30: Support

Proposal 31: Support
Proposal 34: Support
Proposal 36: Oppose
Proposal 37: Oppose

Proposal 41: Support



Submitted by: Cody Ledoux

Community of Residence: Point Agassiz, Alaska

Comment:

To whom it may concern:

Hello,

My name is Cody Ledoux. This is in regards to proposal 22. The motorized vehicle restriction during moose season out at Thomas Bay/Point Agassiz area.

My wife, Faith Nelson, and I live out at Point Agassiz. I am a Disabled Veteran/part time handyman and my wife raises golden retrievers. Needless to say we are a low income family who live a subsistence lifestyle.

My wife has lived out at Point Agassiz for over 15 years. I lived off grid for a dozen years in the Interior on a fly in lake so we both live "field to table"

In my opinion the current non-motorized vehicle restrictions on moose hunting out at Point Agassiz/Thomas Bay is a direct violation of our rights to live a subsistence lifestyle.

No where else in Alaska are you not allowed to use atv's or trucks to hunt. We arent talking about shooting a 150 pound deer, a moose requires a motorized vehicle to process, but you need it then, not in 4 hours after you bike home to get an atv (which I cant due because I am disabled)

Starting in late August most bulls move up the road system. Several groups of hunters have campers along the road systems so there isnt really room to hunt on the road system. This country is too dangerous to go off the roads without gear, and I personally can't pack survival gear on my back or moose meat. I need to use an atv and a chainsaw winch.

You are putting hundreds of pounds of meat at risk of wanton waste if you dont have a vehicle to haul it out, which for us that live out there and don't have the means to have a moose camp (A: because we are currently broke, and B: because it costs a lot of money to live off-grid, costs too much to haul a camper out, especially when you can sleep at home 10 miles away.)

Anyways, there is no scientific reason to not allow vehicles. It is in my opinion unlawful to infringe on our rights to live a subsistence lifestyle and I believe the restriction needs to be completely lifted.

Thank you for your time,

Cody Ledoux

Point Agassiz, AK

[REDACTED]

[REDACTED]

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 22: Support



Submitted by: Ryan Littleton

Community of Residence: Petersburg, Alaska

Comment:

I am writing in opposition to proposal 22. My name is Ryan Littleton, I was born and raised in Petersburg. I have been hunting the Point Agassiz area since I was a young boy and have continued to do so every year since. I harvested my first moose there when I was 12 years old. I am also a landowner and own a cabin in the area. When I first started hunting there the area was vast with lots of moose and roads to put camps on. As the years have gone on the amount of hunting area has shrunk significantly, the once fresh clear cuts have re-grown and logging roads have succumb to mother nature. The main road from Point Agassiz to the end is now only just over 9 miles. The unfortunate part is the clear cuts that allowed the moose to flourish have grown up now there is less vegetation for the moose to browse. The population has declined and now the annual harvest the past few years has been near historic lows. There are a few remaining residential cows that live along the road system, every year during the rut a handful of bulls come down to find one of these cows. I have a concern that with increased motorized vehicle traffic the few remaining moose will leave the area.

I would also like to talk about the different types of hunts in the state of Alaska, one of the best things about growing up in Alaska is all the different types of hunts within the state. We have non-motorized vehicles, draw hunts, archery only draw hunts, youth hunts and areas only accessible by plane and boat. This allows hunters many types of opportunity and experiences.

I also would like to respectfully mention that people with disabilities can apply for a driving permit.

The last thing I would ask the board of game to consider is as the moose habitat has changed more of the moose population is located in the area with the property owners. This benefits those with cabins, as moose sightings on privately owned land have increased over the years. This year one landowner/resident of PT. Agassiz harvested a moose on her property.

I just don't see any upside to allowing hunting with motorized vehicles during the moose season. This will only increase pressure on the remaining moose and potentially chase them out of the area. With very limited amount of hunting area left in the Point Agassiz and few moose left to hunt there just isn't any upside to applying more pressure on them during the rut.

Thanks for your time and consideration.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 22: Oppose



PC91

Submitted by: Rodney Littleton

Community of Residence: Petersburg

Comment:

I have been a resident of Petersburg since 1967 and have been hunting in Thomas Bay for over 50 years . It has a very small road system. I am against proposals 22 and 23 because it would put more pressure on the already small moose herd . Not driving in Thomas Bay has worked for many many years . This not the time to change it.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 22: Support

Proposal 23: Support

Proposal 33: Support



PC92

Submitted by: Rocky Littleton

Community of Residence: Petersburg Alaska

Comment:

Oppose # 22 and 23. Thomas bay has a small road system and allowing motorized vehicles for moose hunting will increase pressure on an already small moose herd. I am 72 to years old and have hunted there for more than 50 years. I can ride a bicycle anywhere on the road system in less than an hour. There are numerous other areas around Petersburg that allow the use of motorized vehicles for moose hunting.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 22: Oppose

Proposal 23: Oppose

Proposal 33: Oppose



PC93

Submitted by: Donald Long

Community of Residence: Ottawa Lake, MI

Comment:

I would like to my opinion known on several of the proposals that will directly affect bowhunting opportunities in Alaska.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support

Proposal 24: Support

Proposal 30: Support

Proposal 19: Oppose

Proposal 29: Support



Submitted by: John Longworth

Community of Residence: Petersburg AK

Comment:

Oppose #24 and #25. This is not the best use for our wildlife and there are safety concerns on lands that are frequented by the public enjoying the area. Bears are not always killed by now hunting.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose

Proposal 25: Oppose



Submitted by: Joey Ludlam

Community of Residence: Juneau, alaska

Comment:

Why do people that don't live here get to even suggest taking things away from people who do live here? Disgusting, sneaky and underhanded. Support hunters and trappers.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Oppose

Proposal 15: Oppose

Proposal 29: Oppose

Proposal 43: Oppose

Proposal 2: Oppose

Proposal 16: Oppose

Proposal 30: Oppose

Proposal 44: Oppose

Proposal 3: Oppose

Proposal 17: Oppose

Proposal 31: Oppose

Proposal 45: Oppose

Proposal 4: Oppose

Proposal 18: Oppose

Proposal 32: Oppose

Proposal 46: Oppose

Proposal 5: Oppose

Proposal 19: Oppose

Proposal 33: Oppose

Proposal 47: Oppose

Proposal 6: Oppose

Proposal 20: Oppose

Proposal 34: Oppose

Proposal 48: Oppose

Proposal 7: Oppose

Proposal 21: Oppose

Proposal 35: Oppose

Proposal 49: Oppose

Proposal 8: Oppose

Proposal 22: Oppose

Proposal 36: Oppose

Proposal 50: Oppose

Proposal 9: Oppose

Proposal 23: Oppose

Proposal 37: Oppose

Proposal 51: Oppose

Proposal 10: Oppose

Proposal 24: Oppose

Proposal 38: Oppose

Proposal 52: Oppose

Proposal 11: Oppose

Proposal 25: Oppose

Proposal 39: Oppose

Proposal 53: Oppose

Proposal 12: Oppose

Proposal 26: Oppose

Proposal 40: Oppose

Proposal 54: Oppose

Proposal 13: Oppose

Proposal 27: Oppose

Proposal 41: Oppose

Proposal 14: Oppose

Proposal 28: Oppose

Proposal 42: Oppose



Submitted by: Eric Lund

Community of Residence: Wrangell, AK

Comment:

Proposal 17

I support a drawing hunt for elk on Zarembo Island. I believe there are more elk then the current estimate living there.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support



Submitted by: Brian Lynch

Community of Residence: Petersburg, Alaska

Comment:

Proposal 16, 5 AAC 85.030(a)(5). Hunting seasons and bag limits for deer:

I am in support of Proposal 16.

As a certified bow hunter, founding member of Devilstumb Archers archery club and one of the initial proposers to establish the Petersburg Management Area (PMA), I am in full agreement with the comments presented by to proposer as the justification for the extended deer bow season in the PMA .

If the Board does not support the two-month August-September season extension in the PMA, I would request an extension to at least include September.

Proposal 22, 5 AAC92.052. Discretionary permit hunt conditions and procedures.

And

Proposal 23, The use of "E-bikes" with 750 watts or less are permitted for hunting.

I am in support of Proposal 22. The conditions of the hunt and habitat at the time the current prohibition on the use of motorized vehicles while moose hunting in Unit 1B was established are no longer at issue. As some of the proposers have stated, the current prohibitions present undue and unnecessary hardship for local residents to hunt moose.

If the Board does not support the full elimination of the current motorized vehicle restriction in Unit 1B I would encourage the passage of Proposal 23, The use of "E-bikes" with 750 watts or less are permitted for hunting.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support

Proposal 22: Support

Proposal 23: Support

Proposal 33: Support



Submitted by: Robert MacKinnon

Community of Residence: Juneau, AK

Comment:

I can only comment on the area's and species that I have hunted and observed over many years in the Juneau area, some of the proposals regarding other community's I have no first hand knowledge of, so my survey will have some holes in it. Thank you for the consideration.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Oppose

Proposal 11: Oppose

Proposal 31: Support

Proposal 38: Support

Proposal 2: Oppose

Proposal 21: Oppose

Proposal 32: Support

Proposal 39: Support

Proposal 3: Support

Proposal 28: Oppose

Proposal 34: Support

Proposal 40: Support

Proposal 4: Support

Proposal 29: Oppose

Proposal 36: Oppose

Proposal 41: Support

Proposal 10: Oppose

Proposal 30: Support

Proposal 37: Oppose

**PC99****Submitted by:** Ken Madsen**Community of Residence:** Petersburg AK**Comment:**

I am against proposal 22,would like to keep it the way it is, been riding a bike there for 15 years and really don't have a problem riding the limited amount of road system there is.To open this area to motor vehicles would be a huge detriment to this area, the roads will get worse there will be more vehicles brought over,more junk that will get abandoned, and it will spoil what minimal moose encounters we have now, never fun to have someone drive up and spook them off.A prime example of what happens to an area open to vehicles is theTonka area, which has at least 100 cars there and 25 are broke down on the side of the road.I think this will just open a pandoras box and ruin the 1 month of no vehicles we have now.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 22: Oppose**PC100****Submitted by:** Kevin Main**Community of Residence:** Petersburg, Alaska**Comment:**

I am opposed to proposals 24 and 25. Both proposals involve opening black bear hunts in the Petersburg creek drainage.

Currently, this is the only protected area for black bear on Kupreanof Island, the remainder is already open. Allowing hunts, especially during the spring, will cause increased and unnecessary user conflict. I hope the board will recognize that with the entire rest of the island open, there is no need to remove the protections for this single area.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose**Proposal 25:** Oppose**PC101****Submitted by:** Casey McConnell**Community of Residence:** Hoonah, Alaska**Comment:**

I oppose proposal 36 in its entirety. Author of this proposal believes a mired of condition conspire against him, reducing his (and potentially others) ability to harvest many sooty grouse ear was to access areas. Author states that new snow machines and fancy skies open access and allow owners of these tools to out-compete hunters pursuing grouse on foot alone. The author also believes that local grouse populations are depressed and a proposes a slight daily reduction in bag limited would alleviate problems caused by more hunters.

To rebut the general over harvest statement I believe that while grouse populations (like every wild species) fluctuate naturally, the hunting pressure from one year should not significantly -if at all - impact the hunting in

the next year. This is because the vast majority of grouse harvested are males. I would suspect that the percentage to be over 90% male only harvest. Females are largely unaffected by hunters and as male grouse do not help in rearing chicks or building a nest they are not needed past copulation. Hunting seasons also end before the breeding season ends, so that any areas pressured during the early part of spring can be re-colonized by males from other unpressured areas or females may move towards hillsides with males actively calling. Additionally, most grouse wings turned into AD are found to be of young birds; even from areas that are rarely hunted or pressured. This indicates that natural mortality is high on male sooty grouse. Reducing the bag limit to "save" grouse for other hunters or future seasons is not likely effective.

The author of proposal 36 also claims that fishermen are now hunting and social media and hunting shows have also increased hunting pressure. I have hunted grouse in Juneau for over 10 years now, and have posted lots of pictures on social media, and been the subject of a grouse hunting film featuring hunters, dogs, and grouse species across the United States. I have never come across another grouse hunter in the woods, and only on two occasions have even seen another grouse hunter at a trailhead or pull-out spot. Both occasions each of us was successful in hunting different hillsides. Furthermore I have never hiked into areas hunting sooty grouse where snowmachiners go; its too far on foot to effectively get there, hunt, and get back in a days hike Also, I have never seen snow machine tracks or ski trails in areas where I do hunt. Lastly, I have never need to hike into an area with "perilous cliffs" described by the author as the last holdout for pressured grouse unto by all the perceived competition.

To me, this proposal seeks to remedy a non-issue, implementing it would not satisfy the authors desire to harvest more "easy" grouse, and subdividing the Juneau area into road crossing drainages vs non road crossing drainages overcomplicated the very simple regulations currently in place.

Submitted by: Casey McConnell

Community of Residence: Hoonah, Alaska

Comment:

I oppose proposal 37 which seeks to reduce the bag limit of ptarmigan from 20 to 5 in the Juneau area.

The author proposes that snowmachiners are harvesting too many ptarmigan and are reducing the population to a detrimental level. I have not personally noticed a decrease and even if snowmachiners were harvesting many birds their use of the Juneau area is limited to a couple small areas on Douglas Island and one small area on the mainland. Because there are vast areas where snow machines cannot access (yet ptarmigan inhabit) I find it impossible to conceive that any localized pressure could depress a region-wide population to the degree described by the author.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 36: Oppose

Proposal 37: Oppose



Submitted by: Karin Mccullough

Community of Residence: Petersburg, Alaska

Comment:

Proposal 24 & 25

I do not support changes for black bear hunting in the Petersburg Creek Drainage

I support no hunting by gun or by bow for black bear in the Petersburg Creek Drainage

My reasons:

1) In the spring there would be a conflict of user groups. Spring sport fishing (I am a participant) brings a significant number of sport fishing folk. Residents on their own and guided folk

2) Residents of Petersburg Borough and visitors enjoy visiting Petersburg Creek to view bear. It is close to Petersburg

3). Petersburg drainage area is the only area in unit 3 that does not allow hunting of black bear by either bow or gun All other areas in unit 3 are open to black bear hunting

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose

Proposal 25: Oppose



Submitted by: Margaret McGinnis

Community of Residence: Hull, MA

Comment:

I am writing to support Proposals 145, 147 and 149-154, as well as the proposals highlighted below. Thank you.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 45: Support

Proposal 49: Support

Proposal 52: Support

Proposal 47: Support

Proposal 50: Support

Proposal 53: Support

Proposal 48: Support

Proposal 51: Support

Proposal 54: Support



Submitted by: Shaun McGraw

Community of Residence: Naukati Bay, AK

Comment:

Proposal #45

I strongly agree with raising the population objective of wolves in unit 2.

I have lived here many years and have seen very little evidence of wolves.

The only people who say that there is already a healthy population of wolves or that we need to harvest more are people who would prefer them all gone. To rely on anecdotal information gathered from them as a basis for setting objectives, as opposed to scientific methodology, could lead to tragic consequences for the species and in turn the ecosystem of the area.

Submitted by: Shaun McGraw

Community of Residence: Naukati Bay, AK

Comment:

Proposal #201

I support Proposal #201.

I believe a management plan for sea otters based on scientific methodology should be established by the state.

Submitted by: Shaun McGraw

Community of Residence: Naukati Bay, AK

Comment:

Proposal #202

I oppose proposal #202.

Emergency closures should be utilized to maintain scientifically established healthy wolf populations.

Submitted by: Shaun McGraw

Community of Residence: Naukati Bay, AK

Comment:

Please see proposal survey below.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 45: Support
Proposal 46: Oppose
Proposal 47: Support

Proposal 48: Support
Proposal 49: Support
Proposal 50: Support

Proposal 51: Support
Proposal 52: Support
Proposal 53: Support

Proposal 54: Support



Submitted by: Chris McMurren

Community of Residence: Wrangell Ak 99929

Comment:

For props 17 and 18 I am interested in only a rural hunt for that area. That being said, In the name of game management the area seems to have a harvestable population. In addition it appears that there is a decrease in the deer population in the high elk traffic areas, thanks

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Oppose
Proposal 3: Support
Proposal 4: Support
Proposal 16: Support
Proposal 17: Support with
 Amendment

Proposal 18: Support with
 Amendment
Proposal 19: Support
Proposal 20: Support
Proposal 22: Support
Proposal 23: Support
Proposal 27: Oppose

Proposal 33: Support
Proposal 42: Oppose
Proposal 43: Oppose
Proposal 44: Oppose
Proposal 45: Support
Proposal 46: Support
Proposal 47: Oppose

Proposal 48: Oppose
Proposal 49: Oppose
Proposal 50: Oppose
Proposal 51: Oppose
Proposal 52: Oppose
Proposal 54: Oppose



Submitted by: K J Metcalf

Community of Residence: Juneau

Comment:

Opposed to PROPOSAL 12 5 AAC 92.510. Areas closed to hunting.

I have extensive experience in Mitchell Bay - I was the first Monument Ranger (Forest Service) and worked extensively with Angoon. Retired and worked and lived in Angoon for 18 years. Conducted week long youth canoe camps for Angoon youth.

My experience working with and being schooled by Angoon elders is that to open Mitchell Bay to bear hunting is to invite user conflict that will not benefit anyone. Angoon is desperate to create local employment focused on non-consumptive wildlife viewing and cultural understanding and appreciation. Mitchell Bay bear hunting would be a significant intrusion and conflict to Angoon's interest.

The area was closed to bear hunting by the BOG because of this very conflict. Please do not recreate the conflict.

The suggesting that fewer bears will promote more deer is not sound science - it has no merit.

Thank You, KJ Metcalf

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 12: Oppose



PC107

Submitted by: Ryan Miller

Community of Residence: Wrangell alaska

Comment:

After hunting zerembo island for the last 20 years I have watched the elk herd grow and and move to different parts of the island from the beach to the middle of the island branching off into multiple herd we have seen sine and elk in places over the last few years that we have never before

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support



PC108

Submitted by: Trevor Miller

Community of Residence: Wrangell, AK

Comment:

I am writing this about Proposal 27. I feel this proposal is unfair to the trappers in our community, most of us trappers are looking to catch a few animals and save some deer. The wolves seem to run the roads in the winter when we are trapping and the deer seem to stay off the roads, making it a good place to put our traps near. I don't disagree with some sort of a restriction within a close proximity of the town, but to make it 100 yards off a drivable road or hiking trail across the whole island seems to be a little much. The wolves in areas run the roads especially where people are not going in the winter. I see most of my wolf sign in the roads, but way out the road in places only accessible by snowmobile or four wheeler in rare cases. These are places people never go in the winter. In my 3 years of trapping I have only ever passed one other person out by my trap line and they were chopping fire wood. I also have never had a problem with a person or pet on my trap line. I could see it being fair if trappers had to put up a trap sign, but to jump straight to a restriction on where we can trap seems unfair.

Thank you

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 27: Oppose



PC109

Submitted by: Ronald Miller

Community of Residence: 441 Church St

Comment:

Vote yes for proposal 17. I support a draw hint on Zarembo Island for Elk.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support

**Submitted by:** Martin Morris**Community of Residence:** Juneau, Alaska**Comment:**

I am against lowering the deer harvest from 6 to 4, the deer population, according to scientists at Dept of Fish and Game, the deer population is healthy and can support 6 deer being harvested ensuring a healthy population and a sustainable environment for future deer populations to thrive for future hunters. Reducing it would have a significant impact on people who harvest their own meat for the year, placing an unnecessary burden and significant cost of replacing deer meat with store bought meat.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose
Proposal 11: Oppose
Proposal 21: Oppose
Proposal 28: Support

Proposal 29: Support
Proposal 31: Support
Proposal 32: Support
Proposal 36: Oppose

Proposal 37: Oppose
Proposal 38: Support
Proposal 39: Support
Proposal 40: Oppose

Proposal 41: Support

**Submitted by:** Mark Mow**Community of Residence:** Juneau**Comment:**

Prop. 10/11 is ludicrous. On the ground observations reveal an over abundance of deer which will impact health of the herds. By allowing hunter's to help control the deer population assures a healthy and long lasting deer environment.

Prop. 41 to eliminate the DIWMA is critical to prolong the health and well-being of the few deer that are left on Douglas. Wolf management is a proven method to help obtain a delicate balance between wolf/deer numbers.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose
Proposal 11: Oppose

Proposal 21: Oppose
Proposal 41: Support

**Submitted by:** Lucas Mullen**Community of Residence:** Petersburg, Alaska**Comment:**

My name is Lucas Mullen, I'm a registered big game guide in units 1 and 4 who is currently residing in Petersburg. I am opposed to this proposal. There is plenty area and opportunity to hunt black bear in and around the Petersburg vicinity. With Petersburg creek drainage being so close to town and a very popular boating and recreational area especially in the spring there will be no doubt negative interactions between user groups if this were to pass.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose

Submitted by: Lucas Mullen

Community of Residence: Petersburg, Alaska

Comment:

My name is Lucas Mullen, I'm a registered big game guide in units 1 and 4 who is currently residing in Petersburg. I am opposed to this proposal. After the extremely large harvest of 49 brown bear in the adjoining unit 1D in the year 2020, it is unwise to open the nearby area to an increase in harvest of brown bear in the area.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 34: Oppose

Submitted by: Lucas Mullen

Community of Residence: Petersburg, Alaska

Comment:

My name is Lucas Mullen, I'm a registered big game guide in units 1 and 4 who is currently residing in Petersburg. I am opposed to proposal 12 in regards to opening up brown bear hunting in Mitchell Bay. Mitchell Bay has been closed for years and using brown bear predation on deer fawns as a reason to in the future increase deer harvest doesn't make sense. The harvest of a few bears in the area I doubt will have much impact on overall deer numbers. Of the number of fawns or adult deer killed by bears in the bay, winter die off plays a much more significant role on deer populations in the area.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 12: Oppose



PC113

Submitted by: Kelly O'Connor Demko

Community of Residence: Petersburg, AK

Comment:

Comments regarding Proposal 24 and 25.

I believe there should not be bear hunting allowed up the Petersburg Creek Drainage for several reasons.

First, I and many others I know use the area specifically for bear viewing. I often take my friends up the creek kayaking in the hopes of seeing bears, which we often do! It is important for people like me to be able to go to a nearby place to see these bears in their natural habitat and in a protected wilderness area.

Second, I see hunting in direct conflict with other uses specifically recreation, fishing and bear viewing. This area is widely used by many people young and old for fishing and hiking and small boating, motorized and unmotorized.

Third, there are many other places available for hunting bear and this is a very small area to preserve for the local people to view bears. People have plenty of places to go on guided and unguided hunts.

Fourth, I have an idea this is being driven by one party interested in a commercial venture and I believe a commercial venture would have no problem getting their clients a bear hunt in some other beautiful areas of SE Alaska.

I also have concerns that the Board of Fish and Game has not taken the time and made an appropriate effort to gather comments by people who would be directly affected by these proposals.

I believe there should not be bear hunting allowed up the Petersburg Creek Drainage.

Thank you. Kelly O'Connor Demko

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose

Proposal 25: Oppose



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



PC114

In Reply Refer To:
SE BOG/22136.LG

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

DEC 30 2022

Dear Chairman Hoffman:

The Office of Subsistence Management (OSM) appreciates the opportunity to comment on the Alaska Board of Game proposals during the January 20-24, 2023 Southeast Region Meeting.

OSM, working with other Federal agencies, reviewed each of these proposals. The attached document includes OSM's comments regarding proposals that have the potential to impact federally qualified subsistence users or associated wildlife resources. During the meeting, OSM may wish to comment on other agenda items that might impact federally qualified subsistence users or wildlife resources.

Again, OSM appreciates the opportunity to comment on these important regulatory matters and looks forward to working with your Board and the Alaska Department of Fish and Game on these issues. Please contact George Pappas, State Subsistence Liaison, at 907-786-3822 or george_pappas@fws.gov, with any questions you have concerning this material.

Sincerely,

Amee Howard
Acting Assistant Regional Director
Office of Subsistence Management

Enclosure

cc: Federal Subsistence Board
Office of Subsistence Management
Interagency Staff Committee
Southeast Alaska Regional Advisory Council
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game

Mr. Jerry Burnett

2



PC114

Mark Burch, Special Projects Coordinator, Alaska Department of Fish and Game
Administrative Record



RECOMMENDATIONS

ALASKA BOARD OF GAME PROPOSALS

Southeast Meeting

January 20-24, 2023

Ketchikan, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 3 – 5 AAC 92.165. Sealing of bear skins and skulls. Remove the requirement for residents to seal black bear skulls harvested in Units 1 - 4.

Current Federal Regulations:

§100.26 Subsistence taking of wildlife

(j)(1) Sealing requirements for black bears of all color phases taken apply in Units 1– 7, 13–17, and 20.

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

Impact to Federal subsistence users/wildlife: Removing the sealing requirement would be less burdensome for Federally qualified subsistence users. However, adoption of this proposal could result in conservation concerns as sealing is currently the only way black bear populations are monitored in these units. Due to logistical issues of Unit 1 and its vast, remote forested areas, population surveys are not possible (Sell 2014).

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

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 3.

Rationale: While requiring users to seal black bear skulls can be a burden to Federally qualified subsistence users, sealing is the primary method used to monitor black bear populations in these units. In order to sustainably manage the population, this data is necessary to detect potential conservation concerns and ensure the continued viability of the species for subsistence uses.

Literature Cited

Sell, S. 2014. Unit 1D Black bear Chapter 1. Pages 4-1 – 4-16 in P. Harper and L. A. McCarthy, editors. Black bear Management report 1 July 2010-30 June 2013. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2015-5. Juneau, AK.

PROPOSAL 4 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear. Change the resident bag limit for brown bear in Unit 1 to one bear every two years.

Current Federal Regulations:

Unit 1 – Brown Bear

Brown Bear: 1 bear every four regulatory years by State registration permit only.

*Sept. 15 – Dec. 31
Mar. 15 – May 31*



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

Impact to Federal subsistence users/wildlife: Adoption of this proposal would increase hunting opportunities for Federally qualified subsistence users hunting under State regulations and may increase the number of brown bears harvested in Unit 1. Based on harvest data from RY09-18, an average of 29 brown bears are harvested each year in Unit 1 (Churchwell 2021).

An increase in harvest may cause conservation concerns for Unit 1 brown bears as the population of brown bears in most of the unit is unknown. Brown bear population data is only collected in the select areas of Bradfield Canal, Unuk River, and Berners Bay. Additionally, the data available for these areas is outdated and from research conducted in 2006 and 2007 (Bethune 2015). Based on data collected during the sealing process, the Unit 1 brown bear population is relatively stable (Churchwell 2021). However due to the large home ranges of brown bears, their population density is typically low. In Unit 1, the bears are known to have a home range four times larger than the sows (Bethune 2015).

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

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 4.

Rationale: With the lack of population data, brown bear populations should be managed conservatively as an increase in harvest could cause a conservation concern.

Literature Cited

Bethune, S. 2015. Unit 1 Brown bear Chapter 1. Pages 1-1 – 1-20 in P. Harper, editor. Brown bear Management Report 1 July 2012-30 July 2014. Alaska Department of Fish and Game Species Management Report ADF&G/DWC/SMR&P-2015-1. Juneau, AK.

Churchwell, R. 2021. Brown Bear Management Report and Plan, Game Management Unit 1: Report Period 1 July 2014 – 30 July 2019, and Plan Period 1 July 2019 – 30 June 2024. Alaska Department of Fish and Game Species Management Report ADF&G/DWC/SMR&P-2021-10, Juneau, AK. 28pp.

PROPOSAL 6 – 5 AAC 84.270. Furbearer trapping. Lengthen river otter trapping seasons in Units 1–4 to align with Unit 5.

Current Federal Regulations:

Units 1, 2, 3, and 4 – River Otter

Otter: No limit

Dec. 1-Feb. 15

Unit 5 – River Otter



Otter: No limit

Nov. 10-Feb. 15

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunities for Federally qualified subsistence users trapping under State regulations. River otter are a common species in Region I, and their abundance is believed to be stable in all units. Although no formal population surveys have occurred, ADF&G bases estimates on anecdotal reports from the public and incidental observations during other wildlife surveys. These estimates show no evidence of a decline in river otter abundance. Harvest of river otter remained consistent at levels lower than other trapped species during the reporting period of 2012–2017 (Bethune 2019a, 2019b, 2020; Dorendorf 2019a, 2019b; Koch 2020).

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

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 6.

Rationale: This proposal would increase trapping opportunity for Federally qualified subsistence users. Extending the season is of little to no conservation concern as river otter populations have remained stable under the current “no harvest limits” in Units 1–5. Additionally, reduced trapping effort in recent years and low overall harvest, suggest any increased harvest from this proposal may not impact the population.

Literature Cited

Bethune, S. W. 2019a. Furbearer management report and plan, Game Management Unit 1B: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-10, Juneau

Bethune, S.W. 2019b. Furbearer management report and plan, Game Management Unit 4: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-9, Juneau.

Bethune, S. W. 2020. Furbearer management report and plan, Game Management Unit 3: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-20, Juneau.

Dorendorf, R. R. 2019a. Furbearer management report and plan, Game Management Unit 1A: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-7, Juneau.

Dorendorf, R. R. 2019b. Furbearer management report and plan, Game Management Unit 2: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-8, Juneau.



Koch, C. H. 2020. Furbearer management report and plan, Game Management Unit 1D: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-3, Juneau.

PROPOSAL 7 – 5 AAC 84.270. Furbearer trapping. Extend marten trapping seasons to align with wolverine seasons in portions of Units 1 - 4 and 5.

Current Federal Regulations:

Units 1, 2, 4 – Marten

Marten: No Limit

Dec. 1–Feb. 15

Unit 3 – Marten

Marten: No Limit (except on Kuiu Island)

Dec. 1–Feb. 15

Marten: Kuiu Island portion of Unit 3. No limit

Dec. 1–31

Unit 5 – Marten

Marten: No Limit

Nov. 10–Feb. 15

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunities for Federally qualified subsistence users trapping under State regulations. Marten are the most trapped species in most units of Region I, and their abundance is believed to be stable in all units (Bethune 2019a, 2019b, 2020; Churchwell 2019; Dorendorf 2019a, 2019b; Koch 2020). Although estimates are based on anecdotal reports from the public and incidental observations during other wildlife surveys, there is no evidence that marten abundance is declining. Harvest of marten remained stable for the 2012-2017 reporting period.

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

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 7.

Rationale: This proposal would increase trapping opportunity for Federally qualified subsistence users. Extending the season is of little to no conservation concern as marten populations have remained stable under the current “no harvest limits” in Units 1–5. Recent trapping effort has remained stable at lower than historical levels, so any increased harvest from this proposal may not impact the population.



Literature Cited

Bethune, S. W. 2019a. Furbearer management report and plan, Game Management Unit 1B: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-10, Juneau

Bethune, S.W. 2019b. Furbearer management report and plan, Game Management Unit 4: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-9, Juneau.

Bethune, S. W. 2020. Furbearer management report and plan, Game Management Unit 3: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-20, Juneau.

Churchwell, R.T. 2019. Furbearer management report and plan, Game Management Unit 5: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-12, Juneau.

Dorendorf, R. R. 2019a. Furbearer management report and plan, Game Management Unit 1A: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-7, Juneau.

Dorendorf, R. R. 2019b. Furbearer management report and plan, Game Management Unit 2: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-8, Juneau.

Koch, C. H. 2020. Furbearer management report and plan, Game Management Unit 1D: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-3, Juneau.

PROPOSAL 8 – 5 AAC 84.270. Furbearer trapping. Extend the marten trapping season in Units 1 and 2.

See comments for Proposal 7.

PROPOSAL 9 – 5 AAC 84.270. Furbearer trapping. Extend the wolverine trapping season to March 15 in Units 1–5.

Current Federal Regulations:

Units 1–5 – Wolverine

Wolverine: No limit

Nov. 10-Mar. 1



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

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunities for Federally qualified subsistence users trapping under State regulations. Wolverine are one of the least trapped species in most units of Region I (either because of their absence or their nature of occurring at low densities), but abundance is believed to be stable in all units of Region I where they are found (Bethune 2019a, 2020; Churchwell 2019; Dorendorf 2019a; Koch 2020). Although estimates are based on anecdotal reports from the public and incidental observations during other wildlife surveys, there is no evidence that wolverine abundance is declining. However, the season extension would overlap with the wolverine denning period, potentially resulting in the unsustainable harvest of denning females with kits.

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

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 9.

Rationale: This proposal would increase trapping opportunity for Federally qualified subsistence users. As overall trapping pressure and harvest is low and as wolverine populations have remained stable under the current “no harvest limits” in Units 1–5, any increased harvest from this proposal may not impact the population. However, conservation concerns may also occur through the unsustainable harvest of reproductive female wolverines.

Literature Cited

Bethune, S. W. 2019a. Furbearer management report and plan, Game Management Unit 1B: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-10, Juneau

Bethune, S. W. 2020. Furbearer management report and plan, Game Management Unit 3: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-20, Juneau.

Churchwell, R.T. 2019. Furbearer management report and plan, Game Management Unit 5: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-12, Juneau.

Dorendorf, R. R. 2019a. Furbearer management report and plan, Game Management Unit 1A: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2019-7, Juneau.

Koch, C. H. 2020. Furbearer management report and plan, Game Management Unit 1D: Report period 1 July 2012–30 June 2017, and plan period 1 July 2017–30 June 2022. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-3, Juneau.



PROPOSAL 10 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Decrease the bag limit to four deer in Unit 4, Remainder.

Current Federal Regulations:

Unit 4 - Deer

*Unit 4 — 6 deer; however, female deer may be taken only from Aug. 1 – Jan. 31
Sept. 15 – Jan. 31.*

Is a similar issue being addressed by the Federal Subsistence Board? Yes. The Board will consider three deferred wildlife proposals concerning deer in Unit 4 at its January 2023 regulatory meeting. Proposal WP22-07, submitted by the Southeast Alaska Subsistence Regional Advisory Council (Southeast Council) requests that Federal public lands of Admiralty Island draining into Chatham Strait between Point Marsden and Point Gardner in Unit 4 be closed to deer hunting Sept. 15 – Nov. 30, except by Federally qualified subsistence users. Proposal WP22-08, submitted by the Southeast Council, requests that the Northeast Chichagof Controlled Use Area (NECCUA) annual deer harvest limit for non-Federally qualified users be reduced to two male deer. Proposal WP22-10, submitted by Patricia Phillips of Pelican, requests that the deer harvest limit for non-Federally qualified users in Lisianski Inlet and Lisianski Strait be reduced to 4 deer.

Impact to Federal subsistence users/wildlife: Adopting this proposal would decrease opportunities for Federally qualified subsistence users hunting deer under State regulations. Federally qualified subsistence users would only be able to harvest four deer on State managed lands, including along beaches below the mean high tide line, which are a popular hunting area. However, this proposal would provide a Federal subsistence priority on Federal public lands and may slightly reduce competition with non-Federally qualified users on Federal public lands.

This proposal is not expected to impact the Unit 4 deer population. Unit 4 has the highest deer population in Alaska, and, according to ADF&G harvest data, only 3% of non-Federally qualified users harvested five or six deer since 2019 when the Alaska Board of Game increased the deer harvest limit in Unit 4, remainder from four to six deer (ADF&G 2022).

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 10.

Rationale: This proposal would decrease opportunity for Federally qualified subsistence users hunting on State-managed lands but would provide a subsistence priority for deer on Federal public lands. No impact to the deer population is expected.

Literature Cited

Alaska Department of Fish and Game. 2022. Draft comments on Wildlife Proposal WP22-08. September 30, 2022. <https://www.doi.gov/sites/doi.gov/files/9.30.22-wp22-08-adfg-comments-508.pdf>. Accessed November 8, 2022.



PROPOSAL 11 – 5 AAC 85.030. Hunting seasons and bag limits for deer. Decrease the bag limit to four deer in Unit 4, Remainder.

See comments for Proposal 10.

PROPOSAL 12 – 5 AAC 92.510. Areas closed to hunting. Open the Mitchell Bay Closed Area in Unit 4 to brown bear hunting.

Current Federal Regulations: N/A

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

Impact to Federal subsistence users/wildlife: This proposal will increase harvest opportunities for Federally qualified subsistence users by allowing them to harvest brown bear inside the Mitchell Bay closed area on State-managed lands. Federally qualified subsistence users can already harvest brown bears on the small amount of Federal lands in this area under Federal regulations. Therefore, adoption of this proposal would align Federal and State regulations, decreasing regulatory complexity. However, there are also public safety concerns of wounded brown bears coming into Angoon and threatening local residents (SERAC 2022). Additionally, the tides in Mitchell Bay can make accessing this area dangerous (SERAC 2022). As the harvest limit would not change, this proposal is not expected to significantly increase the harvest of brown bear or to have any impact on the brown bear population.

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

Rationale: This proposal would provide additional opportunity for Federally qualified subsistence users but could create public safety concerns. No impacts to the brown bear population are expected.

Literature Cited

SERAC. 2022. Transcripts of the Southeast Alaska Subsistence Regional Advisory Council proceedings. October 27, 2022. Ketchikan, AK. Office of Subsistence Management, USFWS. Anchorage, AK.

PROPOSAL 15 – 5 AAC 92.510(a)(5)(B) Areas closed to hunting. Change the description of the Petersburg Road System Closed Area.

Current Federal Regulations:

§100.26 Subsistence taking of wildlife

(3)(ii)(A) In the Petersburg vicinity, you may not take ungulates, bears, wolves, and wolverine along a strip one-fourth mile wide on each side of the Mitkof Highway from Milepost 0 to Crystal Lake campground.

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



Impact to Federal subsistence users/wildlife: Adopting this proposal would further misalign State and Federal regulations, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023. No impacts to wildlife are expected from this proposal.

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

Rationale: As this management area occurs in both State and Federal regulations, OSM supports alignment of the area descriptor to minimize user confusion and regulatory complexity. Currently the descriptors are misaligned and adoption of this proposal would further misalign them.

PROPOSAL 31 – 5 AAC 85.040. Hunting seasons and bag limits for goat. Lengthen the resident, registration goat hunt in Unit 1C, the Southern end of the Chilkat Range.

Current Federal Regulations:

Unit 1C – Goat

*Unit 1C, that portion draining into Lynn Canal and Stephens Passage between Oct. 1–
Antler River and Eagle Glacier and River, and all drainages of the Chilkat Range Nov. 30.
south of the Endicott River - 1 goat by State registration permit only*

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users harvesting goat under State regulations, giving them 31 extra days to harvest goat at the beginning of the season within this hunt area. Goat populations are considered stable even though they are at lower levels compared to before the winter of 2006–2007 (Churchwell 2021). This area of Unit 1C is managed by registration permit RG015. Harvest is limited by ADF&G's point-management system (i.e. 1 point for billies, 2 points for nannies) and monitored closely by a 3-day reporting requirement of successful harvest (Schumacher 2022, pers. comm.). There is little concern for overharvest from this proposal as this hunt area is closed by emergency order if reported harvest approaches or equals the points allotted.

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

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 31.

Rationale: This proposal would increase opportunity for Federally qualified subsistence users hunting under State regulations. Goat populations are healthy enough to support harvest, and they are protected from overharvest by registration permits and ADF&G's point-management system.



Literature Cited

Churchwell, R. T. 2021. Mountain goat management report and plan, Game Management Unit 1C: Report period 1 July 2013–30 June 2018, and plan period 1 July 2018–30 June 2023. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-7, Juneau

Schumacher, T. 2022. Region 1 supervisor. Alaska Department of Fish and Game. Personal communication: e-mail. November 2022.

PROPOSAL 33 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Increase the brown bear bag limit in that portion of Unit 1C of the Chilkat Peninsula mainland north of Point Couverden and south of Sullivan Island for resident hunters, from one bear every four regulatory years to one bear every regulatory year.

Current Federal Regulations:

Unit 1C – Brown Bear

1 bear every four regulatory years by State registration permit only. *Sept. 15 – Dec. 31.
Mar. 15 – May 31*

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

Impact to Federal subsistence users/wildlife: Adoption of this proposal would increase hunting opportunity for Federally qualified subsistence users and would likely increase the number of brown bears harvested in a portion of Unit 1C. Currently there are only select areas of Unit 1 where brown bear population data is collected with Berners Bay being the only area in Unit 1C. However, the data available for Berners Bay is outdated and from research conducted in 2006 and 2007 (Bethune 2015). Based on data collected during the sealing process, the Unit 1 brown bear population is relatively stable (Churchwell 2021).

On average, Unit 1C accounts for 35% of the brown bears harvested in Unit 1, which is the second highest of the four subunits. However, in Regulatory Year (RY) 2016 and RY2018, Unit 1C had the largest harvest numbers of brown bears within the Unit 1 subunits (Churchwell 2021). Between RY14-RY18, the average number of permits issued was lower than between RY09-RY13; however, the average number of brown bears harvested was almost double, indicating a substantial increase in harvest success rates (Churchwell 2021). The average age of brown bears harvested from Unit 1C has decreased to 7.3 years old during the RY14-18 from 8.5 years old during RY09-13 (Churchwell 2021).

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



Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 33.

Rationale: While local observations and increases in harvest success rates indicate the Unit 1C brown bear population may be growing, population estimates are not available for this area of Unit 1C. With the lack of population data, brown bear populations should be managed conservatively as an increase in harvest numbers could cause a conservation concern.

Literature Cited

Bethune, S. 2015. Unit 1 Brown bear Chapter 1. Pages 1-1 – 1-20 in P. Harper, editor. Brown bear Management Report 1 July 2012-30 July 2014. Alaska Department of Fish and Game Species Management Report ADF&G/DWC/SMR&P-2015-1. Juneau, AK.

Churchwell, R. 2021. Brown Bear Management Report and Plan, Game Management Unit 1: Report Period 1 July 2014 – 30 July 2019, and Plan Period 1 July 2019 – 30 June 2024. Alaska Department of Fish and Game Species Management Report ADF&G/DWC/SMR&P-2021-10, Juneau, AK. 28pp.

PROPOSAL 34 – 5 AAC 85.020. Hunting seasons and bag limits for brown bear.

Increase the brown bear bag limit in that portion of Unit 1C of the Chilkat Peninsula mainland north of Point Couverden and south of Sullivan Island for resident hunters, from one bear every four regulatory years to one bear every regulatory year.

See comments for Proposal 33.

PROPOSAL 35 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.

Extend the bear baiting season for Unit 1D.

Current Federal Regulations:

§100.26 Subsistence taking of wildlife

(n)(1)(vii)(A) You may hunt black bear with bait in Units 1A, 1B, and 1D between April 15 and June 15.

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

Impact to Federal subsistence users/wildlife: Adoption of this proposal would provide Federally qualified subsistence users with increased opportunities to harvest black bears under State regulations. In Regulatory Year 2009 (RY09), the most recent year available, 82% of black bears were harvested by local residents, most of whom used the meat for subsistence (Koch 2021).



In Unit 1D, spring harvest accounts for an average of 87% of reported black bear harvests. Of the 87% harvested in the spring, 87% of black bears were harvested over bait from 2010-2013, and 77% of black bears were harvested over bait from 2013-2018, (Koch 2021).

Due to logistical issues of Unit 1 and the vast, remote forested areas, black bear population surveys are not possible. However, Unit 1D is estimated to have the smallest population of black bears within Unit 1 (Sell 2014).

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

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 35.

Rationale: A high percentage of bears harvested in Unit 1D are harvested over bait and population surveys are not possible. There is also a concern for overharvest. In RY09, 105 black bears were sealed with only 84 harvest tickets issued in Unit 1D, indicating 20% more bears are harvested than harvest tickets issued (Koch 2021).

With limited ability to collect population data due to habitat and terrain and most of the harvest taking place over bait by residents, extending the baiting season could lead to conservation concerns with the species. With no surveys conducted the potential decrease in population may not be known until the population crashes.

Literature Cited

Koch, C. H. 2021. Black bear Management Report and Plan, Game Management Unit 1D: Report period 1 July 2013 – 30 June 2018, and plan period 1 July 2018 – 30 June 2023. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2021-1. Juneau, AK. 75pp.

Sell, S. 2014. Unit 1D Black bear Chapter 1. Pages 4-1 – 4-16 in P. Harper and L. A. McCarthy, editors. Black bear Management report 1 July 2010-30 June 2013. Alaska Department of Fish and Game, Species Management Report ADF&G/DWC/SMR&P-2015-5. Juneau, AK.

PROPOSAL 42 – 5 AAC 85.030. Hunting seasons and bag limits for deer.

Extend the deer season to December 31, in Unit 1A remainder.

Current Federal Regulations

Unit 1A –Deer

4 antlered deer

Aug. 1 – Dec. 31

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



Impact to Federal subsistence users/wildlife: This proposal would allow additional opportunity for Federally qualified subsistence users to harvest deer under State regulations, particularly along beaches below the mean high tide line, which are a popular hunting area. This proposal would also align Federal and State deer seasons, decreasing regulatory complexity. However, this proposal would also eliminate the Federal subsistence priority. Currently, Federally qualified subsistence users can hunt on Federal public lands during December without any competition from non-Federally qualified users. Therefore, this proposal would increase competition for deer during December.

Little impact to the deer population is expected. In pellet group surveys conducted by ADF&G in Unit 1A, the mean number of pellet groups/plot increased substantially from 2017-2019 over 2010-2015 levels, indicating the Unit 1A deer population is increasing (ADF&G 2022). Furthermore, less than one deer has historically been harvested per hunter in Unit 1A, and over six days of effort have been required on average to harvest one deer (Dorendorf 2020). While deer may be more accessible during December, especially along beaches if there is deep snow, the Unit 1A deer population can likely sustain some increase in harvest, especially since harvest is limited to bucks-only. However, if this proposal is adopted, the harvest limit could be changed to “one antlered deer” to prevent inadvertent harvest or harassment of does if bucks have already dropped their antlers. This would also align with the Federal harvest limit.

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

Rationale: This proposal would provide additional opportunity for Federally qualified subsistence users to harvest deer under State regulations during December, but would eliminate the current Federal subsistence priority, potentially impacting subsistence hunts during December on Federal public lands. Little impact to the deer population is expected.

Literature Cited

Alaska Department of Fish and Game. 2022. Draft comments on Wildlife Proposal WP22-08. September 30, 2022. <https://www.doi.gov/sites/doi.gov/files/9.30.22-wp22-08-adfg-comments-508.pdf>. Accessed November 8, 2022.

Dorendorf, Ross. 2020. Deer management report and plan, Game Management Unit 1A: Report period 1 July 2011–30 June 2016, and plan period 1 July 2016–30 June 2021. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2020-24, Juneau, AK.

PROPOSAL 43 – 5 AAC 85.040. Hunting seasons and bag limits for goat. Increase the resident bag limit to two goats in Unit 1A.

Current Federal Regulations:

Unit 1A — Goat

Unit 1A, Revillagigedo Island only

No open season.



Unit 1A and 1B remainder - 2 goats; a State registration permit will be required for the taking of the first goat and a Federal registration permit for the taking of a second goat. The taking of kids or nannies accompanied by kids is prohibited Aug. 1-Dec. 31

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users (FQSUs) hunting goat under State regulations on Revillagigedo Island, although FQSUs are already allowed a second goat on the mainland portion of Unit 1A (which is primarily Federal public lands) under Federal regulations. Currently there is no open Federal goat season on Revillagigedo Island, and there has been no harvest of a second goat from 2004- 2019 by FQSU's in Unit 1A/1B remainder, although permits have been issued (OSM 2022).

The goat population on Revillagigedo Island is introduced, is considered to be abundant by ADF&G (ADF&G 2019), and may be able to support extra harvest. Goats in 1A and 1B remainder on the mainland have a greater chance of in-migration of individuals from areas along the coast and inland (Cross 2022, pers. comm.). This hunt area is managed by registration permit RG001. Harvest is limited by ADF&G's point system (i.e. 1 point for billies, 2 points for nannies) and monitored closely by a 3-day reporting requirement of successful harvest (Schumacher 2022, pers. comm.). There is little concern for overharvest from this proposal as this hunt area is closed by emergency order if reported harvest approaches or equals the points allotted.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 43.

Rationale: This proposal would increase opportunity Federally qualified subsistence users. Goat populations are healthy enough to support harvest, and they are protected from overharvest by registration permits and ADF&G's point system.

Literature Cited

ADF&G. 2019. Tab 6.1 Unit 1A Overview. ADF&G. Southeast Region Alaska Board of Game meeting. January 11–15, 2019. Petersburg, AK. <http://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-11-2019&meeting=petersburg> Accessed November 4, 2022.

Cross, Rob. 2022. Wildlife Biologist. Personal communication, phone call. USFS. Petersburg, AK.

OSM. 2022. Federal permits database. Office of Subsistence Management. [https://subsistence.fws.gov/apex/f?p=104:1:9705720053973:::~:](https://subsistence.fws.gov/apex/f?p=104:1:9705720053973:::) Accessed November 10, 2022.

Schumacher, T. 2022. Region 1 supervisor. Alaska Department of Fish and Game. Personal communication: e-mail. November 2022.



PROPOSAL 44 – 5 AAC 85.040. Hunting seasons and bag limits for goat. Extend the goat season in Unit 1A Remainder.

Current Federal Regulations:

Unit 1A – Goat

Unit 1A, Revillagigedo Island only

No open season.

Unit 1A and 1B remainder - 2 goats; a State registration permit will be required for the taking of the first goat and a Federal registration permit for the taking of a second goat. The taking of kids or nannies accompanied by kids is prohibited

Aug. 1-Dec. 31

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would increase opportunity for Federally qualified subsistence users harvesting goat under State regulations. The mainland goat population in Unit 1A is considered to be stable but at lower levels when compared to Revillagigedo Island (Dorendorf 2021). Extending the season later into the winter may allow easier access to goats that get pushed to lower elevations by increasing snow depth in the mountains (Cross 2022, pers. comm.). Disturbance from hunting during January could also increase the energy expenditure of goats during their hardest time of year.

This hunt area is managed by registration permit RG001. Harvest is limited by ADF&G's point system (i.e. 1 point for billies, 2 points for nannies) and monitored closely by a 3-day reporting requirement of successful harvest (Schumacher 2022, pers. comm.). While this hunt area is closed by emergency order if reported harvest approaches or equals the points allotted, goats could be quickly harvested during January when they may be easily accessible at lower elevations. Therefore, the 3-day reporting requirement could be shortened during January as an additional safeguard against overharvest.

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

Federal Position/Recommended Action: The OSM recommendation is **neutral** on Proposal 44.

Rationale: This proposal would increase opportunity for Federally qualified subsistence users hunting under State regulations. Goat populations are healthy enough to support harvest. While they are protected from overharvest by registration permits and ADF&G's point system, a shorter reporting requirement could be considered for the January season. Additionally, hunting disturbance during goats' most physically stressful time of year may result in higher, indirect mortality.



Literature Cited

Cross, Rob. 2022. Wildlife Biologist. Personal communication, phone call. USFS. Petersburg, AK.

Dorendorf, R. R. 2021. Mountain goat management report and plan, Game Management Unit 1A: Report period 1 July 2013–30 June 2018, and plan period 1 July 2018–30 June 2023. Alaska Department of Fish and Game, Species Management Report and Plan ADF&G/DWC/SMR&P-2021-20, Juneau.

Schumacher, T. 2022. Region 1 supervisor. Alaska Department of Fish and Game. Personal communication: e-mail. November 2022.

PROPOSAL 46 – 5 AAC 85.056. Hunting seasons and bag limits for wolf.

Lengthen the hunting season for wolves in Unit 2, to open September 1.

Current Federal Regulations:

Unit 2 –Wolf Hunting

No limit.

Sept. 1-Mar. 31.

Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.

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

Impact to Federal subsistence users/wildlife: Adoption of this proposal would provide Federally qualified subsistence users with additional hunting opportunity to harvest wolves under State regulations on State-managed lands. It would also align State and Federal hunting seasons, reducing regulatory complexity. However, it would reduce the Federal subsistence priority as Federally qualified subsistence users would not have an opportunity to harvest wolves for three months prior to the season opening to non-Federally qualified users.

No impacts to the wolf population are expected as additional harvest during the extended hunting season is expected to be very low. However, one concern is that wolf population estimates used to determine wolf trapping season lengths under the current harvest management strategy are often not available until October. Currently, the in-season Federal manager has delegated authority to close and reopen the season, but it is not clear how ADF&G would manage this situation.

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

Rationale: OSM is neutral on this proposal because although it would provide additional opportunity for Federally qualified subsistence users hunting under State regulations on State-managed lands, it would



also reduce the Federal subsistence priority for Federally qualified subsistence users. Little impact to the wolf population is expected.

PROPOSAL 47 – 5 AAC 92.170. Sealing of marten, fisher, lynx, beaver, otter, wolf, and wolverine.

Require wolf harvest information be reported within 48 hours of recovery and sealing within 14 days in Unit 2.

Current Federal Regulations:

Unit 2 –Wolf Hunting

No limit.

Sept. 1-Mar. 31.

Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.

Unit 2 –Wolf Trapping

No limit.

Nov. 15-Mar. 31.

Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.

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

Impact to Federal subsistence users/wildlife: This proposal would continue the misalignment of Federal and State reporting requirements, increasing regulatory complexity. Reducing the sealing deadline to 14 days would give users one less day to seal a harvested wolf. Requiring harvest information to be called-in within 48 hours of harvest would add undue hardship on Federally qualified subsistence users, especially in areas that have poor phone coverage with frequent outages. There would be no direct impacts to the wolf population if this proposal was adopted, although long-term management of the population may improve.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 47 **with modification** to remove the call-in requirement and to require any wolf taken in Unit 2 to be sequentially numbered and marked with the date and location recorded by the hunter or trapper. Sealing requirements would stay the same.

Rationale: This modification aligns Federal and State reporting requirement for wolves in Unit 2, reducing regulatory complexity. It also decreases the reporting burden on Federally qualified subsistence



users harvesting wolves under State regulations and eliminates reporting redundancy and complexity. Importantly, this modification allows ADF&G to obtain valuable data to inform their Spatially Explicit Capture-Recapture population estimation technique.

PROPOSAL 51 –

5 AAC 84.270. Furbearer trapping. 5 AAC 85.056. Hunting seasons and bag limits for wolf.

5 AAC 92.008. Harvest guideline levels. Establish a percentage of the Unit 2 wolf population that can be harvested on a sustainable basis, develop a harvest quota each season, require in-season reporting, provide the harvest to the public in real time, and allow three days’ notice before closing the season by emergency order.

NOTE: These comments only apply to the *“Establish a percentage of the Unit 2 wolf population that can be harvested on a sustainable basis, develop a harvest quota each season”* portion of this proposal.

Current Federal Regulations:

Unit 2 –Wolf Hunting

No limit.

Sept. 1-Mar. 31.

Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.

Unit 2 –Wolf Trapping

No limit.

Nov. 15-Mar. 31.

Any wolf taken in Unit 2 shall be sequentially numbered, marked with the date and location recorded by the hunter or trapper for each wolf, and all hides must be sealed within 15 days of take.

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

Impact to Federal subsistence users/wildlife: Adoption of the referenced portion of this proposal would revert to the previously used Harvest guideline level (HGL) wolf management strategy for Unit 2, which did not work. Federally qualified subsistence users would not know how long a season would be open, making it impossible to plan for the upcoming season. Early season closures also created hardships for trappers who could not plan for when they needed to pull traps. Timely harvesting reporting is also discouraged, as the sooner trappers report their take, the sooner the season will be closed. Furthermore, the HGL management strategy discouraged hunters and trappers from reporting harvest at all to prevent



the season from closing early. This increases the potential for over harvest, and the harvest quota was exceeded many times in the past under the HGL management strategy.

Adopting this proposal would misalign State and Federal wolf management strategies in Unit 2, increasing regulatory complexity, and complicating management. A similar proposal could be submitted to the Federal Subsistence Board during the next open proposal window in January-March 2023.

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

Rationale: The current State management strategy for Unit 2 wolves was adopted in 2019, replacing the ineffective HGL strategy. This strategy manages harvest to maintain the population within an objective range. Establishing population objectives provides managers with a quantitative benchmark to gauge successful management, helps guide habitat management and regulatory planning, and mitigates disagreements between stakeholders over what is a sustainable wolf population (Wolf Technical Committee 2017, ADF&G 2019).

Literature Cited

ADF&G. 2019. Meeting audio. Alaska Board of Game. Southeast Region Meeting. January 11-15, 2019. Petersburg, AK. http://www.adfg.alaska.gov/static/regulations/regprocess/gameboard/swf/2018-2019/20190111_janse/index.html?mediaBasePath=/Meeting%2001-14-19%20BOG%20%28Jan-18-19%209-58-54%20AM%29#. Accessed May 2, 2019.

Wolf Technical Committee. 2017. Interagency wolf habitat management program: Recommendations for Game Management Unit 2. Management Bulletin R10-MB-822. USDA Forest Service, USDI Fish and Wildlife Service, and Alaska Department of Fish and Game.

PROPOSAL 52

5 AAC 84.270. Furbearer trapping. 5 AAC 85.056. Hunting seasons and bag limits for wolf.

5 AAC 92.008. Harvest guideline levels. Establish a harvest quota for wolves, between 20% and 35% of the estimated wolf population in Unit 2.

See comments for Proposal 51.



Submitted by: Craig Olson

Community of Residence: Kupreanof, Alaska

Comment:

Proposal 24 and 25

I oppose black bear hunting on the Petersburg Creek drainage.

Bow hunting results in wounded animals not killed immediately. The handbook for registered bow hunters talks about the 2 hunts. And recommends waiting to track the wounded animal for 8 hours to let it lie down and bleed out. The proposed dates of April 15 through June 30 corresponds to high use of Petersburg Creek by steelhead fishers, tourist, and recreational boaters. A wounded black bear is a real threat.

As stated in proposal 25 the black bear population in Southeast Alaska is suspected to be on the decline. As a 40 year resident of Kupreanof, Petersburg Creek is the only reliable place to view black bears. With the rest of Kupreanof Island open to hunting it seems unnecessary to open the only sanctuary for bears, which is a Congressional designated wilderness area, heavily used by the non hunting public. Setting aside a small area for bears to maintain a viable population is sound management for maintaining a huntable population elsewhere.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose

Proposal 25: Oppose



Submitted by: Nicholas Orr

Community of Residence: Juneau

Comment:

Proposal #4 -- I am in support of this proposal.

Based on the harvest in Berners Bay (a 1 bear per year area) actually going down after being liberalized to 1 bear per year, there is no reason to believe that a liberalization of the brown bear bag limit is going to result in a material change in brown bear harvest.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 4: Support

Submitted by: Nicholas Orr

Community of Residence: Juneau, Alaska

Comment:

Proposal #6: Support

Changing the river otter season to match the wolverine season simplifies regulations as well as provides increased opportunity for trappers. The season would align with that in Unit 9, which has river otter populations and occupies a similar latitude. Fur primeness is related to daylight, so having similar seasons for similar latitudes makes sense.

River otters are not widely harvested in Units 1-5, so while an expansion of the season has the potential to deplete localized populations, the overall population will likely see no impact.

There is some concern that river otters might be having kits during this proposed season extension, though in my experience with otter bycatch while targeting beavers, only otters in May exhibited signs of recent birth.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 6: Support

Submitted by: Nicholas Orr

Community of Residence: Juneau, Alaska

Comment:

Proposal #7: Support

Like I said in the proposal, this would allow marten bycatch in wolverine traps to be

(legally) retained. It would also allow people who are out deer hunting to participate in marten trapping, as the early part of the season extension overlaps with the deer rut.

Marten are one of the easiest species to target, given they aren't especially trap-shy nor do they require heavy/strong traps. I'm hopeful that if the season was extended, especially in November, more people would try their hand at trapping since they would already be in the field.

From a scientific perspective, fur primeness is related to daylight hours. British Columbia's regions 6 & 7 have similar seasons to the one I have proposed and are at latitudes that mirror and even extend well south of SE Alaska. Given Canada's large share of the marten fur market, if they're utilizing dates like the ones I'm proposing, then those dates are probably producing prime fur.

I have attached a pdf showing the BC regions relative to SE Alaska as well as the BC trapping marten trapping season.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 7: Support

See attachment on the following page.



2022-2024 PROVINCIAL TRAPPING SEASONS

NOTE: THE FOLLOWING OPEN SEASONS APPLY TO THE ENTIRE REGION UNLESS SPECIFIC MANAGEMENT UNITS (MUS) ARE STATED.

SPECIES/REGIONS (MUs)	SEASON DATES	SPECIES/REGIONS (MUs)	SEASON DATES
BEAVER		RACCOON	
Region 1	Oct 1 - Apr 30	Regions 1, 2, 3, 4, 5, 6 (except MUs 6-12, 6-13), 7A, 7B, 8	Oct 1 - Mar 31
Regions 2, 3, 4, 5, 8	Oct 15 - Apr 30	MUs 6-12, 6-13	Jan 1 - Dec 31
Regions 6 (except MUs 6-12, 6-13), 7A, 7B	Oct 1 - May 31	RIVER OTTER	
MUs 6-12, 6-13	Jan 1 - Dec 31	Region 1	Nov 15 - Mar 31
BLACK BEAR		MUs 2-2 to 2-5, 2-12 to 2-16	Nov 15 - Feb 28
Region 5 (except MUs 5-2, 5-15) and MUs 6-3, 6-11 to 6-14 ..	Oct 15 - May 15	MUs 2-6 to 2-11, 2-17 to 2-19 and Regions 3, 4, 5	Oct 15 - Apr 30
Regions 3, 4, 7B, 8, and MUs 5-2, 5-15	Oct 1 - May 31	Regions 6, 7A, 7B	Oct 1 - May 31
Regions 6 (except MUs 6-3, 6-11 to 6-14), 7A	Sept 15 - May 31	Region 8	Nov 1 - Apr 15
Quota = 2 black bear in one licence year		SKUNK	
See the "Bears" and "It's Unlawful" section for general regulations concerning bear parts.		MUs 1-14, 1-15 and Regions 2, 3, 4, 5, 6, 7A, 7B, 8	Oct 15 - Feb 28
BOBCAT		SQUIRREL (douglas, northern flying, red)	
Regions 2, 3, 4, 5, 8	Nov 15 - Feb 15	Regions 1, 2, 3, 4, 5, 8	Nov 1 - Mar 15
See Compulsory Inspection & Reporting requirements, page 72		Regions 6 (except MUs 6-12, 6-13), 7A, 7B	Nov 1 - Mar 30
COYOTE		MUs 6-12, 6-13	Jan 1 - Dec 31
Region 2	Sept 10 - Jun 15	WEASEL (least, long-tailed, short-tailed)	
MUs 1-14, 1-15 and Regions 3, ♦4, 5, 6, 7A, ★7B, 8	Oct 15 - Mar 31	Regions ♦2, 3, 4, 5, 8	Nov 1 - Feb 15
♦ In MU 4-1, open season is Dec 1 - Mar 31 if using a killing snare.		Regions 6 (except MUs 6-12, 6-13), 7A, 7B	Nov 1 - Feb 28
★ There is no closed season for coyote in MUs 7-19 to 7-22, 7-31 to 7-36, 7-42 to 7-58 below 1100 m elevation.		♦ There is no open season for long-tailed weasel in MUs 2-3, 2-4, 2-6, 2-18 & 2-19	
FISHER		WOLVERINE	
MUs 6-19 to 6-27, and Region 7B	Nov 1 - Feb 15	Regions 3, 5	Nov 1 - Jan 31
See Compulsory Inspection & Reporting requirements, page 72		Regions 6 (except MUs 6-3, 6-11, 6-14), 7A, 7B	Nov 1 - Feb 28
Fisher trapping seasons in Regions 3, 5, 7A, and portions of Region 6 have been closed.		MUs 6-3, 6-11, 6-14	Nov 1 - Feb 15
FOX		See Compulsory Inspection & Reporting requirements, page 72	
MUs 1-14, 1-15, and Regions 2, 3, 4, 6, 7A, 7B	Oct 15 - Feb 28	WOLF	
Region 5	Oct 15 - Mar 31	Region 1	Sept 10 - Jun 30
LYNX		MUs 2-5, 2-6, 2-11 to 2-16	Sept 10 - Jun 15
Regions 3, 4, 5, 7B, 8	Nov 15 - Feb 15	MUs ♦3-12 to 3-20, 3-26 to 3-33, 3-34 to 3-44	Oct 15 - Mar 31
Regions 6, 7A	Nov 1 - Feb 15	Regions * ♦4, ♦5, 6, 8	Oct 15 - Mar 31
See Compulsory Inspection & Reporting requirements, page 72		Regions 7A, ★7B	Oct 15 - May 31
MARTEN		* There is no closed season for wolf below 1100 m elevation in MUs 4-2 to 4-5, 4-20 to 4-22, 4-24 to 4-26, 4-34 to 4-37, and 4-40. Restricted to the use of certified restraining traps only (see page 75) from Apr 1 - Oct 14.	
Regions 1, 2, 3, 4, 5, 8	Nov 1 - Feb 15	♦ On private land ONLY, there is no closed season for wolf in MUs 3-12, 3-13, 3-17 to 3-20, 3-26 to 3-33, 3-35 to 3-42, 5-1 to 5-6, and 5-12 to 5-14. From Apr 1 - Oct 14 only certified restraining traps can be used. Private land is defined as land that is not Crown land and that government does not have a vested interest in (i.e., does not apply to Crown grazing lease).	
Regions 6, 7A, 7B (except MUs 7-49 to 7-54)	Nov 1 - Feb 28	♦ The use of killing snares in the Kootenay Region is limited to Dec 1 - Mar 31.	
MUs 7-49 to 7-54	Nov 1 - Mar 15	★ There is no closed season for wolf in MUs 7-19 to 7-22, 7-31 to 7-36, 7-42 to 7-58 below 1100 m elevation.	
MINK			
Regions 1, 3, 4, 5, 7B (except MUs 7-49 to 7-54), 8	Nov 1 - Feb 15		
Region 2 and MUs 6-3, 6-11, 6-14	Nov 15 - Feb 15		
Regions 6 (except MUs 6-3, 6-11, 6-14), 7A	Nov 1 - Feb 28		
MUs 7-49 to 7-54	Oct 15 - Feb 15		
MUSKRAT			
Regions 1, 3, 4, 5, 8	Oct 15 - Apr 30		
Region 2	Nov 15 - Feb 15		
Regions 6 (except MUs 6-12, 6-13), 7A, 7B	Oct 1 - May 31		
MUs 6-12, 6-13	Jan 1 - Dec 31		

Trappers should be aware of the restrictions described in the It's Unlawful section (pages 11-12) and the Hunting Methods and Restrictions sections (pages 12-13).





Submitted by: Nicholas Orr

Community of Residence: Juneau, Alaska

Comment:

Proposal #10 -- Oppose

This proposal purports to act as an 'olive branch' to the SE Rural Advisory Committee (RAC) by establishing a clear rural priority in bag limits. However, as ADFG has pointed out, federally qualified users already have a clear through priority through an extended season as well as the federally designated hunter program.

During the last SE RAC meeting, this proposal wasn't mentioned at all as far as I can tell. If it was, it certainly didn't result in serious consideration. I think it's a reasonable conclusion to say that if this proposal was submitted as an 'olive branch', the SE RAC ignored that gesture.

ADFG has put out a fantastic video on Youtube outlining the Unit 4 deer issue. I encourage you to view this video here: <https://www.youtube.com/watch?v=MZd9YozB8f4>

I would like to point out that the Board of Game increased the Unit 4 deer bag limit because the population is at or near carrying capacity. This has not changed. A board member made the comment that "You cannot stockpile game." This is as true now as it was then. The Board noted that raising the bag limit would eliminate illegality in the limited situations where federally qualified users are harvesting deer 5 and 6 on the beach (state land) as the state did not allow for harvest of deer 5 and 6 previously. The board noted that most non-federally qualified hunters (1) do not harvest more than 4 deer and (2) are not hunting anywhere near federally qualified hunters (i.e. the vast majority of Juneau hunting effort is in the area immediately surrounding Juneau). That also has not changed.

I urge you to oppose this proposal.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose

Submitted by: Nicholas Orr

Community of Residence: Juneau, Alaska

Comment:

Proposal #11 -- Oppose

This proposal suggests that because we have had a limit of 4 deer for a long time that we should revert back to having a limit of 4 deer. The rationale behind this proposal is "Because we've always done it that way." That is the worst rationale to do anything.

I would point out that an increased bag limit is actually a benefit to the overall deer population in heavy snow years. Years where heavy snow forces deer to the beach concentrates deer numbers in limited habitat. Reducing deer numbers, especially bucks (likely to have high mortality figures), in those years allows the remaining deer to have less competition for available browse and increases their chances at surviving the winter.

I would like to point out that the Board of Game increased the Unit 4 deer bag limit because the population is at or near carrying capacity. This has not changed. A board member made the comment that "You cannot stockpile game." This is as true now as it was then. The Board noted that raising the bag limit would eliminate

illegality in the limited situations where federally qualified users are harvesting deer 5 and 6 on the beach (state land) as the state did not allow for harvest of deer 5 and 6 previously. The board noted that most non-federally qualified hunters (1) do not harvest more than 4 deer and (2) are not hunting anywhere near federally qualified hunters (i.e the vast majority of Juneau hunting effort is in the area immediately surrounding Juneau). That also has not changed.

This proposal's author also states that 4 deer is sufficient for one person. I know individuals that can certainly eat 4 deer and I know people who would struggle to eat one. That statement is subjective and not a rationale to make any decision.

I urge you to oppose this proposal.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 11: Oppose

Proposal 21: Oppose

Proposal 22:

Submitted by: Nicholas Orr

Community of Residence: Juneau, Alaska

Comment:

Proposal 36: Oppose

The author of this proposal wants to have higher grouse populations in easily accessible areas for beginning hunters. The problem with this is that easily accessible areas always receive a lot of hunting pressure, resulting in depressed game populations in those spots. This is true with every game animal across the state. ADFG has stated as much, saying that if you wanted to increase potential bird availability, you'd have to decrease the limit to 1 bird. And even then, the amount of birds available would depend on weather during the previous year's hatching season.

I'm not sure that even a limit of one bird would achieve what this proposal's author would like. I used to be an avid grouse hunter, shooting upwards of 20 birds in years with favorable weather (ie limited snow). I wasn't going out and shooting 5 birds in one outing, but rather I went almost every day of the season (approx April 1 - May 15) and got 1 or 2 birds each time. And I would run into other hunters pretty regularly. So to think that reducing the bag limit is going to increase the availability of birds for new hunters goes against common sense as well as the science based recommendation of ADFG.

There were days that I got 5 birds; these days I logged a lot of foot miles and traveled a long ways off the road system. Reducing the bag limit would essentially target hunters who are putting in a lot of effort to reach areas that aren't easily accessible. I think it's important to consider that this proposal looks to limit the bag limit over an enormous area, the vast majority of which does not qualify as "easily accessible"

The proposal has a number of red herring arguments that need to be addressed: (1) there isn't a huge number of skiers targeting grouse. If you drew a Venn diagram with skiers and hunters, the overlap would likely be pretty small. Snowmachines can only really access grouse on Douglas Island and a limited area on the mainland. Any birds that skiers or snowmachiners harvest are not birds that a person on foot is going to be able to access! Furthermore, snowmachiners are not able to target birds consistently. They are completely shut out in years with low snow (2) Hunting shows / social media may be highlighting grouse hunting, but hunting numbers are still going down. (3) Sooty grouse hunting is not a replacement for spring king fishing. Many people do not find a 6-8 hour bushwhacking hike with an elevation gain up to 2500ft to be a similar replacement for a nice day on the water.



PC116

I will grant that the author of this proposal was very persuasive at the Juneau Douglas Advisory Committee meeting. Members were quite concerned about snow machine harvest and increasing the availability of birds in easily accessible areas despite common sense and ADFG telling them that the data doesn't support this proposal.

I urge you not to support this proposal. It covers an overly large area and will not accomplish its stated intent.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 36: Oppose

Submitted by: Nicholas Orr

Community of Residence: Juneau, Alaska



PC116

Comment:

Proposal #37: Oppose

The author of this proposal gives the impression that ptarmigan along the road system are in danger of being overharvested because the population isn't monitored by ADFG. I have run into flocks of 10-15 birds and have heard second hand about hunters seeing many more birds than 10-15. Sometimes you don't run into birds - that's hunting. My accounts and the accounts of others are consistent with ADFG saying that bird populations are driven more by weather during nesting seasons.

The 20 bird limit does seem like a high number; in years with low birds numbers, it doesn't matter because the birds are scarce to begin with. In years with high bird numbers, it still doesn't matter because shooting 20 is rare given the terrain in the alpine. I think a number of members of the Juneau Douglas Advisory Committee (JDAC) were under the impression that ptarmigan will stand around while you harvest them. That may be true for a few birds, but eventually the flock will relocate, often crossing several drainages and gullies in the process. You may be able to see where they went, but good luck getting back within shooting range in a reasonable time period.

There was also concern among JDAC members that hunters on snowmachines would be able to harvest a lot of birds by following flocks once they are located. This may be possible in other areas of the state, but not here. Snowmachiners are limited on the mainland to one area, which isn't very good ptarmigan habitat. On Douglas, there just isn't a lot of ptarmigan habitat. Skiers can certainly reach good habitat, but most skiers I know are more interested in the descent down the mountain rather than maximizing their harvest. Plus, skiers face the same challenges as other hunters once the birds decide to relocate.

To summarize: ADFG says the population fluctuates independent of hunting pressure and despite claims to the contrary, hunting pressure is minimal due to the effort and lack of consistent good weather required to reach the alpine. The area under consideration is huge and the vast majority of it receives no ptarmigan hunting pressure. Complicated regulations is a frequent complaint I hear from hunters and prospective hunters. The last thing Juneau needs is more regulations, especially unnecessary ones. Please oppose this proposal.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 37: Oppose

Submitted by: Nicholas Orr



PC116

Community of Residence: Juneau, Alaska

Comment:

Proposal 41: Support

Please remove the Douglas Island Management plan. It makes no sense to have a wolf sanctuary on Douglas when the wolves are part of an overall population that transits back and forth between the Juneau area mainland and Douglas Island. Typically, a sanctuary is established to protect a vulnerable population or provide wildlife viewing. The Juneau area wolf population is robust; even after the wolves were 'wiped out' back in 2002, they were never absent from the island (I remember hearing wolves howling in 2006). As far as wildlife viewing is concerned, a substantial portion of Douglas Island has limited road access and wolves are not a consistently viewable species in SE Alaska.

I would also like to point out that Douglas Island receives the most deer hunting pressure in the Juneau area. A good portion of these hunters hunt Douglas simply because they have no other alternative -- they cannot afford a boat to get over to Admiralty. I think it's unfair to have a wolf sanctuary that primarily impacts people of lower economic status.

Please support the removal of the Douglas Island Management plan for wolves. It makes no biological sense, it makes no common sense (given wolves are not consistently viewable) and it disproportionately impacts lower income Juneau hunters. Furthermore, it discourages trappers from setting the amount of traps needed to catch wolves given they may have to pull all their gear if the limit is reached.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 41: Support



PC117

Submitted by: Corey ostrander

Community of Residence: Wrangell, Ak.

Comment:

It would be nice to have the opportunity for an elk hunt on zerambo. To would also be nice if there was a limited draw for doe around the wrangell and Petersburg area.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support



Submitted by: Steve Ott

Community of Residence: Juneau Alaska

Comment:

I've filed out the survey conveying my opinion on proposed changes.

Regarding proposals 28 & 29:

Increasing Goat accessibility in the Juneau area by expanding RG014 will allow for greater hunter opportunity and distribution of hunter pressure. Due to the physicality and difficulty of archery goat hunting, it's unlikely to increase hunter numbers in this area. As it stands, there are large low impact areas that have been closed to hunting for as long as I can remember for no good reason. Expand RG014!

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Oppose
Proposal 2: Oppose
Proposal 3: Support
Proposal 4: Support
Proposal 10: Oppose
Proposal 11: Oppose
Proposal 12: Support
Proposal 13: Support
Proposal 14: Support

Proposal 21: Oppose
Proposal 28: Support
Proposal 29: Support
Proposal 30: Support
Proposal 31: Support
Proposal 34: Support
Proposal 35: Support
Proposal 36: Support
Proposal 37: Support

Proposal 38: Support
Proposal 39: Support
Proposal 40: Support
Proposal 41: Support
Proposal 42: Support
Proposal 43: Support
Proposal 44: Support
Proposal 45: Support
Proposal 46: Support

Proposal 47: Oppose
Proposal 48: Oppose
Proposal 49: Oppose
Proposal 50: Oppose
Proposal 51: Oppose
Proposal 52: Oppose
Proposal 53: Oppose
Proposal 54: Oppose



Submitted by: Aaron Overton

Community of Residence: Juneau Alaska

Comment:

No hunting in prime wintering habitats for mountain goats that is so easily accessible. That area is used by many goat viewers that don't hunt.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 28: Oppose



Submitted by: Exor Padro

Community of Residence: Juneau,AK

Comment:

Proposition #32, Exor Padro

I'm in support of this proposition. There is no downside to it. On the contrary, this proposition has the potential to dramatically impact the goat population in a positive matter as the years accumulate.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 32: Support



Submitted by: Bruce Parker

Community of Residence: SITKA

Comment:

Please find the proposals I have interest in one way or the other with support or oppose.

I do not support proposals 1,2,3,4,13 and 14.

I do not see prop[osal # 201 listed here, but I do support it and getting a Sea Otter season and harvest in Place.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Oppose
Proposal 2: Oppose

Proposal 3: Oppose
Proposal 4: Oppose

Proposal 13: Oppose
Proposal 14: Oppose



Submitted by: Dustin Phillips

Community of Residence: Wrangell, Alaska

Comment:

Zarembo island has a very healthy population of animals to allow a reasonable season for locals to harvest this very unique species in south east. I have personally witnessed lots and lots of elk on the Rambo island on the beach is it on the main line logging roads. I believe it properly managed with limited animals taken per year that this can be a very viable hunt that can grow in time. And regards, I hope this comments reaches you well

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support



Submitted by: Richard Phillips

Community of Residence: Wrangell,Alaska

Comment:

The amount of activity seen by people working, hunting and transiting zarembo island snow pass and surrounding areas more than constitutes a draw tag in this island, if this many bulls are being seen constantly in the open then their is certainly plenty that don't get seen by humans.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support



Submitted by: John Plett

Community of Residence: Juneau,Ak

Comment:

Prop 41) I agree, the wolf population on Douglas island has been increasing, and the deer population has suffered. I as well as many Juneau residents rely on deer as a food source, and the deer are getting harder to find every year. I have come across wolf packs on north Douglas at least once per season the last 3 years, and the number of wolf kill sights I have found while grouse hunting in the spring, as well as deer hunting in the fall, has increased greatly since 2018.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Support	Proposal 13: Support	Proposal 29: Support	Proposal 45:
Proposal 2: Support	Proposal 14: Support	Proposal 30: Support	Proposal 46:
Proposal 3: Oppose	Proposal 17: Support	Proposal 31: Support	Proposal 47:
Proposal 4: Support	Proposal 18: Support	Proposal 32: Support	Proposal 48:
Proposal 5: Support	Proposal 19: Support	Proposal 34: Support	Proposal 49:
Proposal 6: Support	Proposal 20: Support	Proposal 35: Support	Proposal 50:
Proposal 7: Support	Proposal 21: Oppose	Proposal 36: Support	Proposal 51:
Proposal 8: Support	Proposal 24: Support	Proposal 37: Support	Proposal 52:
Proposal 9: Support	Proposal 25: Support with	Proposal 38: Support	Proposal 53:
Proposal 10: Oppose	Amendment	Proposal 39: Support	Proposal 54:
Proposal 11: Oppose	Proposal 26: Support	Proposal 40: Support	
Proposal 12: Support	Proposal 28: Support	Proposal 41: Support	



Submitted by: Joshua Plis

Community of Residence: Juneau, Alaska

Comment:

Oppose 28 no hunting in goat wintering grounds.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 28: Oppose	Proposal 29: Support
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Submitted by: Aaron Powell

Community of Residence: Wrangell,Ak

Comment:

I strongly support a opportunity for a chance to harvest a elk on Zarembo Island. The only thing I would like to see different is having the season September 15th - October 15th. It would be nice to be able to hunt Elk during the rut just like we do moose and deer.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support with Amendment



Submitted by: Ed Rauterkus

Community of Residence: Juneau Ak

Comment:

I vote no change on proposal numbers 10. 11. 36. 37. 41. People that are not from Alaska should have nothing to say about our fish and game rules. We don't have anything to say about rules in the states they live in. [REDACTED]

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Oppose

Proposal 21: Oppose

Proposal 37: Oppose

Proposal 11: Oppose

Proposal 36: Oppose

Proposal 41: Oppose



Submitted by: Ryan Reeves

Community of Residence: Wrangell,AK

Comment:

Proposal 27

Regarding requirement to move traps 100 yards from a drivable surface, I strongly oppose this recommendation.

During trapping season most of the logging roads are inaccessible by truck, and is typically accessed by snowmobile or wheeler. With that being said, to require 100yard minimum from road is bogging down trappers access and is unnecessary. Trappers are for the most part targeting wolves to help manage the the wolf population and help the deer population. Wolf traps are heavy, if this proposal went through it would require the trapper to pack their traps, at about 10 pounds each with a chain and drag system, This would discourage people from trapping and would be unreasonable. The alternative is to trap by boat witch is expensive and are subject to bad weather, and is limited to people with boats. I feel that driving past the pavement and posted trap signs is more than enough warning to caution people and prevent trapper/human conflict.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 27: Oppose



unapologetically FOR ALASKAN RESIDENTS

PO Box 60095, Fairbanks, Alaska 99706 (907) 371-7436
email info@residenthuntersofalaska.org web www.residenthuntersofalaska.org

January 5, 2023

**Comments to Alaska Board of Game
Region I Southeast Meeting
January 20–24, 2023**

Proposals we support: 2, 30, 31, 35, 42, 46,

Proposals we oppose: 1, 10, 11, 27, 47-54

Proposal 1- 5AAC 92.003 Hunter education and orientation requirements

OPPOSE

RHAK is involved in hunter education efforts because hunter education and orientation is important for the reasons outlined in this proposal. However, mandating these requirements over Units 1-5 will end up having the effect of disenfranchising many subsistence hunters in outlying areas who are unable to travel and take the required hunter education and orientation course before being allowed to hunt.

One compromise may be to require all hunters in Units 1-5 who have not completed a hunter education and orientation course to take and pass the online course only, which we would support.

Proposals 10 & 11 - 5AAC 85.030 Hunting seasons and bag limits for deer

OPPOSE

Both of these proposals seek to decrease the bag limit for deer in Unit 4 by non-federally qualified users (NFQU) from 6 to 4 deer, using the rationale that if the bag limit for NFQU is not decreased we will see evermore federal proposals to close deer hunting on federal lands by NFQU.

This is the exact opposite approach the state should be taking, and is consistent with past federal proposals to limit NFQU that are not at all based on any conservation concerns for deer populations.

The deer population in Unit 4 is abundant and there is absolutely no reason to decrease the bag limit for NFQU.



Proposal 31 – 5AAC 85.040 Hunting seasons and bag limits for goat

SUPPORT

This is a RHAK proposal and there was no intention with this proposal to eliminate any nonresident goat hunting opportunity, as stated in the Department comments.

The intent of this proposal is to lengthen the resident RG 015 goat season by one month by starting the season on August 1st instead of September 1st. The nonresident RG 015 goat season remains the same.

Unit 1C Chilkat Peninsula southern portion drainages of the Chilkat Range south of the south bank of the Endicott River

1 goat by registration permit only; the taking of nannies with kids is prohibited.

Resident only RG 015 (or new RG XXX) Aug 1 – Nov 30

Nonresident RG 015 Sept 1 – Nov 30

Goat harvests are very low in this area and survey results show an increasing population. We would like resident goat hunters to be afforded more hunting opportunity during August when the weather allows for better, more reliable access.

The Guideline Harvest Level (GHL) for this population allows for up to 18 goat points, which would be 18 billies. We don't expect that much of an increase in goat harvest with a resident-only earlier season start and there are no conservation concerns as the season would still be closed by emergency order if harvest exceeded 18 goat points.

We recommended also imposing a requirement that all hunters participating in this hunt watch and pass the ADF&G goat gender identification quiz, because we don't want the taking of nannies to impact opportunity. However, we support this proposal with or without that requirement.

Proposal 34 – 5AAC 85.020 Hunting seasons and bag limits for brown bear

Withdraw based on Department comments

This is a RHAK proposal. After reading the Department's comments, it appears that current harvest levels of brown bears on the Chilkat Peninsula exceed the recommended harvest. However, the Department does not oppose this proposal asking for more brown bear hunting opportunities, and is neutral on potentially increasing brown bear harvests.

The Department alludes that because this is an allocative proposal, they must remain neutral, which doesn't make any sense if the Department has conservation concerns for the brown bear population in this area if additional harvest opportunities are allowed. Perhaps it's time to revisit the Department policy on neutrality on all allocative proposals.



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

Resident Hunters of Alaska (RHAK)
www.residenthuntersofalaska.org



Submitted by: Beverly Richardson

Community of Residence: Petersburg AK

Comment:

I urged you to Support 45,47,48,49,50,52,53. And 54.

And I urge you to oppose 24, 25, 46 and 16.

Comments on additional form

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Oppose

Proposal 24: Oppose

Proposal 25: Oppose

Proposal 45: Support

Proposal 46: Oppose

Proposal 47: Support

Proposal 48: Support

Proposal 49: Support

Proposal 50: Support

Proposal 51: Support

Proposal 52: Support

Proposal 53: Support

Proposal 54: Support

Submitted by: Beverly Richardson

Community of Residence: Petersburg

Comment:

Proposal 24. I am in opposition to Allowing black bear to be taken by bow and arrow in Petersburg Creek Drainage.

I oppose this proposal. Petersburg Creek watershed has been closed to the taking of black bear since the 1970's. It is a highly used recreational area for the peoples of Petersburg and tourists alike. One of the first and finest events is to go up the creek especially the spring or other times throughout the year and watch the bears come out on the flats. Further, this proposal would occur during and conflict with the renowned steelhead fishing season in this watershed. There is no purpose or need for this proposal. This is only a very small portion of Area 3 and there are numerous opportunities elsewhere.

Proposal 24 I am in opposition to Allowing black bear to be taken in Petersburg Creek Drainage.

I oppose this proposal. Petersburg Creek watershed has been closed to the taking of black bear since the 1970's. It is a highly used recreational area for the peoples of Petersburg and tourists alike. One of the first and finest events is to go up the creek especially the spring or other times throughout the year and watch the bears come out on the flats. Further, this proposal would occur during and conflict with the renowned steelhead fishing season in this watershed. There is no purpose or need for this proposal. This is only a very small portion of Area 3 and there are numerous opportunities elsewhere.

Proposal 16.I am in opposition to this proposal to extend the bow season for deer on Mitkof Island.

I am in opposition to the extension of the bow season on. Mitkof Island by changing the opening from October 1 to August 1. This area often comes close to areas of recreation where local folks and their dogs wander through th woods. This is especially true of berry picking time. This could easily result in conflicts. And would create undue angst with berry pickers and others wandering through the forest near the roadsides.. There is no need to replace the long established use of the forest for berry picking by potential bow hunters. Please do not extend this season



Submitted by: Tavis Rogers

Community of Residence: Oak Creek, CO

Comment:

I am in support of the proposals that would provide additional low impact archery hunting opportunities outlined in Proposals 16, 24, 29, and 30.

I am in opposition of cutting the archery season at Etolin Island in half and adding rifle hunts in that time right on top of the peak of the elk rut as there are already two any weapon hunts in the month of October that yield over 50% more harvest than the archery hunt. This proposal would take away from the lower impact archery season while potentially having a negative effect on the elk herd

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support

Proposal 24: Support

Proposal 30: Support

Proposal 19: Support with

Proposal 29: Support



Submitted by: John Roseland

Community of Residence: Thorne Bay, Alaska

Comment:

I am opposed to proposal 19 for the following:

- 1). There are so few archery only seasons in Alaska that I really hate to see one cut in half.
- 2). In my personal observations, mainly on the west side of Etolin, Onslow and Stone Islands, the population has decreased over the last several years.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 19: Oppose



Submitted by: Rosey Roseland

Community of Residence: Thorne Bay, Alaska

Comment:

Proposal 45: Oppose. Stock piling hundreds of wolves in an area goes against any sound big game management where animals are harvested for a food resource.

Proposal 46: For. We need to harvest more Wolves on Prince of Wales. They are having a terrible impact on the Deer and Beaver populations of the island.

Proposal 49: Opposed.

Proposal 50: Oppose. Alaska Wildlife Alliance is trying to close Wolf season any way they can.

Proposal 51: Opposed

Proposal 52: Opposed

Proposal 53: Opposed. Where is the actual proof that the unreported harvest is 35 to 50% ?

Proposal 54: Oppose. The group the Alaska Wildlife Alliance seems like a radical group to me with this outrageous proposal.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Support
Proposal 2: Support
Proposal 3: Oppose
Proposal 4: Support
Proposal 6: Support
Proposal 7: Oppose
Proposal 8: Oppose
Proposal 9: Support

Proposal 13: Support
Proposal 14: Support
Proposal 17: Support
Proposal 18: Oppose
Proposal 19: Oppose
Proposal 20: Oppose
Proposal 23: Support
Proposal 24: Support

Proposal 25: Support
Proposal 27: Support
Proposal 33: Support
Proposal 42: Oppose
Proposal 43: Oppose
Proposal 44: Support
Proposal 45: Oppose
Proposal 46: Support

Proposal 47: Oppose
Proposal 48: Oppose
Proposal 49: Oppose
Proposal 50: Oppose
Proposal 51: Oppose
Proposal 52: Oppose
Proposal 53: Oppose
Proposal 54: Oppose



PC134

Submitted by: Jesse Ross

Community of Residence: JUNEAU, Alaska

Comment:

Jesse Ross, Alaska Trappers Assoc, Juneau Advisory committee, trapper seat

Juneau resident and avid sportsman since 1996

Prop 4, I support this bc it falls in line with the ADFG mission. Brown bears need to be managed in SE like they are in the rest of the state. No population concern, big apex predators need managed here in SE just like they are statewide.

Prop 6, I support this, otter here in SE use same areas as beaver. many states much further south have otter season opening in Nov. Fur primeness is not an issue

otter are plentiful in SE, procreate fast, and are an underutilized fur bearer.

Prop 7, 8, 9 I support this, SE has the shortest season statewide...WHY?? not a species of concern. losing 75 days of wolverine season??? why

Prop 10 I do not support this, its bogus and goes against science and adfg goals and the mission. Just say, NO to the feds managing Alaska

Prop 11 I oppose, not needed Proposal 12, 13, 14 I support , brown bears in SE need to managed like the rest of the state...PERIOD...there are too many. despite what the Adfg chilkat valley haines survey indicates,that model is inaccurate and cannot be applied to the vast different regions of SE alaska...nowhere else in the state do the biologists do a small sample in a road access area and apply it generally to vastly different regions. i

Pro 27 I oppose, trappers need to police their own here, small local issue not needing a proposal

Prop 30 , 31, 32 33 34 I support, predators need managed, goat populations will go up...predator prey relationship

Prop 36 37 I oppose, not needed not a concern, no science supports these

proposal 38, 39I support, as does the AC

Prop 40 I support as the alternative amendment, well written proposal

Prop 41 I support fully, I have actively trapped and monitored the wolf activity on the island these last years, why do we make certain areas of the state wolf havens, and let them decimate the deer, there is no science here. deer have taken a hard hit and this plan is 20 yrs old, time to update Proposal 43 44 I support, the Ac here has done some great work. good science based

proposals 45,47 thru 54 I oppose these l. If this group, AWA was really an ally of wildlife they would seek to help Adfg in population studies and put their money where their mouth is. AWA does not have the same mission as ADFG. When i see a fellow trapper pull into a bay on southern POW and trap 9 wolves in one check in the short 30 day season, you know the wolf population needs managed. Wolves are apex predators and prolific breeders, the trapping season needs to be atleast 90 days. they are survivors, never ever in the history of Alaska have wolves been endangered. one cannot trap or hunt them to extinction on a remote island such as POW. its only in line with ADFG mission and policy to manage for all use groups, which includes hunters and locals who rely on deer. The deer population has not faired well since the wolf season has by messed with,awa is anti trapping

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Proposal 1: Support
Proposal 2: Support
Proposal 3: Support
Proposal 4: Support with Amendment
Proposal 5: Oppose
Proposal 6: Support
Proposal 7: Support
Proposal 8: Support
Proposal 9: Support
Proposal 12: Support

Proposal 13: Support
Proposal 14: Support
Proposal 27: Oppose
Proposal 28: Oppose
Proposal 29: Oppose
Proposal 30: Support
Proposal 31: Support
Proposal 32: Support
Proposal 34: Support
Proposal 35: Support
Proposal 36: Oppose

Proposal 37: Oppose
Proposal 38: Support
Proposal 39: Support
Proposal 40: Support with Amendment
Proposal 41: Support
Proposal 42: Support
Proposal 43: Support
Proposal 44: Support
Proposal 45: Oppose
Proposal 46: Support

Proposal 47: Oppose
Proposal 48: Oppose
Proposal 49: Oppose
Proposal 50: Oppose
Proposal 51: Oppose
Proposal 52: Oppose
Proposal 53: Oppose
Proposal 54: Oppose



PC135

Submitted by: Blake Rothschild

Community of Residence: Minot, ND

Comment:

I am in support of proposal 32. I did a small research project for my masters on the goat populations in 1D. Simply put they are extremely fragile for various reasons. The continued indiscriminate take of goats especially Nannie's has the potential to lead to a sharp decline. Allowing the take of Nannies with the caveat that you can't hunt goats in 1D is a great change and one that puts the onus back on the hunter.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 28: Oppose
Proposal 29: Oppose
Proposal 30: Oppose
Proposal 31: Oppose

Proposal 32: Support
Proposal 34: Oppose
Proposal 35: Support
Proposal 36: Support

Proposal 37: Support
Proposal 38: Support
Proposal 39: Support
Proposal 40: Support

Proposal 41: Support



Submitted by: Blake Rothschild

Community of Residence: Minot, ND

Comment:

I'm in support of proposal 35. What's the reason behind closing bear baiting down 15 days early yet you can still hunt in the unit. From a standardization standpoint this proposal makes perfect sense as it would align bear baiting and the end of the calendar year regulatory bear hunting season.



Submitted by: Mark Rowenhorst

Community of Residence: Fairbanks, AK

Comment:

Proposal 32 - Support

Biological studies indicate that mountain goat populations are severely impacted when harvest of nannies occurs. Mountain goat populations in Unit 1D are very fragile and hunting opportunity is already very limited. When nanny harvest occurs there is both immediate and long term negative impacts on hunting opportunity due to decreased harvest quotas and a chain reaction of loss of goats in the population going forward. Harvest of nannies needs to be stopped to ensure maximum hunting opportunity.

Proposal 4 - Opposed

The way this proposal is written it includes Unit 1D, which currently has very low annual brown bear harvest quotas following extreme hunter and DLP-caused mortality in 2020. It would not be prudent to increase brown bear hunting opportunity or participation in Unit 1D until Department biologists confirm the population in the Chilkat Valley can withstand increased harvest.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Support

Proposal 4: Oppose

Proposal 32: Support

Proposal 2: Support

Proposal 18: Support



Submitted by: Katherine Russell

Community of Residence: Juneau, AK

Comment:

I oppose proposals 36 and 37. ADFG has done the scientific work to create population estimates, and regulations should be based on informed science. The ADFG is opposed to the reduction in all of these opportunities because there are no conservation concerns for these species in these areas; because there is no science to support these proposals, I am opposed.

On a personal note, I am a new hunter and live in and hunt near Juneau on LÍngít Aaní. I started hunting in 2022. I have seen about 10 sooty grouse from road system accessible areas in the past 6 months when I have just been out casually, not even looking for grouse. I have as a new, young, female hunter been able to harvest sooty grouse while hunting and do not think a decreased bag limit is warranted unless there is science to justify

this need. The claim that this proposal will help beginner hunters is not necessarily true, and is not true in my case. The first weekend of December 2022 I estimate I saw ~100 ptarmigan, many many small flocks and a few large flocks while ptarmigan hunting in a Juneau road system drainage. I was able to harvest multiple ptarmigan as a new, young, female hunter and do not think a decreased bag limit is warranted unless there is science to justify this need. Between August and December of 2022 I estimate I have seen maybe ~200 more ptarmigan or more on ridgelines while hiking and running in the alpine off the Juneau road system, almost always above 2500 ft. I am supportive of strong science to inform regulations and local residents being able to harvest and live sustainability off the land. I support more research as needed, particularly if ptarmigan populations are truly lacking in monitoring.

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Proposal 5: Oppose
Proposal 10: Oppose

Proposal 11: Oppose
Proposal 21: Oppose

Proposal 36: Oppose
Proposal 37: Oppose



PC138

Submitted by: John Ryan

Community of Residence: Hollis, AK

Comment:

Proposal 45: I do not support this. ADF&G no longer considers the population of the GMU 2 wolf as a concern due to low numbers. The now only hold a reduced wolf harvest season because of inbreeding concerns.

Submitted by: John Ryan

Community of Residence: Hollis, AK

Comment:

Proposal 46: I do not support this. ADF&G has continually reduced the GMU 2 wolf season, and this proposal would only hurt the trappers with a reduced season due to early season hunters. Most residents of POW feel the wolf season should open later with a December 1st trapping season start which the BOG will see a proposal on during the next board cycle unless they care to address it during the January 2023 meeting.

Submitted by: John Ryan

Community of Residence: Hollis, AK

Comment:

Proposals 47 - 54: I do not support any of these proposals. The Alaska Wildlife Alliance is a special interest organization who routinely partners up with Greenpeace, Center for Biological Diversity, and other special interest groups who strive for preservation of natural resources and total protection of animal species. AWA itself claims to be for scientifically sound & humane wildlife management. All of their proposals that they submitted set the bar very high to have a wolf harvest on POW. When reading through their proposals, they paint the picture that half of the wolves on POW are killed illegally, ADF&G doesn't know what they are doing, and the POW wolf needs to be protected instead of managed.

The reality is ADF&G needs to follow their wolf management plan and allow for the wolf population to be managed. As an experienced trapper, there is no way trappers and hunter want to kill every wolf on POW. And

there is no way you could kill every wolf on POW. They are extremely smart. They figure trappers out. They get leery of an area after other pack members end up being trapped in that area. And there is no way to really know how many wolves are actually out there until you start to trap them. I can only use the 2019 GMU 2 wolf trapping season as a decent estimate of the Hollis area. With months of trail camera work in my trap locations and an 8 week long season, I was able to harvest up to 20% of a wolf pack in three different locations. The trappers talked amongst each other to make sure every wolf was accounted for and legally harvested. All the other years, which had a maximum of a month-long season, the harvest rates of the wolf packs were very minimal. I continue to invite members of ADF&G staff to go along to check my wolf trap line to hopefully share knowledge with them. I would extend the invite to AWA however they are not located anywhere near GMU 2.

I'm asking the BOG not to take any action of proposals 47 through 54. Thank You

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 47: Oppose
Proposal 48: Oppose

Proposal 49: Oppose
Proposal 50: Oppose

Proposal 51: Oppose
Proposal 52: Oppose

Proposal 53: Oppose
Proposal 54: Oppose

Submitted by: John Ryan

Community of Residence: Hollis, AK

Comment:

Poposal 201: Please create a sea otter management plan under 5AAC. ADF&G continues to refuse to allow this proposal to be reviewed by the board. They state a sea otter management plan is outside their jurisdiction. Meanwhile the SE Alaska sea otter population continues to be managed by no management. The out-of-control population is hurting the resources of Alaska. If Alaska did implement a management plan for sea otters which included harvest, the federal government has already made it clear that they will not prosecute federal regulations if state regulations allow. If anything, if a state management plan is created, the federal government may review and change their regulations, which may allow for state harvest of sea otters. I'm asking the BOG at the very minimum to please consider adding a state sea otter management plan under 5AAC even if it states at this time that the plan will follow federal regulations for the harvest of sea otters in SE Alaska. Over time, the BOG can continue to develop the regulations which will ultimately result into a state harvest season of sea otters in SE Alaska.

Submitted by: John Ryan

Community of Residence: Hollis, AK

Comment:

Proposal 202: I support for the BOG to set a wolf hunting and trapping season for GMU 2 without the ability of ADF&G leaders to shorten it due to special interest groups.

Since ADF&G changed their population estimate model for POW to a DNA hair board study, the hunters and trappers have suffered with short and un-predictable seasons. In 2019, the new tier-based season length was set and implemented. ADF&G allowed for the longest but reduced 8 week season which resulted in 167 legally (2 illegally) harvested wolves out of the 174-wolf population estimate. ADF&G issues a poorly written population harvest news release in 2020 saying the trappers came out in record numbers and did exactly as ADF&G told them not to at the fall 2019 GMU 2 wolf meeting. ADF&G placed blame on the hunters and trappers for harvesting all but 5 wolves on POW. This news release was picked up by every news outlet and caught

immediate attention of special interest groups who responded by filing another petition to list the SE Alaska as federally protected. ADF&G had a conservative wolf harvest in 2020 even though their population estimate was over 300+ animals. The conservative season was due to population concerns. The population estimate grew again in 2021 and then again in 2022. ADF&G held conservative harvest seasons both of those years but moved the goal post. The new conservative harvest seasons were due to "inbreeding concerns", and no longer due to a low population level. The wolf population on POW has been out of control since 2015 and has decimated the deer and beaver populations. The wolves are running out of their preferred food and now feasting on black bears according to scat studies. I'm sure you have already heard it numerous times over concerning the wolves in GMU 2. There are simply way too many of them and the residents of POW are tired of being ignored. The residents are suffering with freezers empty of deer meat and having their dogs attacked in their yards by wolves. These concerns have been expressed year after year to ADF&G only to be told "we hear you but....". The fall 2022 GMU2 wolf meeting didn't have one person comment in support of a reduced 30 day or less season. The season should have been a full-length season as the management plan called for. An ADF&G lead representative admitted they have to take into account of special interest groups in their decisions. And when it comes to the residents of POW, I guess they hear us but.... ADF&G has also stated that they are going to have the BOG to re-set the wolf management plan harvest tiers to higher levels which should not happen until they actually follow the management plan for a few years.

I'm asking the BOG to please implement some type of protection for the residents, resource users, and wolf prey species and force ADF&G to follow their GMU 2 wolf management plan without a reduced season. It would also be appreciated to have a wildlife biologist on POW and for ADF&G to listen to locals.



PC139

Submitted by: Sterling Salisbury

Community of Residence: Juneau

Comment:

I oppose proposal 10 and 11. The proposal contradicts themselves by saying they want to limit the deer tags to four from the current six to help with subsistence hunters and population later in the proposal they say it won't really affect much. The board already moved it from 4 to 6 saying it would have a minimal impact. it's absurd to already be trying to change it back. Leave it the same.

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Proposal 10: Oppose

Proposal 11: Oppose

Proposal 21: Oppose



PC140

Submitted by: Bryce Saviers

Community of Residence: Juneau, Alaska

Comment:

Proposal 4: I support proposal 4. From what I have seen the unit 1 brown bear population has been increasing over the last few years. I often see multiple brown bears in each bay or running rivers in my jet boat while not seeing as many moose or black bear as years prior. Brown bears aren't targeted by hunters in this area as much as black bear, moose, and deer and I think the lack of seeing these animals around is partly due to an increased brown bear population. Due to the fact that fewer hunters hunt brown bear I believe increasing the harvest from

one bear every 4 years to one bear every 2 years will help create a more stable population for all species while allowing hunters that do want to pursue brown bear more opportunity.

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Proposal 4: Support

Submitted by: Bryce Saviers

Community of Residence: Juneau, Alaska

Comment:

Proposal 28: I am completely against this proposal. As a person who has hunted all over RG014 I think opening up this key bit of wintering goat grounds to hunt is a mistake. The area this proposal wants to open is used as safe wintering grounds mainly for Nannie's and kids. This area has extremely easy access from a popular walking trail and a private road. I think opening up this ground to allow hunting will not only give easy access to safe goat wintering grounds but I also believe will increase nannie harvest even if a boundary line with a 2,000 contour at the head of little sheep creek is implemented. There are only a few starting areas in the RG014 units that is accessible from the road and all include a fairly long hike to get into goat country. This spreads out the hunting pressure throughout the season and also minimizes hunter conflict with non hunters. If you open this area up not only will hunting pressure increase in what was once a safe harbor for wintering mountain goat to get away from predators but it will give extremely easy access to goats due to the private road and popular walking trail that is often used by dog walkers and nature viewers.

I am a firm believer in expanding hunting rights as long as it doesn't hurt the species or hunters long term. This proposal does very little to open up new hunting area but instead opens up a small but key piece of habitat the goats need to survive. There is another proposal for this unit (proposal 29) asking to expand the hunting grounds for RG014 which would allow more road system access without giving easy access to safe goat wintering grounds. I ask the board to reject proposal 28.

Submitted by: Bryce Saviers

Community of Residence: Juneau, Alaska

Comment:

Proposal 29: I support proposal 29. As of right now RG014 boundary line is limited to the south side of Blackerby Ridge. This is where most of the recreational hikers stay due to a hiking trail that leads from the road system up to the alpine. Opening up the north side of the Blackerby Ridge and extending it to the Heintzelmann Ridge will give more road system access to hunters and allow hunters to spread out instead of being congested onto just one side of Blackerby Ridge which would minimize conflicts between hunters and also from other non hunting trail users. Opening up the north side of Blackerby and Heintzelmann Ridge will also open up multiple new access points along the road system giving more hunting opportunities to people that don't have boats.

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Submitted by: Bryce Saviers



PC140

Community of Residence: Juneau, Alaska

Comment:

Proposal 30: I support proposal 30. As of now the season on the southern end of the Chilkats doesn't open until September 1st. This area has very few bays or coves to anchor a boat in so unless it's a calm day anchoring a boat during the fall in Lynn Canal can be a big mistake. Opening up a archery season starting august 1st wouldn't increase hunting pressure by much due to the logistics of getting over there but would give better access to people wanting to get away from the crowds and hunt the Chilkats before the big fall storms roll in that limit boating and flying.

Submitted by: Bryce Saviers

Community of Residence: Juneau, Alaska

Comment:

Proposal 31: I support this proposal. This proposal will open up the season a month earlier making it more accessible to hunters and give more opportunities to locals to harvest a goat. As of right now the season doesn't open until September 1 which is generally much worse weather then august. This unit is only reachable by plane or boat and the logistics of getting in and out of this area are completely based on weather. Allowing the season to open a month earlier will help keep hunters safer and also give better opportunity in an area that is abundant with goats.

Submitted by: Bryce Saviers

Community of Residence: Juneau, Alaska

Comment:

Proposal 33: I support this proposal. The Chilkat Peninsula is well known by locals for having an extremely dense brown bear population. You can only get to the area by boat or plane so the logistics to get over there and hunt are limited by weather and there are closer places to Juneau to hunt brown bear so it doesn't have the pressure that other units have. Because there are fewer brown bear hunters in the area and the brown bear population seems to be at a surplus other species are negatively effected. From my experience I have seen less black bear and moose in the area over the last few years while constantly seeing more brown bear. I think allowing the few amount of hunters that hunt that area to harvest a brown bear every year will bring a better balance to all species in the area while allowing more hunting opportunities for residents.

Submitted by: Bryce Saviers

Community of Residence: Juneau, Alaska

Comment:

Proposal 34: I support this proposal. The Chilkat Peninsula is well known by locals for having an extremely dense brown bear population. You can only get to the area by boat or plane so the logistics to get over there and hunt are limited by weather and there are closer places to Juneau to hunt brown bear so it doesn't have the pressure that other units have. Because there are fewer brown bear hunters in the area and the brown bear

population seems to be at a surplus other species are negatively effected. From my experience I have seen less black bear and moose in the area over the last few years while constantly seeing more brown bear. I think allowing the few amount of hunters that hunt that area to harvest a brown bear every year will bring a better balance to all species in the area while allowing more hunting opportunities for residents.

Submitted by: Bryce Saviers

Community of Residence: Juneau, Alaska

Comment:

Proposal 36: I do not support this proposal. This proposal is not based on conservation of the species, and the department of Fish and Game agrees. If grouse numbers are healthy and the access to these birds is abundant throughout the Juneau road system then there is no need to lower the daily limit for local hunters. The author of this proposal states that it will help let less experienced hunters get easier birds along the road system if the daily bag limit is lowered. However, lowering a bag limit of a species whose population is not threatened just for the sole cause of giving people with less hunting experience or people who don't want to put in as much effort as others a better chance at being successful is a dangerous precedent to set. Don't punish other dedicated hunters by cutting their daily bag limit down just to cater to people who don't want to work as hard to be successful.

Submitted by: Bryce Saviers

Community of Residence: Juneau, Alaska

Comment:

Proposal 37: I do not support this proposal and neither does the department of Fish and Game.

Submitted by: Bryce Saviers

Community of Residence: Juneau, Alaska

Comment:

Proposal 41: I support this proposal. Having a quota for Douglas island wolves is pointless due to the fact that those wolves can move easily from the mainland to Douglas island at low tide from multiple different areas. It's an unnecessary restriction that isn't supported by conservation management.



Submitted by: Glenn Saviers

Community of Residence: Juneau, AK

Comment:

See my proposal survey

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Proposal 4: Support	Proposal 16: Support	Proposal 34: Support	Proposal 47: Oppose
Proposal 6: Support	Proposal 17: Support	Proposal 36: Oppose	Proposal 48: Support
Proposal 7: Support	Proposal 18: Support	Proposal 37: Oppose	Proposal 49: Oppose
Proposal 8: Support	Proposal 21: Oppose	Proposal 40: Support	Proposal 50: Oppose
Proposal 9: Support	Proposal 28: Oppose	Proposal 41: Support	Proposal 53: Oppose
Proposal 10: Oppose	Proposal 29: Support	Proposal 43: Support	Proposal 54: Oppose
Proposal 11: Oppose	Proposal 30: Support	Proposal 45: Support	
Proposal 13: Support	Proposal 31: Support	Proposal 46: Support	



Submitted by: Sam Sawyer

Community of Residence: Thorne Bay, Alaska

Comment:

See Attached

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 45: Oppose	Proposal 48: Oppose	Proposal 51: Oppose	Proposal 54: Oppose
Proposal 46: Support	Proposal 49: Oppose	Proposal 52: Oppose	
Proposal 47: Oppose	Proposal 50: Oppose	Proposal 53: Oppose	

See attachment on the following page.

Sam Sawyer- I oppose Proposal 45.

I oppose Proposal 45 because there are already plenty of wolves in unit 2. I am about to turn 40 years old and have lived in Thorne Bay for 30 of those years. I am an avid hunter and spend many hours a year in the woods. I also have 16 cellular trail cameras and 19 regular trail cameras taking photos and videos year-round. Beginning back in 2015, I started seeing wolves on every camera I have. These cameras are not in one location, they are spread out all over the island. What was initially for deer scouting, turned into wolf scouting. Then I began seeing the wolves in person. This was only the second time in my life seeing a wolf here in unit 2. I ended up seeing 12 wolves by the end of 2015. Fast forward to now. I have seen at least one or two wolves a year since 2015. Some years I have seen up to 16 wolves. I see wolf sign everywhere I go, hear wolves, and my trail cams still get lots of pictures and videos of them. The largest pack I have on video had 13 wolves on it. That video only lasted 30 seconds so there could have been even more. There is no doubt in my mind or any of the residents living on Unit 2, that the wolf population is thriving. There is no good reason to raise the threshold from 150-200 wolves to 250-300 wolves. Furthermore, something else that happened from 2015-2022. The deer population has plummeted. I don't find it to be a coincidence that the deer population plummeted during the same time period that wolf trapping harvest limits were very limited. Some of those years, wolf trapping harvest limits ranged from 7 total wolves trapped, to 14 wolves trapped. During this time period, it is obvious the wolf population grew substantially, while the deer population plummeted.

People living in Unit 2 hold valuable insight as to what is happening on this island. It is impossible for anyone not living here or spending time here, boots on the ground for extended periods of time, to know what is happening here.

Sam Sawyer- Proposal 47

I oppose proposal 47 because not everyone has access to cell phones or cell phone coverage in Unit 2 and Alaska Wildlife Alliance would know this if they spent any amount of time on Unit 2.

Some locations are very remote, and weather can hinder traveling for days. If having to call in within 48 hours was the law, it could hinder trapping efforts. I agree that calling in could happen a little faster than it is now, but 48 hours is a tight window. Also, trappers should not have to tell anyone any location of where they trap wolves.

Sam Sawyer- Proposal 48

I oppose Proposal 48 for a few reasons. Alaska Wildlife Alliance stated that the public has no way of knowing wolf carrying capacity. I find this to be false. When wolf sightings dramatically increase the how they have here, there is something to be said about that. When I have hundreds of photos and videos of wolves on trail cameras a year, there is something to be said about that as well. They are correct when they state there is nowhere on Unit 2 where a wolf pack is not exposed to legal and illegal killings. That can be said about almost everywhere. However, there are a few locations on Unit 2 that I am aware of that make it very difficult to harvest wolves. The cutthroat road and the Honker Road. Both roads are gated and do not allow motorized vehicles. Nobody that I am aware of hunts wolves or trap wolves in these locations due to the difficulty. Trappers aren't going to pack hundreds of pounds of traps 7 miles deep on a road, and anyone hunting wolves here knows how difficult that is with such dense forests.

In ending, the minimum number of wolves (100) currently set by the BOG has shown that it is sustainable over the last couple of years, according to the most recent wolf counts.

Sam Sawyer- Proposal 49

I oppose Proposal 49 because Alaska Wildlife Alliance offers no solution on how to better count the wolf population, they just complain how it is being done. They mention “failure to detect declines does not mean there was no decline.” That’s true, but the same goes for an increase in population. I think the way wolves are being counted could be better, but I don’t know how that will be done. I believe that when a low count is published, I know it is not representative though. Not every wolf will come to a wolf board and rub on it. It is a regular occurrence to have wolves walk passed a wolf board and never touch it, while others do. To me that shows a big number of wolves not being counted and I have numerous videos of this happening. A lot of them look at the wolf boards from a distance and watch younger wolfe rub on them. I honestly believe it is impossible to have an accurate count of wolves in Unit 2, due to their elusiveness to humans and the terrain of the island, and the fact that they travel to other islands and others travel to Unit 2. That’s what they do. If there is failure to detect an increase, it doesn’t mean there wasn’t an increase. I personally feel that was the case this year. With ADF&G observers having difficulty traveling around Unit 2 due to harsh winter conditions, they were unable to spend as much time as they normally would have, collecting DNA sampling from wolf boards and their wolf count was lower than the previous year, even though only 64 wolves were harvested. Residents of Unit2 and the deer population suffer when this occurs.

Sam Sawyer- Proposal 50

I oppose Proposal 50 because Alaska Wildlife Alliance compares Coronation Island to the inner islands on the west side of Unit 2. The tides and currents near Coronation Island don’t compare to the water and tides near the inner islands. The inner islands are way more protected and make it easier for wolves and deer to swim to and from. Again, if they spent any time here, they would know this, and if they went and spent any time on these smaller islands, like Tuxacan or Heceta Islands for example, they would see there is no shortage of wolves on them. However, they have never been here or tried to see for themselves what is really going on here and it is just their opinion that wolves don’t inhabit these islands. These smaller islands need to be accounted for when counting wolves.

Sam Sawyer- Proposal 53

I oppose Proposal 53 because there isn’t enough evidence that supports that illegal or unreported taking of wolves is between 35-50% is constant, and that should not be included the annual harvest reports as such.

Sam Sawyer- Proposal 54

I strongly oppose Proposal 54. Closing certain areas of Unit 2 so that wolves have a “sanctuary” and are safe from trapping does nothing but hurt the deer population and hinder trappers’ ability to trap wolves. Wolves travel this entire island and are constantly moving. We already only have 30 days to hope they come through an area, which sometimes they don’t. To only limit 2/3rds of the island to trapping would



only make trapping them even more difficult and could lead to an abundance of wolves and in turn make an already dwindling deer population even worse. As I have stated before, there are places on Unit 2 where nobody traps or hunts wolves due to gates being installed on roads. I could be wrong, but I believe the Karta wilderness area is off limits for wolf trapping and hunting as well. This is just another request by the Alaska Wildlife Alliance to hinder trapping efforts.



Submitted by: Fred Schuman

Community of Residence: Troy, MO

Comment:

Thank you for taking interest in our thoughts and opinions. I'm in agreement with most of the proposals. I support proposals; 16, 24, 29, 30.

I am not in favor of the proposal 19. To me the herd seems to do better while they are only disturbed by archers. I feel that introducing firearms would effect the natural rut action the elk. I believe the gun shot pressure would push the elk to become mostly nocturnal. This would impede both archers and firearms hunters.

Thank you again for this opportunity.

Fred Schuman

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 19: Oppose



Submitted by: Mark Schwan

Community of Residence: Juneau, Alaska

Comment:

Mark Schwan

Juneau, Alaska

I am commenting on Proposal 40, to allow the taking of deleterious wildlife in the Mendenhall Wetlands State Game Refuge.

I strongly OPPOSE the proposal and support the Department's comments in strong opposition to this proposal.

There are continued user conflicts occurring on the refuge between hunters, dog walkers, hikers, wildlife viewers and photographers. Allowing people to wander the refuge year-round with weapons in hopes of taking European Starlings would create new, contentious interactions and raise more safety issues. The likelihood of doing anything meaningful for reducing a rather small local population of European Starlings is practically nil.

Moreover, even if the Board were to allow just the opportunity for fall duck hunters to take European Starlings, this is still very problematic. There is a real possibility that hunters would kill non-targeted songbirds, especially Rusty Blackbirds and Red-winged Blackbirds, both of which occur on the Wetlands during the fall. Rusty Blackbirds are in extreme decline across the continent and they have declined in number locally. There is no doubt some hunters would shoot at these species thinking they are European Starlings. Let's not present such an opportunity.

If there is a desire to reduce the number of European Starlings in Juneau, lets explore other strategies. Thank you for the opportunity to comment.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 40: Oppose

Submitted by: Craig Schwanke

Community of Residence: Craig

Comment:

I'm an avid waterfowl hunter on Prince of Wales (POW). I oppose a split season for waterfowl in southeast Alaska. In southern southeast AK the best waterfowl hunting occurs in October-November when migratory geese and ducks pass through. A split season will likely have a closure during this time frame, which I oppose. I prefer a fixed season start date of September 16 with a continuous season or the status quo of continuous seasons lengths with alternating season start and end dates to accommodate hunters in northern and southern southeast Alaska. A split season will also be a regulatory burden on hunters with the creation of complex regulations. There are not a lot of local ducks in southern southeast AK during the month of September and the birds that are available tend to feed on the abundant salmon eggs and dead salmon present in streams and tidal flats which decreases their table quality. A start date of September 16 was preferred by 41% of hunters surveyed by ADFG in 2008.

If a split season is adopted, I suggest a season closure starting December 1. At least this will extend sea duck hunting opportunity later into the winter.

Thank you for your consideration!

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 5: Oppose



Submitted by: Linda Shaw

Community of Residence: Juneau, Alaska

Comment:

I support Alaska Wildlife Alliance proposals 45, 47, 48, 49, 50, 51, 52, 53, and 54. The Board of Game needs to represent the views of all Alaskans and stop excessive predator control.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 45: Support

Proposal 49: Support

Proposal 52: Support

Proposal 47: Support

Proposal 50: Support

Proposal 53: Support

Proposal 48: Support

Proposal 51: Support

Proposal 54: Support

Sitka Tribe of Alaska

Tribal Government for Sitka, Alaska



PC147

December 16, 2022

Board of Game
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

RE: STA Comments Southeast Alaska on Game Proposals
Regional – Proposals 1, 2, and 4
Sitka-Unite 4 Proposals 10, 11, and 13

Dear Board Members,

I write on behalf of the Sitka Tribe of Alaska (STA), Tribal government in Sitka, Alaska, with over 4,500 Tribal citizens. As a Tribal government, STA is responsible for the health, safety, welfare, and cultural preservation of its tribal citizens. STA respectfully submits the following comments on Southeast Alaska game proposals.

Proposal 1 – Support

Hunting is an important part of the Native culture and an important cultural practice to pass on to tribal youth. Hunter and gun safety are key parts of that of the learning experience. STA supports this proposal providing the State of Alaska can provide adequate access to the mandated training.

Proposal 2 – Support

This proposal can potentially increase the number of goats harvested in the Sitka area by preventing the unintended harvest of nannies. Other big game hunts around the State have similar requirements that maximize the harvest while minimizing the impact on big game populations. STA supports this proposal based on the increased subsistence food it will provide to tribal citizens.



Proposal 4 – Support

This proposal has the potential to increase hunting efforts and achieve the full allowable harvest. STA supports additional hunting opportunities for resident hunters, especially if it has the potential to reduce bear and human encounters in Sitka.

Proposal 10 and 11 - Oppose

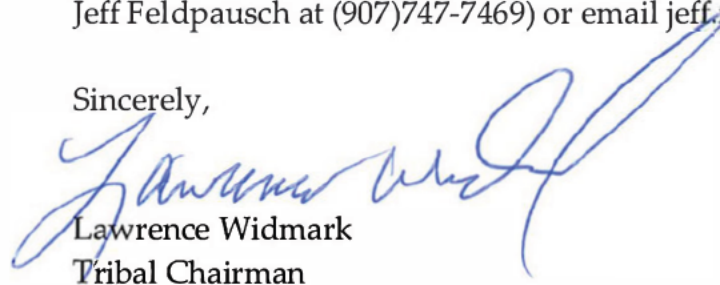
STA would support these proposals if there had been a companion proposal on the federal level to maintain a 6 deer harvest level for rural residents. This scenario would have provided increased opportunities for rural residents to meet their cultural and subsistence needs. STA is opposed to these proposals as written.

Proposal 13 – Support

Over the last 2 years, Sitka has had an explosion of bear-human encounters that have resulted in at least 15 bears being euthanized during this timeframe. STA believes the increase in these types of encounters is due to a robust bear population in the Sitka area. The increased harvest rate being proposed would lower the population of bears in Sitka and reduce these negative encounters.

If you have any questions regarding these, contact STA's Resource Protection Director, Jeff Feldpausch at (907)747-7469) or email jeff.feldpausch@sitkatribine-nsn.gov.

Sincerely,



Lawrence Widmark
Tribal Chairman

**PC148****Submitted by:** Victoria Smith**Community of Residence:** 682 Evergreen Ave**Comment:**

I am in support of proposal 17. Numerous times over to the island has made it very clear that the elk herd is large and multiplying rapidly. The meat would support the locals immensely.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support**PC149****Submitted by:** Martha Smith**Community of Residence:** Petersburg, Alaska**Comment:**

Proposal # 24: As a resident of Petersburg and recreational user of Petersburg Creek, I am strongly opposed to opening this drainage to bow hunting of black bear. There are very few areas close to town where elders, families and visitors can explore in the hope of seeing black bear in natural habitat. Residents of Kupreanof and of Mitkof Islands have worked hard to protect this area from trophy hunters and I urge you to reject this proposal. The harvesting of fish, moose and deer, in my mind, can be understood as a means of providing food for our families. Bear hunting does not fit within this justification.

Proposal # 25: Above comments apply to this proposal; I strongly oppose.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose**Proposal 25:** Oppose**PC150****Submitted by:** Southeast Alaska Conservation Council**Community of Residence:** Douglas, Alaska**Comment:**

Please accept these comments on behalf of the Southeast Alaska Conservation Council.

Proposal 12, Mitchell Bay Closed Area

SEACC opposes Proposal 12.

Based in Juneau, Alaska on Áak'w K̓wáan land, Southeast Alaska Conservation Council (SEACC) is a regional grassroots conservation organization with over 7,000 supporters. For over 50 years, SEACC has been bringing together diverse Alaskans from our region's communities to protect the natural resources of Southeast Alaska, ensure sound stewardship of the lands and waterways of our region, and protect subsistence resources and traditional ways of life side-by-side with fishing, hunting, tourism and recreation.

SEACC supports maintaining the closed status of the Mitchell Bay Closed Area in Unit 4 on Admiralty Island. Our membership, which includes a blend of users from hunters and fishers to wildlife viewers and recreational guides, values a diversity of uses which, in turn, means a diversity in management approaches.

The limited and small closed areas that are dedicated to non-consumptive use are important to our members and to the economy of Southeast Alaska. The Mitchell Bay Closed Area has a high use value for wildlife viewing and the economic potential of non-consumptive viewing use of the brown bear population there is important to Angoon. With over 96% of Admiralty Island open to brown bear hunting, this small closed area does not create an undue burden on Alaska bear hunters or brown bear hunt guiding operations who have good and accessible brown bear hunting opportunities nearby.

Please keep the Mitchell Bay Closed Area of Mitchell Bay, Kootznahoo Inlet, Kanalkoo Bay, and Favorite Bay closed to brown bear hunting.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 12: Support



PC151

Submitted by: Southeast Alaska Subsistence Regional Advisory Council

Community of Residence: Juneau, Alaska

Comment:

Attached letter.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

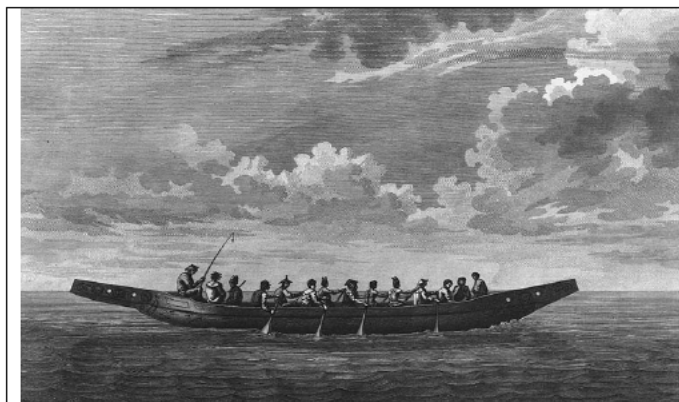
Proposal 1: Oppose
Proposal 2: Oppose
Proposal 5: Support
Proposal 6: Support
Proposal 7: Support
Proposal 8: Support
Proposal 9: Support

Proposal 10: Support
Proposal 11: Support
Proposal 12: Oppose
Proposal 13: Oppose
Proposal 14: Oppose
Proposal 16: Support
Proposal 17: Support

Proposal 21: Support
Proposal 42: Support
Proposal 45: Oppose
Proposal 47: Oppose
Proposal 48: Oppose
Proposal 49: Oppose
Proposal 50: Oppose

Proposal 51: Oppose
Proposal 52: Oppose
Proposal 53: Oppose
Proposal 54: Oppose

See attachment on the following page.



***Southeast Alaska
Subsistence Regional
Advisory Council***

**Don Hernandez, Chairman
1011 E. Tudor Road, MS121
Anchorage, Alaska 99503**

In Reply Refer To:
RAC.SE.22130.DP

JAN 2 2022

Jerry Burnett, Chair
ATTN: Board of Game Comments
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Dear Chairman Burnett,

I am writing to you on behalf of the Southeast Alaska Subsistence Regional Advisory Council (Council) to provide comments on proposals coming before the Alaska Board of Game (BOG) during their Southeast Region meeting scheduled for January 20-24, 2023, in Ketchikan.

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

The Council held a public meeting during in October 2022. Among other topics, the Council discussed the following BOG proposals that would affect subsistence users and resources in the Southeast Alaska Region and formulated their positions and comments on these proposals. The Council requests that the BOG considers these comments in its deliberations.

*Regionwide and Multiple Units:*

Proposal 1: OPPOSE. The Council opposes this proposal to require a certified safety education course to hunt in Units 1 – 5, because, although this may be a great idea, it would be too burdensome for hunters to comply. There are challenges in offering this to remote communities, such as internet connectivity, which creates an extra hurdle for remote residents as well as making it hard to offer the education consistently. The Council could possibly support this proposal, if hunter safety education was voluntary; however, the Council opposes any proposal that would make hunter safety education a requirement to obtain a State hunting license.

Proposal 2: OPPOSE. The Council opposes this proposal to require hunter orientation for hunting goat in Southeast Region units. Similar to its opposition to Proposal #1, the Council feels that it would be too burdensome on hunters; there are issues such as internet connectivity and the challenge to offer this to remote communities consistently.

Proposal 5: SUPPORT. The Council supports this proposal to change the waterfowl season in Units 1 through 4 by creating a split season. It would create more opportunity and afford more flexibility.

Proposal 6 - 9: SUPPORT. The Council supports Proposals 6 through 9, which request lengthening the trapping seasons. The State and the Federal trapping regulations for the species listed in these proposals are currently aligned. These proposals provide additional harvesting opportunities for subsistence users.

Sitka Area – Unit 4

Proposal 10 - 11: SUPPORT. The Council supports both of these proposals to decrease the bag limit to four deer in Unit 4 remainder. The Council felt that the State harvest limit was previously arbitrarily changed from four to six deer and, as a result, there is now more localized competition. It could be beneficial to subsistence users, and the Council supports the return of the stricter bag limit for non-subsistence users on State lands.

Proposal 12: OPPOSE. The Council opposes this proposal to open the Mitchell Bay closed area in Unit 4 to brown bear hunting. The Council heard public testimony at their meeting from the Mayor of Angoon regarding this type of harvest, and the Council member from Angoon shared comments he has received from community members. It is believed that the area was closed originally because bears who were wounded by non-resident trophy hunters would make their way into town and become the responsibility of the community to ensure safety. The personal safety of people going up into the bay is also a concern based on tidal currents experienced in that area. The Council believes this area is too close to Angoon and hunting should not occur in the area for community safety reasons.

Proposal 13 - 14: OPPOSE. The Council opposes the proposals to make changes to RB088, regarding the hunt boundaries in Unit 4 and the increase to the allowable harvest for brown bear.



Any of the brown bear hunts that overlap with usership will exacerbate the competition issue between user groups.

Petersburg and Wrangell Area – Units B and 3

Proposal 16: SUPPORT. The Council supports this proposal to lengthen the deer seasons in Unit 3, that portion of Mitkof Island within the Petersburg Management Area. Lengthening the season is beneficial to Federally qualified subsistence users, and it provides additional harvest opportunities.

Proposal 17: SUPPORT. The Council supports this proposal to establish a fall drawing permit hunt for elk on Zarembo Island in Unit 3. There is competition between elk and deer for habitat, and this proposal would decrease competition with deer. This hunt would create additional opportunity for Federally qualified subsistence users to harvest elk.

Ketchikan Area and Prince of Wales Island – Units 1A & 2

Proposal 42: SUPPORT. The Council supports this proposal, which extends the deer season to December 31st in Unit 1A remainder. This extension would provide more opportunities for people in Ketchikan to take advantage of the additional opportunity to hunt locally and may reduce hunting pressure on Prince of Wales Island.

Proposal 45: OPPOSE. The Council opposes this proposal to raise the population objective from 150-200 wolves to 250-350 wolves in Unit 2 and to raise the threshold for closing the season from 100 to 200 wolves. This Council has worked collaboratively with the Alaska Department of Fish and Game (ADF&G) for several years to come up with a better management strategy than by harvest quota. The Council wants to continue to support ADF&G's management strategy. The Council and ADF&G have heard testimony and traditional ecological knowledge over the years that the population of wolves is actually higher on Prince of Wales Island than data suggests. The Council believes the strategy is working and remains confident that the current management strategy will prove to be the successful, given time. The new strategy has only been in place for a few years and should remain in effect to gather sufficient data to show how managing to a population objective is better than managing to a harvest quota.

Proposal 47: OPPOSE. The Council opposes this proposal to require wolf harvest information be reported within 48 hours of recovery and sealing within 14 days in Unit 2, especially if implemented in a shortened wolf season. Based on recent management decisions, the Council anticipates shorter wolf harvest seasons in the future and feels that this proposal would provide limited value for the population model and that the benefit would not outweigh the burden placed on subsistence users. The Council, in the past, relayed their support for a sealing requirement of seven days after the end of the season. Of concern to the Council was the limited number of sealers in Unit 2, which would result in a hardship on trappers, struggling to find a sealer. Also, for those trappers working out of a boat, access and safety may be an issue in bad weather. This could affect a trapper's ability to harvest while meeting sealing requirements. The Council has previously suggested that ADF&G encourage trappers to seal sooner on a voluntary basis and refrain from requiring a regulation change.



Proposal 48 - 54: OPPOSE. The Council opposes proposals 48 through 54. As mentioned before, this Council agrees with the current management strategy. To adopt these proposals would be to negate all the hard work that the Council and ADF&G staff have done in moving from the recommendation to manage wolves from a harvest quota to a population objective. The Council and ADF&G have spent significant time and effort in exploring a better way of managing wolves in Unit 2. This included several meetings with the local residents, hearing and applying traditional ecological knowledge. A lot of thought and effort went into these regulations that are currently in place and the following only outlines the efforts made in most recent years:

- At the Winter 2018 meeting, the Council voted to submit a proposal to the BOG to allow a harvest guideline of up to 30% for wolves in Unit 2 (Proposal #42). Subsequent to that meeting, Council members worked with ADF&G to develop a proposal suggesting a specific management objection (Proposal #43)
- At its Fall 2018 meeting, the Council voted to withdraw its Proposal #42 and support ADF&G's Proposal #43, which called for eliminating the 20% harvest guideline level (HGL) that was currently in the codified regulations and establishing a management objective for wolves in Unit 2. Support was based on discussions between the Council Unit 2 wolf working group and ADF&G, and Council discussion on the record.
- The Council supported this new management strategy for the following reasons:
 - Current State regulation unnecessarily restricts management of wolves and subsistence harvests of wolves in Unit 2 by specifying a 20% HGL. This guideline limits management flexibility and unnecessarily restricts subsistence harvests in times of abundance. Unit 2 guideline limits are much more restrictive than wolf harvest regulations for other management units in Alaska.
 - Council found that setting a joint State and Federal harvest quota for wolves has not been working because:
 - The HGL for wolves had been set according to wolf population estimates based on DNA sampling. While this methodology may come up with a good defensible population estimate for wolves, the estimate is always out of date, requiring managers to set a harvest guideline based on one-year old data.
 - In times of abundance, the HGL was below what the Unit 2 wolf population could sustain.
 - The HGL has required closing the season by emergency order for five years, creating uncertainty and hardship for subsistence harvests.
 - Subsistence harvest of wolves in Unit 2 is a harvest activity protected by ANILCA and should not be unduly restricted. The Council supported Proposal #43 in 2018 to allow for the continuation of subsistence harvests and the transmission of knowledge to new trappers.
 - This new management approach incorporates the principals of adaptive wildlife management.
 - ADF&G worked effectively with the Council and assured the Council that it will incorporate tribal and community information on wolf population management in Unit 2. ADF&G indicated that it would also incorporate reports from hunters and



trappers on the size of the wolf population based on their experience in the field. It is the Council's understanding that ADF&G would continue to undertake DNA-based population estimates every 2-4 years. ADF&G indicated that it would use other methods of wolf population estimation, including traditional ecological knowledge, hunter/trapper reports, tribal and community reports, as well as den checks and examination of the age of harvested wolves.

- The Council agreed that an appropriate population management objective for Unit 2 wolves is 150 wolves. The Council would support reductions in harvest opportunity if the population dropped below that point. This management objective was supported by extensive public testimony and ADF&G analysis.

For all these reasons and because the Council believes that ADF&G is doing better with their assessments in the last couple of years, the Council feels strongly that the change in management, which took years of collaborative development, deserves time to work. Therefore, the Council strongly opposes Proposals #48 through #54.

The Council appreciates the opportunity to convey its recommendations on and concerns about these proposals. These comments also were transmitted via email at <http://www.boardofgame.adfg.alaska.gov>. If you have any questions regarding this letter, they can be addressed through our Council Coordinator DeAnna Perry at 907-209-7817 or dlperry@usda.gov.

Sincerely,

Donald Hernandez
Chair Regional Advisory Council
Southeast Alaska Region

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



Submitted by: Paul Southland

Community of Residence: Wrangell

Comment:

Proposal 17 Comment in favor.

Expanding elk population may be detrimental to deer survival. A drawing hunt of elk could mitigate issue and supply needed meat for local communities.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support



Submitted by: Randy Steverson

Community of Residence: New Orleans, LA

Comment:

Thank you for the opportunity to take the survey and submit my responses. I'm a lifelong bowhunter and will be hunting Alaska in November.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support

Proposal 24: Support

Proposal 30: Support

Proposal 19: Oppose

Proposal 29: Support



Submitted by: Geoffrey Stokes

Community of Residence: Wrangell, Alaska

Comment:

To whom this may concern. I am Geoffrey Stokes a 30+ year resident of Wrangell, Subsistence Hunter Gatherer in support of proposal 17 opening elk hunting on Zerambo Island. If we don't get to hunt elk what purpose do they serve. This should not be looked at as a trophy hunt it should be looked and guided as a subsistence meat hunt first then worry about the trophy quality of things after we have a subsistence meat hunt established that is sustainable for the subsistence users in these rural communities.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support



Submitted by: Mark Stopha

Community of Residence: Juneau, AK

Comment:

I'm opposed to proposal 36 to reduce the bag limits for grouse, as there's biological justification for it. I've hunted hooters on Douglas and Admiralty for many years. Some years there's lots of birds and some years there are fewer birds. I've not noticed any steady decline that would justify a lower bag limit. Not that many hunters get 5 every time they go out. But people aren't hunting for sport, but for food. It's not like fishing where you can "let them go". I do not want to see food gathering reduced for no biological reason because it could set a precedent. ADFG staff in Douglas have not been averse to reducing bag limits when necessary, as they have recently done with deer. Juneau residents are already seeing reduced hunting limits for deer on Prince of Wales Island on federal lands where no conservation concern, and limited to having a chance at a Berners Bay moose permit because distant rural residents are given the permits. We don't need reduced hunting limits in our back yard where no conservation concern exists.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 36: Oppose



Submitted by: Michael Stainbrook

Community of Residence: Petersburg, Alaska

Comment:

I do not support proposal 24 or proposal 25. I do not support black bear hunting in the Petersburg Creek drainage.

If the Petersburg Creek Drainage is opened for black bear hunting it will open the potential for conflict with other user groups.

The long history of maintaining this drainage closed to black bear hunting should be continued.

Besides being the only portion of unit 3 closed to black bear hunting it's proximity to Petersburg allows both locals and tourists (young and old) accessible opportunities for exceptional black bear viewing. This should not change.

I do not support proposal 24 or 25 .

Thank you. Mike Stainbrook

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 24: Oppose

Proposal 25: Oppose



Submitted by: Adrienne Swan

Community of Residence: Juneau, AK

Comment:

Unit 3 moose regulations need changing. In my attached proposal, I give potential "solutions" and the reasoning behind.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 4: Support
Proposal 6: Support
Proposal 7: Support
Proposal 8: Support

Proposal 9: Support
Proposal 22: Oppose
Proposal 23: Oppose
Proposal 24: Support

Proposal 25: Support
Proposal 28: Support
Proposal 29: Support
Proposal 32: Oppose

Proposal 33: Oppose
Proposal 34: Support

See attachment on the following page.



Game & Fish Unit 3 Moose Regulations Proposal

This past fall, two friends and I hunted moose on Kupreanof Island. We spent 26 days on the island and had incredible hunting nearly the entire time. However, out of nearly 30 bulls we called in, only two were confirmed legal. We hunted with archery equipment, so the bulls we called in, we called in close. Getting good looks at their antlers was not an issue. All of the non-legal bulls were mature bulls (we didn't call in a single spike or fork) that had 1x1 or 1x2 brow tines. Most, if not all, of which will probably never grow more, keeping them illegal their whole life and passing on those genes to future calves. Of the two legal bulls we did find, our party shot one of them. The only reason his bull was legal though was because his left side was goofy. It was much smaller than the right, and had a single brow tine with a roughly 14-inch ladled palm with no points, thus making him a fork. His right side was a full paddle and single brow tine, much like the others we called in.

We met and talked with many other hunters while on the island, and some of them did not see one single legal bull during their entire hunt. We also talked to a couple Game & Fish biologists who said that bulls of all ages are being shot, so the antler restrictions meant to protect the prime breeding class, are not working. This year, too, less moose were harvested in Unit 3 than in previous years. One of our party members did this same hunt in 2019, and from what he could tell, the moose numbers had definitely not decreased. If anything, they had increased, which we think could be a sign of more illegal bulls.

We have brainstormed multiple potential solutions to this problem in Unit 3. Obviously, it cannot become an any-bull hunt, because that would draw too many hunters to the island. Doing an any-bull draw would also not be ideal, because it's a meat hunt for people on the island and close surrounding areas, and that would take away much of their opportunity. So, we propose that a draw for a set amount of Any-Bull permits is added. We think this could help in the long run, in that Any-Bull hunters might take some of the 1x1 and 1x2-browed bulls out of the gene pool. Another potential solution could be reducing the 50-inch and over width down to 40 inches and over. Not one bull we saw was over 50 inches, and we doubt very many bulls ever get that large. We did see three huge bulls that were close to 50 inches though, and would definitely have been over 40.

Please consider our proposals, or another one that may help the problem. We strongly believe that regulations need to change in Unit 3, both to reverse this trend of genetic selection for bad brow tines and so that hunters in the unit have a population of moose that are legal to harvest.



Submitted by: Brenton Taft

Community of Residence: Sandia Park, New Mexico

Comment:

Proposal 16 - SUPPORT

Proposal 16 asks to lengthen an already existing archery only hunt by two months with the bag limit (2 bucks) to remain the same. This would allow more opportunity for pursuing early season deer in the alpine. This proposal would benefit all bowhunters who choose to utilize this hunt but would be of most benefit to local residents of the hunt area. This area is already limited to bow and arrow only with a bag limit of two buck deer and the only change this proposal would bring is added days of season to hunt.

Proposal 19 - OPPOSE

Proposal 19 calls for cutting the Etolin Island archery elk season IN HALF. The proposal also would add a new any weapon season with an additional 25 elk permits that would take place in what is currently the last 2 weeks of the archery season and the peak of the elk rut. In a nutshell, this proposal would cause the number of drawing permits for the month of September to go from 25 to 50 with half of that number being available to rifle hunters during the peak of the rut. There are already 2 existing any weapon drawing permit elk hunts on Etolin during the month of October. Harvest Data shows that currently, the any weapon hunts yield over 50% more harvest than the additional archery hunt. The beauty of the current regulation is that it allows a longer season with more hunting opportunity in September due to the low impact of archery equipment. This proposal would take away from that opportunity while also potentially having a negative affect on the elk herd on the Island.

Proposal 24 - SUPPORT

Proposal 24 advocates for opening a registration archery only hunt for black bear in the Petersburg Creek drainages of Kupreanof Island. There would only be up to 10 permits available for this hunt which would only be available in person at the Petersburg ADF&G office. This permit would only be available to residents of Alaska and would have a bag limit of one bear per regulatory year. The season for this hunt would be from April 15th – June 30th and these dates were purposely chosen by the proposer in order to be the least likely time for any user conflicts in the area. Proposal 24 would afford residents of the Petersburg area a great opportunity to pursue black bear locally with archery equipment.

Proposal 29 - SUPPORT

Proposal 29 would expand the hunt area of the RG014 archery goat hunt in Unit 1C. This would afford more hunting opportunity to bowhunters and would not cause any population concerns according to ADFG.

Proposal 30 - SUPPORT

Proposal 30 would open a fall archery goat hunt in Unit 1C, the southern end of the Chilkat Peninsula from August 1st – September 1st. If adopted, this hunt would afford more hunting opportunity while also having a low impact due to the limitations of archery equipment.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



PC159

Submitted by: Jerry Taton

Community of Residence: Juneau Ak

Comment:

I have hunted Douglas Island for 26 years now the wolf population is getting way out of hand the deer population has dropped dramatically on Douglas Island. and there are a number of us who count on Douglas for our deer if something is not done, and soon there will be no deer population on Douglas Island.



PC160

Submitted by: John Taylor

Community of Residence: Wrangell

Comment:

I fully support opening elk hunting on Zarembo Island

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support

Proposal 18: Support



PC161

Submitted by: Christopher Thalacker

Community of Residence: Hortonville, WI

Comment:

As an out of state bow hunter, I would oppose any such measure expanding the use of any weapon type season to overlap with any bow season. The significant advantage that other weapons brings will put archers at a large disadvantage during those season overlaps. I've experienced such overlap in the lower 48 and have had opportunities snatches out of my hands just for this reason and due to that, I will no longer hunt in those states that allow such and acute overlap of seasons. Thusly, as an out of state hunter, it will erode the pool of potential dollars that could be brought to the state through hunting opportunities for specific seasons which will impact businesses income beyond just hunting license sales. I would highly recommend keeping the seasons separate and without overlap.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support

Proposal 24: Support

Proposal 30: Support

Proposal 19: Oppose

Proposal 29: Support





Submitted by: Steve Thomassen

Community of Residence: Wrangell Alaska

Comment:

17

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support



Submitted by: Donald Thompson

Community of Residence: Troy

Comment:

proposal 19 would have an impact on the elk herd with the success of alternative weapons over archery only. plus shortening the archery season limits its success. we would oppose such a change.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support
:



Submitted by: Brad Thomsen

Community of Residence: Edmonds Washington

Comment:

Proposal 16 - SUPPORT

Proposal 16 asks to lengthen an already existing archery only hunt by two months with the bag limit (2 bucks) to remain the same. This would allow more opportunity for pursuing early season deer in the alpine. This proposal would benefit all bowhunters who choose to utilize this hunt but would be of most benefit to local residents of the hunt area. This area is already limited to bow and arrow only with a bag limit of two buck deer and the only change this proposal would bring is added days of season to hunt.

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Proposal 19 calls for cutting the Etolin Island archery elk season IN HALF. The proposal also would add a new any weapon season with an additional 25 elk permits that would take place in what is currently the last 2 weeks of the archery season and the peak of the elk rut. In a nutshell, this proposal would cause the number of drawing permits for the month of September to go from 25 to 50 with half of that number being available to rifle hunters during the peak of the rut. There are already 2 existing any weapon drawing permit elk hunts on Etolin during the month of October. Harvest Data shows that currently, the any weapon hunts yield over 50% more harvest than the additional archery hunt. The beauty of the current regulation is that it allows a longer season with more hunting opportunity in September due to the low impact of archery equipment. This proposal would take away from that opportunity while also potentially having a negative affect on the elk herd on the Island.

Proposal 24 - SUPPORT

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Proposal 29 - SUPPORT

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Proposal 30 - SUPPORT

Proposal 30 would open a fall archery goat hunt in Unit 1C, the southern end of the Chilkat Peninsula from August 1st – September 1st. If adopted, this hunt would afford more hunting opportunity while also having a low impact due to the limitations of archery equipment.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



PC165

Submitted by: Kris Thynes

Community of Residence: Petersburg, Alaska

Comment:

Proposal #22

I am one of the authors of this proposal, requesting that the special provisions "rule" banning the use of motorized vehicles to access hunting in area 1B, Thomas Bay road system. I firmly believe that this "rule" no longer serves any use in the management of the moose in this area. As a resident of this area, I have seen the change in habitat, the clear cuts have grown back. Seeing moose from the roadway is rare now. And as the habitat changed the moose are no longer as numerous as in the past.

I regret the waste of the board's time, as this is a local rule, and the local game officer could have repealed himself, as our local advisory board has voted twice this past year, that they believe it no longer serves any management purpose.

Proposal #23

I am the author of this proposal, and I would prefer to drop this proposal and instead remove the "no drive rule" as stated in proposal #22. At which point, the use of E-bikes would be allowed.

Thank you for your time, Kris Thynes

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 22: Support

Proposal 23: Oppose

Proposal 33: Oppose



Submitted by: Tim Travis

Community of Residence: Juneau, ak

Comment:

I support the change to the age limit for waterfowl hunters on the mendenhall wetlands. I think the current verbiage is confusing and cuts out a lot of youth from hunting. My 8 year old spent the 2022 season following me around on the wetlands learning about hunting and he is currently in the process of taking the online portion of his hunter's safety course so that he will be able to hunt next year when he is 9. The way it is currently stated I interpreted it as you can not hunt the mendenhall wetlands with out a wetlands permit which requires a hunters safety permit. I think kids under 13 or 14 should be able to hunt with a parental figure. I think it is paramount to getting the next generation into hunting that they get an early start on the experience.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 10: Support
Proposal 11: Support
Proposal 12: Support
Proposal 13: Support
Proposal 14: Support

Proposal 21: Support
Proposal 28: Support
Proposal 29: Support
Proposal 30: Support
Proposal 31: Support

Proposal 32: Support
Proposal 34: Support
Proposal 35: Support
Proposal 36: Support
Proposal 37: Support

Proposal 38: Support
Proposal 39: Support
Proposal 40: Support
Proposal 41: Oppose



Submitted by: Charles Tripp

Community of Residence: Roswell, New Mexico

Comment:

I am in Opposition to proposal 19!

Cutting the length of time of an archery hunt increases pressure both on animals and on the hunters and makes the hunts No as enjoyable!

Adding a rifle hunt during the rut for elk is complete madness as it will almost guarantee 100% success for those rifle hunters, which will greatly reduce numbers!

There is already 2 other rifle hunts in place that the rifle tags could be spread across and zero need for cutting archery season short!

Alaska is known to be an adventure hunt for almost all bowhunters across America and to see a rut hunt for elk put up as a proposal to be rifle hunt destroys bowhunters desire to travel to Alaska to hunt!

With all trends when it comes to politics once one hunt is pushed to the side for another it's hard to stop the momentum that is in motion so please do not move forward with Proposal 19!

I am a life member of Alaska Bowhunters Association, life member of Pope and Young Club, and a life member of Boone and Crocket Club! I cherish the opportunity to pursue wildlife with a stick and string!

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Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



Submitted by: Craig Vanarsdale

Community of Residence: Soldotna, AK

Comment:

Please see Proposal Survey

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Oppose
Proposal 2: Support
Proposal 3: Oppose
Proposal 4: Oppose
Proposal 5: Support
Proposal 6: Oppose
Proposal 7: Oppose
Proposal 8: Support
Proposal 9: Oppose
Proposal 10: Oppose
Proposal 11: Oppose
Proposal 12: Oppose
Proposal 13: Oppose
Proposal 14: Oppose

Proposal 15: Support
Proposal 16: Support
Proposal 17: Oppose
Proposal 18: Oppose
Proposal 19: Oppose
Proposal 20: Oppose
Proposal 21: Oppose
Proposal 22: Oppose
Proposal 23: Oppose
Proposal 24: Support
Proposal 25: Oppose
Proposal 26: Support
Proposal 27: Oppose
Proposal 28: Support

Proposal 29: Support
Proposal 30: Support
Proposal 31: Support
Proposal 32: Support
Proposal 33: Oppose
Proposal 34: Support
Proposal 35: Support
Proposal 36: Oppose
Proposal 37: Oppose
Proposal 38: Support
Proposal 39: Support
Proposal 40: Oppose
Proposal 41: Support
Proposal 42: Support

Proposal 43: Oppose
Proposal 44: Oppose
Proposal 45: Oppose
Proposal 46: Support
Proposal 47: Oppose
Proposal 48: Oppose
Proposal 49: Oppose
Proposal 50: Oppose
Proposal 51: Oppose
Proposal 52: Oppose
Proposal 53: Oppose
Proposal 54: Oppose



To members of the Board of Game,

I am submitting this public comment in **SUPPORT** of **Proposal 5**, which would **establish a split season for waterfowl hunting in the Southeast Zone, Units 1-4**.

During the 2019 BOG meeting, the board encouraged the department to work through the federal process to secure a split season option for the Southeast Zone in order to accommodate the preferences of both early and late season hunters within the region. I appreciate the efforts by the department to complete those steps and to bring this proposal before the BOG. Following are my **four primary objectives** considered in proposing new season dates:

- **Restore the traditional September 1 hunting season start date**

The September 16 start date results in two weeks of lost opportunity for early migrating species that have moved through the area. A return to a September 1 opener will restore the historical start date, get hunters back in the field earlier and increase opportunities to pursue wigeon, green-winged teal and pintail which begin moving down the coast in late August. The first two weeks of September offer mild weather and the longest days of the season and as such, the best opportunity to take advantage of favorable tides for hunting.

- **Provide for uninterrupted hunting during the September and October migration periods**

September harvests are concentrated on the species highlighted previously. The month of October ushers in more unstable weather and with that comes the flights of mallards and geese from the north. This an exciting time to access these other species of waterfowl that are moving through the region throughout the month.

- **Minimize disruption to other traditional hunt periods that are important to hunters**

November brings on the blacktail deer rut along with established traditions of some hunters for combination deer and duck hunts during the early part of the month. The original dates I considered for the first portion of the split season ended November 10. While presenting my proposed season dates to the Sitka Advisory Committee last month, several others at the meeting spoke to the importance of having the waterfowl season open during the entire month of November, a period when they are already in the field hunting deer. One individual also spoke to the importance of the opportunity to hunt waterfowl on Thanksgiving Day. I felt it was prudent to acknowledge these other hunting traditions and have incorporated into my proposed dates their preference for hunting the entire month of November.

- **Maintain a late season hunting opportunity**

In 2008, the BOG delayed the waterfowl season to allow hunting to continue until the end of December. A split season continues to offer the option of hunting through the end of December or to set a later second split that could keep the season open into January, if that was the preference of late season hunters.

Based on the objectives considered, I offer the following dates to satisfy the wishes of early and late season hunters, while not displacing hunters from traditional hunt periods during the middle of the season. The proposed dates align with the 107-day season mandate and are based on the September - December time frame under which our current alternating seasons occur.

Proposed Dates:

Open September 1- November 30 (91 days)

Closed December 1- 15

Open December 16- December 31 (16 days)

Thanks for your consideration!

Mike Vaughn

**PC170****Submitted by:** Paul Vice**Community of Residence:** Seymour, IN**Comment:**

Paul Vice - bowhunter from Indiana ...having bowhunted Alaska multiple times and a current member of the Alaskan Bowhunters Association.

I am writing to oppose Proposal 19, which would cut the archery elk season on Etolin Island in half and replace those lost archery days with a new any weapon hunt. This proposal also cuts the number of archery tags available in half...which considering there are already two any weapon hunts on Etolin Island...is absolutely unfair to bowhunters. Lastly, I would oppose ANY proposal that adds rifle hunting during the peak of the elk rut. IMO, rifles during peak rut has the potential to create a serious negative affect the herd within just a few years. I've seen it happen before. Thanks for your time and consideration. Sincerely, Paul Vice

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support

**PC171****Submitted by:** Brian Watkins**Community of Residence:** EAGLE RIVER**Comment:**

Proposal 84; support; I want to comment on this and say that it doesn't adjust tags or add a new season. I am looking to modify the existing (ds141) season by splitting it into 3 separate hunts. Instead of one 24 tag season September 1-30, I think it would be a better experience to have three 8 tag seasons. Moving the seasons up to August would benefit the archery hunters as well. Adjacent rifle tags start in august where people access that tag through the DS141 unit.

Note: Respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment submission form. This information allows Board Support staff to develop an index for the meeting and is included below as a courtesy:

Proposal 2: Support

Proposal 31: Support

Proposal 35: Support

**PC172****Submitted by:** William Webb**Community of Residence:** Muscogee, Georgia**Comment:**

Support Bowhunting!!!

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



Submitted by: David Wellman

Community of Residence: Bark River

Comment:

Ser attachment Proposal 16 I like many archery hunters do not support proposals 16. I feel we the bowhunters do not need an extra 2 months to hunt. I will reference the affect of an extended season in my home state of Michigan. Michigan has a three month archery season for whitetail deer vs 15 days for rifle season. Archery technology as advance greatly the last 30 years resulting in a great increase of archery hunters. This increase has greatly affected the quality of the deer heard in respect of too many mature bucks taken before the breeding season has started leaving immature bucks doing more breeding. Our overall antler size and body size has dropped greatly over the yrs. By extending hunting seasons you could over time have the problems we see in Michigan. I feel all hunting seasons regardless of weapon used should all have the same time frame to hunt. Proposal 19,24,29 &30 I support. I do not live in Alaska but have relation that does and feel the same way.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 1: Oppose
Proposal 2: Support
Proposal 3: Support
Proposal 4: Support

Proposal 5: Support
Proposal 6: Support
Proposal 7: Support
Proposal 8: Support

Proposal 9: Support
Proposal 10: Support
Proposal 11: Support
Proposal 12: Support

Proposal 21: Support



Submitted by: Jon Wendel

Community of Residence: Juneau, AK

Comment:

See attachment.

Also, Proposal 41 would have unintended consequences, I would support trapping of wolves on Douglas, but removing it from the management area would have impacts on other species, such as deer, and would then allow for only bucks to be harvested? I support the wolf trapping regulation for Douglas be amended to expand wolf trapping.

Also, there are a [REDACTED] of wolves on POW, so I strongly support 45, 46 and strongly oppose 47, 48, 49, 50, 51, 52, 53, and 54. Alaska Wildlife Alliance, what a joke. I'm guessing none of the commenters even live on POW. I just want the better science for basing the wolf harvest on. Currently, I know there are too many to support local subsistence deer harvests, but there should be a reasonable cap too, so do your thing F&G and find that number.

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Proposal 1: Oppose
Proposal 2: Support
Proposal 3: Support
Proposal 4: Support
Proposal 5: Support
Proposal 10: Oppose
Proposal 11: Oppose
Proposal 13: Support
Proposal 14: Support

Proposal 17: Support
Proposal 18: Support
Proposal 19: Support
Proposal 21: Oppose
Proposal 27: Support
Proposal 29: Support
Proposal 30: Support
Proposal 31: Support
Proposal 32: Support

Proposal 34: Support
Proposal 36: Support
Proposal 37: Support
Proposal 38: Support
Proposal 39: Support
Proposal 41: Oppose
Proposal 45: Support
Proposal 46: Support
Proposal 47: Oppose

Proposal 48: Oppose
Proposal 49: Oppose
Proposal 50: Oppose
Proposal 51: Oppose
Proposal 52: Oppose
Proposal 53: Oppose
Proposal 54: Oppose

See attachment on the following page.



ADF&G –

Please accept these comments as they relate to the 2022-2023 Proposal Book proposal 10, 11, 36, and 37.

Firstly – I would like to begin with an overarching comment that ADF&G is charged, in AS 16.05, with the responsibility of managing the resources of the state to the use by its residents, specifically, among other things, [AS 16.05.050.19] “to promote fishing, hunting, and trapping and preserve the heritage of fishing, hunting, and trapping in the state.” Regulatory decisions made by ADF&G are based in science, research, and deliberation. As such, frankly, ADF&G should grow a spine and deny these requests, as the proposals lack the scientific support to be implemented responsibly. Quite to the contrary, ADF&G has conducted their own research into deer populations and have determined that proposition 10/11, specifically, are incorrect. As a southeast hunter (primarily deer), I can say that the impacts Juneau hunters are having on areas outside our relatively small geographical range is likely not significant. Within my friend group of hunters, we do take a significant number of deer annually, but are not spending thousands of dollars to fly/charter to rural areas to ravage their deer populations. It just doesn’t pencil out. The notion that Juneau hunters at having even a marginal impact on deer populations is likely not accurate. ADF&G would have access to this information from harvest reporting, but I generally tag out every year, or close to it, and have never traveled to a rural village to harvest deer. Additionally, my family relies on deer as a sustainable and responsible means of harvesting meat, and while we could go to the store and purchase beef, I have just as much claim to the deer walking around in the woods as any other resident of Alaska as a resource of the state. I hope I’m preaching to the choir, but please see my following comments regarding the proposals:

Proposal 10: This proposal does not include sufficient scientific or analytical information to support this proposal. The proposer claims that it would have ‘minimal impact on the deer population or individual hunter harvests’, if true, why change it? I can say that changing the bag limit from 6 to 4 would drastically impact me on a yearly basis. Also, the proposer claims that the reduction would benefit subsistence hunters. While I assume they mean rural subsistence hunters, people in urban areas can also participate in many forms of subsistence. Indeed, if you’re shooting 6 deer a year, the likely sole purpose you’re hunting is for subsistence purposes. Most ‘recreational’ hunters are not putting the time or effort into shooting even 4 deer. Reducing the number of tags from 6 to 4 would likely **only** impact subsistence hunters. Also, the proposer makes a series of claims which I doubt (such as “Very few individual non-federally qualified hunters harvest a six deer limit in Unit 4”). Just because you don’t harvest 6 deer a year doesn’t mean that you didn’t intend on harvesting that number back in August. The proposer’s final comment cuts to the issue being skirted around, this proposal is primarily targeted at residents of Juneau, who, as stated, likely do not contribute significantly to the harvesting of deer near rural communities and whose residents are participating in subsistence harvesting (even if not federal subsistence), who choose to attempt to harvest 4+ deer, this would negatively impact.

I strongly oppose this proposal and hope that ADF&G trust their own data to show it is misguided and targeted. Neither of which should be the basis for resource management decisions.



Proposal 11: Again, this proposal is not based on facts. The opening statement indicates that 'Unit 4 is special because of the **lack** of predators'. Admiralty Island has the highest density of brown bears in the world... and many other areas have significant numbers of bears/wolves, so I'm not really sure what this person is talking about. Most of the proposal is 'back in my day' type of information and, again, should not be the basis for resource management decisions. This is further enforced by the statement, "**I think** four deer per hunter is a good number when you factor in all the other animals we can harvest and the opportunities we have to use proxies for old-timers who can't hunt for themselves anymore." While proxy hunting is an awesome opportunity, and one that I have taken part in, this only further the idea that an individual should be able to shoot more than 4 deer (total of 8 if proxy hunting). With this number remaining at 6, that same individual could give deer 5 and 6 away if they waned and accomplish the same ends.

Again, I strongly oppose this proposal and hope that ADF&G trust their own data to show it is misguided and targeted. Neither of which should be the basis for resource management decisions.

Proposal 36: I don't know enough about grouse season to either oppose or support this proposal, but I can say that among my grouse friends, there has been a reduction in the number of birds they have seen/shot. Generally, I would agree that a reduction in the Juneau and Douglas road system would be appropriate, but again, I do not have the specific knowledge to support this. I can say that I, personally, can attest to the interest in grouse hunting in the spring. The doldrums of winter give way to spring in Juneau, and hunting is always on my mind, grouse just have the unfortunate misfortune of being my first opportunity to hunt after things start to melt.

I would generally support this proposal, but would defer to ADF&G who likely have more analytical data to support/reject this proposal.

Proposal 37: I would generally support this proposal. The 20 a day bag limit is, honestly, a little insane and does make it seem like the hills are infested with them. Also, the proposal would only affect the Juneau/Douglas road system, so hunters and not investing significant resources to harvesting the birds. So, push come to shove, they could just go back out the next day and get more.



Submitted by: Kathleen Wendt

Community of Residence: Ketchikan, Alaska

Comment:

See attached

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Proposal 26: Support
Proposal 27: Support
Proposal 45: Support

Proposal 46: Oppose
Proposal 47: Support
Proposal 48: Support

Proposal 49: Support
Proposal 50: Support
Proposal 51: Support

Proposal 52: Support
Proposal 53: Support
Proposal 54: Support



Submitted by: Trygve Westergard

Community of Residence: Ketchikan, Ak

Comment:

I believe there should be more options to hunt elk on Etolin and Zarembo.

The elk were transplanted there for the people to hunt. Not as a sanctuary. The limited drawing hunts don't give locals enough opportunities to harvest this wonderful food supply.

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Proposal 17: Support

Proposal 18: Support

Proposal 19: Support

Proposal 20: Support



Submitted by: Charles Whitwam

Community of Residence: Pacifica, ca

Comment:

I support proposals 16, 24, 29 and 30. opposing 19. thank you

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Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



Submitted by: Gordon Williams

Community of Residence: Juneau, AK

Comment:

Gordon Williams

Comments on BOG Proposal 12: Opening the Mitchell Bay area to bear hunting

OPPOSE

I am writing in opposition to Proposal 12 which would repeal the closure of the Mitchell Bay area to the taking of brown bears. I have lived full time or part time in Angoon for 45 years. I was a long-time member of the Angoon Advisory Committee, serving as the Chair for about 10 years. I am a lifetime outdoorsman and hunter – my father was a hunting guide for many years.

In concert with the historical use of Mitchell Bay by the residents of Angoon and special designation of the area in the Alaska National Interest Lands Conservation Act (ANILCA), which includes cooperative management of corridor lands in the Mitchell Bay area by Kootznoowoo Inc., the village Native corporation, the community recognized that the taking of brown bear in the Mitchell Bay area was not in the best social or economic interests of the community. At the request of the community, the BOG closed Mitchell Bay to the taking of brown bears in 1991. In 1992, the City of Angoon selected Mitchell Bay as an Area Meriting Special Attention under the then in place Alaska Coastal Zone Management Program because it was deemed “indispensable to the continuation of the indigenous culture, including locations of traditional and customary use for hunting, fishing, and food gathering.” Mitchell Bay provides sheltered waters for these traditional activities by Angoon residents and others.

Angoon is an economically distressed community. As the community looks to develop economic opportunities, there is currently a renewed interest in culturally and environmentally compatible tourism. A very important element involves Mitchell Bay for wildlife viewing. Opportunities to view brown bears is an important component of those efforts.

There is no valid justification for the Board to change the designation of Mitchell Bay with regard to the taking of brown bear. With very limited exceptions, almost all of Admiralty Island, as well as adjacent Baranof and Chichagof islands, is open for bear hunting. Opening Mitchell Bay for bear hunting would result in conflicts with the community and land management entities, and negatively impact traditional uses and future economic development.



Submitted by: Mary Willson

Community of Residence: Juneau AK

Comment:

Prop. 40: There is a real risk that uneducated shooters will kill red-winged blackbirds and rusty blackbirds that can be in this area seasonally. It takes practice to tell the difference between blackbirds and starlings. (In any case, it is not clear that shooting starlings would make a significant difference in their population size. Trapping them might work better. Starlings don't really do much harm, anyway, except by competing for nest holes, and their population is pretty well localized e.g. near the dump)

Prop. 41. I object strongly to 'controlling' the wolf population in order to increase the numbers of deer on Douglas. Wolves and deer would reach a natural balance, if left alone. I think the human hunters have more effect on the numbers of deer that wolves do--that's a testable hypothesis! (although i dont expect that you will actually test it...)

Every time i wander around on Douglas, in the woods and muskegs, i see deer sign; there should be enough of them over there for both wolves and humans.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 40: Oppose

Proposal 41: Oppose



PC180

Submitted by: James Wondzell

Community of Residence: Wi Rapids,Wi. 54494

Comment:

I support resolutions 16,19,24,29 and 30. Neutral on all the other issues.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Support

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



PC181

Submitted by: Kaden Wren

Community of Residence: Hays, Kansas

Comment:

I am a bow hunter from western Kansas with a strong passion in conservation for all of the United States in order for future generations of bow hunters to be able to enjoy the same resources we get to today.

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Proposal 17: Support
Proposal 18: Support

Proposal 19: Oppose
Proposal 20: Support

Proposal 22: Support
Proposal 23: Support

Proposal 33: Support



PC182

Submitted by: Brenda Wright

Community of Residence: Juneau, AK

Comment:

PROPOSAL 40

5 AAC 92.520(a). Closures and restrictions in state game refuges.

Allow the take of deleterious exotic wildlife in the Mendenhall Wetlands State Game

I am firmly against changing the regulations for expanding the season & including European starlings as year round prey. I especially am concerned about the use of any pellet gun. Although the proposal states a pellet gun

would not be used within 1/4 mile of a road, pellet guns have a very great range. No person walking on the wetlands would be safe from shooting at flying birds. It would be dangerous for all users. European starlings are an invasive species, but their population in Juneau has not skyrocketed. They are city birds & do not compete with the cavity nesting birds in Juneau. The mountain blue bird mentioned in this proposal does not nest in Juneau so there is no competition there. I have observed the rock doves (pigeons) and European starlings for many years as a birder in Juneau. I am aware of their nesting & feeding sites within the borough. Both have adapted to the plentitude of food available at low tide in Juneau. The reduction of invasive species is not a good reason to start using pellet guns at any time on the refuge.

5 AAC 92.530(23). Management areas. Proposal 41

Eliminate the Douglas Island Management Area in Unit 1C as follows:

Remove the Douglas Island Management Area in Unit 1C from regulation.

I am firmly against this regulation to remove all limits on wolf harvest on Douglas Island.

Natural predators like wolves are seldom the single cause of population collapse. Not unusually deer populations are extremely affected by very cold and snowy winters. Leaving no limit on wolf hunting will not fix any major problems with the deer population on Douglas Island.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 40: Oppose

Proposal 41: Oppose



PC183

Submitted by: Jonathan Wunrow

Community of Residence: Angoon, Alaska

Comment:

This comment is submitted by Kootznoowoo, Inc, the Native Village Corporation for Angoon to address the following: PROPOSAL 12 5 AAC 92.510. Areas closed to hunting. Open the Mitchell Bay Closed Area in Unit 4 to brown bear hunting as follows: It is proposed to open: "Mitchell Bay Area: Kootznahoo Inlet, Kanalku Bay, Favorite Bay and all land within 660 feet of mean high tide within that area; area open to the taking of brown bears".

Kootznoowoo, Inc. is opposed to opening these areas to brown bear hunting for the following reasons: It will increase conflicts with local subsistence hunters and gatherers, and increase the potential for human/bear conflict; bears on ABC islands are not major predators of deer; Kootznoowoo Inc. is developing tourism business opportunities in Mitchell Bay specifically because of the opportunity to see bears in a wild setting, and this bear viewing opportunity is supported through a SASS grant from the USFS; Introducing bear hunting would not resolve or reduce dump conflict, and rather, there are other measures that can be taken to stop bears from using the dump; through ANILA legislation, Kootznoowoo, Inc. has control over the 660 ft. shoreline lands within Mitchell Bay. These lands are co-managed with the U.S.Forest Service. Public access is "subject to regulation by the Secretary of Agriculture to ensure protection of the resources, and to protect the rights of quiet enjoyment of Kootznoowoo, Incorporated, granted by law, including subsistence uses (ANILCA 506 a sec 3 C ii)." And finally, the Proclamation establishing the Monument recognizes the importance of protecting the interests of Angoon and Alaska Native culture. Thank you. Jon Wunrow, President and CEO, Kootznoowoo, Inc.



PC184

Submitted by: Jason Yoder

Community of Residence: Hutchinson Kansas

Comment:

I want to Preserve and Protect Bowhunting in Alaska while doing whats best for the different animal species!

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



PC185

Submitted by: Archie Young

Community of Residence: Sitka

Comment:

I support proposal 17 but would limit to 5-10 permits with 1 bull taken. I suspect the first couple years the harvest will happen quickly. I also support proposal 19. However I would reduce the october hunt permit numbers. Maybe less hunters will produce less conflict of hunters in the same drainage. My brothers new of 3 different groups this year in the same drainage. No ethics there and potential unnecessary conflict. I really like the later september rifle hunt. Maybe even fewer permits there as the elk will still be high and easier to find/spot.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 17: Support with
Amendment

Proposal 19: Support with
Amendment



PC186

Submitted by: Marvin Zieser

Community of Residence: Phoenix, AZ

Comment:

I would like to express my support for Proposals 16, 24, 29 and 30 because the increase the opportunities for more days of hunting by more people. I oppose Proposal 19 because it reduces opportunity for days of hunting afield while putting more pressure on the resource animals via firearms during a highly vulnerable period of the year. Thank you.

Note: respondents were allowed to participate in an optional survey to indicate support or opposition for proposals using the online comment portal. This information helps Board Support staff develop an index for the meeting and is included below as a courtesy:

Proposal 16: Support
Proposal 19: Oppose

Proposal 24: Support
Proposal 29: Support

Proposal 30: Support



PC187

Submitted by: Jason Lawrence

Community of Residence: Juneau

Comment:

ADFG should have full authority over this decision not some advisory committee that has done zero research.



PC188

Submitted by: John Doe

Community of Residence: Planet Earth

Comment:

Here is my opinion about wolves on POW. My family and me lived on POW for over two decades. I have watched the island slowly change and get bad. Beaches have been made into houses for snowbirds. The coasts are loaded with boats you can't find a place to fish without seeing a dozen boats sitting out there fishing too. Regulations don't protect POW's animals they try to bring local species they call invasive to extinction. Information always changes so people can make money. This is what's happening with sea otters because people always say they eat too much. This lets people wipe them out for money. Data on sea otters is not used for management but to support allowing natives to kill more of them. This is wrong.

In 2018 the State didn't have trapping regulations on Prince of Wales Island. People had no permits or limits. After the season Fish and Game realized they let people kill 90% of the wolves. No one seems to listen or care. There is no responsibility.

Some say wolves eat all the deer. This is not true. Logging and poaching are more harmful, but no one listens. Some towns want to get rid of wolves completely. "If the Alexander Archipelago wolf gets listed as endangered, it would be the worst thing for us" people from a community on south POW said publicly in 2022. Others say wolves threaten subsistence and recreation. These claims make no sense but having no one care about the wolves makes them seem true.

People here live close to animals and nature on POW people don't shoot the bears in town. If you take care of your trash and fish the bears will leave you alone if you are smart. POW has the highest density of black bears in the world without problems. People enjoy watching bears and hunting them for sport and there are no problems. Why are wolves not important?

There are problems when native species go extinct. Having no sea otters lets sea urchins eat all the kelp away. This gets rid of places for baby salmon. Everyone likes to call otters pests that are eating up all the food and then kill as many as possible. In Yellowstone when all the wolves were hunted the deer population went up then they ate all their food and they starved. You can't kill off a species without it effecting everything. We don't have to kill all the animals like they do in the Lower 48.

Alaska is special. We are lucky to live here. Killing all the wolves will not ruin the forest right away but it will hurt the environment. Prince of Wales needs wolves. It doesn't need over-logging and poaching. Wolves and people can live together in Southeast. We do not need to kill everything like people in the Lower 48 do. We are Alaskans we live close to nature and the animals! On Prince of Wales we can set an example of how to live on land with wolves just like how we share the land with bears.

There are many of us who are watching to see if the Southeast Board of Game will defend our wildlife. We hope you make good decisions for the future of Southeast.

-Anonymous
