

A photograph of a brown bear cub in a forest. The cub is positioned in the center-right of the frame, looking directly at the camera while eating a piece of green grass. Its fur is a mix of light and dark brown. The background is filled with tree trunks and lush green foliage, creating a natural, wooded environment.

Alaska Board of Game

RC3

On-Time Public Comments

ALASKA BOARD OF GAME
Statewide Regulations Meeting
Anchorage, Alaska | March, 21-28, 2025

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*****This file was updated updated to include PCs 63 and 84 which were inadvertently left out..
We apologize for any confusion.*****

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Ahtna Intertribal Resource Commission

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February 27, 2025

Alaska Board of Game
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Dear Alaska Board of Game Members,

On behalf of the Ahtna Intertribal Resource Commission (AITRC), we appreciate the opportunity to submit comments for your consideration in this statewide regulatory cycle. AITRC represents the eight federally recognized tribes of the Ahtna Region, working together to protect and strengthen the Ahtna people's customary and traditional use of wildlife and natural resources.

These comments reflect the collective input of AITRC member tribes and experienced staff, with guidance from our Fish and Wildlife Committee, whose deep connection to the land and resources within the Ahtna Territory informs our perspective.

We hope this input supports the Board in making well-informed decisions that uphold sustainable wildlife management. Thank you for your dedication to this important work and for considering the views of AITRC and our member tribes.

Tsin'aen,


Karen Linnell
Executive Director

Tsin'aen



PROPOSAL 85

5 AAC 92.013 Migratory bird hunting guide services.

Change the definition for migratory bird hunting guide services to include transporter services.

AITRC Supports Proposal 85

Adding Transporters to the registration requirement is needed, if they offer services to migratory bird hunters. Registration will provide the department with valuable data to enhance the management of migratory bird populations.

We've observed transporters relocating to areas with abundant hunting opportunities, over-harvesting, and then moving elsewhere. This pattern has occurred with salmon, moose, sheep, and caribou. AITRC does not want to see this happen with migratory birds.

PROPOSAL 87

5 AAC 92.100. Unlawful methods of hunting waterfowl, snipe, and cranes.

Restrict the use of boats for hunting waterfowl

AITRC Oppose Proposal 87.

Many bird hunters use canoes or small boats to get to the birds, then have to quickly retrieve them. And stop to shoot anyway, there is no need to be anchored or on shore. It is not practical to require an anchor or to expect bird hunters to go to shore before shooting a duck. It would unnecessarily restrict the use of boats in waterfowl hunting, particularly for subsistence practices that rely on boats for the primary means of access. This proposal can end up limiting the ability for hunters to be successful by requiring them to anchor or to go to shore, or requiring them to stay within 100 yards of those discharging firearms. It sounds like they want the boats to follow whoever is walking.

There has not been any demonstration of a need for the change and much of their concerns are addressed in:

5 AAC 92.080 (4) ...prohibits the use of a motor-driven boat ... unless it has been completely shutoff and the progress from the motor's power has ceased...

(5) ...prohibits the use of a motorized vehicle to harass game or for the purpose of driving, herding, or molesting game

PROPOSAL 88

5 AAC 92.034. Permit to take game and use game for cultural purposes.

Add wood bison to the list of game species allowed to be taken for cultural purposes under a permit issued by the Department of Fish and Game

AITRC Supports Proposal 88

The reintroduction of wood bison within the traditional lands of the Minto and Nenana people presents an opportunity to ensure that local communities benefit from this species. Alaska Native communities have long relied on consuming animals close to home, and allowing wood bison for cultural and educational purposes aligns with these traditions. While initial opposition existed, incorporating wood bison into cultural uses follows the traditional practice of harvesting animals that are available and within traditional territories. This proposal does not seek unrestricted hunting but rather a structured approach that balances conservation with cultural needs. Some big game organizations that supported reintroduction now oppose



customary and traditional use designations, yet excluding wood bison from these protections undermines equitable wildlife management. Approving this proposal supports both conservation and Indigenous traditions, ensuring wood bison remain a meaningful resource for the communities whose lands they now inhabit.

PROPOSAL 89

5 AAC 92.003. Hunter education and orientation requirements.

Require nonresident moose hunters to attend a hunter orientation course and be accompanied by a registered guide or resident family member within the second degree of kindred

AITRC Supports Proposal 89

The requirement for all nonresidents hunting moose in Alaska to complete a hunter education course and be accompanied by a registered guide or family member within second-degree kindred, aims to improve meat care practices and reduce wanton waste by ensuring nonresident hunters understand proper salvage requirements and their responsibilities. Given concerns about inadequate meat handling and the lack of enforcement, this proposal provides a proactive approach to educating nonresident hunters and promoting ethical hunting practices. By adopting Proposal 89, the Board can help mitigate waste while reinforcing responsible moose harvesting in Alaska.

*******PROPO**

SAL 90

5 AAC 92.003. Hunter education and orientation requirements.

Require all goat hunters to pass an online mountain goat quiz prior to hunting

AITRC Supports with Modification Proposal 90

Expanding the requirement for all goat hunters to pass an online mountain goat quiz before hunting, aiming to improve hunter awareness and reduce female harvest to support sustainable populations. While AITRC supports efforts to enhance hunter education, an online-only requirement would disproportionately disadvantage rural and remote hunters who lack reliable internet access. To ensure equitable participation, alternative options such as in-person or hard-copy tests should be available.

Additionally, learning from an experienced goat hunter should be recognized as an acceptable form of hunter education and orientation, allowing traditional knowledge to be passed down through mentorship. A grandfather clause should also be considered for experienced hunters who have been actively hunting before a reasonable cutoff date, such as January 1, 1986, which is already in regulation for other exceptions (5AAC92.003(B)). Providing multiple avenues for compliance will help balance education goals with fair access to hunting opportunities for all Alaskans.

PROPOSAL 91

5 AAC 92.003. Hunter education and orientation requirements.

Require all goat hunters to pass an online mountain goat quiz prior to hunting

AITRC Supports with Modification Proposal 91

See AITRC comments for Proposal 90

PROPOSAL 92

5 AAC 92.003. Hunter education and orientation requirements.



Require sheep hunters to complete an online education course

AITRC Supports with Modification Proposal 92

Expanding the requirement for all sheep hunters to pass an online Dall sheep quiz before hunting, aiming to improve hunter awareness and reduce sub-legal ram harvest to support sustainable populations. While AITRC supports efforts to enhance hunter education, an online-only requirement would disproportionately disadvantage rural and remote hunters who lack reliable internet access. To ensure equitable participation, alternative options such as in-person or hard-copy tests should be available.

Additionally, learning from an experienced sheep hunter should be recognized as an acceptable form of hunter education and orientation, allowing traditional knowledge to be passed down through mentorship. A grandfather clause should also be considered for experienced hunters who have been actively hunting before a reasonable cutoff date, such as January 1, 1986, which is already in regulation for other exceptions (5AAC92.003(B)). Providing multiple avenues for compliance will help balance education goals with fair access to hunting opportunities for all Alaskans.

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PROPOSAL 95

5 AAC 92.990(30). Definitions.

Repeal the age criteria for the definition of full-curl horn ram

AITRC Supports Proposal 95

Repealing the age-based criteria for defining a full-curl Dall sheep ram, addressing concerns that hunters attempting to count annuli rings from a distance are unintentionally harvesting sub-legal rams. AITRC supports this proposal, as aging rams in the field is highly challenging, even for experienced hunters and biologists, leading to unnecessary citations, abandoned animals, and loss of recruitment-age rams. Some units have rams that reach only $\frac{3}{4}$ curl by eight years of age, making the age criteria an inconsistent and unreliable method for determining legal harvest.

The age-based requirement is unnecessary and can be detrimental to sustainable sheep management. Removing this criterion will reduce unintentional violations, improve hunter success, and support a more practical approach to Dall sheep conservation.

PROPOSAL 96

5 AAC 92.990(30). Definitions.

Repeal the age criteria for the definition of full-curl horn ram

AITRC Supports Proposal 96

See AITRC comments on Proposal 95

PROPOSAL 101

5 AAC 92.106. Intensive management of identified big game prey populations.

Add sheep to the list of species identified as important for providing high levels of human consumptive use

AITRC Supports Proposal 101

Sheep populations across various regions of Alaska have experienced significant declines, raising concerns about their long-term sustainability and the ability of hunters to access this important resource. Despite ongoing discussions, sheep are not currently included as an IM species, limiting management tools available to support their recovery.



The Board of Game has the authority under AS 16.05.258(e)-(g) to establish IM programs for species deemed necessary to meet human consumptive use goals. Including sheep in this framework would provide an opportunity for more targeted management actions, including predator control and habitat enhancement, to support population recovery. Fish and Game advisory committees have already expressed interest in predator reduction efforts to aid declining sheep populations, but the current regulatory framework does not allow for direct action. The only precedent has been in Unit 19C, where predator control was implemented through a workaround under moose management regulations, highlighting the need for a more direct and appropriate approach.

Adding sheep as an IM species does not automatically mandate predator control but ensures that the Board and the Department of Fish and Game can consider and implement management strategies where necessary. Given the widespread concerns about sheep population declines and the importance of maintaining sustainable harvest opportunities, AITRC supports this proposal as a critical step in improving Dall sheep management and conservation efforts.

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PROPOSAL 122

5 AAC 92.011. Taking of game by proxy.

Allow proxy hunting for plains bison statewide

AITRC Opposes Proposal 122

Expanding proxy hunting to include the Chitina and Copper River bison herds could reduce fairness in the draw permit system, increase harvest pressure, and create opportunities for misuse. Given the limited availability of bison permits and the need for careful herd management, this proposal could negatively impact ethical hunters and long-term population sustainability.

Proxy hunting has been previously restricted for certain species due to documented abuse, including instances where individuals obtained multiple bag limits by enlisting elderly residents through retirement homes. This concern is particularly relevant in high-demand draw permit hunts, where allowing proxy hunting could undermine conservation efforts and equitable access to hunting opportunities. Similar restrictions have been applied in Tier II Nelchina caribou hunts, recognizing the potential for abuse and ensuring responsible wildlife management.

Historically, proxy hunting was introduced to facilitate community-based sharing of harvested meat, particularly in rural Alaska. However, state and federal community hunts now fulfill that purpose by allowing a designated hunter to harvest on behalf of another participant. Given this alternative, reinstating proxy hunting for plains bison is unnecessary and would compromise the integrity of the draw permit system.

PROPOSAL 123

5 AAC 92.011 (i). Taking of game by proxy.

Allow remuneration to be provided to proxy hunters

AITRC Opposes Proposal 123

Removing the prohibition on remuneration for proxy hunting. Proxy hunting was established as a charitable system to allow able-bodied hunters to assist those unable to hunt due to age, disability, or other legitimate reasons. Introducing financial incentives would fundamentally alter its purpose, shifting proxy hunting from a community-based support system to a commercialized service.

Allowing payment for proxy hunting would create opportunities for abuse, including false proxy requests and a "pay-to-hunt" loophole that benefits wealthier individuals at the expense of ethical hunters. This



could lead to overharvesting, as financial incentives may drive hunters to maximize their take rather than focus on sustainable harvest levels. Furthermore, it undermines the principles of fair and equitable resource use, contradicting Alaska's commitment to conservation and subsistence hunting.

From a regulatory perspective, permitting remuneration would blur the line between subsistence and commercial hunting, creating significant enforcement challenges. Ensuring fair compensation without exploitation or privatization of public wildlife resources would be nearly impossible to monitor, increasing the risk of legal disputes and ethical concerns.

PROPOSAL 124

5 AAC 92.044. Permits for hunting bear with the use of bait or scent lures.

Change the term "permanent dwelling" to "permanent domicile" for the purpose of bear baiting

AITRC Opposes Proposal 124

Replacing the term "permanent dwelling" with "permanent domicile" for the purpose of bear baiting regulations would significantly liberalize the establishment of bear bait stations by limiting restrictions to only those areas within a mile of a true permanent home, rather than including seasonally occupied cabins, fish camps, or other important subsistence-use areas.

The current language provides necessary protections against placing bait stations too close to areas where people regularly camp, work, or engage in traditional activities. Changing the definition to "permanent domicile" could allow bait stations to be placed within or near campsites and seasonal residences, increasing the likelihood of human-bear encounters and safety risks. Additionally, enforcement would become more challenging, as determining whether a site meets the definition of a "true and permanent home" would require subjective interpretation and create inconsistencies.

PROPOSAL 125

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

AITRC Opposes Proposal 125.

Define "developed recreation facility" and "permanent dwelling" for bear baiting in Units 15 and 7

See comments in 124

PROPOSAL 126

5 AAC 92.080. Unlawful methods of taking game; exceptions.

Allow the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide

AITRC Opposes Proposal 126

Expanding the use of electronically enhanced night vision and forward-looking infrared (FLIR) devices for taking furbearers statewide, while these technologies were recently approved for Region III, broadening their use statewide raises significant ethical, conservation, and public safety concerns.

The use of night vision and thermal optics fundamentally alters fair chase principles by eliminating an animal's natural ability to evade, conceal, or escape. These tools drastically increase hunting efficiency, raising concerns about potential overharvest and unsustainable impacts on furbearer populations. Traditional methods of hunting and trapping rely on skill, knowledge, and experience, whereas reliance on advanced technology reduces the need for these essential practices, weakening the connection between hunters and the land.



Additionally, not all lands within Alaska are the same, and applying this regulation statewide fails to consider the differences in terrain and habitat. In areas with rugged, forested landscapes, some natural limitations remain, but in flatter, more open regions, these technologies could lead to excessive harvest levels with minimal effort. This imbalance in efficiency could have severe consequences for local furbearer populations, particularly in regions where they are already under harvest pressure. Being from a region that is highly road accessible, this is a concern.

PROPOSAL 127

5 AAC 92.080. Unlawful methods of taking game; exceptions.

Allow the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide

AITRC Opposes Proposal 127

See AITRC comments for proposal 126

PROPOSAL 128

5 AAC 92.080. Unlawful methods of taking game; exceptions.

Allow the use of night vision and thermal optics taking furbearers statewide

AITRC Opposes Proposal 128

See AITRC comments for proposal 126

PROPOSAL 129

5 AAC 92.085. Unlawful methods of taking game; exceptions

Establish a minimum standard of centerfire rifle cartridges for taking big game

AITRC Opposes Proposal 129

It is unclear and potentially confusing wording, which could create enforcement challenges and unnecessary restrictions for hunters. While the intent to establish a minimum caliber requirement for big game hunting is understandable, the language used in this proposal lacks clarity, particularly regarding overall cartridge length and specific exceptions for regional hunting practices. This ambiguity could lead to unintended consequences, including unnecessary limitations on certain effective calibers and confusion among hunters and enforcement officers.

Proposal 130 offers a more clearly defined and practical approach to addressing the issue of appropriate calibers for big game hunting. Rather than adopting Proposal 129 in its current form, AITRC encourages the Board to consider Proposal 130 with modification as a more effective alternative that balances ethical hunting practices with the need for practical, enforceable regulations.

PROPOSAL 130

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

Establish a minimum standard of centerfire rifle cartridges for taking moose

AITRC Supports with Modification Proposal 130



Recognizing the importance of ensuring ethical and effective harvests. Moose are one of North America's largest big game species, and the use of inadequate calibers, such as .223 Remington, has resulted in wounded and unrecovered animals. Implementing a statewide minimum caliber of .243 would help reduce unnecessary game loss and promote responsible hunting practices.

However, Alaska's diverse hunting traditions and regional practices must be considered. Certain areas and specific cultural hunting methods may justify the use of smaller calibers under controlled circumstances. To address this, AITRC recommends incorporating language that allows for regional exceptions where smaller calibers may still be appropriate, ensuring that longstanding hunting traditions are not unfairly restricted.

By adopting this proposal with provisions for designated exceptions based on Game Management Units (GMUs) or specific subsistence hunts, the Board can create a balanced approach that supports both ethical hunting standards and traditional practices. AITRC conditionally supports Proposal 130 with the inclusion of language allowing for region-specific exemptions where appropriate.

PROPOSAL 131

5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Require identification tags be attached to traps and snares

AITRC Opposes Proposal 131

Unnecessary on a statewide level, creates privacy concerns for trappers, imposes additional bureaucratic burdens, and could discourage lawful trapping. While ensuring ethical and legal trapping practices is important, a blanket statewide requirement for identification tags on traps and snares is not the appropriate solution and should be considered on a regional basis rather than as a one-size-fits-all regulation.

Trappers already operate under existing laws that regulate trapping seasons, locations, and methods. Adding an identification requirement creates potential privacy risks by requiring personal information to be tied to each trap or snare, even with a PIN system in place. While the intent to assist law enforcement and provide accountability in specific situations is understandable, the vast majority of trappers follow regulations and do not require additional oversight that could lead to undue scrutiny or harassment.

Additionally, this proposal would create unnecessary administrative burdens on both trappers and the Alaska Department of Fish and Game. Implementing a tagging and registration system for all traps statewide would require significant resources while offering minimal benefits. Trapping conditions vary greatly across Alaska, and any regulatory changes should be determined regionally to address specific concerns rather than applying a broad statewide mandate.

PROPOSAL 132

5 AAC 92.080. Unlawful methods of taking game, exceptions.

Prohibit nonresidents from using snowmachines to approach and pursue the take of wolves and wolverine

AITRC Supports Proposal 132

AITRC supports Proposal 132, which seeks to prohibit nonresidents from using snowmachines to approach and pursue wolves and wolverines. The use of snowmachines in hunting has been recognized as a customary and traditional practice for Alaska residents, particularly in regions such as Bristol Bay and Northwest Alaska, where vast open terrain makes harvesting these species challenging. However, extending this allowance to nonresidents undermines the original intent of these regulations, which were



established to support subsistence users and local communities.

Nonresidents often lack the same cultural ties and subsistence needs as Alaska residents, and allowing them to use snowmachines for pursuit could increase harvest pressure on local wildlife populations. Additionally, there are concerns that some nonresidents may not fully understand or adhere to the ethical and responsible hunting practices associated with this method, leading to potential misuse and conflicts with resident hunters.

This proposal does not restrict Alaska residents, including those who have temporarily left the state for school or work, from engaging in traditional hunting methods. Instead, it ensures that snowmachine-assisted hunting remains a privilege tied to residency and the subsistence needs of local communities.

PROPOSAL 133

5 AAC 92.080. Unlawful methods of taking game, exceptions.

Prohibit the use of snowmachines to approach and pursue wolverine

AITRC Opposes Proposal 133

Removing the use of snowmachines for pursuing wolverines, disregards years of work by the Bristol Bay Native Association, Alaska Native organizations, and local communities to gain recognition of the customary and traditional use of snowmachines for hunting in Alaska.

Snowmachines are an essential tool for hunters and trappers in many regions, particularly in areas like Bristol Bay and Northwest Alaska, where vast, open terrain makes harvesting wolverines and other predators extremely difficult without mechanized assistance. Limiting their use would disproportionately affect rural and subsistence hunters who rely on wolverines as a valuable resource.

The Board of Game has previously recognized the importance of snowmachine use in positioning hunters and facilitating successful harvests. Removing wolverines from the list of species that can be taken using this method would undermine established regulations that acknowledge these traditional practices and could set a precedent for further restrictions on subsistence hunting.

PROPOSAL 134

5 AAC 92.069. Special provisions for moose and caribou drawing permit hunts.

Allocate 90% of all moose drawing permits to residents

AITRC Conditionally Supports Proposal 134

Seeking to allocate 90% of moose drawing permits to Alaska residents in recognition of food security and subsistence needs. Moose are a primary subsistence resource for many Alaskans, and ensuring that more permits are issued to residents aligns with the state's mandate to prioritize the common use, maximum use, and maximum benefit of wildlife resources for Alaskans.

However, it is important to recognize that drawing permits do not provide a reliable or fair means of guaranteeing access for customary and traditional uses, as they are awarded through a random selection process. When harvestable surpluses are insufficient to meet all customary and traditional uses, Alaska's subsistence statute (AS 16.05.258) requires a Tier II application ranking process to allocate permits to those most dependent on the resource. Drawing hunts, in contrast, are typically established when harvestable surpluses exceed subsistence needs, allowing for nonresident participation.



While this proposal would increase the number of moose hunting opportunities for Alaska residents, it may face opposition from the commercial guiding industry and entities that benefit from nonresident hunting, such as ADF&G, which relies on nonresident big game tag fees and licenses for funding. The Board must weigh these competing interests carefully while ensuring that the needs of resident hunters, particularly those in subsistence-dependent communities, are prioritized.

PROPOSAL 135

5 AAC 92.050 (a)(4). Required permit hunt conditions and procedures.

Allocate 10% of the big game permits to nonresidents

AITRC Oppose Proposal 135

Due to its lack of clarity in “big game permits” allocations would be structured and implemented. While the intent to prioritize resident hunters is understandable, the proposal does not clearly define how the allocation system would function or how it would interact with existing management frameworks, such as Tier II and community-based permit systems.

PROPOSAL 136

5 AAC 92.050. Required permit hunt conditions and procedures.

Limit bison and musk ox drawing permit hunts to once in a lifetime, and only allow applicants to apply once per hunt

AITRC Opposes Proposal 136

Limiting bison and musk ox drawing permits to a once-in-a-lifetime opportunity and change the application structure, while the frustration of unsuccessful applicants is understandable, this proposal does not account for the complexities of wildlife management and the legal constraints surrounding hunting permit fees.

First, only the Alaska Legislature has the authority to revise permit fees, meaning the proposed increase to \$50 per application falls outside the jurisdiction of the Board of Game. Second, implementing a once-in-a-lifetime restriction would unfairly penalize those who have successfully drawn a permit while doing little to improve the odds for future applicants. Drawing hunts are inherently competitive due to the limited number of available permits, and restricting opportunities for those who have previously drawn does not guarantee others a successful outcome.

Additionally, proposals like this are frequently submitted by individuals frustrated with the draw system rather than based on biological or management concerns. A more effective approach to improving access could involve increasing permit availability where sustainable or reviewing alternative methods for distributing these highly sought-after tags.

PROPOSAL 137

5 AAC 92.050. Required permit hunt conditions and procedures.

Change the drawing hunt permit process

AITRC Opposes Proposal 137

This proposal primarily reflects frustrations from individuals who have not been successful in drawing permits rather than addressing a biological or management concern. While draw odds have become increasingly competitive, this is largely due to rising application numbers and limited availability of permits, not flaws in the existing system.



The number of applications per species was previously increased to generate additional revenue for ADF&G, which supports wildlife management programs. The examples cited in this proposal demonstrate that more applications have been submitted, leading to increased competition, but altering the process would not necessarily result in better odds for any one group of hunters.

Additionally, many of the suggested changes—such as restricting the number of species an individual can apply for or implementing extended waiting periods—could unfairly limit opportunities for certain hunters while doing little to improve overall draw success rates. Proposals like this are submitted regularly by those who have not drawn permits, but the current system ensures a fair and equitable process for all applicants.

PROPOSAL 139

5 AAC 92.150. Evidence of sex and identity.

Change the evidence of sex requirements for horned big game animals

AITRC Supports Proposal 139

Which seeks to align the evidence of sex requirements for mountain goats and musk oxen with existing regulations for Dall sheep. Currently, sheep hunters are allowed to use horns as evidence of sex without requiring external sex organs to remain attached to salvaged meat, while goat and musk ox hunters must keep the sex organs attached. This inconsistency creates unnecessary burdens for hunters, especially in remote field conditions where bacterial growth and heavier pack loads are concerns.

Requiring sex organs to remain naturally attached to meat is not essential for species where horns provide a clear and sufficient indicator of sex. Eliminating this requirement for goats and musk oxen would simplify meat processing and transportation while maintaining effective enforcement of sex-based harvest regulations.

PROPOSAL 141

5 AAC 92.135(a). Transfer of possession.

Allow the transfer of possession of game meat and game parts to be captured in a digital video format or on paper

AITRC Supports Proposal 141

Allow the transfer of possession of game meat and game parts to be documented electronically via video recording on a smartphone or tablet. This would serve as an alternative method to the existing paper form requirement, improving flexibility while maintaining proper record-keeping and accountability.

Currently, transfer of possession documentation requires a signed paper form that includes critical details such as the names and addresses of both parties, the hunting license number of the harvester, and information about the game being transferred. Proposal 141 does not seek to replace this system but rather provides an additional option for hunters and recipients to document transfers, particularly in situations where paper forms may not be available.

Video recordings offer added benefits, including automatic date and time stamps, audio verification, and immediate digital accessibility for both parties. This method could also help prevent loss or damage to paper forms in the field while ensuring that all required information is documented. Importantly, this proposal retains all necessary safeguards to ensure compliance with salvage responsibilities and legal



accountability.

PROPOSAL 142

5 AAC 92.031(h). Permit for selling skins, skulls, and trophies.

Allow for the sale of legally harvested big game trophies without a permit

AITRC Opposes Proposal 142

Removing this requirement would further commercialize big game hunting in Alaska, increasing the risk of exploitation and undermining the principles of ethical and subsistence-based hunting.

The current permit system ensures oversight and accountability in the sale of big game trophies, helping to prevent illegal harvest, overexploitation, and commercialization that could incentivize non-subsistence-driven hunting. Without this regulation, there is a risk of increased pressure on wildlife populations and a shift toward profit-driven hunting rather than responsible wildlife management.

Additionally, eliminating the permit requirement would reduce the ability of ADF&G to track and regulate trophy sales, making enforcement more difficult and increasing the potential for illegal activities such as poaching or improper transfer of game parts. While the proposal claims that there is no data suggesting issues with trophy sales, removing an existing regulatory safeguard without a clear justification poses unnecessary risks.

PROPOSAL 143

5 AAC 92.200. Purchase and sale of game.

Allow for the sale of legally harvested big game trophies without a permit

AITRC Opposes Proposal 143

Similar to Proposal 142, this proposal would further commercialize big game hunting in Alaska, increasing the risk of exploitation and shifting hunting motivations away from ethical and subsistence-based practices.

The existing permit requirement ensures oversight and accountability in the sale of big game trophies, helping to prevent illegal harvest, market-driven overexploitation, and the commercialization of wildlife. Eliminating the permit process would weaken enforcement capabilities, making it more difficult to track and regulate the sale of trophies while increasing the potential for illegal activities such as poaching or the misrepresentation of game origins.

Additionally, the proposed regulatory language is problematic and lacks clarity in how sales would be monitored or limited. Without proper safeguards, allowing unrestricted sale could incentivize non-subsistence-driven hunting practices, negatively impacting both wildlife populations and resident hunters who rely on these species for food security.

PROPOSAL 146

5 AAC 92.029. Permit for possessing live game.

Exempt sterilized cats from the list of species prohibited from being released into the wild



AITRC Opposes Proposal 146

While the intent of implementing Trap-Neuter-Release (TNR) programs to manage feral cat populations is understandable, allowing the release of sterilized cats would still pose significant risks to Alaska's native wildlife, particularly songbirds and small mammals.

Feral cats are an invasive species with well-documented negative impacts on wildlife populations. Even if sterilized, released cats continue to hunt, kill, and disrupt native ecosystems. In previous regulatory discussions, concerns have been raised about the estimated thousands of feral cats in urban areas such as Anchorage, and their impact on local wildlife has been widely acknowledged. Allowing TNR would only sustain these populations rather than eliminate the problem.

The Board of Game's primary responsibility is to protect Alaska's wildlife, and maintaining the prohibition on releasing domestic animals into the wild aligns with that mission. The current regulations ensure that efforts to manage feral cats prioritize removal rather than further entrenching their presence in the ecosystem.

PROPOSAL 147

5 AAC 92.029. Permit for possessing live game.

Delegate authority from the Board of Game to the Commissioner of the Department of Fish and Game

AITRC Opposes Proposal 147

The clean list determines which species may be possessed in Alaska without a permit, and any changes to it have direct implications for the state's wildlife conservation efforts.

The Board of Game plays a critical role in ensuring that species additions to the clean list are carefully reviewed through a public regulatory process. Transferring this authority to the Commissioner could reduce transparency and public involvement in decision-making, limiting the opportunity for advisory committees, conservation organizations, and the public to weigh in on potential risks associated with introducing new species.

Furthermore, this proposal follows the rejection of Governor Dunleavy's Executive Order 124 by the Alaska Legislature, which aimed to shift broader regulatory powers related to wildlife management. While this proposal is more limited in scope, the rejection of the executive order indicates that decisions about species possession should remain under the Board's authority rather than being transferred to the Commissioner's discretion.

PROPOSAL 148

5 AAC 92.110(e). Control of predation by wolves.

Impose certain conditions on the commissioner's ability to implement an intensive management plan following its adoption by the Board of Game

AITRC Opposes Proposal 148

This proposal would unnecessarily constrain the Commissioner's authority, which has already been delegated by the Alaska Legislature and could delay or obstruct the timely implementation of predator



control efforts.

The current framework allows the Board of Game to approve IM plans and grants the Commissioner the flexibility to implement them as needed based on real-time population data and ecological conditions. Adding another layer of public process would create unnecessary bureaucratic hurdles, potentially impeding the effectiveness of predator control programs designed to support the recovery of key prey populations, such as moose and caribou.

Furthermore, the requirement for additional public notice and comment under the Administrative Procedures Act is redundant, as the Board of Game already provides opportunities for public engagement during the approval process for IM plans. Once a plan is approved, the Commissioner must have the ability to act efficiently without additional delays that could hinder conservation goals.

PROPOSAL 187

5 AAC 92.080. Unlawful methods of taking game; exceptions.

Allow the use of night vision, thermal scopes, and artificial light to be used only for hunting predators as follows: Using a laser sight, electronical-enhanced, night vision, thermal any forward-looking infrared device is authorized for use for the taking of predators only.

AITRC Opposes Proposal 187

Expanding the use of electronically enhanced night vision and forward-looking infrared (FLIR) devices for taking furbearers statewide, while these technologies were recently approved for Region III, broadening their use statewide raises significant ethical, conservation, and public safety concerns.

The use of night vision and thermal optics fundamentally alters fair chase principles by eliminating an animal's natural ability to evade, conceal, or escape. These tools drastically increase hunting efficiency, raising concerns about potential overharvest and unsustainable impacts on furbearer populations. Traditional methods of hunting and trapping rely on skill, knowledge, and experience, whereas reliance on advanced technology reduces the need for these essential practices, weakening the connection between hunters and the land.

Additionally, not all lands within Alaska are the same, and applying this regulation statewide fails to consider the differences in terrain and habitat. In areas with rugged, forested landscapes, some natural limitations remain, but in flatter, more open regions, these technologies could lead to excessive harvest levels with minimal effort. This imbalance in efficiency could have severe consequences for local furbearer populations, particularly in regions where they are already under harvest pressure. Being from a region that is highly road accessible, this is a concern.



PC2

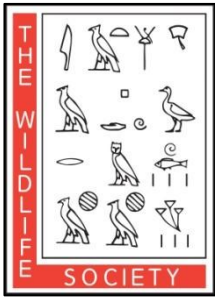
Name: Ak Forgotten Felines

Community of Residence: Chugiak

Comment:

I urge this Board to approve Proposal 146!

TNR can be a very successful tool in reducing the rapidly growing numbers of feral/unmanaged cats in Alaska. TNR has proven results in many other areas of the country and around the world.



THE WILDLIFE SOCIETY

ALASKA CHAPTER

The Alaska Chapter of the Wildlife Society strives to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society.



March 7, 2025

Hon. Jake Fletcher
Chair, Alaska Board of Game

RE: Alaska Chapter of The Wildlife Society comments on proposal 101

Dear Alaska Board of Game members,

The Alaska Chapter of The Wildlife Society (TWS) is a professional society founded in 1971. With over 200 members, the Alaska Chapter is one of the largest chapters of The Wildlife Society, an international organization representing wildlife biologists and managers employed by state, federal, and borough resource agencies, academic institutions, non-governmental organizations, and private industry. Our science-based mission is to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society.

The Alaska Chapter of TWS has reviewed proposal 101, which proposes to add Dall sheep to the list of species identified as important for providing high levels of human consumptive use. This would place sheep under the 1994 intensive management law. After due consideration of the scientific evidence, the Alaska Chapter of TWS recommends that **Dall sheep should not receive a positive IM determination** for the following reasons:

1. Sheep do not provide “high levels of human consumptive use”.

Positive determination of intensive management (IM) and setting of IM objectives has been applied only to moose, caribou, and deer over the last 31 years largely because those species represent about 91% of the game meat harvested by hunters in Alaska (2001-2005 data). Sheep, in comparison, provide about 1 percent of wild terrestrial meat yield from big game. The primary management goal for sheep is the opportunity for harvesting trophy animals first, and meat second. This is reflected in hunting regulations tailored almost exclusively to full-curl rams.

The Department periodically publishes management reports on individual species, by area. Each report includes an estimate of the number of sheep “reasonably necessary for subsistence uses”. In 9 of the recent reports the answer is “none”. Four reports include non-zero sheep numbers (Caikoski 2018, Hatcher 2018, Pierce 2018, Osburn 2025). Totaling these (using the high end of each range estimate) yields 261 animals reasonably necessary for subsistence.

Although Dall sheep were likely never a staple food in northwestern Alaska such as caribou or salmon, they did fill an important niche in some seasons, years, and circumstances (Georgette and Loon 1991). That fact acknowledged, the number of sheep harvested primarily for human consumptive use in Alaska is very small. Such harvest occurs primarily in national parks and wildlife refuges under Federal subsistence guidelines. Intensive Management is unlikely to be authorized in these areas without significant biological concerns and other alternative management actions exhausted.



The Department's own characterization of sheep hunting is accurate: "Dall sheep produce excellent meat but are relatively small in size ... and it is difficult to retrieve meat from the rugged alpine areas which they inhabit. These factors have limited sheep hunting to a relatively few, hardy individuals whose interest is more in the challenge and satisfaction of mountain hunting and the alpine experience than in getting food" (online Dall sheep species profile, ADFG).

The full-curl regulations and management strategy used by the Board and the Department limits harvest to mature rams in most areas of Alaska, which is recognized as a conservative management approach. The full-curl management strategy does not result in harvest that is near the maximum sustained yield for Dall sheep populations as is intended for IM populations. At times of relatively high Dall sheep abundance, the Board and the Department do not liberalize harvest, such as including ewe hunts or additional less than full-curl ram opportunities. If there was a change to offering high levels of Dall sheep harvest for consumption, then that would likely take development of new survey and monitoring methods by the Department. The minimum counts currently used by the Department to track Dall sheep populations are not appropriate for managing populations for maximum sustained yield.

2. Winter weather plays a particularly important regulating role in sheep; and in most cases, predation does not.

Of the 15 management area reports for sheep available online, the following are offered as reasons for stable, low or declining populations among Game Management Unit (GMU): "loss or winter habitat and climate change affecting snow conditions" (GMUs 7 and 15), "weather and carrying capacity" (GMU 12), "weather was the primary contributing factor" (GMUs 12, 13C, 20D), "nutrition and stochastic factors" (GMU 13D), "weather related events, old age, and poor body condition" (GMU 14C), weather-related lamb loss in 2013 (GMU 19B and 19C), "winter weather was a primary contributing factor" (GMU 20A), "longer winters persisting into the spring, more frequent and longer icing conditions, and deeper snow" (GMU 20B, 20F and 25C), "near complete failure of lamb recruitment" (GMU 24, 25A, 26B, and 26C). Explicit mention of predation occurs twice. In GMU 11, the management biologist cites "uncontrollable factors, including weather, habitat quality, and predation" as the reason for low numbers. In the Brooks Range (GMUs 23 and 26A), sheep have experienced two major declines. A recent management report states, "Despite being non-hunted populations since 2016, abundance and trend count surveys suggest that sheep populations within the Baird and De Long Mountains continue to remain at low levels. Predator abundance, disease, forage limitation, and direct and indirect competition by caribou (*Rangifer tarandus*) have frequently been suggested as factors preventing the rebound of this nonhunted population but have not been formally investigated" (Osburn 2025). A former Department biologist with extensive experience in the area suggested that the first decline occurred due to several deep snow winters starting in 1989-90, and the second in the late 1990s occurred when winter icing events started being more frequent (4-5 per winter) (J. Dau, Pers. Comm., Feb. 2025).

Survival of males to full curl or an age status legal for harvest is the relevant question. Predation can affect lamb survival (Scotton 1998), particularly when snowshoe hare populations are low and their predators (coyotes, golden eagles) switch to lambs (Arthur and Prugh 2010). However, Nichols (1971) and Bowyer et al. (2000) concluded that under most circumstances, predation does not exert a controlling influence on Dall sheep abundance. Experiments in the Yukon (Barichell et al. 1989, Hayes et al. 2003) and in Alaska (Gasaway et al. 1983) found that intensive wolf reductions can significantly increase moose and caribou numbers but do not substantially increase numbers of sheep.

The steep, mountainous habitat that sheep have evolved in provides a measure of natural protection from predators that moose, caribou, and deer do not enjoy. At the same time, that mountain habitat can present sheep with acute nutritional challenges, especially under prolonged winter conditions and midwinter icing that have become more common with a changing climate. A growing body of research on sheep highlights the role of nutritional limitation on long-term population levels (e.g., Mitchell et al. 2015) and trophy status (Monteith et al. 2018).



3. A positive IM determination under 5 AAC 92.106 is not required for sheep populations to receive active predator management.

The Commissioner of the Alaska Department of Fish and Game may apply any number of management prescriptions to “manage, protect, maintain, improve, and extend” a depleted Dall sheep population per AS 16.05.020(2). These can range from prey habitat enhancement to diversionary feeding of predators (including lamb predators such as golden eagles, which are protected by the Bald and Golden Eagle Protection Act and the Migratory Bird Treaty Act). In certain circumstances, the Board can authorize Department staff for aerial shooting of predators, as was done on the North Slope to help muskoxen recover from brown bear predation in Unit 26B per 5 AAC 92.126. In turn, the Board can increase hunting season length and bag limits for predators and waive tag fees for predators.

A positive IM determination and subsequent setting of population and harvest objectives per 5 AAC 92.108 is not strictly necessary for a range of active management practices to be applied for Dall sheep. Predator reductions could be considered where Department data indicate that predation is likely the major factor limiting sheep recruitment. A research approach is warranted to better understand the causes and effects of mortality on different age and sex classes and how that affects male cohorts in reaching a harvestable status.

For the above reasons, the Alaska Chapter of The Wildlife Society respectfully asks the Board of Game to reject proposal 101 as unnecessary for management of selected Dall sheep populations.

Thank you for your consideration.

On behalf of the Executive Board and membership of the Alaska Chapter of The Wildlife Society,

Ryan Mollnow

President, Alaska Chapter of the Wildlife Society

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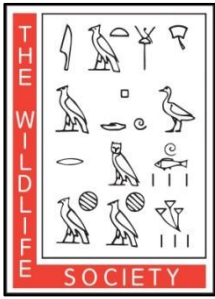
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THE WILDLIFE SOCIETY

ALASKA CHAPTER

The Alaska Chapter of the Wildlife Society strives to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society.



PC3
6 of 8

March 7, 2025

Hon. Jake Fletcher
Chair, Alaska Board of Game

RE: Alaska Chapter of The Wildlife Society comments on proposal 147

Dear Alaska Board of Game members,

The Alaska Chapter of The Wildlife Society (TWS) is a professional society founded in 1971. With over 200 members, the Alaska Chapter is one of the largest chapters of The Wildlife Society, an international organization representing wildlife biologists and managers employed by state, federal, and borough resource agencies, academic institutions, non-governmental organizations, and private industry. Our science-based mission is to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society.

The Alaska Chapter of TWS has reviewed proposal 147 wherein the Department of Fish and Game (department) proposes to have the Board of Game (board) utilize statute AS 16.05.270 to delegate its authority to manage 5 AAC 92.029, commonly referred to as the clean list, to the Commissioner of Fish and Game. This regulation governs the authority to prohibit the live capture, possession, transport, or release of native or exotic game or their eggs.

In 2024, the Alaska Chapter of TWS opposed Executive Order 124ⁱ because a simplified process to consider importing species not listed in 5 AAC 92.029 carries unknown but potentially substantial risk of disease or parasite transmission to native game and domestic livestock in Alaska, and potentially to public safety (e.g., carnivorous or venomous species), and should not bypass the more deliberative and open public process of the board.

For the same reasons, the Alaska Chapter TWS respectfully opposes proposal 147. The reasons given to expedite the process putatively for food security, described below from 2024, are not compelling to modify the present board and public oversight process for risks to wildlife and agriculture. Given Alaska's relatively low incidence of animal diseases common elsewhere in the U.S, we endorse keeping the more deliberative board process to handle requests for review, public comment, and amendment of the clean list.

In testimony before the Senate Resources Committee in 2024, the Commissioner was asked what species requests prompted Executive Order 124ⁱⁱ. He replied it was importation of an emu, but he also related (recording time 1:11:34), "there may be some species that, ostrich, kangaroo...that a person may want to bring in for food [security] reasons, that don't pose a threat to wildlife of Alaska or ecosystems of Alaska that would have to go through this more onerous [3-year board] process. So this would speed that process up by potentially a year or two." The Commissioner did not mention in this instance whether his judgment of threats on species he mentioned was based on a review and recommendation from the department.



An example of risk with importing exotic species was discussed in the statewide board meeting in 2010, where proposal 19 requested addition of several species to the clean list, including walleroos from Australiaⁱⁱⁱ. Department comments for proposal 19, specifically for walleroos, noted “the potential to carry and transmit rabies and other viruses, diseases, bacterial pathogens, and parasites that may affect domestic livestock and wildlife. In addition, over 60% of all human diseases are zoonotic diseases and over 75% of emerging infectious human diseases originated from animals^{iv}.” Furthermore, the landmark publication (Daszak et al. 2000) on emerging infectious diseases (EIDs) that was quoted further states, “The transmission of infectious agents from reservoir animal populations (often domestic species) to sympatric wildlife, termed spill-over, underpins the emergence of a range of wildlife EIDs)”.

History is replete, on all human-occupied continents, with examples of small numbers of captive exotic species escaping into the wild, sometimes with widespread and long-lasting detrimental effects to agriculture and native ecosystems. The Commissioner had previously mentioned in his 2024 testimony that the board denied importation of Eurasian wild boars (*Sus scrofa*), a species desired by some hunters but that if escaped from confinement could damage Alaska ecosystems. This is a recent, relevant example from North America. Aside from disease risk transmission from feral swine to domestic livestock^v, the cost of protecting crops from feral swine in the Lower 48 states is presently \$40 billion^{vi}. Feral swine are rapidly expanding northward in Canada with similar concerns^{vii}. Even successful removal strategies are likely to be only temporary^{viii}.

The Alaska Chapter urges continued vigilance against attempts to shorten or simplify the scientific and public process for review of proposed importation of exotic species not on the clean list, however well-intentioned the arguments by proponents. We support efforts to enhance food security in Alaska and feel the current process for altering the clean list provides meaningful opportunities for food security while also serving to limit risks associated with importing exotic species.

If the board nonetheless approves proposal 147, the Alaska Chapter TWS respectfully asks the board to require the department to notify the public when the commissioner receives a request to add a species to the clean list. Given the serious risks inherent in exotic species, up front notification is warranted for adequate preparation by interested parties well in advance of the 30-day comment period on proposed regulatory changes under AS 44.62. This step is crucial for awareness to review scientific literature and engage in whatever process or plan the department may develop to handle requests for review, public comment, and amendment of the clean list.

Thank you for your consideration.

On behalf of the Executive Board and membership of the Alaska Chapter of The Wildlife Society,

Ryan Mollnow

President, Alaska Chapter of the Wildlife Society

References:

ⁱ https://wildlife.org/wp-content/uploads/2024/04/2024-TWS-Letter-EO-124_1.pdf

ⁱⁱ Alaska Senate Resources committee video, February 5, 2024 (time period 57:30-1:18:00)
https://www.akleg.gov/basis/Meeting/Detail?Meeting=SRES%202024-02-05%2015:30:00#tab2_4e



iii See “Proposals” at <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-29-2010&meeting=anchorage>

iv See “Department Comments” at <https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=01-29-2010&meeting=anchorage>
The department risk analysis in 2010 for exotic species in proposals 15 and 19, per criteria in 5 AAC 92.029(g), is available upon request [*it might be online at the Board of Game meeting archive, but the ADF&G website is presently offline*].

v <https://www.bcpork.ca/wordpress/wp-content/uploads/2020/06/Section-9-WILD-FERAL-PIGS-IN-CANADA-v.-2020-06-01.pdf#:~:text=Wild%20pigs%20are%20the%20most%20prolific%2C%20highly%20invasive%2C,localized%20populations%20in%20British%20Columbia%2C%20Ontario%2C%20and%20Quebec> (accessed February 24, 2025)

vi <https://www.aphis.usda.gov/operational-wildlife-activities/feral-swine> (accessed February 24, 2025)

vii <https://canadiangeographic.ca/articles/mapping-the-rapid-spread-of-invasive-feral-pigs-across-canada/> (accessed February 24, 2025)

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Name: Alaska Outdoor Council

Community of Residence: Palmer

Comment:

Alaska Outdoor Council comments on 2025 Board of Game Statewide proposals.

Proposals 102,190, 192. Take no action - before deliberating on proposal 103.

Proposal 103. Adopt.

A majority of the Alaska Board of Game members present at the meeting, March 2023 voted to adopt an amendment proposals 204. While neither the commissioner of ADF&G nor council from ADOL made an issue of the need for consistency with AS 16.05.255(d) the Alaska Outdoor Council does take issue with the board's amendment to Proposal 204. ADF&G comments have reiterated the same thing that they told the board in March 2023, this is an allocation issue not a biological issue.

. AS 16.05.255(d) does not include Dall sheep as one of the game species that residents have a preference for taking.

It's that simple. The board has plenty of tools to reduce full curl ram harvest below the harvestable surplus if they so choose without banning nonresident participation in the hunt. Doing so was inconsistent with the direction the Legislature gave the board.

Proposals 124, 125. Amend and Adopt.

AAC 92.044(b)(B)(I) needs to be amended to make it perfectly clear to registered bear baiters

what types of structures constitutes a permanent dwelling. Should the Governor's introduced legislation HB109/SB105 pass into law allowing "random" Recreational Cabin Sites anywhere on state lands the definition of permanent dwelling will become more important in determining valid preexisting bear baiting locations.

Proposal 131. Oppose.

Proposal 148. Oppose

Thanks to board members for reviewing public comments.

Alaska Outdoor Council representatives will attend the BOG Statewide meeting to further comment after ADF&G staff reports if new information is provided.

Name: Alaska Professional Hunters Association

Community of Residence: Juneau

Comment:

March 7th, 2025

Dear Alaska Board of Game Members,

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

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

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

- 91.8 Million total economic output (2019)
- 57.4 Million new dollars to Alaska (2019)
- 59% of guide industry spending occurs in rural areas (2019)
- 1,380 people directly employed, total employment with multipliers; 1,890 (2019)
- 85% Active Guides are AK Residents (2019)
- Visiting hunters (guided & non-guided) purchase 14% of total Alaska hunting licenses (2019)
- Guided nonresidents represented only 3% of current licenses but 30% of License/tag revenue
 - Visiting hunters (guided & non-guided) contribute 76% of total revenue to the ADFG wildlife conservation fund (2019)

Significance to Alaskans & Meat Sharing

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

Individual Proposal Comments

Below you will find our comments on individual proposals under your consideration for Statewide regulatory change. Leading up to the drafting of these comments the APHA held multiple teleconferences



and invited all members to participate in the drafting of these comments. Our teleconferences were well attended with over 15 individual guides representing small Alaskan businesses participating. You will find that there are some proposals that we don't have comments listed for. These were proposals that we felt did not directly impact guides or were outside of the group's purview. We also chose, in a couple of instances, to group similar proposals together and combine our recommendations. While these comments represent the voice of our group, you will undoubtedly get comments from APHA members who want their individual positions considered as well. Because the APHA takes a statewide perspective when approaching Board proposals, we urge you to consider regional expertise from our members even when their position is different from that of the APHA. Finally, we thank you for your consideration and urge you to reach out to our membership for clarity and details on proposals before you, either on a unit-by-unit or regional basis. Given the opportunity, Alaska's hunting guides will continue to bring a wealth of wildlife and hunting knowledge to the table.

19C Sheep Proposals-

Oppose Proposals: 108-118, 192

Support Proposals: 102-107

Amend: 190

19C Sheep Working Group (SWG):

The APHA supported and remains supportive of the 19C SWG as long as the goal remains to develop a conservation-based sheep management plan in 19C. During APHA's work to develop comments for this meeting members were updated on the progress of the SWG and Proposal 190. Options were discussed that ran the gamut from total support for Prop. 190 as the final SWG working product to opposing Prop. 190 and even advocating to sunset the SWG. Members on our call included guides who actively guide in 19C as well as members who do not guide in the beleaguered unit. Consensus was reached to support the SWG efforts with the hope a more robust, traditional management plan will be generated as an outcome of the process. From the APHA members standpoint on the call, the beneficial outcomes from a management plan outweigh the downsides, specifically the time it takes to work through the process. The APHA strongly supports continuation of 19C SWG based on the hope a conservation-based management plan will be the eventual outcome.

Proposal 190- OPPOSE/AMEND

The APHA opposes Prop. 190 as written. The APHA requests Prop. 190 be amended to only designate 19C as the initial GMU where guide concessions will go in place and delete all the portions of the proposal that change hunt and allocation structures.

Conservation-

Sheep declines in 19C and other GMUs in Alaska have been driven by weather not hunting. Closing sheep hunting to only nonresidents in 19C is not viewed as a factor to increase the recovery speed of sheep populations in the unit. Closing nonresident sheep hunting in 19C merely reallocated hunting opportunity wholly to residents.

The APHA sees no conservation basis for the tiered hunt structure proposed in Prop. 190 but we are open to more information that may more clearly outline benefits. The APHA encourages the SWG to keep concepts housed withing Prop. 190 live in discussion but to work towards a proposal or suite of proposals that can be represented to benefit sheep in 19C.



Full Curl Management-

Full curl management needs to be delved into and either wholly accepted, rejected or refined. The 19C SWG is the perfect venue for this discussion. Absent careful consideration of this foundational management principle and answering the tough questions about full curl management efficacy, sustainability and public acceptance, future decisions adjusting hunting opportunity will only become MORE chaotic. Yes, predator control, habitat, weather and nutrition are all aspects important to sheep conservation but how we harvest sheep is also important. Data suggests sheep in areas CLOSED to hunting or managed under drawing hunt structures are not fairing any better than areas open to harvest ticket opportunity under full curl management. Data suggests there may be population levels or hunting efforts where full curl management might need modification to achieve hunt quality objectives. One way or another, the APHA wants the 19C SWG to work with wildlife managers to fully understand full curl management. Absent working to understand and build on this successful management strategy a valuable opportunity offered by the SWG will be lost. We hope the 19C SWG will present findings on full curl management as part of the final management plan.

Allocation-

Proposal 190 is concerning because the hunt structures it proposes are not defended or explained in terms that are important to the board's process. Substantive metrics like "maximum benefit," "sustained yield," and "nonresident allocation findings" are not discussed as justification for the proposed new hunt structures. The APHA is also concerned the SWG effort looks more like an allocation subcommittee when it is the board's job to work through allocating harvestable surplus. Moving forward, the APHA would prefer the SWG deliver an estimate of harvestable surplus and management guidelines to inform the board but then step aside and allow the board to divvy up the resource and develop a hunt structure to achieve the management plan goals. We recognize the SWG will likely make a recommendation in the form of a proposal to achieve management goals but we prefer this proposal stops short of allocative aspects and instead allows the board of game to work through its process and reference its own findings to decide how best to move forward.

Hunting Guide Concessions:

Hunting guide concessions were passed late in last year's legislative session. Guide concessions are law and require the Board to designate an initial GMU or GMU subunit for the program to start. GMU 19C is somewhere around 90% state lands and has been recommended by the SWG to be designated as a concession area. It is important the Board act within its authority to designate 19C as the initial concession area during this statewide meeting. Delaying designation of 19C during this meeting will set the program back more than a year. For once the Board of game can set the tempo and timeline to move forward with guide concessions now that the legislature has passed legislation creating the program. You no longer must wait to move this program forward now that it is law.

Private Inholdings/Concessions:

Some percentage of GMU 19C sheep habitat is either large private inholdings (CIRI) or managed by federal concession (NPS). While these managed land statuses represent a small fraction of 19C, highly regulated and tightly controlled sheep hunting has occurred in these portions of 19C before the total closure of nonresident sheep hunting occurred. The board should consider whether guided hunting in these concession or private land tracts is appropriate and within the intent of the unit-wide closure. In essence, guides on federal concessions and guides with private trespass agreements went down with the unregulated state land ship. The APHA recognizes the board has been loath to alter hunt structures based



on land status and we see this as generally a good precedent. We are unsure how the board can stay consistent and allow guiding to occur on private or federal lands withing 19C and support the holistic solution of implementing concessions. APHA's position and the board's precedent aside the plight of the guides on private land and with federal concessions in 19C is compelling and concerning. Please look for ways to answer their prayers for relief if possible.

Proposal 92- SUPPORT

The APHA supports Prop. 92 because it can be easily administered and will elevate the knowledge base of sheep hunters guided and non-guided. In GMU 4 bear hunters are required to watch a video that helps them identify boars and sows because the bear management plan calls for specific rates of sow harvest on a rolling average. This video has worked well, reducing resident sow harvest and improving guided hunter orientation and expectations because sows are legal to take. Educational outreach can be a great way to help achieve conservation objectives. Dall sheep are managed under full curl and 8 years old for conservation reasons. Thus it can be assumed sub-legal harvest works counter to conservation goals. The department claims developing this educational program and video will not cost additional money. If Prop. 92 is revenue neutral but conservation positive it should pass.

Proposal 95 & 96- OPPOSE

The APHA members took quite a bit of time to discuss and work to understand Prop. 95&96. Clearly the proposal is offered to improve conservation outcomes and may in fact be a better way of defining a legal ram in most of Alaska. Some guides expressed concerns because in their hunting areas rams often achieve old age and are still not legal by any of the full curl tests. Because this proposal is specifically designed to increase the age of rams at harvest these specific examples gave us pause.

We understand the department has recorded degree of curl during sealing for some time now. We encourage the use of this data to develop a unit-by-unit approach to changing the definition of a legal ram if the board is interested in increasing the average age of rams at harvest like the author of these proposals are.

Conceptually the goal of Prop 95 & 96 was viewed as desirable but practically there are some units in the state where ram horn configuration would prevent even old rams from being harvested. Again, department data can and should inform this discussion more fully.

Prop. 95 & 96 is an example of a concept that warrants consideration by the 19C SWG.

Proposal 100- OPPOSE

The APHA strongly OPPOSES Prop. 100.

Prop. 100 seeks to allocate harvest instead of opportunity and place nonresidents on statewide draw. Allocating harvest is impossible and ties nonresident opportunity to factors that make no sense from a management perspective, especially in a remote and difficult to access part of the state. If transportation becomes costly or impossible to secure for residents in some remote area of the state this proposal will shutdown nonresident opportunity. This is an insane and likely unconstitutional way to manage a resource on a statewide basis.

Proposal 100 is legally flawed, without precedent from a conservation basis and should fail.



Proposal 101- SUPPORT

The APHA strongly support proposal 101. Absent passage of Prop. 101 the department is lacking one of the most important tools it can have to assist sheep populations that are struggling. This proposal has a strong conservation basis and should be passed.

Proposal 126 & 127- SUPPORT

The APHA strongly supports Prop. 126 and 127. Recent allowances for the use of night vision for taking furbearers in the interior has not been shown to have any impacts except increasing hunting opportunity. The APHA supports these proposals because any issues that arise in specific portions state can easily be addressed down the road. Passage of this proposal sets a statewide and consistence allowance for a method and means that has been stress tested in one unit and passed with flying colors.



Name: Alaska SPCA

Community of Residence: Anchorage

Comment:

March 4, 2025

Alaska Board of Game Meeting

March 7, 2025

RE: Support for Proposal 146, A Proposal to Amending 5 AAC 92.029 To Allow For the Release of Sterilized Cats Into the Wild

Dear Members of the Alaska Board of Game,

I write on behalf of the Alaska SPCA and the broader community of Alaskans who care deeply about humane, effective, and science-based solutions to the challenges posed by free-roaming cat populations. I urge this board to amend the current regulation that prohibits the release of sterilized cats back into their environments, a restriction that effectively bans Trap-Neuter-Return (TNR) programs in Alaska.

The Problem

Feral cat populations exist in every part of Alaska, and they continue to grow despite efforts to remove them. Without intervention, unsterilized cats breed rapidly—one pair can lead to thousands of offspring over time. The unfortunate reality is that removal efforts alone—whether by euthanasia or shelter placement—do not work. New cats will move into vacated areas, and the cycle of overpopulation continues.

Current regulations prevent organizations like the Alaska SPCA from implementing TNR, a widely accepted, research-backed strategy for humane population control. Without this option, the only choices are to euthanize healthy animals or leave them to reproduce unchecked—both of which contradict responsible wildlife and community management principles.

The Science Behind TNR

Decades of research and real-world application show that TNR programs successfully reduce free-roaming cat populations over time. Here's how it works:

1. Trap – Cats are humanely captured and assessed for health and socialization.
2. Neuter/Spay – Cats are surgically sterilized, vaccinated, and marked for easy identification
3. Return – The sterilized cats are returned to their territory, where they no longer reproduce and help prevent the influx of new, unaltered cats.

A well-managed TNR program has three major benefits:

- Population Control: By preventing new litters, TNR gradually reduces the overall number of feral cats.
- Reduced Predation Pressure: Sterilized cats spend less time hunting and more time defending territory, leading to a decline in wildlife predation over generations.
- Improved Public Health: Vaccinated, monitored colonies reduce the spread of disease and minimize nuisance behaviors like yowling and fighting.

TNR and Wildlife Protection Can Coexist

We acknowledge concerns about the impact of free-roaming cats on wildlife, particularly on birds and small mammals. But eliminating TNR doesn't solve this problem—it worsens it. Instead of stabilizing cat numbers and reducing their hunting activity, a ban on TNR allows populations to keep growing, increasing the impact on native species.

By allowing TNR, we can work in partnership with game management agencies to track colony numbers, prevent uncontrolled breeding, and focus sterilization efforts in areas where ecological concerns are highest.

A Path Forward

I respectfully request that the Board of Game revise the current prohibition on releasing sterilized cats and instead allow for regulated TNR programs under licensed animal welfare organizations. This approach has been successfully implemented in many other states and municipalities across the U.S., including areas with delicate ecosystems.

By making this change, the Board would:

- Empower organizations like the Alaska SPCA to take proactive, responsible action
- Reduce feral cat populations over time, lessening their impact on wildlife
- Improve public health and community well-being

This is an opportunity for Alaska to lead with science, compassion, and effective policy—one that benefits cats, wildlife, and Alaskans alike.

Respectfully,
Kelly Donnelly
Executive Director/CEO
Alaska SPCA



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

ATTN: BOG COMMENTS

2/11/25

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, I wish to share our opinion on specific proposals that you will be considering at your March Statewide meeting.

Proposals 126, 127 and 128 would allow night vision and infrared devices to be used for taking furbearers. While it is our position that trapping should be the primary means for taking furbearers, we have no established position on this newer night-time practice. We defer to the opinion of the Board in related rule making. Since this kind of harvest is relatively new, time will tell how acceptable it is. It can be monitored and, if necessary, regulations can be adjusted in the future.

Proposal #131 would require trapper identification tags to be attached to traps and snares. ATA strenuously opposes this perennial proposal. It would be a nuisance to legitimate trappers and would present a significant opportunity for abuse. It would create a temptation for people to disturb sets. It would also create an opportunity for ill-intentioned people to maliciously move traps and tags around. Irresponsible trappers would not abide by the requirement anyway. ATA encourages trappers in traveled areas to mark traplines. Properly done, that practice eliminates any purpose for marking individual equipment.

Thank you for this opportunity to participate in the regulatory process.

Sincerely,

A handwritten signature in blue ink that reads "Randall L. Zarnke".

Randall L. Zarnke, president



The Alaska Waterfowl Association was formed in 1975 and is an Alaska based non-profit that's mission is to enhance, conserve and promote all aspects of traditional waterfowl hunting throughout Alaska. The Alaska Waterfowl Association submits the following comments on proposals 85 through 87.

Proposal 85 – Proposes to change the definition of migratory bird hunting guide service to include transporter service.

This proposal is flawed in concept. First, requiring a transporter to register and operate as a guide service will have unfair effects on all Alaskans that use transporters services.

Alaskans, especially waterfowl hunters are a do-it-yourself kind of crowd. The use of a

transporter service allows Alaskans to enjoy all parts of Alaska without bearing the expense of owning large boats or using an all-inclusive outfitter. Requiring transporters to register as guides will increase their costs which will in turn be passed along to the end users, which is Alaskans. The second part of this proposal would not only require transporters who transport waterfowl hunters to register as a guide service, but also fishing charters, combo hunting/fishing boats, and lodges who transport waterfowl hunters and their equipment to or from the field. This is a blatant attempt to limit waterfowl hunters' access into the Alaskan environment by making it too expensive to do.

The Alaska Waterfowl Association recommends that the Board of Game maintain the term Migratory bird hunting guide as defined at 5 AAC 92.013(c)(1) and migratory bird hunting guide service as defined in 5 AAC 92.013(c)(2).

Proposal 86 – Harvest tickets and reports.

This proposal suggests that waterfowl hunters be required to possess a paper or electronic harvest ticket for sea ducks and require the immediate recording once a sea duck is harvested. The proposer states this should be required because sea ducks have seen a 30% population reduction across the United States. The proposer infers that the required harvest reporting will assist in providing regulatory agencies with an accurate count of sea ducks. While in reality it would just give a snapshot of areas that waterfowl hunters use to harvest sea ducks. The issue with this proposal is that it places the sole population loss over three decades on the shoulders of waterfowl hunters. When in fact, the reason for loss is much larger than just waterfowl hunting. For example, habitat loss and competition for nesting grounds with other migratory bird species are prime drivers in the reduction over time. Currently the only waterfowl species that requires a harvest ticket is the Emperor Goose. While hunting was allowed for that species, a tag like a big game tag was issued



through a registration for Alaskans and through a drawing for non-residents. The limit in that species was one bird per year. So, requiring a harvest ticket and reporting wasn't onerous. Current bag limits for sea duck in Alaska are very generous. More so for residents versus non-residents. Requiring a harvest ticket or online reporting for every sea duck that is harvested is overly onerous and will result in unwarranted enforcement for people who are unaware of the requirement. The Alaska Waterfowl Association recognizes that sea ducks are a very important part of Alaska's eco system. With that mind the Alaska Waterfowl Association recommends the following in lieu of harvest tickets for sea ducks.

First, the Alaska Waterfowl Association recommends that ADFG work with their federal partners to conduct a spring and fall sea duck assessment statewide. The proposer stated that they currently conduct winter counts in specific areas but that is just a snapshot in time and doesn't address all factors that would indicate any population reduction over time. Second, as indicated by the proposer, waterfowl hunters who get a State of Alaska duck stamp are required to register in the HIP program. This program isn't perfect, but initial registration could be expanded to include questions like "how many sea ducks did you harvest last year" and "how many days did you spend sea duck hunting last year". Currently the HIP registration process includes questions similar to these for brant and sandhill cranes. This is the Alaska Waterfowl Association's preferred way to require reporting. Lastly, due to Alaska's position on the globe and as a feeder for all four of North America's flyways sea ducks can be encountered in non-traditional sea duck areas. This is due to overlapping migration routes with other waterfowl species to the bays and oceans along Alaska's coast where sea ducks winter. This means that requiring a harvest ticket particularly early in the season would be extremely onerous for waterfowl hunters who harvest sea ducks without intentionally targeting them.

Proposal 87 – Unlawful methods of hunting waterfowl, snipe, and cranes.

This proposal is only meant to keep waterfowl hunters out of the Alaskan environment. 18 AAC 5.92.100 already makes it unlawful to harvest waterfowl from a powered vessel or sailboat while the vessel is underway and includes language that the vessels progress must be completely stopped prior to engaging in waterfowl hunting. The proposal is asking the Board of Game to add language to 5 AAC 92.100(a)(2) that states "all boats shall remain stationary throughout the duration of the hunt, beached or anchored, within 100 yards of those discharging firearms to eliminate driving, herding, or chasing migratory birds into hunters on land, or on other boats." First of this infers that all waterfowl hunters are acting illegally and herding or molesting resting birds for the purpose of flushing them into hunters. The Alaska Waterfowl Association finds that offensive and wants to restate that the activity the proposer is trying to ban through more regulations is already illegal. The



proposed language that the proposer wants to insert into regulation isn't reality. Not all waterfowl hunters hunt from shore. Many of us have boats with blinds that allow us to hunt from the marshes and creeks throughout the fall migration. Specifically, the language that states "all boats shall remain stationary throughout the duration of the hunt, beached or anchored, within 100 yards of those discharging firearms..." infers that it would be illegal to hunt from any vessel. That is simply not the reality that Alaska waterfowl hunters live in. Many of the Alaska Waterfowl Association's members have several thousand dollars invested into boats, motors, and blinds we use for 45-60 days a year. The Alaska Waterfowl Association recommends the following.

5 AAC 92.100 should remain unchanged. The regulation already makes it illegal to shoot from a boat under power. Driving, herding, and chasing waterfowl species for the purpose of shooting waterfowl hunting is already illegal under federal law. Additionally, adding the proposed language to 5 AAC 92.100 would really cripple Alaskans ability to get out and enjoy the swamps, creeks and rivers for the purpose of waterfowl hunting. By the Alaska Waterfowl Association's read, the proposed language would make it unlawful to shoot from a boat whether it's anchored in place or not. If this proposal were to succeed, it would ruin the way the Alaska Waterfowl Associations members and other waterfowl hunters enjoy Alaska.

The Alaska Waterfowl Association would like to thank the Board of Game for the opportunity to count on these proposals. The Alaska Waterfowl Association is happy to further discuss these proposals and comments with the board should they have any questions.

Sincerely,

Graham Wood

Board member, Alaska Waterfowl Assc.



Subject: Opposition to Proposal 190 and Support for Proposal 101

Dear Alaska Board of Game Members,

The Alaska Wild Sheep Foundation (AK WSF) respectfully provides the following comments on Proposal 190 and Proposal 101. We oppose Proposal 190 – 5 AAC 85.055, Hunting seasons and bag limit modification of the resident and nonresident hunt structure for sheep in Unit 19C, and establishment a guide concession pilot program.

We heartily support Proposal 101– 5 AAC 92.106. Intensive management of identified big game prey populations (adding wild sheep to the list of species covered under the Intensive Management Plan).

The mission of the Alaska Wild Sheep Foundation: ***Enhance wild sheep populations, promote scientific wildlife management, educate the public on wild sheep, and protect and increase sheep hunting and viewing opportunities in Alaska.***

Adding Dall sheep to the Intensive Management Plan makes is justified because of the number of hunters, both sport and subsistence, that relish sheep meat and seek it above all other wild game as a natural food source. Reduction of predators in wild sheep habitat will also help facilitate the recovery of the herd numbers that have been reduced by a series of bad winters and increased predation following the reduction in prey numbers.

AK WSF appreciates and supports the formation of a sheep working group tasked with developing a sheep management plan for GMU 19C. Although we remain supportive of the effort, we see a great deal more work to be done on the conservation portion of the plan. We strongly support the implementation of the guide concession area in GMU 19C but we do not think hunting should resume until significant conservation actions have been undertaken or as a minimum a management plan adopted that has significant conservation actions built into it.

The AK WSF is also grateful to the working group members for their efforts as unpaid volunteers who are willing to give their time to benefit wild sheep in Alaska. AK WSF looks forward to providing continued support as efforts are re-focused to generate recommendations to assist recovery and enhance wild sheep populations.

As President of the Alaska Wild Sheep Foundation, I am afforded the opportunity to speak with a myriad of people about sheep and hunting. These people include not only hunters and outfitters throughout Alaska but also numerous hunters and outfitters from outside Alaska as well as biologists from British Columbia, Alberta, the Yukon and Northwest Territories. Most of these jurisdictions are facing similar problems to Alaska



with their Dall sheep populations, so they spend a lot of time looking for and discussing ways to help the populations recover.

I do not consider myself an expert on sheep or even wildlife management. My expertise is in the management of organizations and long-term projects. As such, organizing and leading teams in the accomplish of missions is a big part of that job.

Here are my outside observations on the 19C Work Group and recommendations for the operation going forward.

The mission of the group should be generated by the board now to refocus the efforts of the 19C Work Group. We don't recall seeing an actual mission statement or even a concise statement of the problem. It is difficult to solve any problem until the tasked group agrees that there is a problem and succinctly defines that problem.

Maybe a problem statement focused on the interface with people like: ***The problem is there is insufficient Dall sheep numbers within GMU 19C to accommodate the needs / demands of all user groups.*** In this case "User Groups" would include those people who simply like to watch sheep as opposed to hunting them.

We have heard from our biologists that the decline was almost certainly due to natural factors like the weather. The decline may have been acerbated buy more intense predation following the decrease in the food supply but there is no indication that it was caused by hunting. We have also been told that recovery of the population will have to be mostly natural and could take up to 20 years. We also know that sheep hunters and other interested parties are clamoring for some type of action.

So, a potential mission statement might look like this: ***Develop a Management Plan that includes everything that can be done to facilitate and guarantee the natural recovery of the Dall sheep population in GMU 19C through research, innovation, and actions, which if successful, could be exported to other parts of Alaska.***

Basically, it says we can only do what we can do and after that it is up to mother nature. But that is still a call for action. We do not believe closing hunting will have any impact at the population level however it makes sense to use this group to fully explore the advantages and potential limitations of full curl management.

As to the actions: The working group should be charged to generate strategies to accomplish the mission that they have been given. Of course, this must be done working hand in hand with the department and their scientists, managers and researchers.

Here are some thoughts and suggestions that I have picked up in my travels. Each of these should be addressed by the group and if they discard them the group should publish their reasoning so the public can understand the reasoning.

To date, the only actions that have seemed to come from the Working Group were hunting and allocation solutions. Since the problem was not caused by hunting, we



need to see a predominance of conservation ideas that can be tried and verified or eliminated with the thought of using the ideas that prove most successful throughout the remainder of the state.

Encourage the establishment of a pool of contractors who can accomplish various conservation tasks so we are not limited by ADF&G staffing – we need force multipliers. This may require ADF&G to hire contracting officers as opposed to filling other positions.

The Board of Game, and by extension the 19C Working Group has the authority to direct the Department to develop and execute plans.

Understand that funding is easy to find when you have specific projects that NGOs and other concerned individuals can fund. There are literally hundreds of thousands of dollars that can be made available if there are projects to fund.

We are not alone in our efforts, both British Colombia and the Yukon are faced with similar challenges in sheep numbers and are experimenting with some of the same techniques outlined here – direct communication for sharing of information is warranted.

Conduct detailed aerial mapping (contracted) of the entire Unit 19C area, determine exact boundaries of sheep range, travel corridors, key wintering areas, mineral licks and conduct ground verification of vegetative cover. This will require a lot of cooperation but people who are helping to solve a problem are not as likely to be critical.

Conduct a full survey of all the sheep in unit 19C each year and publish the results – this will be the best measures of herd recovery – emphasis on lamb recruitment numbers and lamb to ewe ratios can be used as a means of determining problems.

Capture and test sheep in 19C for Movi and if present do strain typing – might be a time to collar sheep as well for other studies in conjunction with ewe and lamb health assessment and evaluation.

Research use of controlled burns, mechanical treatments and other ways of clearing encroaching brush – we know that sheep habitat quality and quantity is shrinking as other vegetation moves up the mountain because of the warming climate – both BC and Yukon are working on this as well.

Experiment with the use of fertilizers on select critical areas to enhance food availability – especially on critical wintering ranges.

Consider installing satellite weather stations in key locations to allow for correlations of significant weather events with changes in sheep populations

Study and review the use of supplemental minerals like selenium as a way of enhancing the health of ewes and lambs – observations in Canada by outfitters with expensive concessions indicates that this may be a definite benefit.



Add Dall sheep to the species covered under the Intensive Management Plan and conduct a full scientific predation study for 19C and use it to determine and justify a science-based predator control plan. Pay particular attention to documenting eagle predation to confirm or dispel anecdotal reports.

Conduct research on use of helicopters around wild sheep that parallel some of the studies that have already been conducted concerning Rocky Mountain Goats. Determine if there is a need for guidelines for helicopter use around critical habitat. The goal would be to mitigate disturbance and corresponding negative impacts to sheep populations while allowing responsible development.

Do away with the concept of 100% consensus within work groups where one person out of ten can prevent the selection of a course of action. Realistically 90% solutions are way better than no solutions.

Finally, again it's worth emphasizing, take a deep dive into full curl management to validate that it is still a good tool when sheep numbers are so low.

As always, the Alaska Wild Sheep Foundation appreciates the hard work done by professionals and volunteers on this issue and stands ready to assist in any way to help the efforts. We need to think one team, one campfire.

Keeping Wild Sheep on the Mountains of Alaska

A handwritten signature in blue ink that reads "Kevin J. Kehoe".

Kevin J Kehoe, President
Alaska Wild Sheep Foundation
M: [REDACTED]
President@AKWildSheep.org



Dear members of the Board of Game,

On behalf of the Alaska Wildlife Alliance membership, staff and Board, we respectfully submit the following comments on 2025 Statewide proposals.

Proposal 86: Mandatory Harvest Reporting of Sea Ducks

AWA Position: Support

While we understand the Department's concern that tracking these data will not help inform management decisions, we support this proposal for the following reasons:

- We support the framework of a national migratory bird survey because states differ in their data collection. However, federal capacity to maintain this survey may be limited - particularly as federal agencies are experiencing mass layoffs. Having a statewide dataset may not show the full picture of sea duck population trends, but could help identify research and management questions within the state.
- The State asserts that harvest data alone lacks the context to make management decisions. However, the State uses harvest data exclusively to manage many species when population or abundance estimates do not exist, including for bears, wolves, furbearers and small game. We agree that harvest data alone is not ideal, but if it's a decision between no data and harvest data, harvest data is the better choice.
- Each component of the national survey is voluntary. Having required harvest data for migratory ducks, especially in the major flyways of Alaska, would be valuable.

Proposal 89: Nonresident Hunter Education Requirements

AWA Position: Support

Currently, nonresident hunters can bypass the educational standards that Alaskans under 39 years of age must complete. This proposal would ensure that nonresident hunters understand the State's standards for meat care, conservation, and hunting regulations- aligning them with the requirements for resident hunters.

Proposals 90 and 91: Mountain Goat Hunting Education

AWA Position: Support

This is a low-cost, low barrier mechanism for reducing nanny harvest, which is essential for maintaining sustainable mountain goat populations. If this proposal passes, we encourage ADFG and/or AWT to track post-regulation nanny take compared to pre-education years to determine if the quiz is achieving its goal to reduce illegal/unintended nanny harvest.



Proposals 92: Sheep Hunting Education

AWA Position: Support

We support this proposal to improve hunter education, prevent unintended illegal harvest of sheep, and to support the recommendations of the 19C Sheep Working Group.

Proposal 101: Add Dall sheep as a prey species under the Intensive Management statute

AWA Position: Oppose

1. Sheep do not qualify as a species that provides “high levels of human consumptive use”, and should not be in the same category as moose, deer, and caribou.
 - a. On average, hunters take 25,000 caribou, 10,000 deer, and 7,000 moose per year. Division of Subsistence surveys of harvest records show that the total sheep harvest, across 36 communities, is 266 per year. While sheep are important to some communities, the meat sheep hunting provides pales in comparison to the species originally identified in the statute: moose, deer, and caribou.
 - b. While Dall sheep produce great meat, they’re small and are often in areas that are difficult to get to. As ADFG notes: *“these factors have limited sheep hunting to a relatively few, hardy individuals whose interest is more in the challenge and satisfaction of mountain hunting and the alpine experience than in getting food.”*
2. Intensive Management has recently become synonymous with Predator Control, but predators aren’t the cause of sheep decline.
 - a. In management reports, the most frequent cause of sheep population decline is a loss of winter habitat and climate change, and weather. Of the 14 management reports for sheep available online, the following are offered as reasons for stable, low or declining populations: “loss or winter habitat and climate change” (GMUs 7 and 15), “weather and carrying capacity” (GMU 12), “possible changes in habitat” (GMUs 12, 13c, 20d), “nutrition and stochastic factors” (GMU 13d), “severe winters” (GMU 14c), weather-related lamb loss in 2013 (GMU 19b and c), “late spring breakup in 2013” (GMU 20b 20f and 25c), “near complete failure of lamb recruitment” (GMU 24, 25a, 26b, and 26c). The sole mention of predation is in GMU 11, where the management biologist notes: “uncontrollable factors including weather, habitat quality, and predation”.
 - b. This is not to say predation on sheep, especially lambs, is not occurring - of course predation occurs. But further research is needed to determine if this predation is compensatory and/or if populations are near carrying capacity (which may be reduced or limited by changing habitat).
 - c. We understand the State usually regards the special management option in IM as “another tool in the toolbox”, but distributing those tools across the entire state to impact a variety of species does not reflect the intent of the IM law. These tools are highly controversial, and should thus carry a high degree of assessment before



applying them in the range of ungulates, especially predominantly a trophy species.

3. This proposal would set a dangerous precedent that any big game species can be characterized as providing “high levels of human consumptive use”. If this proposal passes, what is keeping mountain goats, musk ox, or bison from being added? The scope of species to be managed for under IM was kept narrow on purpose, and species under that statute should be limited to those truly providing high levels of human consumption.
4. We strongly encourage the Board to reject this proposal. If BOG adopts this proposal, population objectives must be realistic for current and future conditions. The State and BOG have to recognize that sheep habitat is changing with the climate, and past objectives may not be attainable. BOG must wrestle with the costs to Alaskans and the State of enacting IM in areas where non-resident hunters account for a significant percentage of the sheep harvest.

Proposal 124 and 125: Defining “permanent dwelling” and “developed recreational facility” for bear baiting setbacks

AWA Position: Support, with amendment

We support regulatory clarity around the buildings and facilities that require bear baiting setbacks, both for the protection of property and recreational spaces as well as hunters trying to follow regulations. This is, admittedly, a tricky term to define and we offer the following suggestions:

- Include active outhouses in the facilities requiring buffers
- Consult the regulatory language in other states to see what definitions may apply in Alaska
- Rely on AWT for input on what clarifications would help officers in the field

Proposal 126, 127, 128: Night Vision and Thermal Optics

AWA Position: Oppose

1. At the 2016 Statewide meeting the Board adopted Proposal 68, submitted by the Alaska Wildlife Troopers, which prohibited the use of forward-looking infrared devices (FLIRs) for taking game. We believed that [AWT’s comments](#) from 2016 resonate today, particularly the following quotes from page 8:
 - a. “The use of a FLIR scope or device gives an individual an unfair advantage when hunting and allows an individual to locate and take an animal in the total darkness by the animal’s body heat signature.”
 - b. “If the board decides that a FLIR device should not be used to take game the Alaska Wildlife Troopers ask the board to apply this restriction to all game and furbearers to eliminate any enforcement difficulties.”
 - c. “Under 5AAC 92.085(C) artificial light may be for the purpose of taking furbearers under a trapping license during an open season November 1- March 31 in Units 7 and 9-26. These restrictions were included to eliminate an individual from using artificial light to locate and take deer.”



- d. “The use of artificial light is easier to enforce as the individual is visible when using artificial light as opposed to an individual using a FLIR or NVG device.”
2. AK Wildlife Troopers previously proposed to prohibit the use of night vision and FLIR devices because of concerns about increased harvest. What has changed to address those concerns? The Interior proposal for FLIR was only passed in 2024, so we don’t yet have a full season’s data to understand the impacts before it is proposed Statewide. We recommend the Board deny this proposal and the author resubmit at the next Statewide cycle, once data has been collected on the impacts of FLIRs in the Interior region.
3. AWA supports fair chase hunting principles. These technologies are not commonly allowed in hunting states, and when they are they rarely apply to all furbearers. This would be a massive change for Alaska, and an unusual one for the United States on the whole.

Proposal 131: Mandatory Trap Identification

AWA Position: Support

We support the proposal’s intent for traps and snares to have an identification tag. There appear to be two main concerns in opposition to this proposal: fear over disclosing trapper personal information and added cost to trappers.

Concern about personal information on traps: We understand trappers’ concern about having their name attached to traps. As Wildlife Troopers have noted, public disclosure of a trapper’s identity could impede ongoing law enforcement investigations. This proposal seems to allow a trapper ID instead of personal information, which could be the trapper’s license number; this practice is already in place in many states and on federal land in Alaska and could be replicated by state regulation. This would allow anonymity in the field while providing information to law enforcement.

Concern about additional costs to trappers: To understand this potential burden, we reviewed trap ID tag costs and found that trap ID tags range from 10 - 40 cents per tag (see [Fur Harvester’s Trading Post website](#)), depending on how many are purchased at a time. That cost includes the cost of having the information stamped on the tag. If a trapper buys in bulk, it would cost only \$30 to tag 300 traps and snares. It would be important that the trapper ID number or name would stay consistent over time, ensuring this is not an annual expense. However, if the Board is still concerned about burdening trappers, they could amend to have the ID requirement apply only to non-subsistence areas.

As the Board deliberates this proposal, we emphasize that trap ID requirements are not a novel regulation.

1. The State has successfully regulated trap ID requirements in the past.
 - a. In 2001, trap ID regs were passed on snares in 12 and 20E to, as ADFG summarized, *“address enforcement concerns”*. That original regulation has a two-year sunset clause, which was reinstated in 2022 due to “positive support from local trappers and law enforcement”. ([Slide 40](#))



- b. In 2006 the Board required trap ID in Units 1-5 for all traps and snares to “*address conflicts between recreational trail users and trappers.*”(Slide 41)
 - c. In 2016, a statewide proposal (Proposal 78) requested to remove those requirements. ADFG was neutral on the proposal and, interestingly, AWT did not submit comments. However, since the removal of that regulation, AWT has often cited a lack of trap ID as a challenge for enforcing areas with trap setbacks (1, 15C, and Mat Su).
2. Many federal and private lands in Alaska have trap ID requirements. For example:
- a. On Alaska Mental Health Trust land, [subsistence trapping permits](#) require “*the trapline be posted with signage at the beginning and end of the segment located on Trust land. The signage must identify that a trapline is present, the first and last name of the trapper, and the trapper’s license number.*”
 - b. On Kenai National Wildlife Refuge, trapping permits require “*All traps and snares must have an attached tag identifying the permittee. Permittees can use a specific identifier such as a mark, symbol, or letters rather than name, to maintain field anonymity, which is provided to the refuge.*”
3. It is common in other trapping states to have ID requirements. For example:
- a. Idaho: “*All traps or snares, except those used for pocket gophers, ground squirrels or other unprotected rodents, shall have attached to the snare or the chain of every trap, a metal tag bearing: 1.Name and Address in legible English the name and current address of the trapper; or 2.Number. A six digit number, to be obtained by the trapper from any Department office. Any person assigned a six digit number to mark his traps or snares must notify the Department in writing or in person at any Department Office within thirty days of any change in address.*” - [Idaho Admin. Code r. 13.01.16.100](#)
 - b. Montana: “*A person may not use a trap or snare for the purpose of trapping or snaring a fur-bearing animal, a predatory animal, or a nongame species unless the trap or snare is tagged with a metal tag bearing an individual identifying number issued by the department or the owner's name and address unless the person is trapping or snaring on the person's land or an irrigation ditch right-of-way contiguous to the person's land*” - [Montana code 87-6-601](#)
 - c. Oregon: “*All traps and snares, whether set for furbearing or unprotected mammals, must be legibly marked or branded with the owner’s license number that has been assigned by the Oregon Department of Fish and Wildlife; except that unmarked traps or snares may be set for unprotected mammals by any person or member of their immediate family upon land that they lawfully own. No branded trap or snare may be sold unless accompanied by a uniform bill of sale.*” - [Oregon 2024-2026 Trapping regulations](#)



Proposals 132: Prohibit nonresidents from using snowmachines to approach and pursue the take of wolves and wolverines

AWA Position: Support

The current regulation affords nonresident trappers an improper and unfair advantage in killing free ranging wolves and wolverines. A key reason this trapping methods and means exception was allowed for wolves and wolverines was for subsistence users, but the regulation also created an exception for nonresident hunters and trappers. Nonresidents should not be afforded this exception and should be held to basic fair chase principles.

Proposal 133: Prohibit trappers from using snowmachines to approach and pursue the take of wolverines.

AWA Position: Support

This exception for use of a snowmachine affords trappers an improper and unfair advantage in the taking of wolverines. This practice is counter to basic hunter and trapper ethics and contrary to fair chase.

Proposal 147: Transferring the authority to manage the ‘clean list’ from the Board of Game to the Commissioner

AWA Position: Oppose

1. This proposal was previously attempted last spring via a Governor’s Executive Order 124. Due to broad public opposition, that Executive Order was [rejected by the legislature](#) by a vote of 23-26. We opposed that Executive Order last year, and oppose this proposal for the same reasons.
2. Proposal 147 would have a substantial negative effect on the public process. As you all know, the current process involves a Board of Game request for proposals, ADFG analyzes and gives recommendations, there are public comments, and then Board deliberations with input from all 7 members. If this process were to transition to the Commissioner, that sole individual could draft regulations, post them on a system with an automated notice sent out to a list of recipients, and allow 30 days for public comment without group deliberation.
3. We understand the desire to streamline permitting for more responsive action on requests to import exotic species as potential food sources, particularly in rural communities, however:
 - a. Importing species not listed on the clean list carries an unknown but potentially substantial risk of disease or parasite transmission to native wildlife and domestic livestock. Any decision to import a new species must be reviewed by multiple people and the public to pass muster.
 - b. The risks are too important to bypass the more deliberative and public-facing process of the Board of Game.
 - c. The Board may choose to delegate regulation of the live capture, possession, transport, or release of native or exotic game or their eggs to the commissioner to



streamline individual permits (on a case-by-case basis) where disease risk and mitigation measures are clearly understood. This could streamline some permits while ensuring problematic species imports are reviewed by the full Board.

Proposal 190: 19C Dall sheep working group modification to resident-nonresident hunt structure and guide concession pilot program

AWA position: Support

We support the working group model for tackling challenging management problems, and appreciate ADF&G's support to make working groups possible. Given the time and investment of working group members, we are generally inclined to support their proposals. We echo many of the sentiments in the working group's October, 2024 letter to the Board, particularly:

- Concurring that forthcoming sheep regulations must prioritize the well-being of the species over the distribution of hunting opportunities. *"The primary goal is to balance the interests of conservation, local communities, and economic factors."* We hope the Board will prioritize managing the resource sustainably rather than just allocating hunting rights.
- Encouraging ADF&G to continue to learn about sheep populations, specifically adding radio collars to better understand mortality issues.
- The working group did not take a position on predator control being implemented for sheep (Proposal 101), writing *"At this time, the sheep working group wishes to see [...] research documenting mortality prior to any predator control for sheep."*
- We hope the working group is correct in assuming that a guide concessionaire program will control commercial efforts and harvest of Dall sheep. We strongly encourage that this program be assessed to determine how/if it achieves those objectives. Overall, we are highly supportive of programs that reduce conflict between resident and nonresident hunters.

In terms of process, we appreciate that the working group received presentations and reports from the Department, was open for public listening, included Board of Game members, and received public comments. In the future, we hope these groups can also include more formal consultation with affected tribes and rural communities as well.

Thank you for your service to the Board and Alaska's wildlife, your time in reviewing these proposals, and your consideration of these comments.

Nicole Schmitt
Executive Director



Name: Earline Alinsunurin

Community of Residence: Anchorage

Comment:

I support Proposal 146. There are free-roaming cats in many Alaska communities, and we need to be proactive and humanely be able to trap, spay/neuter and release feral cats. I urge the board to amend current regulation 5 AAC92.029 that prohibits the release of sterilized cats back into their environment, a restriction that basically bans TrapNeuterReturn (TNR) programs in Alaska.

The cycle of cat overpopulation will continue if TNR is banned.

How TNR works:

1. Trap - Humanely capture and assess cats for health and if socialized.
2. Neuter/Spay - Cats are surgically sterilized, vaccinated, and marked for identification.
3. Return - The sterilized and vaccinated cats are returned to their territory, and can no longer reproduce, and help deter the influx of new, unaltered cats.

Benefits of well managed TNR programs:

1. Population Control - TNR prevents new litters and gradually reduces the overall number of feral cats.
2. Reduce Predation Pressure: Sterilized cats hunt less and defend territory, leading to a decline in wildlife predation over time.
3. Improved Public Health: Vaccinated, monitored cat colonies reduce the spread of disease and minimize nuisance cat behaviors.

I respectfully request that the Board of Game revise the current ban on releasing sterilized cats and allow TNR programs under licensed animal welfare organizations.

Many states and municipalities in the US have successfully implemented TNR programs that are effectively reducing feral cat populations.

TNR is a way for Alaska to compassionately, humanely and effectively reduce feral cat populations and reducing the feral cat populations will benefit the feral cats, wildlife, the environment and Alaskans.

Sincerely,

Earline Alinsunurin



Name: Rachel Alinsunurin

Community of Residence: Unalaska

Comment:

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Sincerely,

Rachel Alinsunurin

PO Box [REDACTED]

Dutch Harbor, AK 99692



Alaska Board of Game
1801 S Margaret Drive
Suite 2
Palmer, AK 99645
(907) 746-6300

March 6th 2025.

Re: Board of Game Proposals: 90, 91, and 92

To the Alaska Board of Game,

The Alaska Chapter of Backcountry Hunters & Anglers (AK BHA) works to conserve Alaska's wild public lands, waters, fish and wildlife.

Proposals 90 and 91: AK BHA **SUPPORTS** proposals 90 and 91 which recommend setting a statewide standard for hunter education in mountain goat identification. As Paul Forward cites in his proposal (91), it is well established and accepted that the harvest of nannies is detrimental to the mountain goat population in most areas. According to statistics from ADF&G staff, recent efforts to educate hunters by requiring that they complete a mountain goat identity quiz have proven successful in reducing the nanny harvest in those areas. Currently Units 1, 4, 5, 6C and 6D require that hunters complete the Mountain Goat Sex Identification quiz. Alaska BHA supports making this a statewide requirement, which increases hunter education.

Proposal 92: AK BHA **SUPPORTS** proposal 92, to implement an online education quiz for identifying legal Dall sheep rams for harvest, prior to hunting in any unit. It has been shown through mountain goat ID tests required in units 1, 4, 5, 6C and 6D and moose tests in units with antler restrictions, that this hunter education results in decreased sublegal harvest.

As Dall sheep populations continue to struggle in Alaska, declining in many areas, the implementation of a legal ram test could help reduce sublegal harvest by increasing hunter education prior to going into the field.

As concerns rise about wildlife populations and their habitats, we as hunters should do everything we can to support conservation of wildlife species, where appropriate.





These proposals fit BHA values. We request that the Board of Game please implement a mountain goat ID test for all goat hunters statewide as well as develop a legal Dall sheep test.

Thank you to the Board of Game for your deliberation and careful consideration of these proposals.

On behalf of the Alaska Chapter of Backcountry Hunters & Anglers,

A handwritten signature in cursive script that reads "Mary Glaves".

Mary Glaves
Alaska Chapter Coordinator
[REDACTED]
glaves@backcountryhunters.org





PC14

Name: Johanna Bakker

Community of Residence: Auke Bay

Comment:

Proposal 126: I oppose the use of all electronic equipment, devices with night vision and FLIR for hunting and trapping.

Proposal 127: I oppose the use of all electronic equipment, devices with night vision and FLIR for hunting and trapping.

Proposal 128: I oppose the use of all electronic equipment, devices with night vision and FLIR for hunting and trapping.

Proposal 147: I oppose. Proposal 147 would have a substantial negative effect on the public process.



PC15

Name: Nancy Bale

Community of Residence: Anchorage

Comment:

I lived in the Alaska bush, Unit 19C, for 20 years during the winter months. I worked in Unit 20C during summers for 20 years. These comments are based on my experience in the Alaska bush and my knowledge of the Intensive Management Law.

Proposal 102 - Opposing this proposal should be relatively easy for the Board of Game. From my close knowledge of Interior regions, it is clear to me that Dall's Sheep are not a species that can be expected to provide a high level of consumption for Alaskan hunters, a requirement for listing as an IM species. A single sheep, being a relatively small ungulate compared with moose and caribou, could not by itself feed a family for a year. Instead several sheep would need to be harvested. Even self-sustaining, stable populations of Dall's sheep in Alaska are not now or have they ever been large enough to support that burden of harvest. And, sheep populations in Alaska are currently not stable.

Sheep populations across the state have been in decline for several years now. This has led to efforts by the Department of Fish and Game to determine important influences on their populations. As of today, studies utilizing unhunted populations as controls are studying a wide range of variables, including the full curl rule, nutrition, predation, and migration patterns that could be major influences on sheep populations. Until studies can show that predation is the main or even an important factor in sheep populations, the Board of Game should not adopt regulations that ultimately lead to heavier predation control under IM.

The Intensive Management Law was established to help Alaskans fill freezers with needed nutritional resources, and yet much of the hunting pressure on sheep in Alaska (and hunter success) is from non-resident hunters. With that in mind, it is just not good management to declare Alaska Dall's Sheep as a prey species to be managed under IM, "for the benefit of residents".

Although the Department of Fish and Game hints that passage of Proposal 102 is no guarantee that any sheep population in Alaska would be declared an IM species, passage of the proposal makes sheep eligible for IM designation. This is inappropriate, not in line with the provisions and definitions of the IM law, and I strongly oppose it.

Proposal 126 - I oppose. I did not support the Fairbanks Advisory Committee proposal to allow night vision equipment in Region III under a trapping license for furbears, which include, I believe, all the following species - Beaver, Coyote, Arctic Fox, Red Fox, Lynx, Marten, Mink, Muskrat, River Otter, Weasel (Least and Short-tailed), Wolf, Wolverine, and Squirrels (Red, Flying, and Ground). I do not support the extension of that proposal to all GMUs in Alaska. In particular, Proposal 126 does not specify that the original proposal was only for those with a trapping license and would cover a limited period of time, between Nov 1- March 31. The proposal is vague and creates uncertainty, in my mind, as to exactly what dates and licensures would be required.

Proposal 127 - I oppose. This proposal, by the Fairbanks Advisory Committee, is more specific than Proposal 126 by arguing for statewide provision of the specific methods and means adopted in the original Fairbanks Advisory Committee proposal in 2024.

My opposition to the use of night vision technology rests on the fair chase argument, which is important and worthy of consideration when the Board of Game debates significant changes in its methods and means policies, statewide. The Boone and Crockett club, an important voice in hunting across our country, has stated, in its Position Statement, revised in 2022, that "Using any technology or device that allows hunters to see in the dark in order to harvest an animal is both illegal and unsportsmanlike." The advantage provided by night vision equipment is not necessary, either. Trappers have, for millenia, found a way to see and discern and use their cunning at dusk and in the night.

I believe that introducing this technology into the trapping space is a dangerous first step toward wider use of night vision equipment. When the equipment gets into the field in one setting, it just slowly migrates from that setting to all settings. Please vote down this proposal.

Proposal 128 - I oppose this proposal for the reasons given above.

Name: Jamie Bellefeuille

Community of Residence: Clam Gulch

Comment:

Prop 127

With the amount of predators I think allowing night vision and infrared thermals should be legal statewide. It allows more people more time to get out and help control these predators. Moose in our area could use the help.



PC16



PC17

Name: Chet Benson

Community of Residence: Hamilton, Montana

Comment:

Concerning Proposals 102 - 118 & 190 regarding sheep seasons in GMU 19C. I:

Support Proposals 103-107 to open up a general non-resident season from Aug. 10th - Sept. 20th. Full Curl works. At the very least, these proposals should be amended to open private land and NPS concessions in 19C to non-resident sheep hunting. Private land holders should not be lumped in with state land nor should NPS lands open to sheep hunting which already have concessions.

Support Proposals 102 & 113. Short of opening back up a 42 day non- resident general season, I could support the shorter seasons offered in these 2 proposals for state land in 19C. Private land and NPS concessions in 19C should not be lumped in with state land and should go back to a 42 day non - resident season. Private lands owners should be allowed to manage their lands and NPS lands open to hunting, already have concessions which limit harvest.

Support Proposals 117 & 190. Short of passing similar proposals to 102-107 & 113, I would support Proposals 117 and 190 on all state lands in 19C to keep the sheep working group intact - BUT - non-resident sheep seasons should be re-opened on private land and NPS concession lands in 19C. Private land holders should not be lumped in with state land nor should NPS lands open to sheep hunting which already have concessions.



PC18

Name: Big Game Big Country

Community of Residence: Fairbanks

Comment:

proposals

92

97-101

107-108



Name: Michelle Bittner

Community of Residence: Anchorage

Comment:

My name is Michelle Bittner, I am an attorney licensed to practice law in the State of Alaska, and I am providing these comments in opposition to Proposal 101 which would add Dall Sheep to the list of species identified as important for providing high levels of human consumption so that the AFD&G could target bears and wolves for predator control in a futile attempt to increase the number of Dall Sheep. This proposal, if approved, would be illegal and easily challenged by filing a lawsuit in court for several reasons.

First, Dall Sheep cannot be an animal identified for providing high levels of human consumption for several reasons. First, Dall Sheep are declining precipitously all across Alaska. And second, Dall Sheep are difficult to hunt and most Dall Sheep hunters hunt primarily for the challenge and the trophy and not for the meat although they do eat the meat.

Second, I have reviewed all of the ADF&G's scientific studies relating to the decline of Dall Sheep and the primary factors causing the decline are predation by golden eagles on lambs, severe weather events including deep snow and thawing and freezing events which prevent the sheep from accessing their food sources, and overhunting.

Third, since this is a statewide proposal, this proposal is overly broad. While there may be GMU's in which Intensive Management of Dall Sheep would be helpful in boosting their population, the scientific studies in GMU 14C and 19C and other GMU's indicate that predator control would not be effective because predation is not a primary factor causing the decline in Dall Sheep populations.

Fourth, if adopted, this proposal would violate the Intensive Management statute, AS 16.05.255(e) & (f), because Dall Sheep have been declining primarily due to weather related events and climate change and, therefore, under AS 16.05.255(e)(3), enhancement of abundance or productivity of the big game prey population is NOT feasibly achievable utilizing recognized and prudent management techniques and, under AS 16.05.255(f)(1)(A), would be ineffective, based on scientific information.

Fifth, the Staff Comments and all scientific reports completed by ADF&G wildlife biologists and independent contractors have determined that scientific information does not indicate predation is the leading factor contributing to low sheep numbers.

As a result, this proposal violates and exceeds the Department's authority as provided for in the Intensive Management Statute and ignores the scientific information gained through research by the ADF&G's own wildlife biologists and independent contractors. Therefore, if approved, this Proposal could be legally challenged as it is an abuse of discretion for the Board of Game to ignore, rather than utilize, the analysis of its own expert wildlife biologists.

**PC20****Name:** Blake Rideout**Community of Residence:** Palmer**Comment:**

Regarding Proposals 188 and 189. I support these proposals. Many of these people have been putting in for this EXTREMELY hard to draw tag for most of their lives. The incident with the bison was no fault of the permittee, and they should not be held to the rules and regulations that would typically apply here. It would be downright disrespectful to not re-issue these tags for RY2026. There is no one who would be affected negatively by doing so.

**PC21****Name:** Tim Bouchard**Community of Residence:** Valdez**Comment:**

PROPOSAL 85

5 AAC 92.013 Migratory Bird Hunting Guide Services

The current regulations already have this license in place, and it is required by the state as a free license. As a result, the majority of outfits in the state seem to sign up, regardless of whether they actually do much guiding or not. If the state biologists think this data is needed and they want more information, I see no problem adding the text. However, I would assume that if they thought it was necessary, they would have already required it.

PROPOSAL 86

5 AAC 92.010 Harvest Tickets and Reports

Until the state and federal governments take into account the spring harvest by rural communities, this reporting will only represent a smaller percentage of the management effort. It is designed to target fall hunters, who are much more highly regulated than spring hunters but are easier to regulate. Bag limits, shooting times, and legal means of harvest are enforced during the fall/winter seasons, while there are no such regulations in the spring season.

Data from Harvest of Waterfowl and Sandhill Crane in Rural Alaska: Geographic and Seasonal Patterns by Liliana C. Naves and Jason L. Schamber show that Sandhill Crane harvest is 68% in the spring/summer and 32% in the fall/winter. Another paper, Alaska Subsistence Harvest of Birds and Eggs, 2019–2020, Alaska Migratory Bird Co-Management Council by Liliana C. Naves, Lara F. Mengak, and Jacqueline M. Keating, in Table 10 (Estimated Bird Harvest, Alaska-wide, 2019), shows the total spring/summer harvest across all regions to be 180,061 birds, compared to 74,258 birds in the fall/winter. The fall/winter harvest accounts for about 30% of the annual bird harvest.

A final example, looking at one of the most studied waterfowl species in the state, Emperor Geese, comes from Emperor Goose Fall–Winter Harvest Monitoring and Hunters' Perspectives in Alaska by Liliana C. Naves, Jason L. Schamber, Lara F. Mengak, Jacqueline M. Keating, and James A. Fall. In Table 1, estimates of harvest by rural hunters during the spring and fall for the open years 2017–2019 show an

estimated 535 birds harvested in the spring, compared to just 39 in the fall, representing only 7% of the total harvest in fall.

While there haven't been many studies focused specifically on the sea duck population and harvest levels, these examples from the overall population can give us insight into trends.

If the state and biologists are truly concerned about our harvest numbers, we need to start collecting better data from the areas of the state that harvest the majority of the waterfowl. After 25 years of hunting and 20 years of guiding waterfowl, I have observed the same relative number of sea ducks in Prince William Sound. The only benefit these report cards will provide is a high cost to the state to maintain the system and collect the data.

The author used Washington as an example. That state implemented report cards to monitor the Harlequin Duck harvest when it began. They did this because their population dropped below 3,000 birds for the entire state. In contrast, Alaska has an estimated population of over 250,000 Harlequin Ducks, according to Fish and Game. Looking at the data from the 2019 harvest, as mentioned by Naves, the estimated annual harvest of Harlequins was 1,768. This is not the number reported, but an estimate based on their confidence in reporting and other data. That is less than 0.7% of the estimated population. We implemented report cards and permits for Emperor Geese for a reason: a much smaller population required more specific data to regulate.

I believe a better use of these funds would be to conduct more baseline population studies so we can gain a better understanding. The studies done after the oil spill showed an increase in bird populations every season in Western Prince William Sound, which was affected by the spill, but these studies are now quite old.

I hope the board considers ways to better fund our biologists to determine populations, rather than spending money on a small percentage of hunters in the state by requiring a report card. The HIP program could be more easily adapted to provide additional information through duck stamp purchases, rather than creating an entirely new system.

PROPOSAL 87

5 AAC 92.100. Unlawful Methods of Hunting Waterfowl, Snipe, and Cranes

This regulation is designed solely to limit the amount of hunting occurring for waterfowl. It is already illegal to "drive, herd, or chase migratory birds," as stated in the added text by the author. State and/or federal officers have ticketed people for this violation.

Requiring the anchoring of a boat during all hunting does not allow multiple groups to hunt from one vessel. For example, if a group of friends went out and dropped off two people with their dog and decoys, and then motored away half a mile to hunt on their own, would this regulation make it illegal due to not anchoring where they originally dropped off the hunters? I personally have dropped friends off and then gone to check my traps on my trapline for 3-4 hours without duck hunting. Does this make that illegal? Another example: if part of the group wants to duck hunt and others want to deer hunt, would it now be illegal to leave the group to go deer hunting while the others go duck hunting?

Gas is expensive, and limiting activities to one pursuit with vague wording on anchoring vessels does not seem to address any waterfowl regulation issues that are not already covered by existing laws.



Bristol Bay Subsistence Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

In Reply Refer To:
OSM.B25016

MARCH 03 2025

Jake Fletcher, Chair
Alaska Board of Game
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Fletcher,

I write to you on behalf of the Bristol Bay Subsistence Regional Advisory Council (Council) to provide the Council's comments on proposals that will be considered during the March 21-28, 2025, Statewide Alaska Board of Game (BOG) Meeting.

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

The Council held a public meeting on February 18, 2025, in Naknek, and took up eight BOG Proposals. Please see the Council comments below.

Proposal 87: Restrict the use of boats for hunting waterfowl

The Council **opposes** Proposal 87, which would restrict the use of boats for hunting waterfowl. The proposed requirement for a boat to be anchored or beached within 100 yards of anyone discharging a firearm would be difficult to comply with and enforce. Current regulations already prohibit waterfowl hunting from a motorboat unless the motor is off, and the boat's forward movement has stopped.

The Council is also concerned about the potential safety risks this regulation could pose to waterfowl hunters. Hunters in the Bristol Bay region navigate tidal gullies with thick mud, steep banks, and up to 24-foot tides. Requiring boats to be anchored or beached could create hazardous situations. Additionally, the Council is concerned about how hunters would retrieve dead or injured birds if this regulation was enacted.

Proposals 126, 127, and 128: Allow the use of electronically enhanced night vision and forward-looking infrared device for taking furbearers statewide

The Council **opposes** these three proposals allowing the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers. The Council believes these technologies could be misused if the regulation was approved, creating an unfair advantage. Additionally, we see no legitimate need for such devices in our region, aside from potential misuse.

Proposals 129 and 130: Establish a minimum standard of centerfire rifle cartridges for taking big game

The Council **opposes** Proposals 129 and 130 because it is an unnecessary restriction on hunters. Effective hunting depends more on shot placement than caliber size. A well-placed shot with a smaller cartridge can be more effective than a poorly placed shot with a larger one.

If passed, this regulation could also impose additional costs and burdens on hunters who may be forced to purchase new firearms and ammunition, creating an unnecessary financial strain. In remote or rural areas, ammunition availability is often limited, and requiring a minimum cartridge size could make it even more difficult for hunters to find suitable ammunition.

Proposal 131: Require identification tags be attached to traps and snares

The Council **opposes** Proposal 131, which would require trappers to place identification tags on traps and snares. The Council believes this regulation imposes an unnecessary burden on trappers.

Additionally, the Council is concerned about potential negative consequences if an identification tag is lost or destroyed. Wolverines and other animals can struggle vigorously when trapped, potentially breaking off the tag. Identification tags may also become buried or frozen, leading to unintentional violations.

The Council is also worried about the risk of trapper harassment from the public and the disruption human presence and scents near traplines could cause, potentially reducing the chances of harvesting furbearers.

Proposal 133: Prohibit trappers from using snowmachines to approach and pursue the take of wolverine



The Council **opposes** Proposal 133, which would rescind the regulation allowing hunters and trappers to use snowmachines to approach and pursue wolverines.

The Council and the Bristol Bay community have worked for many years to establish this regulation, as this method of harvesting wolves and wolverines is a long-standing subsistence practice in the region. Snowmachines are a critical tool for trappers in Alaska, where vast, rugged, and remote terrain makes foot travel impractical. Restricting their use would negatively impact traditional trapping practices.

Wolverines cover large territories and move quickly, making snowmachines an effective way for trappers to access active trapping areas. Revoking this regulation could harm the subsistence economy, as many rural Alaskans rely on trapping as part of their livelihood. Limiting snowmachine use would make trapping wolverines less viable, reducing income and fur availability.

Additionally, many hunters sell wolverine hides to fund fuel purchases for hunting other species. If enacted, this proposal would reduce critical harvest opportunities for those in the Bristol Bay Region.

The Council supports the existing regulations, in place, that allow hunters and trappers to use snowmachines to approach and pursue both wolves and wolverines.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Leigh Honig at (907) 891-9053 or leigh_honig@ios.doi.gov.

Sincerely,

Nanci Morris Lyon
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Bristol Bay Subsistence Regional Advisory Council
Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of
Fish and Game
Administrative Record



PC23

Name: Tel Brown

Community of Residence: Juneau

Comment:

Proposal 87

I Tel Brown am strongly opposed to proposal 87. I believe that being 100 yards away from your boat while hunting for waterfowl will cause a substantial amount of injured fowl being lost. I have been hunting waterfowl primarily sea ducks and divers for the last 7 years. I cant even imagine how many birds I would have lost if I had not had some type of boat with a motor to retrieve cripples. Also many people in my area including myself hunt from an anchored boat. There are many places where I live that hunting from a boat is the only safe way to hunt these birds. If this proposal passes it would take away how many Alaskans hunt. There are already laws in place to prevent herding and harassing waterfowl with a boat under power, so I believe this proposal will just hurt hunters and increase the number of lost waterfowl. In conclusion I am strongly opposed to Proposal 87 because it will cause an unethical increase in crippled waterfowl being lost and prevent many people in my community from hunting waterfowl.

Proposal 85

I am also opposed to proposal 85 because any transporter who does not actually guide for waterfowl should not have to register as a guide. This will just create more work for the state with no benefits. There is no biological reason to support this proposal.



PC24

Name: Catherine Bursch

Community of Residence: Homer

Comment:

I am in support of the Statewide proposal # 86.

I believe that the State of Alaska, ADF&G, should monitor changes in sea duck harvest through a regulation requiring sea duck harvest reporting.

I spend a good amount of time on the S. side of Kachemak Bay near Homer and regularly see multiple species of sea ducks . Recently, I was amazed to learn that sea ducks pretty much stay in the same area. I always thought they moved through, in and out of larger areas. This means that sea ducks are especially vulnerable to hunting pressure that occurs repeatedly in one area.

I have spoken with folks out hunting sea ducks as I rode water taxis around Kachemak Bay. I have realized that there are favorite spots where the hunters get dropped off by the water taxis repeatedly. They are looking for easy access beaches and other hunt friendly factors. This means certain areas are being selected for heavier hunting pressure and thus, specific populations of sea ducks with high fidelity to those sites, will get more hunting pressure.

I guess my fear is that this could lead to sea duck population numbers to decline too much in certain areas to recover in a timely manner. They don't multiply as fast as mallards. They have less young with lower survival rates. We really don't know that much about sea ducks and that is a good reason to take on this reporting program so we can learn from it.

With a harvest reporting program in place the Department will be able to see a population decline and respond to it.

Thank-you,

Catie Bursch



PC25

Name: Wendy Carpenter

Community of Residence: Eagle River

Comment:

In support of proposal 189- those permit holders to have their Bison permits reinstated for the 2026 year.

Thank you for considering. This is a hard permit to draw and would like to see those hunters who lost their permits in 2024 reinstated for 2026.



PC26

Name: Douglas Carroll

Community of Residence: Cordova

Comment:

I am writing to support proposals 188 and 189 for transferring Bison tags that were taken away in 2024 to a later season automatically or by request.

On Feb 16, 2024, after many years of applying, my wife Lisa was fortunate enough to draw a once in a lifetime DI403 tag. We celebrated and immediately started planning her hunt. We were excited all the way up to the point where the tag was taken away during the summer. We understand the need for conservation and definitely support the conservation measures that were taken, but were still very disappointed.

I urge this board to do the right thing and award the people who were lucky enough to get drawn for this hunt a tag in an upcoming season. We have already applied for this tag for approximately 30 years before finally drawing the tag. Just getting to apply again in less than 10 years would not really be any consolation.

Thank you for your consideration.



Name: Jerry Cates

Community of Residence: Sterling

Comment:

Opposed to Proposals 95, 96 and 100

I strongly oppose Proposals 95, 96 and 100. I have been a resident here in Alaska and a licensed hunting guide here in Alaska for a decade and have hunted and explored it for quite a few more years than that. I understand that these 2 Proposals are proposed to be Statewide. In the area I'm referring to (within the Talkeetna Range) where I have guided for, hunted, observed and studied Dall Sheep, a minimum of 90% of the Rams only ever reach the definition of being legal due to the clause in the definition of a full curl ram that specifically allows a Ram to be legally harvested if it has at least 8 Annual rings or more on a horn. The ability for the Rams in this area to reach legal status otherwise is simply almost non existent, thus it is imperative in my view to keep the 8 Annual Rings or more an option in order for a Ram to be legal. I also know first hand of populations of Rams here and there in other regions throughout the state where this same situation with Rams' horns only achieving legal status by the 8 Annual Ring clause is present.

I have drawn this conclusion through observing several dozen Rams over the years and by having guided several Sheep hunters successfully and having always taken a keen interest in the measuring of the horns when Fish & Game seals them. Even the winter killed or predator killed Rams' horns that we have found in the area have reflected this.

Former Registered Guide (Arthur "Art" Hirschel, whom is Retired now) that I apprenticed under, and whom operated in this same area I am mainly referring to here, always maintained this same outlook on Rams horns only achieving legality due to the 8 Annual Ring clause, as he still does today. His records are that 28 out of 30 Rams that his clients harvested over a period of 15 years or so reflected this same pattern. The other Assistant Guides and Packers that have worked with Mr. Hirschel and myself know this to be true as well.

Regarding Proposal 100 :

I oppose Proposal 100 because I think it would be a folly to put a number on the percentage of the Annual Sheep Harvest by Non Residents. Seems to me that this would not set a good precedent and it would be difficult if not impossible to implement in a reasonable manner.

The respective people listed below agree wholeheartedly with opposing these particular proposals and have given me (Jerry Cates) permission to include their endorsement here. Their names / titles are listed below.

Thank you for your time and attention with these matters.

Sincerely,

Jerry Cates - Alaska Registered Guide - Outfitter (License # 160959)

David "Butch" Gratias - Retired / Former Alaska Registered Guide - Outfitter and Pilot

Arthur "Art" Hirschel - Retired / Former Alaska Registered Guide - Outfitter and Pilot (License # 1072)

Joel Boniek - Former Alaska Registered Guide - Outfitter

Erika Brayton - Alaska Assistant Hunting Guide (License # 213117)

Mark Nelson - Alaska Assistant Hunting Guide (License # 224703)

Shane Bailey - Hunter and Packer in the Alaska Guiding Industry

Cody Whitmire - Hunter and Packer in the Alaska Guiding Industry

Jay Jacobs - Packer in the Alaska Guiding Industry

March 5, 2025



PC28

Name: Center for Biological Diversity

Community of Residence: Homer

Comment:

Dear members of the Board of Game,

On behalf of the Center for Biological Diversity and our members across Alaska and nationwide, we provide the following comments on proposals 86, 101, 132, and 133.

Proposal 86:

We support this proposal. Harvest data can provide important metrics for management, particularly when abundance estimates do not exist. This is especially true as sea ducks face myriad and amplifying threats, including marine heatwaves and resultant changes in prey abundance. The Department should be capturing all the data it can to best support the health and abundance of sea ducks.

Proposal 101:

We oppose this proposal. This proposal is intended to open up predator control on behalf of dall sheep for which there is no scientific basis. As with all other ungulates in Alaska, predators are not the cause of sheep decline. Sheep habitat is changing due to fossil fuel-driven climate change, with management reports stating that the most frequent cause of sheep population decline is a loss of winter habitat and climate change, along with weather. Moreover, sheep are not a species that provides "high levels of human consumptive use" and it would be unlawful for them to be categorized as such. Predator control is not a solution to climate change and habitat loss and the Department does not need the "tool" of predator control "in its toolbox." The board must reject this proposal.

Proposals 132, 133:

We oppose these proposals. Using snowmachines to kill wolves and wolverines is abhorrent and goes against basic fair chase principles.

Thank you for considering these comments.

Cooper Freeman

Alaska Director

Center for Biological Diversity



PC29

Name: Mike Christensen

Community of Residence: Soldotna

Comment:

I am in favor of proposal 127, though I would prefer thermal and night vision be made available under a hunting license and not just under a trapping license.

Thermal and night vision optics will bring many benefits including:

Providing us with an activity which can be done during our long and dark winters,

Allow for safe and accurate identification of game species at night,

Reduce predator populations,

And appeal to our younger generation of hunters who are well adapted to advancements in technology. As times change so should our rules if we care about maintaining our hunting heritage for the future.

Potential downsides seem few. I suppose there may be a concern about increased take of illegal game using this technology, but if a criminal wants to poach at night they can do so with a \$20 spotlight and will likely not bother investing the thousands of dollars into thermal or night vision. Alaska is in the minority of states which do not allow thermal/nightvision. From what I can tell, states that do allow it have had minimal issues while enjoying the upsides listed above.

Thanks for your consideration.



March 1, 2025

Alaska Board of Game
P.O. BOX 115526
Juneau, AK 99811-5526

The Chugach Regional Resources Commission (CRRC) comments on statewide proposals 85, 86, 87 on sea ducks, proposal 88 to permit wood bison in cultural practices, proposal 121 to create new GMU 15D from GMU 15C.

CRRC **opposes** proposal 85 requesting that transporters be required to register as “migratory bird hunting guides”. The proposer of this regulation states that there are many different migratory bird hunting guide services not providing registration forms required by the department under 5 AAC 92.013 for basic information on who and where commercially compensated migratory bird hunting services are taking place. They state that a business entity or affiliated services such as water taxis, air taxis, fishing charter outfitters, combo fishing and hunting boats, or lodges when serving small game hunters to, from, or in the field, their equipment, or migratory birds that are harvested, needs to register as a “migratory bird hunting guide”. Transporters who have nothing to do with small game hunters other than moving them from point A to point B are not and should not be classified as guides. This is an unnecessary request and would not bring any new data to the Department of Fish and Game (ADF&G) as guides do not currently have logbooks like charter fishing vessel captains.

CRRC **opposes** proposal 86 requesting that there be mandatory harvest reporting of sea ducks in Alaska. This proposal seeks to require hunters to possess a paper or electronic harvest record and after taking possession of a sea duck they would be required to record all the information on the harvest record card or through an app. There would be consequences to not filling this out immediately. The proposer states this new regulation could be modeled after the State of Washington’s management admin code 220-416-060 which reads “Hunters must physically possess a special 2023-2024 paper or electronic hunting authorization and harvest record card for sea ducks when hunting scoter, long-tailed duck, and goldeneye in Western Washington. Immediately after taking a sea duck into possession, hunters must record all required information on the harvest record card. Hunters required to physically possess a paper harvest record card must enter all required information in ink. Hunters required to physically possess an electronic harvest record card must enter all required information through the licensing mobile application.”

The proposer believes the current Alaska migratory bird harvest reporting system, known as HIP, uses randomized voluntary reporting and provides only slim and spotty information. The state of Alaska does not currently have mandatory sea duck reporting because sea ducks are considered small game. This proposal would create an issue for the ADF&G. The agency would need to hire a person to create a new data sheet and application and would need to collect and input the data into a usable form. Enforcement issues would result from the passing of this proposal as there is currently limited enforcement officers now that are spread across the state. In our current budget climate, there is real concern for the long-term availability of funding for this new position. This proposal places an unnecessary burden on the hunters, ADF&G staff, and enforcement.

CRRC **opposes** proposal 87 requesting the restriction of boats for hunting waterfowl. This regulation is already on the books but the proposer wants to include any mechanical vehicle; however, a power or sailboat may be used only as a direct means of retrieving a dead or injured bird; all boats shall remain stationary throughout the duration of

A Tribal Organization Focusing on Natural Resource Issues Affecting the Chugach Region of Alaska

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the hunt, beached or anchored, within 100 yards of those discharging firearms to eliminate driving, herding, or chasing migratory birds into hunters on land, or on other boats. The proposer believes that while use of a moving vessel is legal for retrieval of dead or crippled waterfowl, this exception is used to justify continual movement of affiliated vessels during a hunt resulting in illegal driving, herding, or chasing migratory birds into single or multiple hunter parties on shore, or on other boats.

This proposal would force water taxis to stop moving through an area if active hunting is occurring because they could be considered herding, chasing or driving the birds to the hunters. This would add additional burden on enforcement in that it would make it necessary for enforcement to monitor long stretches of water in an attempt to ensure there were no moving boats. An increase in birds getting shot is very likely because eagles are known to retrieve hunters birds faster than the hunter is able to.

CRRC **supports** proposal 88 that is requesting to add wood bison to the list of game species allowed to be taken for cultural purposes under a permit issued by ADF&G. A regulatory response is needed to protect Alaskan cultural practices, knowledge, and values. In regions where bison's cultural significance now exists predominantly in story form, such as Fort Yukon, testimonies shed light on ancestral knowledge that has simply not been practiced for over a generation now, but tradition still exists. Despite historical disruptions like boarding schools and cultural loss, the resurgence of wood bison offers a tangible opportunity for reconnection and revitalization.

This proposal embraces the adaptive nature of Alaska Native values and recognizes the evolving landscape of ceremonial practices. Including regulatory language, empowers Tribes and communities to preserve traditions using both established and newly introduced species in ceremonies and practices. Adding "wood bison" to 5AAC 92.034 honors Alaskan cultural practices and knowledge. It upholds honoring Alaska Native traditions, revitalizing cultural practices, and fostering a deeper connection to our shared heritage. The inclusion of wood bison represents the profound cultural and educational opportunities that Wood Bison presents for the transference of both new and ancestral knowledge and skills.

CRRC **opposes** proposal 121 requesting that Game Management Unit (GMU) 15C be divided into two subunits. The new Unit 15D would consist of the current portion of Unit 15C south of Kachemak Bay, Sheep Creek, and Dinglestad Glacier. This would align management boundaries with areas of stark physiographic differences of topography, climate, geology, vegetation, and wildlife species distributions and densities. ADF&G utilizes the USGS Unified Ecoregions of Alaska map to depict Alaska's 32 ecoregions.

An ecoregion is defined as "an area of land and water containing vegetation communities that share species and ecological dynamics, environmental conditions, and interactions that are critical for their long-term persistence." North Unit 15C, overlays the Coast Mountain Boreal; Cook Inlet Basin ecoregion of gently sloping lowlands of lakes, swamps, bogs, and rivers drained from glaciers with an annual snowfall of 63 - 100 inches and total yearly precipitation averaging 15 - 27 inches. Unit 15D (South 15C), would overlay two rugged ecoregions within the distinct Hyper-maritime Forests; the Chugach (Kenai) Mountains Ecoregion, with ice fields, narrow deep gorged valleys; fringed with the Gulf of Alaska Coastal Ecoregion, of deeply carved glacial fjords, archipelagos and short swift streams. Elevations dramatically rise from sea level to over 5,400 feet with a maritime climate. Annual snowfall averages 32 - 236 inches and total precipitation 30 - 160 inches. Land ownership within the proposed Unit 15D area consists of primarily Kenai National Wildlife Refuge land, Kachemak Bay State Park and Wilderness Park land, and



Alaska Native Corporation land. Kachemak Bay waters and submerged intertidal lands are legislatively designated a State Critical Habitat Area (CHA) for the "perpetuation of fish and wildlife". This CHA overlays Special Purpose Site Park lands and waters located within the proposed Unit 15D.

Proposals 85, 86, and 87 do not take into account the costs to the state and the sea duck harvesters, or additional enforcement needs. The need for ADF&G to hire a new staff member and create a new application and maintain would call for additional spending of funds for an agency that is already greatly impacted by budget cuts. The inconveniences to charter boats, water taxis, air taxis, and the average person who might be traveling through an area with active sea duck harvesting seem to outweigh any benefits that this proposal is seeking. The proposals are regional in nature and do not fit the state overall.

Proposal 88 to permit the use of wood bison in cultural practices is a way to reconnect Alaska Natives with a food source they relied on years ago before the wood bison went extinct. Many generations have grown up not having this resource in their lives anymore and this reintroduction by the State of Alaska will reconnect them with their history.

Proposal 121 to divide GMU 15C into two subunits creating unit 15D is an unnecessary change. It would create issues of lines and open and closed seasons. This would put an undue burden on the hunter and also enforcement.

We are thankful for this opportunity to comment on these proposals.
Thank you,

Willow Hetrick-Price

Willow Hetrick-Price
Executive Director
Chugach Regional Resources Commission

A Tribal Organization Focusing on Natural Resource Issues Affecting the Chugach Region of Alaska

Chenega • Eyak • Nanwalek • Port Graham • Qutekcak Native Tribe • Tatitlek • Valdez Native Tribe



Name: Clear Creek Cat Rescue

Community of Residence: Homer

Comment:

In reference to Proposal 146.

I am asking that the Board support the proposal to allow the return of neutered cats to the area from where they were rescued. This would require a simple wording change to 5 AAC 92.029. to exempt sterilized cats from the list of species prohibited from being released into the wild.

I would like to point out that no one is asking to release cats into the wild. The wild is not where the groups of homeless cats are living. The problem areas are in highly populated areas of towns and cities; trailer courts, apartment complexes, industrial areas. This is not, in any way, a problem for any endangered species as the fragile creatures who once lived in these areas disappeared when they lost habitat to development long ago.

What we are asking is that the Board of Game NOT stand in the way of allowing cities and towns and boroughs to make decisions about how to deal with what is clearly a health and animal control problem in their own communities. At present, animal professionals are ready and willing to take humane measures to solve a problem in their own communities. It is a real, growing problem that is not going to be solved by pretending that it does not exist. We, who live in these communities and have to see these creatures in distress, as well as officials of animal shelters and volunteers with cat rescues, are standing by to take humane measures that would make things better for the people and the cats who live here.

We need your help to do that.

I have worked with Clear Creek Cat Rescue for sixteen years. During that time, the number of homeless cats in southcentral Alaska has exploded. Every shelter and every rescue group is overwhelmed with cats who have been lost or abandoned, or born homeless under apartment buildings or in empty warehouses from parents who were abandoned by irresponsible owners. There are health issues involved and animal abuse issues involved that we have been stymied from attempting to solve because of the Board of Game's regulation language.

The cat overpopulation problem is one created by humans and it will require a thoughtful solution by humans. Trap neuter return is a step in the right direction for stopping the continued population increase of cats that have no one to care for them.

Pretending that there isn't a problem, or pretending that it is not our problem to deal with, will only allow the problem to get worse. The Board of Game's cooperation in helping our local shelters and rescues to deal with the problem in a rational and humane way is essential.

We make this appeal to the Board of Game to step up and do their part, which will allow us, the people who live among these homeless cats, to move forward with solving this increasing problem in the towns and cities where we live in a rational and humane way.

Thanks for your time.

Judy Price

Homer, Alaska

**PC32****Name:** Shayne Coisman**Community of Residence:** Wasilla**Comment:**

Proposal 85 oppose

Just because someone transports someone with a shotgun doesn't make him a migratory bird hunting guide. Small business owners who operate transport services, such as water taxis or air taxi are already overloaded with excessive regulations from agencies such as the EPA, OSHA, FAA, DOT, coast guard, IRS, etc. Adding more regulations makes it more burdensome to transport hunters and will accomplish nothing. It surely will not ensure that Migratory bird hunting guides will provide required registration forms.

Proposal 87 Oppose

The proposed regulation change would make the ethical and legal methods of hunting, drifting, and sculling, illegal. It would also add more words and confusion to a simple regulation. It is already illegal to drive, herd or chase game, including ducks.

Proposal 86 oppose

All hunters are already required to participate in the HIP program. If the reporting is spotty fix the HIP system to help all ducks not just sea ducks.

Who will pay to develop the database and the manpower to collect and use the data?

Adding more confusion and complexity to the current mountain of regulations to enforced by US fish and wildlife and Alaska troopers, and needing to be interpreted by Alaska hunters, is never good.

Modeling anything after Washington state is a very bad Idea in itself

**PC33****Name:** Cheyenne Dahlberg**Community of Residence:** Mat-Su borough**Comment:**

I'd like to bring support to proposal 127

PROPOSAL 127 5 AAC 92.080. Unlawful methods of taking game; exceptions. Allow the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide as follows: We are proposing 5AAC 92.080(7)(C) artificial light, except that artificial light, night vision goggles, and forward-looking infrared devices may be used: (I) for the purpose of taking furbearers under a trapping license during an open season November 1 - March 31 in all units.

Night vision and thermal imaging would help tremendously for predator control.

**PC34****Name:** Gabriel Davis**Community of Residence:** North Pole**Comment:**

I am writing in support of proposal 98. The current restrictions on spotting Dall sheep from an airplane do not apply to the youth sheep season or the late season archery hunts. In recent years, there have been several instances of aircraft, circling sheep that were actively being pursued by bow hunters. Enacting this regulation would provide some level of protection to hunters from aircraft interference during the open sheep season. Aircraft flying and spotting sheep at low levels is particularly frustrating on archery hunts when it results in the sheep retreating to an unstalkable position, or even moving out of the hunt boundary entirely.

Thank you for your consideration.

**PC35****Name:** Jake Davis**Community of Residence:** Wasilla**Comment:**

Proposal 86: SUPPORT. Science should always control game management decisions. Knowing the total number of individuals in a game population is the baseline for establishing take quotas. This proposal is common sense.

Proposal 87: SUPPORT. Why do we insist on not allowing hunters to work for their game? How lazy has sport hunting become?

Proposal 88: OPPOSE. For 400,000 thousand years Woods Bison existed in Alaska. Humans callously eradicated them last century. We now, thankfully, have Woods Bison back on the Alaskan range. It is schizophrenic to begin the eradication process anew so shortly after having learned our lesson about over-harvest. The bison need a real chance at surviving. Hunting currently does NOTHING to benefit their fragile existence.

Proposal 89: SUPPORT. There is not a single good argument for why this proposal should be opposed.

Proposals 90-91: SUPPORT. Common sense.

Proposal 92: SUPPORT. Common sense.

Proposal 101: OPPOSE. Adding Dall Sheep to the prey species under the intensive management statute (IMS), which already includes caribou, moose, and deer, is nothing more than an excuse to slaughter more predators. Predators are keystone species and thus vital to the health of all ecosystems in which they exist. They are not responsible for the drop in Dall Sheep numbers, human-caused climate interference is the responsible party. Moreover, ADFG said that "factors have limited sheep hunting to a relatively few, hardy individuals whose interest is more in the challenge and satisfaction of mountain hunting and the

alpine experience than in getting food.” If Dall Sheep are added as a prey species under the IMS it will set a precedent enabling virtually any species to be added. Instead of vilifying and trying to eradicate predators, perhaps we humans should take accountability and not assign unscientific blame to already stressed populations of wolves, cougars, and bears, among others.

Proposal 109: SUPPORT. Science should always control the management decisions of any game board, including this one. Opposing this proposal simply means the Board's decisions are political, not scientific. This is a common-sense proposal allowing for the study of mortality issues. Perhaps the Board is afraid to learn that predators are not as responsible for the decline in Alaskan sheep as they seem to believe. Either way, this seems like one of the more obvious proposals to support.

Proposal 122: OPPOSE. If you want to take an animal, the baseline requirement should be for you to do it yourself. Hunting is a privilege. Proxy hunting is wasteful, and dishonest, and leads to the overconsumption of otherwise needed individuals from a population dynamic standpoint. If this proposal must pass, then an amendment should be added proving that the proxy-hunted animals were later consumed by the party unable to hunt. Otherwise, proxy hunting is an excuse for sport hunters to get a permitless kill "fix."

Proposal 124 and 125: SUPPORT. Clarifications are needed and always welcome.

Proposals 126, 127, 128: STRONGLY OPPOSE. Fair chase does not contemplate the use of night vision and thermal optics. If animals do not even get the advantage of nightfall or natural conditions like snowpacks, why not put all our game species in a penned enclosure and allow hunters and trappers a free-for-all? There is also the issue of certain thermal optics being unable to accurately identify animals in challenging conditions; low-quality thermal optics may fail to distinguish between similar species, leading to potential misidentification and ethical concerns. However, the advancement of the technology is a minor point. Turning Alaska into little more than a game preserve is the issue here. Hunting and trapping are based on the pursuit of the game through strategic tracking, not the use of X-ray vision. This would be a massive, SHAMEFUL change for Alaska and an unusual one for the United States on the whole.

Proposals 129 and 130: SUPPORT. To oppose this proposal is to say the Board of Game wants moose to suffer and die tortured deaths.

Proposal 147: OPPOSE. Governor Dunleavy's ridiculous desire to allow a few LLamas into our state should not override the interest of most Alaskans in protecting our fragile ecosystems. The risks are simply far too important to bypass the more deliberative and open process of the BOG.

Proposal 131: SUPPORT. This is common sense.

Proposal 132: SUPPORT. Allowing non-residents the use of snowmachines to approach and pursue the take of wolves and wolverines will only lead to further senseless, unethical, and illegal killing of native wildlife by outsiders.

Proposal 133: SUPPORT. Perhaps this Board will stop catering to the laziness of trappers and give their victims a fighting chance. Allowing trappers the use of thermal optics and snow machines to take wolverines gives the trapper every conceivable advantage. And to what end? This is not fair chase, it is not ethical, and it inevitably leads to the question of whether the wolverine can subsist in the state.

Proposal 136: SUPPORT. Common sense or we inevitably lose the species like we did the Woods Bison.

Proposal 148: SUPPORT. Irrespective of the unscientific and horrific policy known as intensive management (IM), IM should be the most transparent of any Board of Game process. Otherwise, there is little accountability, which is why the State of Alaska is currently being sued by AWA.

Proposals 150-151: OPPOSE. No game tags should be "exempt." Taking bears, or any species for that matter, "opportunisticly" only leads to overharvesting. It also is likely sows will be killed thereby further reducing the population's viability. The ADFG should WANT to monitor the take of brown bears and establish more guidelines than simply saying, "go kill whatever you want while out there."

Proposal 149, 152-165: OPPOSE. More dead cows mean less overall moose.



PC36

Name: Katie Dawley

Community of Residence: Soldotna

Comment:

The decreasing cost of night/thermal vision equipment allows more trappers to equip themselves to broaden the time they can pursue furbearers. The equipment helps ensure the correct animal is targeted and adds a level of safety regarding possible unwanted downrange damage. Please give serious consideration to adopting proposals such as 126 and 127.



PC37

Name: Christian DeCelle

Community of Residence: Thorne Bay

Comment:

I oppose proposal 131. The submitted proposal seems to be more focused on creating a barrier for trapping, and identifying local trappers than actually reducing trapping violations. The instructions stating that law enforcement will release the identity of trappers who's traps catch pets (or children) is worrying.

Proposal 131 seems to be more focused on ways for people to retaliate against trappers, and less about stopping regulations. This proposal come from Anchorage. If they want these regulations, keep them only to that unit. This should not be a statewide law.



PC38

Name: Melanie Doss-Goodwin

Community of Residence: Wasilla

Comment:

I was one of the permits holders that got canceled for the 2024 DI404 hunt. This is pretty much a once in a lifetime opportunity. I believe Alaska residents should get the opportunity to hunt this tag if they were awarded one. I support proposal 188.



I oppose Proposal 94. Horns do not grow at right angles to the skull.

I oppose Proposal 95 and 96. Selecting for age is the goal of the current management strategy and full curl restrictions are only the tool to achieve that goal. Removing the age criteria for legality is illogical since it is the management strategy. All of the criteria for judging full curl or age are difficult in the field.

I support Proposal 97 and 98. There is a significant problem of hunter conflicts in the field, especially with guides. These proposals help to address hunter conflict issues and to reduce stress on sheep.

I oppose Proposal 99. With the number of hunter conflicts caused by flying, we do not need more people flying. Increased flying also increases stress on animals. The rule is already unenforceable and this proposal adds to complexity.

I strongly support Proposal 100 with amendments. Non-residents should be limited to under 25% of harvest. This proposal is one approach to addressing the problems of decreasing resident opportunity and increasing hunter conflict. Alaska is being exploited by a new non-resident hunter with more funds and more knowledge at their fingertips than ever before. Resident hunters and our environment are paying the price. Our regulations are so far behind the current nation-wide hunting situation it is frightening.

I strongly oppose Proposals 102-117 as well as ACR 5 and support Proposal 118. This comment is for Proposals 102-118 and ACR 5 relating to the management of sheep in 19C.

There is not a problem with managing for sustained yield that needs to be addressed. By ADFG reports and all guide/outfitter testimony there is no biological concern to reduce the harvest of full-curl rams.

However, there is a problem with managing for the benefit of the people (Alaskans). There is a shortage of sheep in this area compared to recent historical numbers. There have also been too many guiding operations in this area for the number of sheep that are left there. This is primarily due to the numbers of sheep that used to be present, the proximity to



Anchorage, and the unregulated nature of guide permitting on state land. All of this is compounded by inexhaustible outside money and desire to hunt sheep.

These problems were addressed by the board of game by eliminating non-resident hunting in the area. Residents have given up their youth hunt and subsistence hunting in response as well. Resident hunters have only ever taken a very small portion of the rams in this area.

For all of these reasons there is no justification to restrict resident opportunity or provide opportunity to non-residents.

These proposals as they relate to the state Constitution-

- Restricting resident opportunity is not necessary for managing for sustained yield and goes against managing for the benefit of the people (Alaskans)

- Restricting non-resident opportunity is necessary to manage for the benefit of the people (Alaskans). Benefit is not defined as monetary. Money brought in by non-residents should not be rated any higher than any other benefit for the people (Alaskans).

I oppose Proposal 122. These hunts are already over-subscribed. If a person cannot participate in these hunts, they should not be applying.

I strongly oppose Proposal 123. This proposal would effectively open a market to purchasing permits.

I support Proposals 129 and 130 with amendments. There is a statewide problem with hunting with bullets that are ineffective for that purpose. There are .223 caliber bullets that are effective for hunting so I think a straight across caliber restriction would not be right. Limiting bullet design or minimum energy of the cartridge would be a better way.

I support Proposal 134 and oppose 135 unless it is amended. There should be a cap on non-resident allocation. This would better align with our Constitution by increasing the benefit to the people.

Alaska is being exploited by a new non-resident hunter with more funds and more knowledge at their fingertips than ever before. Resident hunters and our environment are



paying the price. Our regulations are so far behind the current nation-wide hunting situation it is frightening.

I support Proposals 136 and 137 with amendments. Low draw odds and over-subscribed hunts are an increasing issue. Non-resident permit allocation should first be capped. The fact is that there are too many hunters applying for too few hunts.

I support Proposal 139 with amendment and support Proposal 140. Leaving evidence of sex attached leads to meat spoilage. A hind quarter with evidence of sex attached is no better proof of sex of the animal than the head. The proof of sex requirement is just an excuse used by AWT to hassle hunters. Checking for wanton waste fulfills the same investigatory purpose.



Name: Jesse Dunshie

Community of Residence: Fairbanks

Comment:

Proposal 93 : Support

I submitted this proposal because drilling and plugging sheep horns is not necessary to accomplish the main objective of sealing rams. The main objective for requiring sealing of rams is to ensure they meet the legal requirements for harvesting and to collect age and length data from analyzing the horns of the ram. The department has sealing requirements for several species of game and furbearers, none of which utilize any sort of permanent marking. Plugging ram horns is the only permanent method utilized, but for what reason? Some of the furbearers sealed in Alaska are covered under the international CITES treaty, and they are not even permanently marked. Some sheep hunters hate the method, some are indifferent, but I can guarantee that none prefer it.

The department states several reasons for opposing proposal 93 but none of them make any biological or real enforcement sense. The horn shavings can be replaced with tissue sampled from the skull plate. If taxidermists need visual confirmation a ram has been sealed, a non-permanent marker or tag of some kind can easily be used or even a paper certificate from the department. If the plug was so crucial for law enforcement, then the wildlife troopers would have opposed this proposal, which they did not. The department states, requiring horns to be permanently sealed helps prevent exploitation of the resource. But ram horns can legally be sold in Alaska if separated from the skull, whether they are harvested or found dead and deadheads are not required to be sealed. Bighorn sheep from the lower 48 and sheep in Canada are managed much differently than Alaska's sheep, so why align practices for plugging? Canada's interpretation of full curl is different than Alaska's and we haven't switched to align ours. Most bighorn hunts are any ram, Alaska is very opposed to any ram hunts, even for draw tags.

Alaska is different on almost every aspect of sheep management when compared to other states and Canada, so why does Alaska need to follow suit on plugging ram horns?

The departments comments are basically stating plugging horns stays status quo, because we say so. That is an unacceptable answer.

Proposal 135: Support

There needs to be a cap on non-resident draw permits. Good opportunity for residents to hunt sought after species like sheep and mountain goats is dwindling rapidly. In some areas of the state non-residents are drawing up to 30% of goat tags some years on hunts open to both residents and non-residents.

Typically, the fewer permits available means that access is better or easier. Those are exactly the type of hunts that should be reserved for residents.

Proposal 135

Support with amendments

I support the portion of this proposal that is requesting to put a cap all non-resident drawing permit allocations. My suggested amendment to the proposal would be a 5% cap instead of the proposed 10%.

Most western states have gone to a decreased allocation for non-resident hunters. For example, Wyoming has capped all DIY non-resident hunters at 4% for most species. In some instances a non-resident has a better chance of drawing some coveted tags than a Alaskan resident does. A prime example is the DC827 caribou tag. Non-residents have a set 10% allocation of the tags for DC827 so their chances are substantially higher than residents of drawing a tag. 5% would be much more appropriate for such a highly sought after tag.



PC41

Name: Nancy Eagleson

Community of Residence: Denali Park

Comment:

I strongly oppose Proposal 101. Dahl Sheep have never provided for high levels of human consumption. There is no conclusive data showing predation is the main cause for sheep declines. Habitat loss, weather and climate change have had major impacts on sheep populations. I have lived and worked in the Denali area for 45 years and have experienced the profound changes of climate, particularly the winter rains and icy conditions that challenge all wildlife populations, particularly ungulates. I was on the Middle Nenana F&G AC for 16 years. I strongly support reducing hunter allocations for sheep, particularly for out of state hunters. Sheep should not be added to the list of game animals allowed for Intensive Management for predators in Unit 19C. I strongly oppose Proposals 126, 127, & 128 allowing night vision and thermal optics for hunting bears. These proposals go against the concept of Fair Chase, are not supported by Wildlife Troopers and as recently as 2016 was opposed by the BOG. I support Proposal 132 and 133, to not allow hunting of wolverines by snow machines. Again, this goes against the ethics of Fair Chase and there is not sufficient data on wolverine numbers to support this method of hunting.

I support Proposal 131, requiring identification on traps. I live in the Denali area & know of many dogs, including my own, who have been caught in traps with no way of knowing who the owner was to ask for help to remove the pet. The guide published some time ago regarding how to remove a pet from a trap is unreasonable & in most instances impossible for a single person trying to remove their injured & traumatized pet. Please support this proposal.



Eastern Interior Alaska Subsistence Regional Advisory Council

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In Reply Refer To:
RAC.B25015

MARCH 06 2025

Jake Fletcher, Chair
Alaska Board of Game
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Fletcher,

I am writing to you on behalf of the Eastern Interior Alaska Subsistence Regional Advisory Council (Council) to provide the Council's comments on proposals that will be considered during the March 21-28, 2025, Statewide Board of Game (BOG) Meeting.

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

The Council held a public meeting on February 19-20, 2025, in Fairbanks, and took up 11 BOG Proposals. Please see the Council comments below.

Proposal 88 – Add wood bison to the list of game species allowed to be taken for cultural purposes under a permit issued by the Alaska Department of Fish and Game

The Council **supported** **Proposal 51 on a 9-1 vote.** Alaska Natives customarily and traditionally harvested and used wood bison for subsistence prior to their expiration. This is documented through oral history and the archeological record. In the future, when a harvestable surplus of wood bison becomes available, the ability to harvest them for cultural purposes must be allowed due to their historical use for subsistence. The cultural harvest of wood bison was

severed only because of their extirpation. The reintroduction of wood bison provides a chance for cultural practices and use of wood bison to be revitalized. Allowing wood bison to occasionally be harvested for potlatches and other cultural events will enable the traditions of their harvest and use to be passed on.

Proposal 89 – Require nonresident moose hunters to attend a hunter orientation course and be accompanied by a registered guide or resident family member within the second degree of kindred

The Council **supported** **Proposal 89 on a unanimous vote.** The Council agreed that these should be requirements statewide for nonresident moose hunters. The Council's hope is that this would increase nonresidents' awareness of proper firearm selection and meat care, and reduce waste of meat.

Proposal 92 – Require sheep hunters to complete an online education course

The Council **supported** **Proposal 92 on a unanimous vote** but noted that this requirement should only apply to first time sheep hunters. The Council notes that this will help increase awareness of how to properly identify legal sheep in the field. Because it is online, it will not be a significant burden to hunters.

Proposals 95 & 96 – Repeal the age criteria for the definition of full-curl horn ram

The Council **supported** **Proposals 95 and 96 on a unanimous vote.** The Council noted that it is very difficult to age a sheep by counting annuli, especially in the field at a distance. This proposal would focus harvest on only full curl rams, which is important due to the current low sheep numbers. It would also reduce the harvest of sub-legal rams.

Proposals 97 & 98 – Lengthen the time period hunters are restricted from using aircraft for hunting sheep

The Council **supported** **Proposals 97 and 98 on a unanimous vote.** The Council noted that aircraft should not be used for spotting sheep at any time, including during youth hunts. The Council agreed with the proponents that passing these proposals would reduce pressure on sheep during a time when they are experiencing conservation concerns.

Proposal 99 – Shorten the time period hunters are restricted from using aircraft for hunting sheep, and modify the use of aircraft restrictions

The Council **opposed** **Proposal 99 on a unanimous vote.** The Council noted that sheep are facing a conservation concern and use of aircraft to hunt them should not be liberalized at this time.

Proposal 100 – Limit nonresident sheep hunting opportunity statewide so that nonresidents do not harvest more than 35 percent of total sheep harvest from any game management subunit

The Council **opposed** **Proposal 100 on a unanimous vote.** The Council noted that this proposal

is way too complicated to be dealt with in this manner. Every region and sheep population faces different issues, and the one size fits all approach of this proposal is not appropriate. Instead, the Council advocates for using regional sheep working groups or coalitions to bring stakeholders together and discuss proposal ideas on a region-by-region basis. The Council has sent out an invitation to Advisory Committees in the Eastern Interior region to form a sheep management coalition to discuss such topics together.

Proposal 101 – Add sheep to the list of species identified as important for providing high levels of human consumptive use

The Council **supported** **Proposal 101 on a unanimous vote**. The Council noted that this proposal is very important because sheep are not currently listed as a species eligible for intensive management. Sheep populations are in decline, and tools for helping them recover are limited without the passing of this proposal. Intensive management is a prerequisite for any predator control efforts.

Proposal 123 – Allow remuneration to be provided to proxy hunters

The Council **opposed** **Proposal 123 on a unanimous vote**. The Council feels strongly that people should not be paid to go hunting or paid to give their permit to someone else. The proxy hunting system exists to help people get the food they need that they would otherwise be unable to obtain on their own. This system is based on the values of helping others, and it should not be monetized or turned into a market hunting system. Additionally, the Council notes that the proponent wrongly states that remuneration is allowed in the Federal designated hunter permit system. It is not.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Brooke McDavid at (907) 891-9181 or brooke_mcdavid@ios.doi.gov.

Sincerely,



Robert “Charlie” Wright, Sr.
Chair

cc: Federal Subsistence Board
Eastern Interior Alaska Subsistence Regional Advisory Council
Office of Subsistence Management
Interagency Staff Committee
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of
Fish and Game
Administrative Record



PC43

Name: Kolton Eischens

Community of Residence: Wasilla

Comment:

99: Why would we make hunting sheep easier and allow planes to locate sheep?

STRONGLY OPPOSE

100: Great idea, with the help of ADFG and bios this could be great. Every other state sees 90/10 harvest residents to NR maybe this will also help with air charters having to take residents as well instead of "only taking guides" for business.

111 and 112: I strongly agree and wish this was state wide. Promoting hunters to shoot more mature rams and if they do shoot less mature rams, waiting a year or two before harvesting another ram. Sheep are trophy animals not animals to be considered "subsistence". Either of these are great starts.

115: STRONGLY OPPOSE sheep are not subsistence animals. Using your 180,000 dollar cub to hunt for "subsistence" is goofy.

118: I spent 20-30 days the last 3 years in 19 and can see that the guided NR hunters have absolutely demolished the sheep population. Having outfitters taking 20 rams a year is not a long term success.

135: Strongly agree and should for sure be a capped NR number. I apply all over the L48 for 8-15% of the tags being available to NR.



PC44

Name: Paul Forward

Community of Residence: Girdwood/Kotzebue

Comment:

89: **SUPPORT:** I have hunted moose in Alaska for well over 30 years and, in areas where non-residents frequent, have repeatedly seen poorly handled meat. I honestly think that we should consider moving moose to the list of species for which non-residents require a guide. In lieu of that, we should require additional education for NR's who wish to hunt moose in AK.

90: **SUPPORT:** I've written about this in my proposal as well but there are plethora reasons why this is a good proposal that will both improve goat conservation and increase opportunity

91: **SUPPORT:** I am writing to express my **strong support** for **Proposals 90 and 91**, which would require all mountain goat hunters in Alaska to complete an **online mountain goat identification quiz** before hunting. This requirement will not only benefit **mountain goat conservation** but also **increase hunter opportunity** by reducing the unnecessary harvest of female (nanny) goats.

As a hunter, I recognize the importance of ensuring sustainable populations so that future generations can also experience the opportunity to hunt mountain goats. One of the greatest



challenges in mountain goat management is reducing the harvest of nannies, as their removal from the population has long-term consequences due to their slow reproductive rates. By requiring all hunters to complete a sex identification quiz, we can ensure that more hunters are educated on how to distinguish between billies and nannies, leading to **a more sustainable harvest and greater long-term hunting opportunities.**

One major reason this proposal is **beneficial to hunters** is its impact on the **goat point system used in registration hunts.** In many areas, each hunt unit is assigned a set number of "goat points," which are deducted as hunters harvest goats:

- **Harvesting a billy results in the deduction of one goat point.**
- **Harvesting a nanny results in the deduction of two goat points.**

Since the total number of available goat points determines how many hunters can participate in a given season, **excessive nanny harvest reduces the number of hunters who can participate.** By helping hunters identify and target billies, this proposal will **allow more hunters to hunt each season, increasing overall opportunity while conserving the goat population.**

Additionally, this quiz requirement is a simple, low-cost measure that does not impose additional restrictions on hunting but rather provides education to improve hunter decision-making. A similar requirement has already been implemented in Units 1, 4, 5, 6C, and 6D, where it has successfully **reduced the percentage of nannies harvested.** Expanding this education effort statewide will benefit both hunters and wildlife management efforts.

I urge the Board of Game to approve Proposals 90 and 91 to enhance hunter education, increase sustainable hunting opportunities, and ensure healthy mountain goat populations for years to come.

92: **SUPPORT:** with statewide sheep declines and a concerning trend toward the harvest of young rams, improving education for sheep hunters can only be a positive

97: **SUPPORT:** I fully support this proposal to extend the restriction on the use of aircraft for locating sheep during the open sheep hunting season. The Board of Game's existing regulation has already made a positive impact by promoting a fair chase hunting experience, and this proposal builds upon that success by addressing a significant loophole—allowing aerial scouting during the youth hunt beginning on August 1. Teaching young hunters the value of fair chase from the outset is critical, and continuing to allow aerial scouting during this period sends the wrong message about ethical hunting practices.

Additionally, the proposal aligns with the principles of fair chase, as recognized by the Boone and Crockett Club, which has long condemned the use of aircraft to locate and pursue game. Extending the restriction to August 1 would prevent hunters from gaining an unfair advantage by locating sheep before the general season, ensuring that all hunters have a more equitable experience.



Furthermore, this change could enhance safety for pilots and hunters alike. Currently, the days leading up to August 10 see a flurry of low-altitude scouting flights, increasing aviation hazards. Extending the restriction to August 1 would likely reduce the number of pilots engaging in last-minute aerial scouting, creating a safer environment in high-traffic hunting areas.

This proposal represents a logical step forward in maintaining ethical hunting standards, fostering fair chase principles, and potentially improving safety conditions. I strongly encourage the Board of Game to adopt this measure to preserve the integrity of Alaska's sheep hunting tradition.

98: **SUPPORT:** for the same reasons listed above in support of proposal 97

99: **OPPOSE:** I strongly oppose this proposal to shorten the time period restricting aircraft use for locating Dall sheep and to modify the existing regulations. The logic behind this proposal is fundamentally flawed and ignores the clear benefits the current regulation provides to both fair chase ethics and aviation safety.

The current restriction, which has been in place since 2015, was implemented to prevent unethical hunting practices such as spotting and pursuing sheep from the air. The proposal's suggestion that these restrictions are "too long and overly restrictive" fails to acknowledge the well-documented benefits of limiting aerial scouting. The Boone and Crockett Club has long condemned the use of aircraft to locate and pursue game, recognizing that it undermines the principles of fair chase hunting. Shortening the restriction period would only serve to reintroduce unfair advantages for those who have access to aircraft, at the expense of other hunters who rely on traditional hunting methods.

Additionally, the proposal does not adequately address the potential increase in aviation hazards that could result from relaxing the current rules. The existing regulation helps mitigate the risks associated with concentrated low-altitude scouting flights before the season begins. By allowing aerial scouting after just 11 days, this proposal would encourage a rush of aircraft activity in prime sheep habitat, leading to increased air traffic, reduced situational awareness, and a higher likelihood of mid-air conflicts.

The claim that the current regulation has driven resident hunters away is misleading. The regulation applies equally to all hunters and was implemented to promote a fair and ethical hunt for everyone. If anything, rolling back these restrictions would further favor those with access to private aircraft while diminishing the experience for those who hunt on foot, ultimately decreasing the overall fairness of the hunt.

This proposal disregards the clear ethical and safety justifications behind the current aircraft restrictions. The Board of Game should reject this attempt to weaken fair chase principles and maintain the existing prohibition through September 20th to ensure a level playing field for all hunters and a safer hunting environment.

100: **SUPPORT:** In times of resource scarcity the state is obligated to favor opportunities for resident hunters. This proposal suggests a fair and equitable way forward.



102, 103, 104, 105, 106, 107: **OPPOSE:**

All of these proposals essentially request that the NR sheep hunt be reinstated.

While the historical cyclic patterns of Dall sheep populations are well-documented, current declines in Unit 19C and across Alaska are not solely part of a natural cycle. Climate change is playing a significant role, with rising temperatures, altered snowfall patterns, and more frequent extreme weather events leading to habitat degradation, increased mortality, and reduced lamb survival. Unlike past fluctuations, these environmental stressors are unprecedented and make recovery far less certain.

Although full curl management has been in place since 1992, ongoing research suggests that this strategy alone may not be adequate for maintaining stable populations under current conditions. The claim that predator impacts and weather are the primary issues ignores the reality that climate-driven changes in habitat quality are making sheep more vulnerable overall.

The argument that hunting numbers have declined by 62% in recent years and are thus "self-regulating" does not necessarily indicate sustainability. It could also reflect a population decline so severe that fewer hunters are willing or able to pursue sheep. Furthermore, the assertion that these sheep will "die of natural causes and go unused" oversimplifies the issue. Allowing unrestricted nonresident harvest at a time of ecological instability risks further depletion of a population that is already struggling to recover.

Given that nonresident hunters account for the majority of sheep harvested in this area, limiting their take is a logical and targeted approach to ensure sustainable management. Instead of maintaining the status quo, a precautionary approach that prioritizes resident hunting opportunities while closely monitoring population trends is the most responsible path forward. The one exception being the idea to transition the entire unit to archery only which would likely allow for maintenance of full hunter opportunity.

108: **SUPPORT**

109: **SUPPORT**

1. **There is precedent for this! Those who argue that this restricts freedom or creates a slippery slope are not acknowledging that we already impose many restrictions to maintain fairchase and maintain sustainable harvest. We have many restrictions on weapons, use of airplanes and drones and even the very idea of having only certain times of year and areas open for hunting and closing other times and areas are all ways that we restrict or restrain harvest. Even the very concept of having bag limits is essentially is a restriction put in place to limit the harvest but maintain opportunity for hunting. An archery only area is no different.**
2. **Maintains Nonresident Hunting Opportunity** – This proposal provides a balanced approach by allowing nonresidents to continue pursuing sheep in Unit 19 while significantly reducing harvest rates. Keeping the season open ensures that nonresidents can still participate in Alaska's hunting heritage and contribute to conservation funding through licenses and fees.



3. **Supports Local Outfitters and Guides** – Closing nonresident sheep hunting entirely has economic consequences for local outfitters and guides who depend on this activity for their livelihoods. Allowing archery-only hunts provides a compromise that keeps these businesses viable while addressing conservation concerns.
4. **Minimal Impact on Sheep Populations** – Due to the added challenge of hunting sheep with a bow, the harvest success rate would be significantly lower than with firearms. This means that very few rams would be taken, aligning with the goal of limiting the take while still allowing hunting.
5. **Scientific Data Supports Weather as the Primary Cause of Sheep Decline** – We know well that this is a not a temporary problem but rather part of a long term and worsening change of weather trends and habitat. We must design strategies that are forward thinking and provide long term solutions. We cannot wait until things “go back to normal”.
6. **Bowhunting as a Conservation Tool** – This proposal allows for the collection of valuable data on how archery-only regulations can be used to manage game populations effectively. The findings could be used in future Board of Game discussions to develop regulations that balance conservation with hunter opportunity.
7. **Ensures Ethical and Fair Chase Hunting** – Bowhunting is widely recognized as one of the most challenging and fair-chase methods of hunting. By requiring archery-only hunting for nonresidents, this proposal promotes an ethical, low-impact approach to sheep hunting in Unit 19.
8. **Future Policy Adjustments Based on Real Data** – Rather than making blanket closures based on perceptions, this proposal allows the Board of Game to gather actual harvest and impact data. Future decisions can then be based on real evidence rather than assumptions.
9. **Promotes a Balanced and Sustainable Hunting Model** – The proposed archery-only regulation ensures that hunting remains a sustainable practice while mitigating concerns about overharvest. This solution strikes a balance between conservation, hunter opportunity, and economic sustainability.

110: OPPOSE: The Resident harvest has been consistently a small fraction of the total in this area and limiting Resident harvest will do very little to address the issue while simultaneously decreasing hunter opportunity for Alaskans.

111: SUPPORT:

I strongly support the proposed regulation to adjust the sheep bag limit in Unit 19C for resident hunters based on the age of the ram harvested. This strategy represents a necessary and responsible step toward ensuring the long-term sustainability of Alaska’s sheep populations while maintaining opportunities for future generations of hunters.

Alaska’s Dall sheep populations have been in decline for years, with ongoing research based on concerns that Full Curl Management may not be adequate as a management strategy. The age structure of harvested rams in Unit 19C has been trending younger, raising concerns about maintaining a stable breeding population and the overall health of the herd. While the adoption of Proposal 204 and the five-year moratorium on nonresident sheep hunting was a significant step toward conservation, additional measures are needed to encourage more selective harvesting practices among resident hunters.



This proposal offers a balanced and science-backed solution by incentivizing the harvest of older rams while discouraging the harvest of younger rams. By allowing hunters who harvest an 8-year-old or older ram to continue hunting in the following season, while instituting temporary ineligibility periods for those who take younger rams, this regulation encourages patience and selectivity in the field.

Importantly, this regulation does not alter Full-Curl Management standards but instead provides an additional conservation tool. It helps to ensure that younger rams have more opportunity to contribute to the breeding population before being subject to harvest, which is critical given the environmental pressures and habitat changes affecting sheep populations.

If nonresident hunting resumes after the current moratorium, adopting a similar stratification system for nonresident hunters and guides will further reinforce responsible hunting practices and long-term conservation goals.

Alaska's hunting community has a duty to uphold ethical, science-based wildlife management practices that support both conservation and hunting opportunities. This proposal provides an innovative and reasonable solution to address the decline in sheep populations while maintaining a fair and functional hunting system. I urge the Board of Game to adopt this proposal to ensure the continued health and sustainability of Dall sheep populations in Unit 19C and beyond.

112: SUPPORT for the same reasons as stated above

114: SUPPORT: Here's a statement of support for the proposal:

I fully support the proposed transition of all sheep hunting in Unit 19C to archery only, for both resident and nonresident hunters. This proposal presents a balanced approach that maintains hunting opportunities while addressing the critical need for conservation of the sheep population in this area.

Over the past several years, the sheep population in Unit 19C has faced significant declines despite the existing Full Curl Management strategy. The recent implementation of a five-year moratorium on nonresident sheep hunting reflects the urgency of the situation. While this moratorium will help limit harvest, it also restricts opportunities for nonresident hunters. A long-term, sustainable alternative is needed—one that allows for continued hunting access while reducing the impact on the population. Transitioning to an archery-only framework provides exactly that.

Key Justifications for Support:

1. Reduced Harvest While Maintaining Opportunity

Archery hunting has a naturally lower success rate compared to rifle hunting, which will significantly reduce overall harvest pressure on the declining sheep population. However, this shift does not eliminate opportunity; it simply introduces a greater challenge that aligns with fair-chase hunting principles. Any hunter—resident or nonresident—who is willing to adapt to archery methods will still have access to the resource.

2. Proven Success of Archery-Only Sheep Hunts



Other archery-only sheep hunts, such as Alaska's DS140/141 and DS240/241 draw hunts, have demonstrated that archery hunting allows for extensive opportunity while keeping harvest numbers sustainable. These hunts have been in place for years without negatively impacting population levels, proving that an archery-only approach is an effective conservation tool. Additionally, examples from Canada, such as the Canmore "Bow Zone" and the Todagin Mountain area, show that archery hunts can be highly popular while maintaining stable populations of mature rams.

3. Addressing High Success Rates and Sustainability

In recent years, rifle hunting success rates in Unit 19C have been exceptionally high—over 40% for resident hunters and up to 80% for nonresidents. These figures suggest that current harvest levels could be unsustainable in the face of a declining population. By shifting to archery-only, we introduce a natural limitation on success rates while still allowing skilled and/or lucky hunters the chance to be out enjoying the mountains and potentially to harvest a ram.

4. Archery as an Accessible and Ethical Alternative

The idea that transitioning to archery-only reduces hunting opportunity is a misconception. Modern archery equipment is widely available, affordable, and accessible to anyone willing to invest the time to learn. With bows costing less than many rifles and proficiency achievable in a matter of weeks, this shift does not exclude hunters—it simply challenges them to refine their skills in a different way.

5. There is precedent for this! Those who argue that this restricts freedom or creates a slippery slope are not acknowledging that we already impose many restrictions to maintain fair chase and maintain sustainable harvest. We have many restrictions on weapons, use of airplanes and drones and even the very idea of having only certain times of year and areas open for hunting and closing other times and areas are all ways that we restrict or restrain harvest. Even the very concept of having bag limits is essentially is a restriction put in place to limit the harvest but maintain opportunity for hunting. An archery only area is no different.

By implementing this change, we can ensure that Unit 19C remains open for hunting while promoting long-term conservation. This proposal is a proactive step toward protecting the Dall sheep population while preserving hunting heritage for future generations. I urge the Board to approve this proposal as a responsible and effective wildlife management solution.

115: OPPOSE-there is too much concern for sheep population to continue with extended and/or subsistence harvest

116: OPPOSE -there is too much concern for sheep population to continue with extended and/or subsistence harvest

117: OPPOSE

122: SUPPORT

126: OPPOSE



130: SUPPORT

131: SUPPORT

132: SUPPORT

133: SUPPORT

134: SUPPORT

138: SUPPORT



Name: Colt Foster

Community of Residence: Eagle River

Comment:

My name is Colt Foster and I'm a lifelong Alaskan that has hunted sheep in various mountain ranges of AK almost every year since 1989. Obviously, I've seen highs and lows of sheep hunting in this state and I'm very concerned about the future of sheep hunting especially for the younger generations. My children are 11 and 13 now and have enjoyed being in the mountains hunting sheep (unsuccessfully) along with other animals. I think as a state we need to preserve hunting opportunities for sheep, while having a clear preference for residents of this state. By limiting nonresident sheep hunters we can reduce harvest numbers which helps current low population densities and we can reduce conflicts between hunting parties in the field. This will improve the overall hunting experiences for everyone involved, especially younger hunters. So I will focus my comments on sheep hunting related proposals today.

#92- Support - More education is always a good thing and I feel this could help reduce the number of sublegal rams taken. All hunters (resident, nonresident and guides) should be required to complete this.

#95,96- Oppose - Harvesting older rams is the goal so we should continue to allow the 8 year old legality. I understand this gets used to bail out hunters that make a mistake but I have handled many 8-11 year old rams over the years that were not full curl.

#100 - Support - I agree that unlimited nonresident sheep hunting in much of the state has led to overharvest and negative conflicts in the field. Residents should have the priority just like they do in every other western state which consistently limit nonresident tags for sheep, moose, goats and premiere elk/deer hunts to 10% of total tag numbers.

#101 - Support - This change in status should make it easier for ADFG to implement predator control programs to benefit sheep overall.

#102,103,104,105,106,107,113,117- Oppose - Sheep populations need to continue to rebound in 19C and appear to have started to without the pressure from nonresident hunters. This is shown by slight increase in resident hunter harvest in 2024 compared to 2023. This minimal resident pressure has resulted in quality hunting experiences while not stressing the herds. This should continue to improve population dynamics and overall numbers.

#108 - Support - Although I would prefer continued closure of nonresident sheep hunting in 19C for the 5 years as approved previously by the board of game, this proposal could be a good compromise for future management of the unit. Unlimited nonresident sheep hunting is not sustainable and alternative options must be found. When the sheep population rebounds enough then nonresident tags should be issued through a drawing permit system of some sort.

#109,114- Oppose - I don't believe weapon restrictions are the solution in 19C as this would not do anything to reduce stress on the sheep population or reduce overcrowding and hunter conflicts.

#110- Oppose - I could eventually support a proposal like this if nonresident sheep hunter numbers were drastically limited by a drawing permit system. Unfortunately, a rule for one ram every two years for residents is not comparable to one ram every four years for nonresidents as very few individual nonresidents book multiple hunts in that short of a time period. So this would only limit resident hunters while guide operations would continue to book multiple nonresident hunters every single year.

#111,112 - Oppose - I like the goal of these proposals to encourage harvest of older animals as this is always the most sustainable long term for an animal population. However there's too much inconsistency in the sheep aging process and I foresee problems with disagreements, enforceability, lawsuits and even possible corruption.

#115,116- Oppose - While the sheep population is rebounding I think it is counterproductive to kill rams in their prime (3/4 curl or smaller) as they have the highest chance of survival.

#118- Oppose - With Unit 19C already closed to nonresident sheep hunting this proposal seems unnecessary but harvest statistics were not included.

#190 - Oppose - There are many things of concern with this proposal which should make it basically unusable. First, the guide concession program is a whole separate issue and should be treated as such. To have it vaguely put in this proposal as a contingency makes this unrealistic. It will be difficult to have a true guide concession program up and running by 2028 and I strongly oppose the idea of opening 19C back up to unlimited nonresident hunting at that point if it is not. I also oppose closing resident sheep hunting in 2025. Right now the limited resident pressure in the unit is sustainable and the sheep population appears to be increasing. If we displace these resident hunters to other units it will cause increased pressure/harvest and more in the field conflicts for the remainder of open sheep units. The last thing we need is more areas having similar issues as 19C.

#192 - Support - There is a lot of info to digest with this proposal but I agree with the ideas behind it. I urge the board to look to the long term goal of having quality sheep hunting for future generations while having a priority for resident hunting opportunities.

Thanks to the board for their efforts on these complicated issues and thanks for taking the time to read my comments.



Name: Andrew Freeburg

Community of Residence: Unalaska Alaska

Comment:

Proposal 146

I support Proposal 146. There is a free-roaming cat issue in many Alaska communities, and we need to be proactive and humanely be able to trap, spay/neuter and release feral cats. I urge the board to amend current regulation 5 AAC92.029 that prohibits the release of sterilized cats back into their environment, a restriction that basically bans TrapNeuterReturn (TNR) programs in Alaska.

The cycle of cat overpopulation will continue if TNR is banned.

How TNR works:

1. Trap - Humanely capture and assess cats for health and if socialized.
2. Neuter/Spay - Cats are surgically sterilized, vaccinated, and marked for identification.
3. Return - The sterilized and vaccinated cats are returned to their territory, and can no longer reproduce, and help deter the influx of new, unaltered cats.

Benefits of well managed TNR programs:

1. Population Control - TNR prevents new litters and gradually reduces the overall number of feral cats.
2. Reduce Predation Pressure: Sterilized cats hunt less and defend territory, leading to a decline in wildlife predation over time.
3. Improved Public Health: Vaccinated, monitored cat colonies reduce the spread of disease and minimize nuisance cat behaviors.

I respectfully request that the Board of Game revise the current ban on releasing sterilized cats and allow TNR programs under licensed animal welfare organizations.

Many states and municipalities in the US have successfully implemented TNR programs that are effectively reducing feral cat populations.

TNR is a way for Alaska to compassionately, humanely and effectively reduce feral cat populations and reducing the feral cat populations will benefit the feral cats, wildlife, the environment and Alaskans.

Sincerely,

Andrew Freeburg

PO Box [REDACTED]

Dutch Harbor, AK 99692



Name: Tyler Freel

Community of Residence: Fairbanks

Comment:

Proposal 130

I would like to voice my opposition to Proposal 130, which requests to establish a minimum of .243 caliber for taking moose. I have hunted moose for many years and through my occupation as a writer for Outdoor Life, am able to test at tremendous amount of ammunition.

I believe this proposal to be well intended, but it would be an unnecessary and ineffective restriction on hunters statewide — particularly on rural hunters. The arguments in favor of the proposal are shallow and surface level in their understanding of terminal ballistics and modern ammunition, and many of the same arguments could be made for many cartridges and bullets larger than .223 and .243 caliber as well. Ultimately, it assumes that there is a problem with too many moose being wounded and lost because of using a .223, without providing any evidence that this is causing a significant drop in the harvestable surplus.

In my 23 years hunting moose, I've observed that wounding loss happens just as often with larger caliber rifles as a result of poor shooting or hasty decision making.

The proposal's language is correct in stating that perfect shot placement is not always a guarantee, but the variables at play can have the same negative impact on bullets from much larger cartridges too. This is, again, a matter of education and decision making by the hunter in choosing the most ethical shots to take to harvest game.

It is correct that lots of commercially loaded ammunition is intended for furbearers and many bullets aren't a good choice for moose. However, there are plenty of bullets that ARE adequate for moose under reasonable conditions. The proposal's language oversimplifies and casts a wide net over .223 ammunition types, making some assertions that are not really correct. There are, for example, a number of ballistic-tipped bullets that are NOT intended to "explode," but rather offer great penetration. A couple examples of this are actually target bullets, the Hornady ELD-M, and Sierra TMK, which are constructed similarly to older cup-and-core hunting bullets that hunters have used for many decades in .223 and .222 Rem. before that. Nationwide, there have been many hunters using these on big game and gathering data that supports their potential as adequate big game bullets when used within reasonable parameters.

There are also lots of factory ammunition options which are designed specifically for controlled expansion and deep penetration — such as Barnes TSX and Hornady CX.

Though it's certainly important for moose hunters to choose adequate ammunition, arguing that because there is lots of varmint ammunition made for .223, the cartridge shouldn't be allowed for moose isn't logical or fair to hunters. There is lots of ammunition made for .243, 6.5mm, and .308 that isn't suitable for moose hunting either. Ultimately, the hunter needs to choose what will work best in the rifle they hunt with.

In conclusion, I think that a regulation like this would be an unnecessary restriction that would unfairly target rural residents (who likely use the .223 more for moose than any other category of hunters), and not really address the issue (if there is one) of hunters choosing inadequate bullets for moose. If I were to

guess, I'd say there are more moose wounded and lost with archery equipment and .30-caliber rifles than with .223 rifles statewide. This is a hunter education and decision-making issue, not a cartridge issue.



PC48

Name: Jayden Frelin

Community of Residence: Anchorage

Comment:

I support prop. 127. If we are to allow said forward looking thermal devices, and night vision devices, for hunting purposes it should be written for that exactly. Hunting. Most people who would be using these devices would be hunting and not trapping. Simply making it legal under the definition of trapping just forces us people to spend more money on another license. Furthermore, there are many units that are over run with predators which has negative impacts on the environment. Unit 16 is an example of this. Allowing these devices, would allow for these specific animals specifically to be targeted easier. (I do not support for moose/caribou hunting)



PC49

Name: Garrett Frost

Community of Residence: Kodiak

Comment:

Board of Game members,

Regarding proposals 188 and 189 involving re-allocating bison permits for those successful applicants whose permits for Delta bison were suspended.

We understand the circumstances surrounding this unfortunate scenario is no fault of anyone and a freak occurrence.

My 14 yr old son, Easton, was one of the many successful applicants whose tag was unfortunately rescinded. Due the current process and draw regulations, this unique tag is basically a "once in a lifetime" opportunity. Even if allowed to apply again within the 10 year window, the chances of drawing a second time are extremely low. This tag is one that has to be looked at differently compared to other AK species.

For our situation, it's completely about a 14 yr old boy who wanted to hunt bison.

Being selected successfully to obtain this tag was a huge excitement for my son and a great opportunity for the two of us to spend more time together in the field. This opportunity is a unique one unlike many others in AK and the ability to teach as a parent and learn as son is invaluable.

I humbly ask that you give great consideration to approving the reallocation of bison permits to those who lost them as proposed.

Thank you for your time.

Sincerely,

Garrett and Easton Frost



PC50

Name: Kay Frost

Community of Residence: Anchorage

Comment:

I am writing in support of Prop 146 to amend ACC92.029

The feral cat populations in Anchorage are growing. Strays in my area are a common site. Especially around the vacant and industrial buildings in midtown. I have caught and tried to adopt out several myself but see no realistic end to the problem and that means many many animal will / are suffering. Veterinary cost have skyrocketed and many people who would like to, can not afford to fix their cats. Let alone the people who are adopting one off the streets simply because they do not want it to suffer.

The only low income clinic is still costly and has a very long waiting list. Their clinic is constantly overwhelmed and underfunded for the need. We really need a free spay/ neuter program for both cats and dogs. City rescues are constantly full and there are more rescues, non profits and private people rescuing then ever before and it is still over capacity with the amount of animals in need. PLEASE take a step in the right direction and PASS Prop 146.

PLEASE consider a way the State/ Moa could support a free or a least very low cost spay/neuter program. In the long run it will save countless amounts of animals from suffering and bad ownership. It will also save the State/ Moa money on the amount of animals in the system and the long run costs.

Sadly, Nothing there is to much of will ever be valued 😞

Thank you for your time,

Kay



PC51

Name: Michael Gawel

Community of Residence: Dededo Guam

Comment:

Michael Gawel comments on Proposal 101. listing Dall Sheep for Intensive Management.

I oppose this proposal.

I base my opposition on my familiarity of the Dall Sheep populations in and near Denali National Park and sheep hunters access potentially through our private property. in the foothills of the Alaska Range. I have had discussions with successful Alaska resident sheep hunters who have undertaken difficult and dangerous hunts as a sporting challenge and have shared their sheep meat with our family. I worked for National Park Service at Denali several years as a Ranger Naturalist and conducted ecological research on Denali National Park predators and food chains for my thesis at Yale School of the Environment.

I believe the numbers of Dall Sheep hunted for meat annually are very small and do not justify the listing by BOG under "Intensive Management"



Friday, March 7, 2025

Dear Members of the Alaska Board of Game:

We the undersigned support Proposal 86. Alaskans want evidence-based sea duck management that promotes the long-term viability of populations.

Proposal 86 would provide essential and cheap data to monitor changes in harvest. We are asking that:

- Hunters possess a paper or electronic harvest record card for sea ducks.
- After taking a sea duck into possession, hunters must record all required information on the harvest record card or through a mobile application.
-

Why Do We Need to Change Sea Duck Management in Alaska?

Accurate sea duck harvest numbers are needed to assure hunt opportunities now and in the future. Alaska's migratory bird harvest reporting system, known as the Harvest Information Program, or HIP, invites a small number of randomized voluntary harvest reporting. This approach provides slim and spotty statewide information, with no ability to monitor regional variations. As a result, the state has never adjusted bag limits on the basis of HIP reporting, according to ADF&G managers.

Alaska does not currently require sea duck harvest reporting, since these birds are classified as small game. Harvest reporting isn't typically required for small game, because, in general, these species are evolved to recover quickly from big drops in population. But sea ducks do not recover quickly, which means there are long-term negative effects of over-harvest. According to the Sea Duck Joint Venture — a project in partnership with US Fish and Wildlife, the Pacific Flyway Council, USGS, and Ducks Unlimited Canada, and others — sea duck populations are slow to recover for the following reasons:

1. Sea ducks are known to have a remarkable degree of site fidelity—around 5 miles or so, according to studies—which means that if an area's population is depressed, birds from other areas will not boost recovery.
2. In general, sea ducks do not breed until they are 2 or 3 or so years old.
3. They lay only one clutch of eggs per year, in contrast with the 2 or 3 for many dabbling ducks.
4. They have significantly lower chick survival rates than other ducks.



Sea duck populations across the United States have fallen 30% since 1970, and they remain in decline, according to the U.S. Committee of the North American Bird Conservation Initiative's "[2022 State of Birds Report](#)". On the bright side, the report notes that efforts at conservation have been shown to be effective.

This proposal is supported by three consecutive years of Kachemak Bay Community Science Sea Duck Surveys—a local annual effort of 10 boats and over 30 people. In 2020/21, residents and hunters in Kachemak Bay noticed a significant increase to sea duck hunting pressure, as a result of the arrival of a few more guides. So, local birders began monitoring populations to create a population index. Our population index does not show total number of birds in Kachemak Bay, but by focusing on a few areas with dense sea duck populations, we are able to see population trends. Our data shows that populations have not bounced back after a significant harvest. Fish and Game has historically monitored sea duck populations in Kachemak Bay, but they have not surveyed in Kachemak Bay since several years before community science surveys began, so our data is the only record of this trend.

What are sea ducks?

There are 15 species of sea ducks in several groups including the eiders, scoters, goldeneyes, mergansers, the harlequin and long-tailed ducks, and bufflehead.

In general, sea ducks are diving ducks, who have a high degree of site fidelity--returning every year to the same place, sometimes within 5 miles of their wintering grounds. Many Alaska sea ducks spend their entire lives in the state, wintering in the protected, ice free waters of places like Kachemak Bay and Prince William Sound. Many summer in the boreal forests of the Yukon-Kuskokwim Delta, where they lay eggs and rear their chicks.

From a management perspective, there are important differences between sea ducks (diving ducks) and dabbling ducks, like teal or mallards. Dabbling ducks, in general, do not have a high degree of site fidelity and have a high rate of reproduction. Importantly, according to the USFWS, Pacific Flyway population estimate of total ducks--the basis for bag limits in Alaska and the Lower 48--"**excludes** scoters, eiders, long-tailed ducks, mergansers, and wood ducks because the survey area does not include a large portion of their breeding ranges."

Please pass Proposal 86 to ensure the long-term viability of sea duck populations.

Sincerely,

Dave Eckert

[REDACTED]

Homer, AK 99603

Brenda Dolma

[REDACTED]



Homer, Alaska 99603

Jannette Keiser

[REDACTED]

Homer, Alaska 99603

Dale Banks

[REDACTED]

Homer, AK 99603

Linda Gorman

[REDACTED]

Homer, AK 99603

Roberta Highland and Robert Archibald

[REDACTED]

Homer, Alaska

Nina Faust

[REDACTED]

Homer AK 99603

Carol Harding

[REDACTED]

Homer, AK 99603

Penelope Haas

[REDACTED]

Homer, Alaska 99603

Bjorn Olson

[REDACTED]

Homer, Alaska

Michelle Michaud

[REDACTED]

Homer, AK 99603

Gary Lyon

[REDACTED]

Homer, AK 99603

Sharon Nelson

[REDACTED]

Homer, AK 99603



Steve Hughes

[REDACTED]
Homer, Ak 99603

Ella Post

[REDACTED]
Palm Springs, CA 92264

Diego Norena

[REDACTED]
Rocky River, OH, 44116

Nancy Lord

[REDACTED]
Homer, AK 99603

Deborah Tobin

University of Alaska Anchorage - KPC - Kachemak Bay Campus

Nigel Raithby

[REDACTED]
Valdez, AK 99686

Leslie Slater

[REDACTED]
Homer, AK 99603

Ella Parks

[REDACTED]
Homer, AK 9603

Rika Mouw

[REDACTED]
Homer, AK 99603

Dolly Peach

[REDACTED]
SLC, UT 84103

Bob Shavelson

[REDACTED]
Homer, AK 99603

Bruce Friend

[REDACTED]
Homer, Alaska 99603



Jim Sterns

[REDACTED]

Homer, Alaska 99603

Sue Christiensen

[REDACTED]

Homer, Alaska, 99603

Toby Wheeler

[REDACTED]

Homer AK 99603

Carol Harding

[REDACTED]

Homer, AK 99603

Martie Krohn

[REDACTED]

Homer, Alaska

Gary Lyon

[REDACTED]

Homer, Ak 99603

Cooper Freeman

[REDACTED]

Homer, Alaska

Katie Aspen Gavenus

[REDACTED]

Homer, Alaska

Mark Conrad

[REDACTED]

Homer, AK 99603

Georganna Baker

[REDACTED]

Homer, AK 99603

James Dolma

[REDACTED]

Homer, Alaska 99603

George Matz



[REDACTED]
Homer, AK 99603

Dale Chorman
[REDACTED]
Homer, AK 99603

Kim Smith
[REDACTED]
Homer, Alaska 99603

Eric Knudtson
[REDACTED]
Homer, Alaska 99603

Eleanor Sarren
[REDACTED]
Anchor Point, AK 99556

Jinky Handy
[REDACTED]
Homer, Alaska

Laurie Daneil
[REDACTED]
Homer, AK 99603



PC53

Name: Henry Hall

Community of Residence: Palmer

Comment:

Proposal 87

This is an unreasonable requirement of waterfowlers that often find themselves in need of moving hunt locations and or decoys throughout the duration of a single hunt. The relational of this proposal is also baseless due to the presence of already established wildlife harassment regulations.



PC54

Name: Carol Harding

Community of Residence: Homer, AK

Comment:

I am in strong support of Proposal #86 requiring hunters to report the number of sea ducks they harvested.. I support responsible management of Alaskan sea ducks to insure a continual healthy population. Alaska needs to know harvest numbers for good management.



PC55

Name: Erik Haugen

Community of Residence: Healy

Comment:

Support of Proposal 131, Unlawful methods of taking furbearer exceptions; require identification tags be attached to traps and snares.

Board members, thank you for your service on the BOG. I am a member of the Middle Nenana AAC, and appreciate everyone service in our regulatory process.

I'm writing as an individual citizen in support of proposal 131. I have seen an increase in out of town trappers in the Healy area, and these weekend warriors have been trapping very close to the Healy subdivision and other populated ares in our borough.

We use the trails behind our house to ski, bike, and snowmmachine almost daily. My dogs were caught in traps three times in the same area behind my house. Also, a moose was caught in this area and no one checked that trap for at least three days. Each time there was an incident I notified the troopers so they were aware that I was not intentionally disturbing the set.

We need a way to identify traps for incidents like mine, and for traps left set in the field after the season is over. There must be some accountability and method of identifying the traps owner.

I know the Trappers Associations's arguments on the subject, and find their arguments weak. If they are worried about the trappers name being on the set, make the rule that the trappers licenses number is the

required identification. The argument of being worried about someone stealing a set and putting it somewhere illegal can also be averted by the trapper notifying the troopers of the stolen trap.

Please consider bringing back trap identification tags for accountability and as a useable tool in helping resolve conflicts on shared use trails or when other concerns arise.

Respectfully,

Erik Haugen

Healy, Ak

[REDACTED]

[REDACTED]



PC56

Name: Marshal Hill

Community of Residence: Wasilla AK

Comment:

Alaska Board of Game,

This comment is in reference to proposal 188 and 189 (DI404 & 403 bison tags). Please see below list of reasonings to allot permits in follow on years for those whos Delta Bison tags were rescinded in 2024.

1. Just over 33,000 applications were submitted for the DI 403, 2023 draw year (404 not available in 2023). Just over 41,000 applications were submitted for the DI 404/3 2024 draw year with 135 total permits available (increased permits due to herd size). Just over 35,000 applications were submitted for the DI 403 2025 draw year (404 removed herd health) with only 30 permits available. 30 permits is around half the number of permits that are usually available for the Delta bison draw.

Even with less of a chance to draw in 2025, hunters still submitted 2,000 more applications in draw year 2025 than draw year 2023. Meaning, if available permits for draw are reduced by a number of those hunters whos bison tags were rescinded, it is likely not to effect the number of applications received. The states revenue from the Delta bison applications should see little, if ANY impact, if this proposal is passed.

2. Many Alaskans feel the draw is rigged, not fair, or they have such little chance to draw there is no point to apply. I have herd story after story of Alaskans not drawing anything for 10+ years.

If this proposal is not approved by the BOG there will be another reason for residents and non residents to give up on the draw, decreasing the states revenue in draw applications. The BOG has an opportunity to win some trust back for the draw system and possibly even increase the states revenue with those who decide start applying again.

3. Talking with the Delta field office, the heard is doing very well with little snow cover and is expected to rebound. This year's hunters who still have their tags have until the end of March to harvest their bison but as of 06March only half of this year's permits have been filled successfully.

This all alludes to an additional amount of bison permits that will likely be available for follow on years and would reduce the possible impact of 2024 bison hunters participating in coming years if the proposal is approved.

4. Just after moving to Alaska I drew this tag as a non resident. Meaning this was a once in a lifetime opportunity for me and my family.

My father and brother were purchasing their gear, and so had I for this hunt. I imagine others were doing the same if not spending even more on airplane tickets, boats, gear, etc (thousands of dollars). If the board is able, the approval of this proposal is the right thing to do. I understand there is much to consider and I hope the others and my self will be able to experience this epic hunt that we were drawn for.

Lastly, if 188 or 189 is approved with the solution being allowing us to apply during draws in the future instead of allowing us to hunt a follow on year. You might as well not have approved either of the proposals. The chances of drawing this bison tag is less than 1%, the chances of drawing it twice is next to impossible.

I drew this tag, was given a hunt group, and a hunt date. I understand the importance of conservation but I have done nothing illegal not to have the right to hunt for this permit taken away.

Thank you for your considerations.

Respectfully,

Marshal Hill

[REDACTED]

[REDACTED]

Name: Drew Hilterbrand

Community of Residence: Ninilchik

Comment:

Prop 89. Oppose on the grounds that it would prove inconvenient and unnecessary for GUIDED nonresident hunters who have the benefit of the guides expertise in field judging legal bulls and it is the guides responsibility to ensure that all meat is handled in a manner that minimizes the risk of spoilage and ensures all edible meat is salvaged.

90,91. I would support a requirement for resident goat hunters and nonresidents accompanied by a relative to pass an online goat quiz as it would educate them on management concerns and benefits of taking mature animals, but believe this should be amended to specify that guided nonresidents would not be required to complete this quiz as they are accompanied by a guide whom they have hired to ensure that they comply with all regulations and who's expertise is relied upon to accurately judge sex and maturity of the animal.



PC57

92. Support with amendment that nonresidents accompanied by guide would be exempt from the online education course. At a time when every ram on the mountain matters anything we can do to prevent immature and illegal rams from being taken is beneficial.

97,98. Both of these proposals are far too restrictive and 98 is ridiculously so. There is already regulation that prevents aircraft use during sheep season. Many sheep hunting areas are also areas used by caribou and grizzly hunters. Expanding these regulations does nothing to benefit sheep conservation and discourages legal use of many areas when pilots are afraid to utilize valleys and ridge tops while hunting other species for fear of false accusations from ignorant or uneducated people who "feel" the pilot has made too many passes checking out his proposed landing zone.

99. Support for many of the same reasons mentioned above.

101. Support. Any steps we can take to give our sheep a better chance of survival and recovery are important. Rather than user groups fighting over allocation of declining populations we should be focusing the best avenues to promote population abundance of those species.

121. Oppose. There is no biological or conservation reason for dividing 15C into 2 subunits. There is already regulatory language in place that gives the department discretion to implement special regulations in the lower portions of 15C when or if there is a concern in some high usage areas. My greatest concern is that if there was a separate subunit (15D) comprised of state park, refuge, and private native lands we will see a push for unnecessarily restrictive rules and regulations influenced by certain special interest groups who have already tried to push their agenda in our state park and critical habitat areas.

124,125. Support. I support these proposals in their intent though not necessarily specific language. I do believe that it should be clearly defined what constitutes a permanent dwelling and developed recreational facility. It has become obvious that leaving these definitions to the interpretation of enforcement is inconsistent.

126-128. Support. Will provide additional opportunities for trappers to take fur animals many of which are predators that can have a significant impact on prey species.

129. Oppose. Could create hardship for individuals who live remote and have limited access to ammunition and often times have only one rifle they use for everything. This would also make it illegal to take wolves or wolverine under a hunting license with commonly used "varmint" calibers. It would also make it illegal to take sitka blacktail with commonly used deer calibers. If the board feels that caliber restrictions are prudent I would suggest that they be species specific and not just a blanket requirement for all species.

131. Oppose. I believe this is simply an unnecessary burden on lawful trappers. There would be some additional expense to purchase and attach tags. I could also invite increased scrutiny and harassment from antis. It could also result in someone stealing a tagged legally set trap and placing it in another area illegally in an effort to put trappers in a bad light. I seriously doubt it will do anything to deter those already intent on breaking the law.

134. Oppose. There is ample opportunity for any resident or nonresident to hunt moose under general seasons. Any allocation of draw moose permits should be considered on a per hunt basis. In my opinion cow or any bull draw permits should be resident only. "Trophy" moose draw permits should have ample allocation for nonresidents and I believe should simply be a general draw with no specific allocation between resident and nonresident.

135. Oppose. One of the wonderful things about being a resident of Alaska is that we can hunt nearly every species and most areas with over the counter permits. I have never understood the way so many focus on the allocation of a limited number of draw permits in relatively small areas. With the overall size of Alaska and the diversity of its ecosystems, game and their populations, and access of those areas I believe strongly that allocation of draw permits should always be considered on a per hunt basis and it would be foolhardy to simply place blanket allocations on permits statewide.

137. Oppose. I am satisfied that the current draw permit system is fair and well managed. I don't see the need to complicate it. As mentioned in my comment on 135 alaskans have ample opportunity to hunt nearly all species with over the counter permits.

146. Oppose. Feral cats even sterilized cats have a serious impact on song birds and small mammals that native wildlife species prey upon. Feral cats have no place in our native ecosystem. They should be eradicated whenever and wherever possible. Certainly not simply captured, sterilized , and released to do more damage.

147. Oppose. No one person should have the authority to determine what animals should be place on the "clean list". It should always be a transparent public process where the public has access to all information and data and can make comment to let their opinion be known and considered.

148. Oppose. When prey species are in decline and action needs to be taken to implement intensive management of predators the department and commissioner need to be able to take what action is necessary to implement management in a timely manner and not jump through hoops in order to help prey populations that many alaskans rely on.

155. Support. Based on the departments count moose numbers need to be reduced significantly. There would be no reason not to reauthorize this hunt.

156. Oppose. I would be in support of this reauthorization if the antler less permit area for DM549 hadn't been expanded. The original purpose for DM549 was to reduce conflicts with cow moose that were in the "homer bowl" and thin the numbers of moose in the area as many get pushed down on deep snow years. I would guess that since the area expansion many of the cows killed under this permit are not even in the "homer bowl" totally defeating the purpose of the original permit and taking viable breeding cows out of areas that would fully support them and their calves.

Name: Pete Imhof

Community of Residence: Wasilla

Comment:

Sheep working 19C proposal.. I oppose there proposal as written, first and foremost we should not close 19C to the harvest of sheep, full curl management has worked since 1992, taking opportunity away from both residents and non residents makes no sense, it will not bring sheep back any faster by closing it. Open it to limited draw for non res and registration for residents with a max. It works for goats... in 2024 residents harvested 10 rams, as you are aware there's other units in worse shape then 19C. By closing per working group we're pushing resident and non resident to other units. So is a dead sheep in unit 16 better



PC58

than 19C I'd say no.. and is a concession better than a draw system that's already in place for sheep permits 14 13 12 etc. it cost money to run and manage. Draw seems way less expensive and it spreads the client pool to all guides... young and old.

Proposal 190 (19C working group proposal) DO NOT SUPPORT

First, I'd like to say thanks to the board for your service and your time away from family to serve the public.

I somewhat participate in the 19C working group with a testimony and sheep harvest data for 34 yrs both state wide and 19C, and have a real good understanding of sheep and all dynamics around them, saying that we all know weather events have put our sheep in a bad spot, not only 19C but state wide, Closing sheep in 2025 and bringing in a small permit in 26 and 27 for residents and nonresidents will not bring our sheep back any faster, we need (EWES) are we trying to override the departments stance on full curl management doesn't work.. I'll say this again and again full curl management works, think of it as a fruit tree and picking that fruit just before it falls, that's full curl management in a nut shell, closing 19C is not the answer, 2024 there were 10 rams harvested by residents in 19C, the unit I hunt had 4 Rams harvested with many residents and nonresidents participating, please don't get me wrong, I and most sheep hunters want what's best for the resource first and foremost. I ask the board to please look at statewide harvest reports and ask yourself why 19C is getting the attention?? why not unit 16 right next to 19 that's in just as bad of shape if not worse, or unit 7 and 15 that has a way high participation of hunters for very few sheep.

Some things the working group didn't consider, Weather events in 25,26 etc. based on survey data could delay it out to who knows when, I also ask myself why a concession divided into 3 areas, why spend 500 thousand getting it through legislation?? and then spending endless money supporting it with management. As far as most of us can see 14A,14B,14C13D, TMA and delta all on draw for nonresidents works fine, not a whole lot of cost associated with that system and it works, it also allows young guides a chance at hunting and making a living, I'll also add that if a sheep hunter can't participate in 19C then he moves over to another area, so the question to you board members is a harvested ram in 16 a better option, what I'm getting at is the pressure moves from 19 to elsewhere that's in just as bad of shape or worse than 19C.

My thoughts, permits for non-residents for the foreseeable future based on survey data and input from local department on number of tags for nonresidents, residents continue to participate with OTC tags, sounds selfish, I'm not that guy promise, residents tend to back off when resources are hurting, no matter if its king salmon or sheep, and you can see that in the harvest reports within the dept website. Were down from a all-time high of 3,641 in 1991 to 1,552 in 2023.

My last comment was something that came from a 19C working group member, his statement was we all need to share the burden of conservation by closing it, I beg the board to look at the last 3 yrs. 19C was open too nonresidents, 2020 non res took 80% of harvest followed by 21 at 85% and lastly in 22 was 90% of the harvest. The 34 yrs of harvest average for non res was 68 percent. In my opinion that's total abuse of a resource that should be shared equally across all user groups, when there's that kind of pressure residents back out. I have so much more, LOL thanks for reading and please feel free to reach out if you have questions.

I've already commented on proposal 190 just noticed I forgot to say. OPPOSE. Once again I'd like to thank the board members and all the staff.

proposal 190 oppose

proposal 192 support/ Full curl management works, reduce the non resident pressure that saw nearly 70 percent of the harvest in 19C over the 34 yrs i collected harvest data. please read my down loaded information on harvest data for residents/non residents, also look closely at survey data versus harvest, and lastly the information on harvest in other units across the state... thanks guys wish i could be there to testify but i have commitments that i can't break...



PC59

Name: Corey Jackson

Community of Residence: Matsu

Comment:

In support of people 127



PC60

Name: Kenneth Jones

Community of Residence: Cordova

Comment:

Proposal 85 - oppose

Proposal 86 - oppose

Proposal - 87 oppose - safety issue, we use boats to retrieve ducks, this is not feasible to retrieve ducks without using a moving boat, and is attempting to "solve" an issue that does not exist. If there are operators driving birds that is an enforcement issue. Not a regulation issue. It is already illegal to drive birds purposefully.

Proposal 127 - support - this has been adopted in northern areas and should be adopted statewide. More hunting of predators with thermals could help moose and deer populations. I would also support an amendment to allow for hunting for fur animals not just furbearers on a trapping license.

Proposal 130 - support - any efforts of moose conservation should be encouraged and supported. This seems very reasonable

Proposal 132 - oppose

Proposal 133 - oppose

Proposal 134 - oppose

Proposal 135 - oppose - Alaska is one of the most liberal with their tags of any western state, state residents have a plethora of opportunities, this is not justifiable whatsoever.

Proposal 136 - oppose - muskox and bison are delicious meat and people should have the right to put in for multiple draws. What if you draw the tag after putting in for 10 years and a family emergency comes up or weather cancels the trip. Lifetime requirement would make it where you lose your chance forever. That is not very fair.

Proposal 137 - oppose - there is nothing wrong with the current system

Proposal 139 - support - this makes sense

Proposal 142 - support

Proposal 143 - support

Proposal 152 - oppose - we do not need more cow harvest in unit 6, if anything we need less cow harvest. At the very least this should be moved to the region meeting which is next year to let more area stakeholders have input.



PC61

Name: Thomas Jones

Community of Residence: Anchorage

Comment:

I support Proposal 188, with amendments or modification. My son Zachary K Jones was awarded a Unit 20 (D) Bison permit for regulatory year 2024. His permit was subsequently revoked due to a mass die-off incident during the Spring of 2024. My request and suggestion is that permittees who had Unit 20 (D) Bison permits awarded, then revoked for RY 2024 should have those permits re-issued for RY 2030, RY2029, or earlier at the request of the permittee. This delay in the re-issue of the permit would allow the Bison herd to grow back to the harvestable numbers which existed at the time the permittee won their award, I feel it's important to consider the true Lottery nature of this permit. These Bison permits have such low odds of winning, they are in a different category than most Alaska Draw Permit hunts. They truly are akin to winning a state lottery for money. Imagine winning a Power Ball lottery, then having the lottery directors tell you that you don't really get your check: that's pretty brutal. I fully understand the need to limit hunters for the sake of the herd. The hunters who "won the lottery" for a RY 2024 Delta Bison hunt should be allowed to use their Lottery Ticket (permit) in a year when the herd strength is comparable to the permit they fairly won for RY 2024.

I support Proposal 189 with amendments or modification. For permittees who won Unit 20 (D) Bison permits for RY 2024 and had them subsequently revoked, ADFG proposes that those permits be re-issued for RY 2026. I support the concept, but I feel the permits should be re-issued for a year when the Delta Bison permit is back up to a population level comparable to when the hunter "won the Lottery" for their RY 2024 hunt. For this reason, I propose that the affected permit holders have their revoked Unit 20 (D) Bison permits re-issued for RY 2030, RY 2029, or earlier at the permittee's request. I feel that the ADFG proposal to allow a Resident hunter to re-apply before the 10-year window falls short of fair treatment, considering that the hunter won a permit, then the permit was revoked. Please consider again the analogy of a state Lottery for money: A person wins the Power Ball lottery, then is told they won't actually get their check, but they can buy more lottery tickets next month. That's unsatisfactory. These Delta Bison permits are so highly sought-after and rare to win, that I feel in the concept of Fair Treatment, a hunter whose permit was revoked due to a rare die-off event should be allowed to use their awarded permit in the future when herd strength is back to the "normal" number of Bison which existed when they won their RY 2024 permit.



Alaska Board of Game
PO Box 115526
Juneau, AK 99811-5526
<https://www.boardofgame.adfg.alaska.gov>

March 3, 2025

To: Board of Game:

Re: Proposal 86

Kachemak Bay Birders (KBB), established in 2008 in Homer, Alaska, is an informal, all-volunteer organization of approximately 320 members who are interested in birds, birding, and the conservation of birds. Our mission is “To promote the enjoyment and protection of Kachemak Bay native birds and their habitat through citizen science, field trips, education and stewardship.”

KBB would like to take this opportunity to **support** Proposal 86 5 AAC 92.010. Harvest tickets and reports.

We support the sustainable management of Alaska’s sea ducks, particularly those that occur in the Kachemak Bay area where they are a valuable resource. ADF&G’s publication *Surveys of Waterfowl in Kachemak Bay, Alaska During Winter 1999–2019* says “Waterfowl comprise a substantial portion of the total marine bird community inhabiting Kachemak Bay, Alaska in winter (Agler et al. 1995). Among the waterfowl inhabiting Kachemak Bay, sea ducks are the most abundant species group (Erikson 1977, Agler et al. 1995).”

Sustainable management of game species requires good harvest information. The State of Alaska requires hunters to have harvest tickets for some game species. “Hunt reports are important to Alaska wildlife managers” (www.adfg.alaska.gov). But sea ducks are not included. The reference cited above says, “Inadequate and/or imprecise quantitative information on abundance, breeding ecology, migration routes, and harvest rates for many species of sea ducks have limited the ability of waterfowl managers to accurately assess current trends for these populations.” This oversight needs to be corrected to avoid inadvertent overharvest. Without this vital information, bag and possession limits become nothing more than a guessing game. The Board of Game



approval of Proposal 86 will correct part of the vital information needed for sustainable sea duck management.

In addition to harvest records, sustainable management of sea ducks requires some population estimate or index, the latter needing several years of data. The report cited above also says, “In response to the accessibility of Kachemak Bay to sport hunters and public interest in sea ducks, the Alaska Department of Fish and Game Waterfowl Program conducted periodic winter surveys in Kachemak Bay during 10 years between 1999 and 2019. The surveys were conducted during early to mid-March because 1) waterfowl numbers are relatively stable in winter compared to periods of migration (spring and fall), 2) a greater number and diversity of waterfowl are present during the winter, 3) numbers and composition reflect waterfowl occurrence during and after the hunting season, and 4) it is impractical to conduct surveys from November through February due to limited daylight and winter storms that occur during this time.”

“With 10 years of survey data, we are beginning to understand trends in the waterfowl aggregations utilizing Kachemak Bay in late winter. With continued monitoring and refinement of survey methodology, it is possible to improve the accuracy of trend estimates for duck populations at the local level. However, such efforts would be costly in terms of time and money and are of questionable utility given that waterfowl are not typically managed at local levels such as Kachemak Bay.”

The conclusion of the report said, “results from our analyses suggest that overall abundance of sea ducks (species combined) increased between 1999 and 2019.”

Unfortunately, the Waterfowl Program hasn’t done any surveys in Kachemak Bay since 2019, which would be after the impact of the “blob”. So, in response to ADF&G not continuing the Waterfowl Program surveys and what appeared to local residents as a significant increase in sea duck hunting in 2020, due mostly to new guides using the area (they haven’t returned), the Kachemak Bay Birders and Kachemak Bay Conservation Society, started its own survey, using some of the ADF&G protocol as guidance, but not including transect surveys over open water. A summary of the surveys is given below.



Kachemak Bay Sea Duck Survey					
Average totals by species for Sadie Cove, Tutka Bay, Little Tutka Bay, Jakalof/Kasitsna, and Islands					
Duck Species	2021	2022	2023	2024	Average
American Wigeon		3.0			0.8
Mallard	282.5	144.0	104.0	131.0	165.4
Greater Scaup	16.0	-	53.0	6.0	18.8
Greater/Lesser Scaup		152.0		25.0	44.3
Steller's Eider	3.0	-	-	-	0.8
Common Eider	2.0	-	-	-	0.5
Harlequin Duck	424.5	470.0	559.0	715.0	542.1
Surf Scoter	268.5	146.5	279.0	267.5	240.4
White-winged Scoter	336.0	108.0	81.0	65.0	147.5
Black Scoter	83.5	160.5	91.0	176.5	127.9
scoter sp.	33.0	-	8.0	63.0	26.0
Long-tailed Duck	3.0	0.5	3.0	-	1.6
Bufflehead	38.0	73.0	18.0	21.5	37.6
Common Goldeneye	58.5	43.0	141.0	53.5	74.0
Barrow's Goldeneye	1,419.0	1,978.5	1,114.0	1,432.5	1,486.0
Common/Barrow's Goldeneye	251.5	6.5	20.0	31.5	77.4
Common Merganser	281.5	117.0	163.0	164.5	181.5
Red-breasted Merganser	123.0	89.5	55.0	45.5	78.3
Common/Red-breasted Merganser		4.0	3.0	17.0	6.0
Total	3,623.5	3,496.0	2,681.0	3,493.5	3,323.5

What we found after our surveys in March 2021-2024 is that there may have been a change since the last Waterfowl Program survey. Although our four years of data is preliminary, based on current data, it doesn't appear that the increase in the overall abundance of sea ducks, as previously reported by ADF&G has continued. This is a case where having harvest tickets would now be extremely valuable.

KBB is committed to conducting these annual surveys long-term and sharing the data with ADF&G as we have in the past. If requested, we would be pleased to provide the Board of Game with our survey protocol and data.

Sincerely,
George Matz
Sea Duck Survey organizer
Kachemak Bay Birders



KAWERAK, INC.

REPRESENTING

Brevig Mission

Sitaisaq

Council

Akauchak

Diomedede

Inaliq

Elim

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Chinik

King Island

Ugiuvak

Koyuk

Kuuyuk

Mary's Igloo

Iglaaruk

Nome Eskimo

Sitnasuami Inuit

Savoonga

Sivungaq

Shaktoolik

Saktuliq

Shishmaref

Kigiqtat

Solomon

Anuutaq

St. Michael

Taciq

Stebbins

Tapraq

Teller

Tupqaqruk

Unalakleet

Uqalaqtiq

Wales

Kinigin

White Mountain

Natchigvik

Kawerak, Inc.

P.O. Box 948

Nome, AK 99762

TO:

Alaska Board of Game

ADF&G Boards Support Section

P.O. Box 115526

Juneau, AK 99811-5526

Fax (907) 465-6094

Kawerak is the Alaska Native non-profit Tribal Consortium for the 20 federally recognized Tribes of the Bering Strait/Norton Sound region. Kawerak offers many services to our tribes and tribal members, including advocating for subsistence users and resources.

Kawerak **supports:**

Proposal 151 - Reauthorization of the current resident tag fee exemption for Brown Bears in GMU 18, 22, 23 & 26A. GMU 22 has a long-standing history for a brown bear tag fee exemption. Local concerns relayed to ADF&G staff from residents across the region is that there are too many brown bears, so much so that cabins are being broken into and meat drying racks are continually being raided. The recent bear population data conducted on the Seward Peninsula also indicates and aligns with local observations that the brown bear population is indeed on the rise. On the Seward Peninsula, brown bears do not appear to be a major big game animal of interest or first choice for hunters. Hunters are more interested in harvesting moose and/or caribou when the fall hunting season begins. When the brown bear tag fee exemption first came into effect it provided more incentives to local hunters and opportunities for a harvestable resource.

Kawerak **opposes:**

Proposal 86 – Mandatory reporting for sea duck harvest. Up front, this proposal makes it appear that there is no reporting requirement for sea ducks, or that the only reporting option is the Harvest Information Program or HIP for the whole state of Alaska. This is incorrect, the ADF&G Office of Subsistence Management collects bird harvest reports for spring, summer, fall & winter that is all inclusive for harvestable migratory birds, including sea ducks. The proposal only indicates what may be happening in their area, a small area of the state, and is not all inclusive to what may be happening statewide. Perhaps the sea ducks in their area, maybe moved onto another area, an area where there is far less hunting pressure. The latest population data collected by the US FWS indicates that the sea duck populations are stable. Having another requirement for harvest reporting will cause harvest reporting burn-out amongst harvesters who already fill out harvest reports for other areas of Alaska.

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Proposal 126 – Unlawful methods and means of taking game; the exceptions allow the use of night vision and forward looking infrared devices for taking furbearers. The use of night vision to harvest furbearers is not fair. It goes against the rules of fair chase, not only to animals that are nocturnal but to other trappers who are also in the area. Being that most furbearers are nocturnal there is a high probability that allowing the use of infrared devices will cause an overharvest of furbearers across the board. Already the use of artificial light is illegal to hunt any game. Night vision or infrared devices are no different than artificial light in that they give a distinct advantage to the hunter.

Proposal 129 & 130 – Establish a minimum standard caliber restriction for the taking of big game animals. Proposals like this have come before the Board of Game numerous times and have failed. There is sufficient data collected on the effectiveness of high velocity, small caliber center fire ammunition on big game animals.

High velocity, small caliber ammunition such as the .223 Remington is perfectly capable of hitting the vitals on even the biggest of big game animals and at distance with the right bullet. The key to any successful hunt is proper shot placement. Hitting the vitals, heart or double lung shot on any big game animal is well within the capabilities of a .223 Remington or similar high velocity, small caliber cartridge. Younger hunters who are just getting started in hunting are more likely to not want to use a bigger rifle cartridge for many reasons including recoil and muzzle blast being significantly higher. These factors may not be evident to an adult, but these factors certainly can and do impact younger hunters, so much so that they may not want to use a bigger caliber ever again.

In both Proposal 129 & 130 the proposer's are making a lot of suggestions based off of speculation or information that is incorrect, or hear say, or is implying that certain calibers are only available in certain types of bullet design, this is also incorrect. In proposal 129 the proposer states that a big game animal was lost because the hunter they talked to, missed the animal completely. The proposer states that they were aware of a moose that were shot several times with .223 rifles, and shot an entire AR-15 magazine of ammo but must have missed.

In Proposal 129 it stated: I had people tell me about shooting a brown bear over eighteen times with a .223 and then it died slow. Nowhere does either of the proposals address taking the time to aim and proper shot placement. Improper shot placement is not the fault of the caliber, but the sole responsibility of the hunter who missed continually. The proposer even goes so far as to state: – The waste of game, due to the use of insufficient cartridge size is a significant contributor to the dwindling game populations. This is pure speculation that is not backed by facts. It is false information stating high velocity, small caliber is the cause of game population decline. It is our opinion that it is the sole responsibility of the hunter behind the trigger and shot placement, and not the cartridge size dwindling the game population.

However, bigger calibers can cause even the most seasoned hunter to flinch, which in turn will make a hunter miss his target. This can contribute to big game loss; not hitting the vitals.

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If this regulation were to pass, it would cause undue hardship on many rural Alaskan hunters, who often times inherit a rifle from grandfather to grandson, father to son. Many individuals in rural Alaska simply cannot afford to buy a brand-new rifle or the bigger caliber ammunition that goes along with it which is also more expensive.

Many hunters throughout Alaska are meat hunters, and do not want to use a bigger caliber. Bigger calibers have been proven to cause more meat damage, hence more waste.

Proposal 135 – Allocate 10% of big game permits to non-residents. The proposal assumes that most big animal populations are doing well or that there is an overabundance in the majority of Alaska. This is false. Big game populations can and do vary from extremely low in one game management unit, to fair in another game management unit, to high in another game management unit. Extensive population surveys for moose and caribou conducted by ADF&G attest to this.

Proposal 139 & 140 – Remove Evidence of sex on hunts limited to one sex. Antlers or horns do not prove evidence of sex. For instance, a hunter can shoot a big bull moose and cut the head off, then immediately after shoot a cow moose. Having evidence of sex naturally attached to any big game is the easiest and simplest means of verifying male or female and does not cost anything. The proposal recommends DNA testing, and a cost associated with this. However, the proposer does not clarify who will pay for the testing to be performed. If the testing is passed onto the hunter, it will be an added cost on top of paying for gas, time off from work, supplies, ammo etc. etc., which in turn causes an undue hardship for many hunters if the additional cost of testing is expensive (cost of test, processing, and mail from rural community to testing site).

For further information or inquiries please contact Kawerak, VP of Natural Resources, Brandon Ahmasuk at 907-443-4377 or bahmasuk@kawerak.org.

Sincerely,

Melanie Bahnke

Kawerak, President, Melanie Bahnke

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PC64

Name: Ben Kennedy

Community of Residence: Fairbanks

Comment:

PROPOSAL 189, 5 AAC 92.050. Required permit hunt conditions and procedures.

Kennedy Comment:

I am in favor of PROPOSAL 189, 5 AAC 92.050. Required permit hunt conditions and procedures, allowing permittees that had their Unit 20D bison permit revoked for regulatory year 2024 to have their permits transferred to regulatory year 2026 upon request.

Background:

After post-calving surveys conducted in the summer of 2024 showed low population values, the Alaska Department of Fish and Game department revoked a number of previously issued hunting permits. The department adjusts permits and bag limits annually in an attempt to keep the population at approximately 360 adults, post hunt. A mortality event in the spring of 2024 led to a situation where too many permits were awarded, running a risk of unsustainable harvest.

As one of the hunters awarded a 2024 Unit 20D bison permit that was revoked, allowing the DI403 and DI404 permits awarded for the 2024 regulatory year, that were subsequently taken away, to be transferred to regulatory year 2026 is a fair and equitable solution for the small group of hunters affected by the revocation.

I appreciate your time and effort in considering this proposal and urge you to vote in favor of allowing permittees that had their 2024 Unit 20D bison permits revoked, through no fault of their own, to have their permits transferred to regulatory year 2026 upon request.

Regards,

Ben Kennedy



PC65

Name: Gabe King

Community of Residence: Homer

Comment:

Proposal #86

I oppose

I am a 35 year Waterfowler in kachemak bay. This is just another "spray and pray" technique by a few locals in kachemak bay who want no hunting in "there Bay". Put out allot of senseless proposals and hope one sticks.

I love duck hunting and would be the first one to want more regulations if I thought the stocks were in jeopardy. But they are not and the science/ surveys prove that. There are only 2 guides in k-bay and they

only hunt 3-5 weeks a year.

Thanks

Gabe king
[REDACTED]

Proposal 87

I oppose

What!!??

Leave your boat on the beach in Alaska in November/December? We have up to 28' tide swings here in Kachemak Bay. Boats would go dry if they didn't sink from being in the surf first.

Not to mention how are you supposed to retrieve your ducks or finish cripples. The eagles would love it...

This is just another "spray and pray" technique. Put in a bunch of unnecessary proposals and hope one sticks. Put in by a few folks whose end game is to prohibit hunting on "their bay"

If so much waterfowl harassment/hurdling is going on why isn't it documented. Everyone has a video camera now.

Thanks

Gabe king
[REDACTED]

Proposal 85

Oppose

I would think this would apply to every air carrier statewide as well. Everyone transporting anyone with a duck stamp.

I believe the true motive behind this is to make it look like there are hundreds of waterfowl guides in AK.

Thanks

Gabe king
[REDACTED]



PC66

Name: Michael Knapp

Community of Residence: Wasilla

Comment:

Proposal 131, I STRONGLY OPPOSE THIS PROPOSAL.. All an activist or anyone for that matter would have to do is steal one of my traps and set it someplace else where traps are prohibited and I would have to prove I didn't set it ,, this has been done in the lower 48 . Also the author claims it would keep kids out of traps. I know of no human being hurt by a trap or snare except trappers getting their fingers snapped ,further more why does someone trapping hundreds of miles off the road system need to liable their traps, most people know where traps are in the bush,including law enforcement



Kodiak / Aleutians Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

In Reply Refer To:
OSM. B25021

MAR 07 2025

Jake Fletcher, Chair
Alaska Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Fletcher,

I am submitting comments on behalf of the Kodiak/Aleutians Subsistence Regional Advisory Council (Council) on proposals 87, 123, 126, 127 and 128 that will be considered during the March 21-28, 2025, Statewide Board of Game (BOG) Meeting.

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

The Council held a public meeting on March 6-7, 2025, in Kodiak, and took up five BOG Proposals to provide comments. Please see the Council comments below.

Proposal 87: Migratory Bird Hunting – Restrict the use of boat for hunting waterfowl

The Council **opposes Proposal 87**, which would restrict the use of boats for hunting waterfowl. The proposal as written is confusing and it is not clear exactly what use of boats would be allowed. The Council believes the restriction in paragraph (3) would make it tremendously difficult and potentially dangerous for people to hunt sea ducks (where a boat is required) and would impose a burden on subsistence users in the Kodiak Aleutians region.



Proposal 123: Removes restriction on remuneration for proxy hunting

The Council **opposes Proposal 123**. The Council noted that a federal designated hunter is not allowed to charge for their services under Federal regulations and believes this should not be allowed for a proxy hunter either. Proxy hunting and hunting by designated hunters is currently conducted in our communities without remuneration, and the Council felt strongly that should continue. Allowing remuneration could result in dire unanticipated consequences where people are purchasing, or selling, the right to act as a proxy hunter.

Proposal 126, 127 and 128: Allow the use of electronically enhanced night vision and forward-looking infrared devices for taking furbearers statewide

The Council **opposes Proposals 126, 127, and 128**. This statewide proposal was generated from an interior region and is likely intended to target wolves and coyotes. The Council observed that the Kodiak Aleutian region is a coastal environment and is very different from the Interior of Alaska. Night vision and forward-looking infrared devices are extremely effective for spotting game/furbearers and will confer a significant advantage to hunters/trappers. The Council noted the use of these devices boats while hunting along the shorelines could decimate the local populations of foxes and other furbearers here.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator, Lisa Hutchinson at (907) 310-4097 or lisa_hutchinson@ios.doi.gov.

Sincerely,

A handwritten signature in black ink, reading "Rebecca Skinner", is positioned above the printed name.

Rebecca Skinner

Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Kodiak/ Aleutians Subsistence Regional Advisory Council
Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of
Fish and Game
Administrative Record



Name: Jon Kruger

Community of Residence: Kenai

Comment:

Proposal 85-Oppose

Proposal 86-Oppose

Proposal 87-Oppose

Proposal 88-Oppose

Proposal 89-Support

Proposal 90-Support

Proposal 91-Support

Proposal 92-Support

Proposal 93-Oppose

Proposal 94-Oppose

Proposal 95-Oppose

Proposal 96-Oppose

Proposal 97-Support

Proposal 98-Support

Proposal 99-Oppose

Proposal 100-Support

Proposal 101-Support

Proposal 102-Oppose

Proposal 103-Oppose

Proposal 104-Oppose

Proposal 105-Oppose

Proposal 106-Oppose

Proposal 107-Oppose

Proposal 108-Support

Proposal 109-Oppose

Proposal 110-Oppose

Proposal 111-Oppose

Proposal 11-Oppose

Proposal 113-Oppose

Proposal 114-Oppose

Proposal 115-Oppose

Proposal 116-Oppose

Proposal 117-Oppose

Proposal 118-Support

Proposal 119

Proposal 120

Proposal 121

Proposal 122-Oppose

Proposal 123-Oppose

Proposal 124-Support

Proposal 125-Support

Proposal 126-Support

Proposal 127-Support

Proposal 128-Support

Proposal 129-Oppose

Proposal 130-Oppose

Proposal 131-Oppose

Proposal 132-Oppose

Proposal 133-Oppose

Proposal 134-Support

Proposal 135-Support

Proposal 136

Proposal 137-Oppose

Proposal 138-Oppose

Proposal 139-Support

Proposal 140

Proposal 141-Oppose

Proposal 142-Oppose

Proposal 143-Oppose

Proposal 144-Oppose

Proposal 145

Proposal 146

Proposal 147

Proposal 148

Proposal 149

Proposal 150

Proposal 151

Proposal 152

Proposal 153

Proposal 154

Proposal 155

Proposal 156

Proposal 157

Proposal 158

Proposal 159

Proposal 160

Proposal 161

Proposal 162

Proposal 163

Proposal 164

Proposal 165

Proposal 187

Proposal 188

Proposal 189

Proposal 190-Support

Proposal 191



PC69

Name: Wayne Kubat

Community of Residence: Meadow Lakes

Comment:

Oppose Proposal 100

Support Proposal 101

Concerning Proposals 102 - 118 & 190 regarding sheep seasons in GMU 19C. I:

Support Proposals 103-107 to open up a general non-resident season from Aug. 10th - Sept. 20th. Full Curl works. At the very least, these proposals should be amended to open private land and NPS concessions in 19C to non-resident sheep hunting. Private land holders should not be lumped in with state land nor should NPS lands open to sheep hunting which already have concessions.

Support Proposals 102 & 113. Short of opening back up a 42 day non- resident general season, I could support the shorter seasons offered in these 2 proposals for state land in 19C. Private land and NPS concessions in 19C should not be lumped in with state land and should go back to a 42 day non - resident season. Private lands owners should be allowed to manage their lands and NPS lands open to hunting, already have concessions which limit harvest.

Support Proposals 117 & 190. Short of passing similar proposals to 102-107 & 113, I would support Proposals 117 and 190 on all state lands in 19C to keep the sheep working group intact - BUT - non-resident sheep seasons should be re-opened on private land and NPS concession lands in 19C. Private land holders should not be lumped in with state land nor should NPS lands open to sheep hunting which already have concessions.

Oppose Proposals 108, 109, 111, 112,114,& 116

No Comment on proposals 110 115 and 116



PC70

Name: Gary Kuhn

Community of Residence: Palmer AK

Comment:

I Oppose proposals 102-107 and 190! Do not open our state for unlimited non-resident hunters access via draw permits or other mechanisms. Thank you.

Regards

Gary Kuhn



Name: Alexis Kwachka

Community of Residence: Kodiak

Comment:

Board of Game Members,

I would like to express my concerns on proposals 126 and 127. This is a fundamental shift in hunting and I do not feel is appropriate for a State wide regulation.

Guard rails must be put in place when using this awesome technology, and all areas of the State are not the same by any means.

In Kodiak there is a saying when the tide is low the table is set. For good reason we are not allowed to spot light at night. When the tide is low I have seen fox and many other furbearers almost on top of each other feeding.

If night vision ,thermal, spot lighting were allowed it will have an immediate and devastating consequences. The board took actions to limit deer harvest during the Kodiak cycle, thank you.

CONCERNS:

Limit who can use this.

Do not allow non residents

Do not allow it to be offered on guided, or transporter hunts

Prohibit advertising use of

Think about calibers that can be used

Limit number of animals that can be taken using this technology

Think about timing of use of this technology (not while big game season open)

Understand this is not just useful at night

Spend some time thinking about enforceability of any restriction that may be applied

Transporters are a growing and relatively unregulated business model. Allowing anyone to use this technology will play out in many unintended ways. So every time the Board squeezes regulation it manifest out in unintended ways. Really dive into the reality of enforcement and unintended uses.

Thinking about calibers I do not want to hit by a bullet shot a long ways off while I'm trying to dig clams. I do not want to be in my tent and struck by someone shooting a fox and doesn't have a clue I am there in the night far away. Isn't hunter safety about knowing where your bullet is going? 22, 22 mag, 204, 17, on up all act very differently. unintended but with ever increasing pressure this could Be a reality of shooting at night for us.

This will give a boat the ability to clean out bays on kodiak of fur bearers in short order if lots of thought is not put into it. Can a thermal tell the difference between a river otter and a sea otter? That would be a major blunder.

The Board of Game should consider what the outcomes are of unethical hunters using this technology. This is being labeled as for fur bearers but I'm unsure how you could enforce its use for other species? Bear, Deer, Goat, Caribou, Elk, all give off a heat signature, can I hunt red squirrel during elk season walking through the forrest during Elk season with it on? Gosh that could be handy!

Not to belabor this anymore. I think its getting into a lane that approaches unethical and we as a State have done a fantastic job of holding ourselves and our resources to a high standard, this is a trail I think you should not go down as a State wide regulation. This technology may be appropriate for predator issues, certain aspects on a trap line or something else, look at it case by case and not a blanket regulation. The unintended consequences far out weigh the benefits from my perspective.

We are not the lower 48 and I'm ok with hunting during daylight hours and game should have some advantages against all the advantages that we already have. I am an avid hunter and I think this is a shiny new tool that should be left on the shelf, unneeded and if used should have very clear and enforceable regulation.

Appreciate your time and commitment to keeping our State as last frontier as it can be,

Alexus Kwachka
Kodiak, Alaska



PC72

Name: Emma Laatsch

Community of Residence: Wasilla Alaska

Comment:

I am writing in support of Proposal 146, it is an essential and humane tool to curb the overpopulation of feral cats in Alaska.

I foster cats with one of the incredible local cat rescue groups and I currently have two foster feral cats; I am working to see if they could become adoptable cats or if they will need to become "barn cats". But we don't have enough homes available to take in barn cats and even adopting out shy kitties who used to be feral is difficult. And there are thousands of cats out there freezing and starving and having more and more kittens. Please, give us this essential tool to curb the exploding populations of feral cats and support Proposal 146 to TNR cats in Alaska.

Thank you



PC73

Name: Ron Linder

Community of Residence: Wasilla

Comment:

I disagree with the resident closure of 19C. once closed it is hard to get re opened. I also disagree with the format of this proposal. I believe 19C sheep population is no different than other parts of the state. all across Alaska and Canada sheep are struggling due to weather. continue resident HT hunts (minimal resident harvest), open nonresident guided hunts starting August 15th with guide use concessions in place.



Louden Tribe

P.O. Box 244
Galena, Alaska 99741
Phone (907) 656-1711
Fax (907) 656- 2491

LOUDEN TRIBAL COUNCIL

RESOLUTION NO. 2025-11

OPPOSING THE ALASKA BOARD OF GAME STATEWIDE PROPOSAL 119

WHEREAS, the Louden Tribe is both a state and federally recognized Tribe; and

WHEREAS, the Tribal members of the Louden Tribe have occupied the area known to the Alaska Board of Game as Game Management Unit (GMU) 21D for over 10,000 years; and

WHEREAS, the Koyukon Athabascan People of the Louden Tribe have harvested, hunted and fished to survive off these lands since time immemorial; and

WHEREAS, the Louden Tribal members have the right to protect their cultural and sovereign rights; and

WHEREAS, Board of Game Statewide Proposal 119 seeks to enact a Game Management Unit (GMU) boundary change for GMU 21E to take a portion of GMU 21D so as not to have to abide by the current antler destruction regulations; and

WHEREAS, GMU 21D contains several Native Allotments that belong to Louden Tribal members or their descendants and the original boundaries were established based on the traditional hunting grounds; and

WHEREAS, the proposed boundary change would lead to increased hunting pressure from outside hunters seeking trophy antlers, resulting in higher traffic in the area and directly impacting local subsistence hunters, including both tribal members and non-tribal residents of Galena, by increasing competition for critical subsistence resources and disrupting traditional hunting and trapping practices; and

THEREFORE BE IT RESOLVED, that the Louden Tribe opposes the Alaska Board of Game Statewide Proposal 119.

CERTIFICATION

I hereby certify that the Louden Tribal Council at a duly called meeting which was convened and held on the 4th day of March 2025, at Galena, AK, approved the foregoing resolution that a quorum was present and that 6 voted for and 0 opposed and 0 abstained.

ATTEST

Charlie Green, First Chief

Jenny Bryant, Secretary

**PC75****Name:** Stacy Luddy**Community of Residence:** Wasilla**Comment:**

RE: Support for Proposal 146, A Proposal to Amending 5 AAC 92.029 To Allow For the Release of Sterilized Cats Into the Wild

I can not understand why it is illegal in Alaska to provide TNR services for feral cat populations. Most of these cats were originally discarded by irresponsible owners and had to fend for themselves. Without being sterilized these cats continue to breed. Many of these colony cats are feral and can not be placed into homes. That doesn't mean that they don't deserve to live. They deserve to be given a chance. Trapping these cats and sterilizing them and then releasing them to the only home they know is humane population control.

I bought my home here in Alaska 2 years ago and moved from CT. I am on the Board of Directors for Kitty Kat Rescue located in CT and have been since 2018. I was a member of the FFA in high school with my main study being Veterinary Sciences. I graduated from the University of Connecticut with a bachelor of science degree in Animal Science. I have worked as a veterinary technician in private veterinary hospitals for 26 years. In CT I did TNR with Kitty Kat Rescue. We would speak with the colony feeder and work out a feeding schedule that would allow us trapping time. We would wait until we had a vet appt and then set traps and catch the quota for our appt. We would usually hold onto the cats until the day after the procedure to make sure they were awake enough to be released. All TNR cats had to be ear tipped so other rescues or feeders would be able to identify the already sterilized cats, which was especially useful when we had to continue trapping in the same colony to complete the group. The law was that these cats had to be released back to their colony unless it was deemed unsafe to do so. We could not trap a cat in one area and release in another. Some colonies we trapped were being poisoned by neighbors so once trapped we could not return them. We had other colonies or farms where we were able to release them in staged release areas so they could acclimate to their new environment. This helped with community relations as well. Most people don't mind a cat or two hanging around their neighborhood. People do mind 50 cats or male non sterilized urine spraying or seeing dead kittens hit on the road. TNR does away with these issues.

I respectfully request that the Board of Game revise the current prohibition on releasing sterilized cats and instead allow for regulated TNR programs under licensed animal welfare organizations like I was able to do in CT.

**PC76****Name:** Garrett Martin**Community of Residence:** Homer, AK**Comment:**

PROPOSAL 127 5 AAC 92.080.

Think of it like this: trapping is like casting a wide net, while using a basic rifle is more like spear fishing. Traps work tirelessly 24/7, giving you a huge edge by passively increasing your harvest. A basic rifle, on

the other hand, demands your full attention, patience, and skill—success depends on being in the right place at the right time.

Now, enter thermal optics, and everything changes. Thermal imaging flips the script, turning night into day and giving rifle hunters a massive advantage. Suddenly, the playing field starts to level. With the ability to detect animals in complete darkness, a hunter equipped with thermal gear can match—or even surpass—the effectiveness of trapping. It’s like upgrading from a candle to a spotlight.

But here’s where fairness comes into play: if you’re investing in cutting-edge tech like night optics, adding a trapper license to your toolkit is an incredibly cheap and reasonable requirement. For the price, it opens up a whole new realm of efficiency and opportunity. Trapping combined with night optics is a game-changer, giving you a nearly unbeatable edge while helping to ensure sustainable and ethical harvests.

In my opinion, it’s completely fair for regulations to require a trapper license for those using thermal gear. It balances the advantages of high-tech equipment while encouraging responsible use of resources. At the end of the day, it’s all about striking the right balance between maximizing efficiency, respecting the wildlife, and following the rules to keep hunting sustainable for everyone.



PC77

Name: Gary McCarthy

Community of Residence: Chugiak

Comment:

Support of proposal 100 which would limit non-resident sheep hunters to draw throughout the state as unlimited permits have taken away from resident opportunity.

Strongly oppose 102-107 ..

Support 108 which opens up 19C to very limited non- resident opportunity and retain open resident hunting.



PC78

Name: John McCombs

Community of Residence: Ninilchik

Comment:

In the past there were many moose along the Homer bench. We voted no on 156 because of the new expanded area north to Deep Creek. This was excessive and does not solve the problem in the more urban Homer area. Further I am opposed to the proposed October season in 15c. The rut is important and the meat is questionable! Thanks. John McCombs.



Dear Alaska Board of Game Members,

I am writing in **support of Proposal 189** up for consideration during the statewide regulations meeting scheduled for March 2025. Specifically, I support the proposed change to 5 AAC 92.050 (a)(6) to read:

“(E) a permittee who had their Unit 20(D) bison permit revoked for regulatory year 2024 may, upon request, have the permit transferred to regulatory year 2026.”

I successfully drew a DI404 hunt permit for the regulatory year 2024 hunting season. When I found out I had won this extremely low chance tag, I was so excited! Since I knew this was a once in a lifetime hunt for me, I invested substantial time and money in planning, preparation and implementation. I planned and researched this particular hunt for about 5 months; pouring over maps and reading everything I could find about it and Bison in general. Preparation and expenses included purchasing multiple plane tickets to Fairbanks, driving to and storing a truck/w camper in Fairbanks for transportation during the hunt, a larger caliber rifle than the one I usually hunt with, and wintertime transportation and hunting gear.

Then my permit was subsequently cancelled on July 24, 2024. While I understood and fully supported the reasoning for cancelling almost half of these hunt permits for the hunting season, my disappointment was great. This is why I support Proposal 189’s language of allowing permittees who had their 2024 permit revoked to request that permit be transferred to 2026. In consideration of the time and effort I have already invested, I would still very much like the opportunity to hunt for a Bison in 2026.

Thank you,
Rachel Miller
Sitka, AK



PC80

Name: Trevor Miller

Community of Residence: Wrangell

Comment:

I am commenting on Proposal 131, and I am NOT in favor of this proposal. In this proposal it says "The need for identification of illegally set traps and snares to assist law enforcement". First I will say if anyone is illegally setting traps or snares the person wouldn't put any form of identification on the trap/snare. Also, for trappers who are following the law, this would allow for harassment if their name is on the tag. Adding trap tags will just be a foot in the door for more restrictions that are not needed for law abiding trappers and another way for people to harass trappers.

Thanks you for reading my comment



PC81

Name: Dan Montgomery

Community of Residence: Wasilla

Comment:

Thank you, Chairman Fletcher and board members for this opportunity to comment on these statewide proposals and 19C sheep proposals.

I'm a 43 year resident of Alaska and have served on the Mat Valley A/C for over 15 years.

I am a Master guide and make my living guiding sheep, goats and Brown bear in Alaska.

I SUPPORT the following proposals.

I support Proposal 94- This proposal would clarify how to determine full curl rams by viewing them from the side, level with the base of the horns, 90 degrees to a line from the middle of the horns to the end of the nose. This would eliminate the Tube Test which I have always viewed as a farse. There would be no turning of the horns, up, down or sideways to give them the optical illusion of completing a 360 degree circle.

I support Proposal 99 - I authored this proposal. It would leave in place the aircraft restrictions known as proposal 207 from August 10th to August 20th. This is when 70% of all the rams are harvested and 90% of the sheep hunters hunt. From August 21st to Sept. 20th you still could not approach closer than 1500 feet from any sheep but you could fly through the mountains and look for a place to hunt without worrying about being turned in for spotting sheep. This aircraft restriction has almost eliminated resident aircraft owners from hunting sheep after opening day for fear of getting turned in for spotting sheep and possibly losing their aircraft. They shouldn't have to worry about that. The public perception is that it is illegal to fly in the mountains if you aren't going straight to or from a camp and this would eliminate that. It would still be illegal to buzz sheep. That has always been harassment and has always been illegal.

I support Proposal 190 with a small amendment. I would amend this to keep the resident season open for 2025 from August 10 to August 31st, 2025. The last 2 years the residents have only taken 15 rams for a 20% harvest success rate and will have little impact on the ram populations and should retain their opportunity to hunt

I support 188 and 189. The either sex permit holders from 2024 should be allocated permits in 2026,2027 and 2028. 9 each year for the 27 total. this would still leave 21 permits for the public to draw each year.



PC82

Name: Bernadette Namasivayam

Community of Residence: Dutch harbor

Comment:

Proposal 146 I support the proposal .



United States Department of the Interior

NATIONAL PARK SERVICE

Interior Region 11 • Alaska
240 West 5th Avenue, Room 114
Anchorage, Alaska 99501

AKRO (A1)

Date: 03/04/2025

Mr. Jake Fletcher, Chair
ATTN: Alaska Board of Game Comments
Alaska Department of Fish and Game
Board Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chairman Fletcher,

The National Park Service (NPS) appreciates the opportunity to comment on proposals for Statewide Regulations being considered by the Alaska Board of Game. We value our role in this important process. Below are recommendations on proposals that affect or have the potential to affect NPS areas.

Proposals 89, 90, 91, and 92. NPS Recommendation: Support.

Proposal 89 would require nonresident moose hunters to attend a hunter orientation course and be accompanied by a registered guide or resident family member within the second degree of kindred; proposal 90 and 91 would require all goat hunters to pass an online mountain goat quiz prior to hunting; proposal 92 would require sheep hunters to complete an online education course. The NPS supports the proposed education and orientation requirements for hunters to increase hunter awareness and to reduce sublegal and female harvest. Additional training requirements will reduce chances for population declines and local extirpation.

Proposals 126, 127, 128. NPS Recommendation: Exclude NPS-managed lands.

These proposals would allow the use of night vision goggles and forward-looking infrared (thermal) devices for taking furbearers with a trapping license statewide. The NPS opposes these proposals as the use of night vision goggles, forward-looking infrared (thermal) devices, and artificial light has the potential to negatively impact the natural abundance, behavior, distribution, and ecological integrity of all native wildlife, including small game. The use of



artificial light and other means and methods is prohibited under Federal hunting regulations 50 CFR 100.26(b)(8), with few exceptions. If the Board adopts these proposals, NPS lands should be excluded.

Proposals 139 and 140. NPS Recommendation: Exclude NPS-managed lands.

Proposal 139 would change the evidence of sex requirements for horned big game animals; proposal 140 would eliminate the evidence of sex requirement for big game having a bag limit restricted to one sex. Providing evidence of sex requirement is a critical management tool. Removing evidence of sex requirement for big game hunts with bag limits restricted to one sex would complicate management, law enforcement, and could even promote illegal harvests. Adoption of this proposal would further complicate law enforcement's ability to determine adherence to regulations. Evidence of sex and identity is regulated under Federal hunting regulations 50 CFR 100.26(g). If the Board adopts these proposals, NPS lands should be excluded.

Thank you for the opportunity to comment on these wildlife regulatory matters. Should you or your staff have any questions, please feel free to contact me.

Sincerely,

ELIZABETH BELLA Digitally signed by ELIZABETH
BELLA
Date: 2025.03.04 14:24:17 -09'00'

Elizabeth Bella
Acting Associate Regional Director - Resources
National Park Service - Alaska Region

cc:
Kristy Tibbles, Executive Director, Alaska Board of Game, ADF&G
David Alberg, Acting Regional Director, National Park Service, Alaska Region
Sara Boario, Regional Director, U.S. Fish and Wildlife Service
Superintendents, National Park Service, Alaska Region



NATIVE MOVEMENT

These comments on 2025 Statewide proposals are submitted on behalf of Native Movement, an Alaska-based non-profit organization dedicated to building people power, rooted in an Indigenized worldview, toward healthy, sustainable, and just communities for all.

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Native Movement's Comments Supporting Board of Game Proposals

Native Movement respectfully requests that the Board of Game approve the following proposals. These proposals aim to advance sustainable wildlife management, wildlife conservation, subsistence rights, equitable distribution of hunting opportunities, improved hunter education, and regulatory clarity. The rationale for supporting each proposal is outlined in the respective proposal section.

Proposal 86: Mandatory Harvest Reporting of Sea Ducks

Native Movement's Stance: Support

We endorse the national migratory bird survey framework due to inconsistencies in data collection among states. However, federal capacity to maintain this survey may be limited, particularly with ongoing federal agency layoffs. While a statewide dataset may not fully capture sea duck populations, it could help identify research and management questions within the state.

The State argues that harvest data alone lacks the necessary context for management decisions. However, the state relies exclusively on harvest data for managing many species without population estimates, including bears, wolves, and small game. Although harvest data alone is not ideal, it is valuable in the absence of other data. Each component of the national survey is voluntary. Mandating harvest data for migratory ducks, especially in Alaska's major flyways, would be beneficial.

Proposal 88: Permit to Take and Use Game for Cultural Purposes

Native Movement's Stance: Support

Proposal 88 seeks to amend 5 AAC 92.034 to include wood bison as a species eligible for cultural use permits. This amendment is crucial for cultural revitalization, education, and the preservation of Alaskan Native traditions, particularly in communities near the Minto Flats State Game Refuge where wood bison have been reintroduced. Allowing the cultural use of wood bison ensures Indigenous communities maintain agency over conservation efforts and can integrate these animals into traditional practices.

Proposal 89: Nonresident Hunter Education Requirements

Native Movement's Stance: Support

Currently, nonresident hunters can bypass the educational standards required for Alaskans under 39. This proposal ensures nonresident hunters understand the State's standards for meat care, conservation, and hunting regulations, aligning them with resident requirements. Requiring education will help preserve subsistence resources and reinforce ethical hunting standards.

Proposals 90 and 91: Mountain Goat Hunting Education

Native Movement's Stance: Support

These proposals offer a low-cost, low-barrier method to reduce nanny harvest, crucial for sustaining mountain goat populations. If passed, we encourage ADFG and/or AWT to track



post-regulation nanny take compared to pre-education years to assess the quiz's effectiveness in reducing illegal or unintended nanny harvest.

Proposal 92: Sheep Hunting Education Requirement

Native Movement's Stance: Support

Proposal 92 advocates for mandatory online training for all sheep hunters in Alaska, emphasizing the identification of legal rams. With Dall sheep populations declining, illegal harvests exacerbate sustainability issues. Implementing educational requirements could reduce misidentification and improve compliance with legal harvest criteria. We support this proposal to improve hunter education, prevent unintended illegal harvest of sheep, and to support the recommendations of the 19C Sheep Working Group.

Proposal 95: Repealing Age-Based Criteria for Legal Full-Curl Rams

Native Movement's Stance: Support

Proposal 95 advocates for removing the age-based criterion (eight years old) for determining legal full-curl ram harvests. The difficulty of field judging the age of rams has led to unintentional illegal harvests. Eliminating this criterion would simplify regulations, focusing instead on full-curl or broomed horns as primary indicators of a mature ram. With Dall sheep numbers at historic lows, ensuring rams reach full maturity before harvest will support long-term population recovery.

Proposal 96: Removing Age Criteria for Full-Curl Sheep

Native Movement's Stance: Support

Similar to Proposal 95, Proposal 96 seeks to eliminate the age-based standard for determining legal rams. The current requirement for hunters to judge age from a distance often results in errors, complicating compliance and enforcement. By shifting the focus to full-curl or broomed horn criteria, this proposal aims to simplify regulations and support conservation efforts, ensuring younger rams have the opportunity to mature and breed before harvest.

Proposal 97 and 98: Extending Aircraft Restrictions for Sheep Hunting

Native Movement's Stance: Support

Proposal 97 and 98 seeks to extend the current restriction on using aircraft for scouting sheep. This extension ensures that all hunters, including youth and archery hunters, adhere to the same fair chase principles. Reducing aerial scouting would prevent excessive hunting pressure on sheep populations and promote ethical hunting practices.

Proposal 100: Nonresident Sheep Harvest Cap

Native Movement's Stance: Support

Implementing a 35% cap on nonresident harvests aims to increase the availability of legal rams for residents, thereby improving resident success rates. This proposal prioritizes resident hunting



opportunities while still offering reasonable access for nonresidents. Additionally, a drawing permit system would enable the Board to manage nonresident hunter numbers and mitigate the negative impacts of excessive harvests on Dall sheep populations statewide. Although the Board prefers a Guide Concession Program (GCP) to achieve these goals, Proposal 100 provides an immediate alternative that does not require legislative approval.

Proposal 108: Instituting a Limited Draw System for Nonresident Sheep Hunters

Native Movement's Stance: Support

Proposal 108 seeks to allow nonresident hunting through a controlled permit system. For over a decade, nonresident hunters have taken nearly 80% of the annual ram harvest in Unit 19C. In 2022 alone, nonresidents accounted for 90% of the sheep harvest, despite a significantly reduced sheep population. This disproportionate share of the harvest by nonresidents raises serious concerns about overharvesting and its impact on the local sheep populations. Instituting a limited draw system will help rectify this imbalance by controlling the number of nonresident hunters while also ensuring a more equitable distribution of hunting opportunities.

Proposal 116: Reinstating Late-Season Resident-Only Sheep Hunt (RS380)

Native Movement's Stance: Support

Proposal 116 seeks to reinstate the RS380 late-season resident-only sheep hunt in Unit 19C, which was previously closed. This proposal prioritizes local hunters by permitting the harvest of one ram with $\frac{3}{4}$ curl horns or smaller, using ground-based methods without aircraft. Reinstating RS380 aligns with subsistence priorities, ensuring rural Alaskans retain equitable access to traditional hunting opportunities.

Subsistence hunting is a fundamental right for Indigenous and rural Alaskans. The RS380 hunt provided an essential food source for local communities, and its closure unjustly restricted traditional harvest opportunities. While nonresident sheep hunting was closed due to overharvest concerns, subsistence hunters should not have been penalized in the same way. Reopening RS380 restores fairness to local access.

Proposal 120: Adjusting GMU 25C and 25D Boundary

Native Movement's Stance: Support

Proposal 120 suggests altering the boundary between GMUs 25C and 25D, using the Steese Highway between Birch Creek and Circle as the new demarcation. This change aims to simplify boundary recognition for hunters. The existing boundary, reliant on less conspicuous geographic markers, has caused confusion. Establishing a clear boundary along the highway would likely improve compliance and facilitate navigation for hunters in the area.



Proposal 131: Trap ID

Native Movement's Stance: Support with Amendment

We support the proposal's intent for traps and snares to have an identification tag but have concerns around personal information and burdening trappers. This regulation is applicable to urban areas like Anchorage, Fairbanks, and Juneau where recreational users and novice trappers have conflicts. Therefore, regulations should mandate that all traps and snares in non-subsistence areas, under State definition, have an identification tag.

We oppose disclosing trappers' identities to the general public, as Wildlife Troopers have noted that public disclosure could impede ongoing law enforcement investigations. In the event of a violation, records become public and can be obtained. We propose that ADF&G issue trappers an identification number instead. Tags should be physically placed on the trap and posted conspicuously at the entrance to the trap set. This would help law enforcement in determining ownership without having to approach carefully constructed sets.

Trap ID requirements have existed in Alaska for decades. For example, in 2001, Units 12 and 20E passed trap ID regulations on snares to address enforcement issues. Though this regulation had a two-year sunset clause, it was reinstated in 2022 due to support from local trappers and law enforcement. In 2006, the Board required trap ID in Units 1-5 for all traps and snares to address conflicts between recreational trail users and trappers. In 2016, Proposal 78 requested to remove those requirements, and while ADFG was neutral and AWT did not submit comments, AWT has frequently cited a lack of trap ID as a challenge for enforcing areas with trap setbacks (Units 1, 15C, and Mat-Su). Additionally, subsistence trapping permits on Alaska Mental Health Trust land require signage with the trapline, trapper's name, and license number, and Kenai National Wildlife Refuge trapping permits require tags on all traps and snares with a specific identifier.

Proposal 132: Prohibit nonresidents from using snowmachines to approach and pursue the take of wolves and wolverines

Native Movement's Stance: Support

The current regulation affords nonresident trappers an improper and unfair advantage in killing free-ranging wolves and wolverines. This trapping method and means exception was originally allowed for subsistence users, but it also created an exception for nonresident hunters and trappers. Nonresidents should not be afforded this exception and should be held to basic fair chase principles.

Proposal 133: Prohibit trappers from using snowmachines to approach and pursue the take of wolverines

Native Movement's Stance: Support

This exception for the use of snowmachines affords nonresident trappers an improper and unfair advantage in the taking of wolves and wolverines. This practice is counter to basic hunter and trapper ethics and contrary to fair chase principles. Nonresidents should not be afforded this exception and should adhere to fair chase standards.



Proposal 148: Increasing Public Oversight for Predator Control Measures

Native Movement's Stance: Support

Proposal 148 mandates additional public notification and input before the ADF&G Commissioner can initiate an Intensive Management (IM) predator control plan. This ensures transparency and accountability in wildlife management decisions, and prevents unilateral administrative actions without Board or public input. By giving the public a voice in these critical decisions, Proposal 148 strengthens trust and credibility in the management of Alaska's wildlife.

Native Movement's Opposition to Board of Game Proposals

Native Movement respectfully urges the Board of Game to oppose proposals that unduly restrict traditional hunting practices, expand nonresident trophy hunting at the expense of subsistence users, and prioritize economic interests over conservation.

Our wildlife specialist has identified several proposals that threaten traditional hunting, favor nonresident trophy hunters over Indigenous and resident users, and fail to prioritize conservation. We aim to highlight these key concerns and advocate for the protection of traditional hunting rights, sustainable wildlife management, and equitable distribution of hunting opportunities. Further changes to existing regulations, which already address many of these concerns, would disproportionately impact rural and subsistence hunters.

Native Movement strongly opposes these proposals and urges the Board of Game to uphold policies that support sustainable, ethical, and equitable wildlife management.

Proposal 87: Restricting Boat Use in Waterfowl Hunting

Native Movement's Stance: Oppose

Proposal 87 proposes limitations on boat movement during waterfowl hunting by mandating that boats be anchored or grounded within 100 yards of individuals discharging firearms. A substantial number of Indigenous hunters depend on boats for customary waterfowl harvests, especially in remote regions characterized by expansive wetlands. Imposing restrictions on their movement could impede their ability to access birds. The current regulation (5 AAC 92.100) already prohibits hunting from a moving boat unless the motor is off and the boat has ceased motion. This regulation adequately addresses concerns regarding the herding and pursuit of birds, rendering additional restrictions unnecessary and onerous for hunters operating within legal boundaries, particularly those engaged in subsistence practices. We also refer to Trooper comments of concerns about the enforceability.

Proposal 93: Changing Sealing Requirements for Dall Sheep Horns

Native Movement's Stance: Oppose

Proposal 93, which seeks to replace the permanent plugging of Dall sheep horns with a nonpermanent plastic seal, prioritizes trophy aesthetics over wildlife conservation. The current system effectively prevents illegal harvest and trafficking. There is no clear justification for

weakening these enforcement mechanisms. Current regulations ensure the integrity of sheep management, and this proposal does not provide scientific evidence or a viable alternative that maintains the same level of accountability.

Proposal 94: Redefining "Full-Curl" Dall Sheep

Native Movement's Stance: Oppose

Changing the definition could impact sheep population management if it leads to a higher or lower harvest of rams, depending on how the revised method affects field judgments. Without clear data on whether this change would lead to more or fewer sheep being taken, it is difficult to determine whether the impact is positive or negative.

Proposal 99: Reducing Aircraft Restrictions in Sheep Hunting

Native Movement's Stance: Oppose

Proposal 99, which would relax current restrictions on aircraft use for sheep hunting by allowing aerial scouting earlier in the season, primarily benefits wealthier outfitters and nonresident hunters while increasing pressure on struggling sheep populations. Dall sheep habitat encompasses high elevations and valleys, where sounds from airplane motors are amplified and transmitted across vast distances. The current prohibition on early-season aerial scouting ensures fair chase principles and prevents unnecessary stress on wildlife. Dall sheep populations are already under strain, and reducing aerial scouting restrictions could exacerbate these issues, potentially resulting in fewer mature rams in the population.

Sheep do not qualify as a species that provides "high levels of human consumptive use" and should not be categorized with moose, deer, and caribou.

Proposal 101: Add Dall Sheep As A Prey Species Under The Intensive Management Statute

Native Movement's Stance: Oppose

Dall sheep do not qualify as a species providing "high levels of human consumptive use" and should not be categorized with moose, deer, and caribou. On average, hunters take 25,000 caribou, 10,000 deer, and 7,000 moose annually, while Division of Subsistence surveys show a total sheep harvest of 266 per year across 36 communities. While sheep are important to some communities, the meat sheep hunting provides pales in comparison to the species originally identified in the statute: moose, deer, and caribou.

The proposal to include them lacks scientific evidence and could set a dangerous precedent for other big game species. This proposal would set a dangerous precedent if any big game species can be characterized as providing "high levels of human consumptive use". Mountain goats, musk ox, and bison could also be added. The scope of species to be managed for under Intensive Management (IM) was kept narrow on purpose, and species under that statute should be limited to those truly providing high levels of human consumption.

IM has recently become synonymous with Predator Control, but predators are not the cause of sheep decline. In management reports, the most frequent causes of sheep population decline are



loss of winter habitat, climate change, and weather. No research has indicated that Alaska's sheep are declining due to predation. Therefore, IM will not address the root causes and could be ineffective. Of the 14 management reports available, reasons for stable, low, or declining populations include:

- Loss of winter habitat and climate change (GMUs 7 and 15)
- Weather and carrying capacity (GMU 12)
- Possible changes in habitat (GMUs 12, 13c, 20d)
- Nutrition and stochastic factors (GMU 13d)
- Severe winters (GMU 14c)
- Weather-related lamb loss in 2013 (GMU 19b and c)
- Late spring breakup in 2013 (GMUs 20b, 20f, and 25c)
- Near complete failure of lamb recruitment (GMUs 24, 25a, 26b, and 26c)

The sole mention of predation is in GMU 11, where the management biologist notes uncontrollable factors including weather, habitat quality, and predation. Further research is needed to determine if predation is compensatory and if populations are near carrying capacity, which may be reduced by changing habitat.

If the BOG adopts this proposal, population objectives must be realistic given current and future conditions. The State and BOG must recognize that sheep habitat is changing due to the climate, and past objectives may no longer be attainable. The BOG must also consider the costs to Alaskans and the State of enacting IM in areas where non-resident hunters account for a significant percentage of the sheep harvest. The BOG should consider whether it is ethical or represents sustainable management to enact IM so non-residents can have access to trophy sheep hunts.

Wildlife management decisions should be science-based. The current proposal lacks scientific justification for including sheep in the IM program. Focusing on increasing sheep for human consumption could neglect the broader ecosystem and other species. Conservation should maintain natural population dynamics, which IM may undermine by prioritizing human use over long-term ecological health.

Proposal 102: Reopening Dall Sheep Hunts in Unit 19C

Native Movement's Stance: Oppose

Proposal 102 proposes the reinstatement of subsistence and nonresident sheep hunts in Unit 19C. These hunts were previously closed by ADF&G due to severe and prolonged population declines; therefore, reinstating the hunts at this time would be premature. While the proposal argues that sheep populations follow natural cycles, recent data indicates that the declines have been significant and ongoing. Until the population recovers, reinstating hunting—especially for nonresident hunters—poses a serious risk to conservation efforts.



Proposal 103: Rescinding the Five-Year Closure of Sheep Hunting in Unit 19C

Native Movement's Stance: Oppose

Proposal 103 proposes to overturn the five-year closure of sheep hunting in Unit 19C. While proponents of this proposal contend that the population decline is weather-driven, reopening the hunt without clear evidence of recovery is irresponsible. The closure was enacted to allow for population rebound and should remain in effect.

Proposal 104: Reopening Nonresident Dall Sheep Hunting in Unit 19C

Native Movement's Stance: Oppose

Proposal 104, which would permit nonresident hunters to harvest one full-curl ram every four regulatory years, should not be adopted. The previous closures were implemented to safeguard the population, and prioritizing nonresident trophy hunting over the subsistence needs of residents is unacceptable. Wildlife management should be grounded in conservation, not financial considerations.

Proposal 105: Reopening Nonresident Dall Sheep Hunting in 2024

Native Movement's Stance: Oppose

Proposal 105 proposes reopening nonresident sheep hunting in Unit 19C before the full recovery of the population. The assertion that nonresident hunting does not impact populations fails to consider the cumulative stress on a struggling species. Conservation efforts and Indigenous hunters must be prioritized over nonresident and economic interests.

Proposal 106: Reopening Nonresident Dall Sheep Hunting Based on Natural Cycles

Native Movement's Stance: Oppose

Proposal 106 asserts that Dall sheep populations follow natural cycles, and that hunting should consequently resume. However, without confirmation and evidence of population recovery, reinstating hunting could risk further population declines. Economic losses for nonresident guides should not be prioritized over conservation efforts.

Proposal 107: Rescinding the Nonresident Sheep Hunting Closure in 19C

Native Movement's Stance: Oppose

Proposal 107 proposes a delay or rescission of the closure. While the economic losses for guides and outfitters are a valid concern, maintaining a focus on conservation is paramount. The closure to nonresident hunting is an important measure for ensuring sustainability. Delaying the closure to nonresident hunting for one year to gather additional data, as suggested in Proposal 107, is not advisable. This precautionary closure is essential for allowing sheep populations to recover before hunting can be reopened. A reinstatement of nonresident hunting before adequate recovery has occurred would undermine current conservation efforts.



Proposal 109: Reopening Nonresident Sheep Hunting with Archery Restrictions

Native Movement's Stance: Oppose

Proposal 109 proposes that nonresident sheep hunting be restricted to bowhunting. While this may reduce harvest rates, it still poses risks to an already struggling population. Wildlife conservation should not be utilized as a testing ground for alternative hunting methods. Moreover, establishing an archery-only hunt can have detrimental effects through wound loss; bow hunters statistically have the highest rate of wound loss. This poses a risk to an animal that is already challenging to pursue, as it could potentially fall or jump off a cliff edge.

Proposal 110: Changing Resident Bag Limits for Sheep

Native Movement's Stance: Oppose

Proposal 110 intends to impose a two-year restriction on resident sheep hunters, which would disproportionately affect subsistence users who depend on these resources, and impose undue hardship. Additional conservation measures should target nonresident hunting instead of limiting resident access.

Proposals 111-115, and 117: Various Amendments to Sheep Hunting Regulations

Native Movement's Stance: Oppose

The proposed tiered eligibility systems based on ram age, archery-only requirements, shortened resident seasons, and modifications to nonresident allocations favor economic gains over conservation (this shift in focus undermines the long-term health of sheep populations, which should be the primary concern of any regulatory framework) and disproportionately affect Indigenous and resident hunters. The introduction of new eligibility requirements and penalties will complicate regulations and make compliance more difficult for hunters. This could lead to more violations, increased enforcement challenges, and further strain limited resources. It is crucial to prioritize conservation and equitable access over economic interests to ensure the sustainability of sheep populations and the preservation of cultural practices.

Proposal 119: Changing the GMU 21E and 21D Boundary

Native Movement's Stance: Oppose

Proposal 119 proposes modifying the boundary between Game Management Units (GMUs) 21E and 21D to allow residents of Grayling greater access to hunting grounds. This change would address significant accessibility issues for Grayling residents, who currently must travel long distances—up to 120 miles by boat—to hunt traditional grounds. When water levels in the Yukon and Shageluk Slough are low, these travel distances increase further, placing undue hardship on local hunters.

However, the proposed boundary change would allow more hunters access to Unit 21D, potentially leading to overharvest without additional conservation measures such as antler destruction or stricter permit requirements. Unit 21D currently has an antler destruction



requirement, which helps prevent high levels of nonresident or outside hunter pressure. Expanding Unit 21E into this area could undermine those protections and potentially increase illegal harvest and hunting competition.

The current unit boundaries are based on historical wildlife management data. Changing the boundary without strong biological evidence that benefits game populations could disrupt moose conservation efforts. While expanding access for local hunters is important, any boundary changes should be implemented alongside conservation safeguards to ensure the long-term sustainability of game populations.

Proposals 126, 127, And 128: Night Vision And Thermal Optics

Native Movement's Stance: Oppose

The Board of Game previously proposed to prohibit the use of night vision and FLIR devices due to concerns regarding increased harvest. Therefore, we inquire as to the reasoning for this change. The Interior proposal for FLIR was only passed in 2024, so we lack sufficient data to understand its impacts before proposing it statewide. At the 2016 Statewide meeting, the Board adopted Proposal 68, submitted by the Alaska Wildlife Troopers (AWT), which prohibited the use of forward-looking infrared devices (FLIRs) for taking game. AWT's comments from 2016 remain relevant today:

- "The use of a FLIR scope or device gives an individual an unfair advantage when hunting and allows an individual to locate and take an animal in total darkness by the animal's body heat signature."
- "If the board decides that a FLIR device should not be used to take game, the Alaska Wildlife Troopers ask the board to apply this restriction to all game and furbearers to eliminate any enforcement difficulties."
- "Under 5AAC 92.085(C), artificial light may be used for taking furbearers under a trapping license during an open season from November 1 to March 31 in Units 7 and 9-26. These restrictions were included to prevent individuals from using artificial light to locate and take deer."
- "The use of artificial light is easier to enforce as the individual is visible when using artificial light, as opposed to an individual using a FLIR or NVG device."

Proposals 142-143: Allow for the sale of big game trophies without a permit

Native Movement's Stance: Oppose

Proposals 142-143 seek to eliminate the permit requirement for the sale of big game trophies, promoting the commodification of big game animals and risking exploitation by the commercial industry and wildlife crime. These animals are vital food sources, and eliminating the permit requirement could lead to negative impacts.

Requiring a person to obtain a free permit to sell an Alaskan big game trophy is the only means the state has to curtail potential illicit trade in Alaskan trophies. The illegal and illicit trade in wildlife worldwide is estimated at between \$7 billion and \$23 billion annually, aligning with



concerns from the Alaska State Wildlife Troopers. Wildlife crime is considered one of the world's most lucrative illegal businesses.

We strongly oppose these proposals to prevent the exploitation and illegal trade of Alaskan big game trophies.

Proposal 147: Delegate Authority to Manage 5 AAC 92.029 (Clean List) to the Commissioner

Native Movement's Stance: Oppose

This proposal is the second attempt at Governor Dunleavy's 2024 Executive Order 124. The Executive Order faced broad opposition and was opposed by the legislature.

This proposal would allow the Commissioner of ADFG to manage the "clean list", which contains all the mammal, bird, and reptile species that have been specifically approved for entry or possession in Alaska.

Proposal 147 would have a substantial effect on the public process, and not a positive one.

Currently, the Board of Game issues a call for proposals, ADFG analyzes and gives recommendations, public comments are collected, and the Board deliberates with input from all seven members. Transitioning this process to the Commissioner would allow a single individual to draft regulations, post them for public comment, and finalize them without group deliberation.

While we understand the desire to streamline permitting for importing exotic species as potential food sources, importing species not listed on the clean list carries substantial risks of disease or parasite transmission to native wildlife and domestic livestock. These decisions must be reviewed by multiple people and the public to ensure thorough evaluation.

The risks are too significant to bypass the more deliberative and public-facing process of the Board of Game. The Board may choose to delegate regulation of the live capture, possession, transport, or release of native or exotic game or their eggs to the Commissioner to streamline individual permits on a case-by-case basis where disease risk and mitigation measures are clearly understood.

We strongly encourage the Board to reject this proposal to maintain a transparent and comprehensive review process.



PC85

Name: Zach Nemelka

Community of Residence: Anchorage

Comment:

92 aac 92.003 I believe that educating sheep hunters is a good thing. It doesn't prevent people from hunting but makes sure people know what a legal sheep is. As a sheep hunter myself I would welcome further education



I oppose proposal 87 as the passage of this proposal creates a situation where hunters and other non-affiliated boat operators unintentionally violate regulations, or hunters are prevented from retrieving downed birds, which is counterintuitive to hunter ethics and potentially wasteful. I believe the current federal and state regulations are suitable.

I support proposal 88 as including wood bison in 5 AAC 92.034 provides the Board and ADFG with a tool to provide harvest that is true to the intention for reintroducing wood bison to Alaska, as spelled out in ADFG's Spring news release, "“This restoration isn't just about ecological conservation; it's about enhancing the cultural, economic, and social fabric of our state, enriching the lives of its people and communities.”"

I support proposal 89 with either of the following amendments:

(c) A nonresident hunter [in Unit 17(B)] must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting for moose and caribou [or] and must be accompanied by a registered guide or resident family member within the second degree of kindred.

[(d) A nonresident hunter in Unit 19(B) must have attended a department-approved hunter orientation course (to include trophy recognition and meat care) before hunting for moose or caribou or must be accompanied by a registered guide or resident family member within the second degree of kindred.]

OR by excluding section (d) from the proposed change, as the proposal as written would remove hunter education requirements in Unit 19(B) from 5 AAC 92.003.

If residents are required to take a hunter education course in order to hunt in Units 7, 13, 14, 15, and 20, non-residents hunters should be required as well. As written, hunter education requirements for non-residents would not adversely affect guiding opportunities. Additionally, there is strong evidence to suggest that hunter education reduces accidents, creates safer hunting environments, promotes ethical and sustainable hunting, and adherence to hunting regulations. Finally, as stated in staff comments, many states have hunter education requirements, all states offer hunter education courses according to IHEA-USA standards, and ADFG accepts these courses from other states and countries.

I oppose proposal 119 to change the boundary between Unit 21 D and E because the current boundary accurately reflects the separate moose populations and hunter-use patterns.

I support the intent of both proposals 129 and 130, as such I specifically support proposal 129 as establishing standards for weapons in moose and big game hunting is unfortunately necessary. As noted in staff comments, when small calibers are used correctly, they can be effective in taking moose and other big game, but unfortunately the people with such skill appear to be far outnumbered by those who are not effective in taking moose and big game with the smaller caliber rifles. Naturally I would support the Board's original position leaving individual hunters to gauge their own capabilities in deciding which caliber rifle to harvest big game, but each year moose and other big game are left to suffer and die because smaller caliber cartridges leave little room for error.



I oppose proposal 131 on a statewide level. I very clearly see the need for trappers to include ID tags with their traps and snares in more urban/urban accessible areas, but I do not see it as necessary for more rural and less accessible areas of the state. In rural areas of the state, such as where much of my family is from, traplines are inherited from family members, so more often than not people in the community know who the traps or snares belong to. Additionally, people in rural areas generally have more area to set their traps and snares away from where children or pets may encounter them.



North Slope Subsistence Regional Advisory Council
c/o Office of Subsistence Management
1011 East Tudor Road MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

In Reply Refer To:
OSM.B25019

MARCH 05 2025

Jake Fletcher, Chair
Alaska Board of Game
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Fletcher,

I write to you on behalf of the North Slope Subsistence Regional Advisory Council (Council) to provide the Council's comments on proposals that will be considered during the March 21-28, 2025, Statewide Board of Game (BOG) Meeting.

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

The Council held a public meeting on February 28, 2025, in Utqiagvik, and took up three BOG Proposals. Please see the Council comments below.

Proposal 86: Harvest Tickets and Reports

The Council **opposes** Proposal 86, which would require mandatory harvest reporting of sea ducks throughout the State. Sea ducks are an important part of the diets of the people of the North Slope Region, and the Council believes this reporting requirement would impose a burden on subsistence users in the region.



Proposal 151: Brown Bear Tag Fee Exemption

The Council **supports** Proposal 151, which would reauthorize the resident tag fee exemptions for brown bears in Game Management Units (Units) 18, 22, 23, and 26A. The Council concurs with the justifications provided by the North Slope Advisory Committee, as discussed in their February 20, 2025 meeting and believes the reauthorization of this proposal would alleviate the burden associated with purchasing a \$25 tag and minimize confusion on brown bear harvest regulations among users.

Proposal 165: Hunting Seasons and Bag Limits for Moose

The Council **supports** Proposal 165, which would reauthorize the resident antlerless moose season in Unit 26A with an **amendment** to extend the antlerless moose season through September 30. The Council's support for the amendment aligns with the recommendation of the North Slope Advisory Committee provided in their February 20, 2025 meeting. Furthermore, the Council concurs that extending the season through September 30 can increase harvest opportunities for users and is unlikely to negatively impact the moose population within the specified portion of unit 26A.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Gisela Chapa at (907) 310-6129 or gisela_chapa@ios.doi.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Brower Frantz".

Brower Frantz
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
North Slope Subsistence Regional Advisory Council
Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of Fish and Game
Administrative Record



PC88

Name: Philip Nuechterlein

Community of Residence: Eagle River

Comment:

I support RHAK proposals 100, 108, and 192!

I oppose proposals 102-107 and 190!

Alaskas wildlife is a public asset. I oppose giving preference to wealthy, elite hunters (guided non-residents) over resident hunters that have limited assets and cannot afford extraordinarily expensive hunts!!!!



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

In Reply Refer To:
OSM.C25007

FEBRUARY 28 2025

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

Dear Chair Fletcher:

The Office of Subsistence Management (OSM) appreciates the opportunity to comment on the Alaska Board of Game proposals during the March 21 - 28, 2025 Statewide Regulations Meeting.

The Office of Subsistence Management, working with other Federal agencies, reviewed each of these proposals. The attached document includes comments from OSM regarding proposals that have the potential to impact federally qualified subsistence users or associated wildlife resources on or adjacent to Federal public lands in Alaska. During the meeting, we may wish to comment on other agenda items that might impact federally qualified subsistence users or wildlife resources.

Again, we appreciate the opportunity to comment on these important regulatory matters and look forward to working with the Board of Game and the Alaska Department of Fish and Game on these issues. Please contact Lisa Grediagin, Wildlife Division Supervisor, 907-786-3357 or lisa_grediagin@ios.doi.gov, with any questions you may have concerning this material.

Sincerely,

Crystal Leonetti
Director

Enclosure: Office of Subsistence Comments



cc: Federal Subsistence Board
Office of Subsistence Management
Interagency Staff Committee
Southeast Alaska Subsistence Regional Advisory Council
Southcentral Alaska Subsistence Regional Advisory Council
Kodiak/Aleutians Subsistence Regional Advisory Council
Bristol Bay Subsistence Regional Advisory Council
Yukon/Kuskokwim Delta Subsistence Regional Advisory Council
Western Interior Alaska Subsistence Regional Advisory Council
Seward Peninsula Subsistence Regional Advisory Council
Northwest Arctic Subsistence Regional Advisory Council
Eastern Interior Subsistence Regional Advisory Council
North Slope Subsistence Regional Advisory Council
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director Wildlife Division, Alaska Department of Fish and Game
Administrative Record



OFFICE OF SUBSISTENCE MANAGEMENT

RECOMMENDATIONS

on

ALASKA BOARD OF GAME PROPOSALS

Statewide Regulations Meeting

March 21 – 28, 2025

Anchorage, Alaska

Office of Subsistence Management (OSM)



PROPOSAL 94 – 5 AAC 92.990(30). Definitions.

Change the definition for “full-curl” ram.

Current Federal Regulations:

§100.25(a) Definitions:

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

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

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may harvest a full curl ram judged by any of three different methods under Federal regulations: measuring the curl, if both horn tips are broken, and counting annuli. If this proposal is adopted, the definition of measuring the curl would change. The addition of language regarding the viewing perspective would be more restrictive than Federal regulations but would add clarity to users in the field and may prevent some sublegal harvest.

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 open Federal wildlife proposal window, which closes April 4, 2025.

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

Rationale: Adopting this proposal would clarify State regulations but would misalign Federal and State definitions of full-curl rams, increasing regulatory complexity and the potential for user confusion.

PROPOSAL 95 – 5 AAC 92.990(30). Definitions.

Repeal the age criteria for the definition of full-curl horn ram.

Current Federal Regulations:

§100.25(a) Definitions:

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

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

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may harvest a full curl ram judged by any of three different methods under Federal regulations: measuring the curl, if both



horn tips are broken, and counting annuli. If this proposal is adopted, counting of horn annuli would be eliminated as a method for determining full-curl rams under State regulations. Removing one method of determining a legal ram under a full-curl harvest limit might require additional time observing rams before harvesting, but it should not substantially impact federally qualified subsistence users' opportunity to harvest sheep under State regulations.

Sublegal harvest of sheep has been noted during the sealing process and reported by three ADF&G offices during the 2022 season. A total of 26 out of 315 harvested sheep reported, or 8.2%, were declared sublegal during the 2022 season. This is up from the 3-4% estimated annual sublegal harvest from the 2015-2019 sheep seasons. Anecdotally reported at the time of sealing, the most common mistake leading to sublegal harvest was attributed to hunters aging sheep by annuli, of which 42% were hunters using the services of a guide (ADF&G 2022). In Unit 19C specifically, 2013–2022 nonresident harvest (which requires the use of a guide or 2nd degree of kinship) reported an average 2.8% sublegal harvest (ADF&G 2024). Aging of sheep in the field, at a distance is extremely difficult and ADF&G recommends to hunters not to use this method for determining legality of a ram in their publication, *Dall Sheep Hunting: Full-curl identification guide* (Taras 2016).

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 open Federal wildlife proposal window, which closes April 4, 2025.

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

Rationale: Adopting this proposal would remove a difficult method of aging sheep in the field. All users would still be able to identify full-curl rams for harvest by either of the two remaining methods. Given the current declines in sheep populations and relatively high rate of sublegal rams harvested in 2022, removing this method may benefit sheep by keeping sublegal rams in the population to bolster productivity and aid in recovery of sheep populations.

Literature Cited

Alaska Department of Fish and Game. 2022. Board of Game Sheep Informational Meeting Presentation. Alaska Department of Fish and Game, Division of Wildlife Conservation.

ADF&G. 2024. Alaska Department of Fish and Game Science Support Presentation to the 19C Sheep Working Group. October 17, 2024. Division of Wildlife Conservation.

Taras, M. 2016. Dall sheep hunting: Full-curl identification guide. 2017. Alaska Department of Fish and Game, Division of Wildlife Conservation, Fairbanks.

PROPOSAL 96 – 5 AAC 92.990(30). Definitions.

Repeal the age criteria for the definition of full-curl horn ram.

Please see comments on Proposal 95.



PROPOSAL 110 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Change the sheep bag limit in Unit 19C for resident hunters to one ram with full-curl horn or larger every two regulatory years.

Current Federal Regulations:

Unit 19–Sheep

Sheep: 1 ram with 7/8 curl horn or larger

Aug. 10-Sep. 20.

Unit 19C, that portion within the Denali National Park and Preserve—residents of Nikolai only—no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system

Oct. 1-Mar. 30.

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

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may currently harvest a 7/8 curl ram in Unit 19 under Federal regulations. Adopting this proposal would not affect that opportunity. However, federally qualified subsistence users that hunt under State regulations would be limited to one ram every two years, decreasing their opportunity to harvest sheep. This proposal would also modify the State subsistence hunt, which would take away the opportunity of federally qualified subsistence users to harvest a 3/4 curl or smaller ram under State regulations. While not stated in the proposal, implementation of a registration permit during the early fall hunt would likely be needed to track hunter participation, limiting them to one permit every two years.

Both hunted and nonhunted sheep populations in and around Unit 19C have decreased in concert with each other, by approximately 50% since 2017. Sheep population estimates within Denali National Park and Preserve have decreased since 2019 (Borg 2023, pers. comm.), paralleling the declining sheep populations in the adjacent Unit 19C. ADF&G survey data indicates about a 64% decrease in Unit 19C sheep abundance since 2017. Reported harvest of sheep in Unit 19C has also followed this declining trend, decreasing by about 80% from 2018 to 2022. The total number of sheep hunters has also declined by about 75% for the same timeframe (ADF&G 2024).

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

Rationale: Although opportunity for federally qualified subsistence users hunting sheep under State regulations in Unit 19C would be restricted, substantial conservation concerns exist for Unit 19C sheep populations and potential increases in sheep abundance may provide more opportunity in the future. Since total sheep, legal ram, and harvest numbers have all severely decreased in the last five years, continuing to allow harvest from the Unit 19C sheep population may exacerbate conservation concerns.



OSM also supports implementing registration permits for the Unit 19C sheep hunts, which is likely necessary to effectively implement this proposal and would also improve harvest monitoring and sheep management).

Literature Cited

ADF&G. 2024. 19C Sheep Working Group, Alaska Department of Fish and Game Science Support Presentation. October 17–18, 2024. Alaska Department of Fish and Game. Division of Wildlife Conservation.

Borg, B. 2023. Wildlife Biologist. Denali National Park and Preserve. Personal communication: e-mail. National Park Service, Healy, AK.

PROPOSAL 113 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Shorten the sheep hunting season in Unit 19C for residents and open a season for nonresidents in Unit 19C.

NOTE: These comments only apply to the resident hunt portion of this proposal and do not apply to the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 19–Sheep

Sheep: 1 ram with 7/8 curl horn or larger *Aug. 10-Sep. 20.*

Unit 19C, that portion within the Denali National Park and Preserve—residents of Nikolai only—no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system *Oct. 1-Mar. 30.*

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

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may currently harvest a 7/8 curl ram in Unit 19 from Aug. 10-Sep. 20 under Federal regulations. Adopting this proposal would not affect that opportunity. However, federally qualified subsistence users hunting under State regulations would be limited to a season of Aug. 15-Sep. 10, reducing their opportunity.

Both hunted and nonhunted sheep populations in and around Unit 19C have decreased in concert with each other, by approximately 50% since 2017. Sheep population estimates within Denali National Park and Preserve have decreased since 2019 (Borg 2023, pers. comm.), paralleling the declining sheep populations in the adjacent Unit 19C. ADF&G survey data indicates about a 64% decrease in Unit 19C sheep abundance since 2017. Reported harvest of sheep in Unit 19C has also followed this declining



trend, decreasing by about 80% from 2018 to 2022. The total number of sheep hunters has also declined by about 75% for the same timeframe (ADF&G 2024).

Adopting this proposal would misalign State and Federal sheep seasons in Unit 19C, increasing regulatory complexity. A similar proposal could be submitted to the Federal Subsistence Board during open Federal wildlife proposal window, which closes April 4, 2025.

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

Rationale: Although opportunity for federally qualified subsistence users hunting sheep under State regulations in Unit 19C would be restricted by a shortened season, substantial conservation concerns exist for Unit 19C sheep populations and potential increases in sheep abundance may provide more opportunity in the future. Since total sheep, legal ram, and harvest numbers have all severely decreased in the last five years, continuing to allow harvest from the Unit 19C sheep population may exacerbate conservation concerns.

Literature Cited

ADF&G. 2024. 19C Sheep Working Group, Alaska Department of Fish and Game Science Support Presentation. October 17–18, 2024. Alaska Department of Fish and Game. Division of Wildlife Conservation.

Borg, B. 2023. Wildlife Biologist. Denali National Park and Preserve. Personal communication: e-mail. National Park Service, Healy, AK.

PROPOSAL 114 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Change all sheep hunting in Unit 19C to archery only and require future nonresident sheep hunting in Unit 19C to be by bow and arrow only.

NOTE: These comments only apply to the resident hunt portion of this proposal and do not apply to the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 19–Sheep

Sheep: 1 ram with 7/8 curl horn or larger *Aug. 10-Sep. 20.*

Unit 19C, that portion within the Denali National Park and Preserve—residents of Nikolai only—no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system *Oct. 1-Mar. 30.*

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



Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may currently hunt sheep with a rifle in Unit 19C under Federal regulations. Adopting this proposal would not affect that opportunity. However, federally qualified subsistence users that hunt sheep in Unit 19C under State regulations would be restricted to harvesting with only archery equipment. This would decrease opportunity for federally qualified subsistence users under State regulations by requiring a less efficient means of harvest.

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 Federal wildlife proposal window, which closes April 4, 2025.

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

Rationale: This proposal would decrease opportunity for federally qualified subsistence users to harvest sheep under State regulations in Unit 19C. While OSM supports conservation measures for the declining Unit 19C sheep population, OSM supports measures other than weapon restricted hunts. Weapon restricted hunts could disenfranchise federally qualified subsistence users who do not own a bow or have experience using one.

PROPOSAL 119 – 5 AAC 92.450. Description of game management units.

Change the boundary between Units 21E and 21D.

Current Federal Regulations:

§100.26(n) Unit regulations

(21)(i) Unit 21:

(D) Unit 21D consists of the Yukon River drainage from and including the Blackburn Creek drainage upstream to Ruby, including the area west of the Ruby-Poorman Road, excluding the Koyukuk River drainage upstream from the Dulbi River drainage, and excluding the Dulbi River drainage upstream from Cottonwood Creek.

(E) Unit 21E consists of that portion of Unit 21 in the Yukon River and Arhymot Lake drainages upstream from a line starting at the downriver boundary of Paimiut on the north bank of the Yukon River, then south across the Yukon River to the northern terminus of the Paimiut Portage, then south along the Portage to its intersection with Arhymot Lake, then along the northern and western bank of Arhymot Lake to the outlet at Crooked Creek (locally known as Johnson River) drainage, then to, but not including, the Blackburn Creek drainage, and the Innoko River drainage downstream from the Iditarod River drainage.

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



Impact to Federal subsistence users/wildlife: According to the proponent, this boundary change may improve access to traditional hunting areas of Grayling residents. No impact to wildlife is expected from adopting this proposal.

Adoption of this proposal would result in misalignment between Federal and State regulations, increasing regulatory complexity and confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open Federal wildlife proposal window, which closes April 4, 2025.

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

Rationale: This proposal would misalign State and Federal boundaries for Unit 21 subunits, increasing regulatory complexity and confusion.

PROPOSAL 120 - 5 AAC 92.450. Description of game management units.

Change the boundary between Units 25C and 25D.

Current Federal Regulations:

§ 100.26(n) Unit regulations

(25)(i) Unit 25

(C) Unit 25C consists of drainages into the south bank of the Yukon River upstream from Circle to the Subunit 20E boundary, the Birch Creek drainage upstream from the Steese Highway bridge (milepost 147), the Preacher Creek drainage upstream from and including the Rock Creek drainage, and the Beaver Creek drainage upstream from and including the Moose Creek drainage.

(D) Unit 25D consists of the remainder of Unit 25.

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

Impact to Federal subsistence users/wildlife: If this proposal is adopted, the boundary separating Units 25C and 25D along the Steese Highway between MP147 and Circle would be clearly defined. Current State and Federal unit maps depict this subunit boundary close to/along the Steese Highway between MP147 and Circle, making it difficult to determine subunit boundaries when in the field. No impacts on wildlife populations are expected if this proposal is adopted.

Adoption of this proposal would increase regulatory complexity and law enforcement concerns by misaligning State and Federal subunit descriptions. A similar proposal could be submitted to the Federal Subsistence Board during the open Federal wildlife proposal window, which closes April 4, 2025.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 120.

Rationale: Utilizing the north side of the Steese Highway as the Unit 25C/25D subunit boundary provides clarity and simplicity for users and law enforcement.



PROPOSAL 121 – 5 AAC 92.0450. Description of game management units.

Divide Unit 15C into two subunits.

Current Federal Regulations:

§ 100.26(n) Unit regulations

(15)(i) Unit 15

(C) Unit 15C consists of the remainder of Unit 15.

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

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

Adoption of this proposal would result in misalignment between Federal and State regulations, increasing regulatory complexity and confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open Federal wildlife proposal window, which closes April 4, 2025.

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

Rationale: This proposal would misalign State and Federal boundaries for Unit 15 subunits, increasing regulatory complexity and confusion.

PROPOSAL 124 – 5 AAC 92.044. Permits for hunting bear with the use of bait or scent lures.

Change the term “permanent dwelling” to “permanent domicile” for the purpose of bear baiting.

Current Federal Regulations:

§ 100.26 Subsistence taking of wildlife

(b)(14)(v) You may not use bait within 1 mile of a house of other permanent dwelling, or within 1 mile of a developed campground or developed recreational facility.

Federal subsistence regulations do not include definitions for permanent dwelling or domicile.

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

Impact to Federal subsistence users/wildlife: No substantial impacts to federally qualified subsistence users or wildlife are expected from adopting this proposal. However, this proposal could provide clarity



to law enforcement officers and bear hunters on the legal placement of bait stations. This could reduce citations and inconsistency in enforcement.

Adoption of this proposal would misalign verbiage used in Federal and State regulations, increasing regulatory complexity and user confusion. A similar proposal could be submitted to the Federal Subsistence Board during the open Federal wildlife proposal window, which closes April 4, 2025. A proposal to add the definition of “domicile” in Federal regulations could also be submitted.

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

Rationale: This proposal clarifies State regulations by replacing an ill-defined term (dwelling) with one that has a legal definition (domicile), which reduces law enforcement concerns. OSM supports clarifying State regulations for federally qualified subsistence users when bear baiting but notes similar definitions do not currently exist under Federal regulations.

PROPOSAL 125 – 5 AAC 92.044. Permit for hunting bear with the use of bait or scent lures.

Define “developed recreation facility” and “permanent dwelling” for bear baiting in Units 15 and 7.

Current Federal Regulations:

§ 100.26 Subsistence taking of wildlife

(b)(14)(v) You may not use bait within 1 mile of a house of other permanent dwelling, or within 1 mile of a developed campground or developed recreational facility.

Federal subsistence regulations do not include definitions for developed recreation facility or permanent dwelling.

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

Impact to Federal subsistence users/wildlife: This proposal would provide clarity for federally qualified subsistence users baiting bears under State regulations, alleviating some law enforcement concerns. However, this proposal would misalign State and Federal regulations and ambiguity could still occur for law enforcement officers and users baiting bears under Federal regulations as these terms are not defined in Federal regulation. A similar proposal could be submitted to the Federal Subsistence Board during the open proposal window, which closes April 4, 2025. This proposal would not have any effect on bear populations.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 125 **with modification** to adopt a definition for “developed recreation facility” only.



Rationale: OSM supports clarifying State regulations for federally qualified subsistence users when bear baiting but notes similar definitions do not currently exist under Federal regulations. OSM supports Proposal 124 to replace “dwelling” with “domicile”, rendering defining “permanent dwelling” in this proposal moot.

PROPOSAL 131 – 5 AAC 92.095. Unlawful methods of taking furbearers; exceptions.

Require identification tags be attached to traps and snares.

Current Federal Regulations: None.

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

Impact to Federal subsistence users/wildlife: If this proposal is adopted, it would require federally qualified subsistence users to mark traps with permanently affixed tags identifying the individual when trapping under State regulations. This would put a significant burden on users to mark all their traps, while unethical trappers may still set illegal traps without identification tags. No impacts on the furbearer population are expected if this proposal is adopted. Adoption of this proposal also misaligns State and Federal regulations.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 131.

Rationale: Requiring users to mark traps is an unnecessary burden on subsistence users. Additionally, mandatory marking does not prevent illegal trapping activity.

PROPOSAL 133 – 5 AAC 92.080. Unlawful methods of taking game, exceptions.

Prohibit the use of snowmachines to approach and pursue wolverine.

Note: OSM’s comments only apply to Units 9B, 9C and 17.

Current Federal Regulations:

§ 100.26(n) Unit regulations

(9)(iii)(I) In Units 9B and 9C, a snowmachine may be used to approach and pursue a wolf or wolverine provided the snowmachine does not contact a live animal.

(17)(iii)(E) In Unit 17, a snowmachine may be used to approach and pursue a wolf or wolverine provided the snowmachine does not contact a live animal.

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



Impact to Federal subsistence users/wildlife: Adopting this regulation would reduce opportunity for federally qualified subsistence users taking wolverine under State regulations. It would also misalign State and Federal regulations in these units, increasing regulatory complexity and burdening users with differentiating land status.

Harvest limits under State trapping regulations are ‘no limit’ for wolverine, indicating no conservation concerns. However, whether or not this provision is legal is unlikely to affect overall wolverine harvest as this is a traditional and common local practice that will continue (OSM 2023).

Federal Position/Recommended Action: The OSM recommendation is to **oppose** this proposal for Units 9B, 9C, and 17.

Rationale: Using snowmachines to position wolverines for harvest is a traditional practice in the Bristol Bay area (OSM 2023) and provides opportunity for federally qualified subsistence users. Wolverine harvest is not likely to be affected by this regulation change. Rejecting this proposal also reduces regulatory complexity by maintaining alignment between State and Federal regulations.

Literature Cited

OSM. 2023. Staff analysis WP22-40. Federal Subsistence Board Meeting Materials. January 2023. Office of Subsistence Management, DOI. Anchorage, AK.

PROPOSAL 140 - 5 AAC 92.150. Evidence of sex and identity.

Eliminate the evidence of sex requirement for big game having bag limits restricted to one sex.

Current Federal Regulations:

§ 100.26(g). Evidence of sex and identity.

(1) If subsistence take of Dall sheep is restricted to a ram, you may not possess or transport a harvested sheep unless both horns accompany the animal.

(2) If the subsistence taking of an ungulate, except sheep, is restricted to one sex in the local area, you may not possess or transport the carcass of an animal taken in that area unless sufficient portions of the external sex organs remain attached to indicate conclusively the sex of the animal, except that in Units 1-5 antlers are also considered proof of sex for deer if the antlers are naturally attached to an entire carcass, with or without the viscera; and except in Units 11, 13, 19, 21, and 24, where you may possess either sufficient portions of the external sex organs (still attached to a portion of the carcass) or the head (with or without antlers attached; however, the antler stumps must remain attached) to indicate the sex of the harvested moose. However, this paragraph (g)(2) does not apply to the carcass of an ungulate that has been butchered and placed in storage or otherwise prepared for consumption upon arrival at the location where it is to be consumed.



(3) If a moose harvest limit requires an antlered bull, an antler size, or configuration restriction, you may not possess or transport the moose carcass or its parts unless both antlers accompany the carcass or its parts. If you possess a set of antlers with less than the required number of brow tines on one antler, you must leave the antlers naturally attached to the unbroken, uncut skull plate; however, this paragraph (g)(3) does not apply to a moose carcass or its parts that have been butchered and placed in storage or otherwise prepared for consumption after arrival at the place where it is to be stored or consumed.

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

Impact to Federal subsistence users/wildlife: If this proposal is adopted, it would decrease the burden for federally qualified subsistence users by removing the evidence of sex requirement for big game animals under State regulations. This could improve meat care but would put a significant burden on users and law enforcement to indicate the sex of harvested animals while in the field. The proponent's solution of DNA testing would delay and increase costs of enforcement. Adoption of this proposal also misaligns State and Federal regulations, increasing regulatory complexity and law enforcement concerns.

The proponent also mentions changing the definition of evidence of sex to include horns or antlers. Similar to OSM's suggested modification in Proposal 139, OSM would support modifying the evidence of sex requirements for moose hunts limited to a single sex to include either the antlers or the sex organs naturally attached to the meat.

Federal Position/Recommended Action: The OSM recommendation is to **oppose** Proposal 140.

Rationale: Removing evidence of sex requirement for big game hunts with bag limits restricted to one sex complicates management, law enforcement, and could even promote illegal harvests. Adoption of this proposal would also complicate law enforcement's ability to determine adherence to regulations during field checks. DNA testing is much more expensive and time intensive than checking if sex organs are naturally attached to the meat. The high expense of DNA testing would also be compounded by the cost of the time to collect and send samples for testing and the follow up when the results become available.

PROPOSAL 150 – 5 AAC 92.015(a)(4). Brown bear tag fee exemptions.

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

Current Federal Regulations:

§ 100.6 Licenses, permits, harvest tickets, tags, and reports

(a)(3) Possess and comply with the provisions of any pertinent permits, harvest tickets, or tags required by the State unless any of these documents or individual provisions in them are superseded by the requirements in subpart D of this part.

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



Impact to Federal subsistence users/wildlife: It is unlikely there would be any impact on the brown bear population if this proposal was adopted; however, there would be an increased cost for subsistence users harvesting a brown bear if the tag fee exemptions are not reauthorized.

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

Rationale: There are no known conservation concerns for brown bears in the affected units. If this proposal is adopted, it would continue the tag fee exemption, which eliminates the requirement that federally qualified subsistence users purchase a \$25 tag before hunting brown bears in these units. This decreases costs and maintains opportunity for federally qualified subsistence users. Retaining the tag fee exemption is particularly important in areas where there are few vendors.

PROPOSAL 151 – 5 AAC 92.015. Brown bear tag fee exemptions.

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

Please see comments on Proposal 150.

PROPOSAL 152 – 5 AAC 085.045(4). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 6C.

Current Federal Regulations:

Unit 6C–Moose

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

Unit 6C—1 bull by Federal drawing permit only Sep. 1-Dec. 31.

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

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

Impact to Federal subsistence users/wildlife: This proposal would have a minimal effect on federally qualified subsistence users as they are allocated 100% of the antlerless moose permits under Federal regulations. As ADF&G notes in their proposal, an antlerless moose hunt has not occurred in Unit 6C under State regulations since 1999. Close coordination between the Federal in-season manager and



ADF&G is important if this hunt ever occurs. As this hunt is closely managed by a joint State/Federal harvest quota, no impact to the moose population is expected if this proposal is adopted.

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

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

PROPOSAL 153 – 5 AAC 85.045(5). Hunting seasons and bag limits for moose.

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

NOTE: These comments only apply to Unit 7.

Current Federal Regulations:

Unit 7—Moose

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

Unit 7, remainder—1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only *Aug. 20 - Sep. 25*

Unit 14—Moose

No Federal regulations. *No Federal open season.*

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

Impact to Federal subsistence users/wildlife: This proposal will provide federally qualified subsistence users continued opportunities to harvest antlerless moose under State regulations and has long-term benefits for the moose population. In the Twentymile/Portage/Placer drainages, where the moose population greatly fluctuates in tandem with the weather and winter severity, antlerless hunts provide a management tool to maintain the population within desired levels. The 2023 composition survey showed a slight decrease in overall numbers, but an increased calf:cow ratio over the previous 2021 survey results (ADF&G 2024). Because the number of antlerless permits issued for the Twentymile/Portage/Placer hunt is adjusted annually, accounting for current population metrics, there are no conservation concerns.

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



Rationale: Federally qualified subsistence users benefit from the additional opportunity of State managed antlerless moose hunts. Additionally, these hunts are an important management tool to keep the moose population within management objectives.

Literature Cited

ADF&G. 2024. Staff comments on Proposal 197. Interior and Eastern Arctic Region Meeting March 15-22, 2024. Alaska Department of Fish and Game. Division of Wildlife Conservation.

PROPOSAL 156 – 5 AAC 85.045(13). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose season in Unit 15C.

Current Federal Regulations:

Unit 15 – Moose

Units 15A remainder, 15B, and 15C - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only Aug. 20-Sept. 25.

Units 15B and 15C - 1 antlered bull with spike-fork or 50-inch antlers or with 3 or more brow tines on either antler, by Federal registration permit only. The Kenai NWR Refuge Manager is authorized to close the October-November season based on conservation concerns, in consultation with ADF&G and the Chair of the Southcentral Alaska Subsistence Regional Advisory Council Oct. 20-Nov. 10.

Unit 15C - 1 cow by Federal registration permit only Aug. 20-~~Sept.~~ 25.

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

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users can already harvest cow moose with a Federal subsistence registration permit on Federal public lands during the fall in Unit 15C, although Federal public lands only comprise 28% of Unit 15C and habitat can be a limiting factor during winters with deep snow accumulations. Reauthorizing the antlerless moose season in this subunit would provide additional opportunity for federally qualified subsistence users who can receive a State AM550 or DM549 permit to harvest an antlerless moose on State managed lands.

Antlerless moose harvest is limited by annual quotas and the number of permits available. According to ADF&G in their proposal, the moose population in Unit 15C has increased and is at or above the Intensive Management population objective, and the moose population can withstand restricted cow harvest. Because there are such high densities of moose in the area, large snow events may concentrate moose on or near human habitats and roadways, creating negative interactions with humans. Having the flexibility to manage this moose population via drawing permit and targeted hunts allows ADF&G to maintain the moose population at sustainable levels.



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

Rationale: Federally qualified subsistence users benefit from the additional opportunity of State managed antlerless moose hunts. These hunts allow take of a limited number of cows in specific areas to keep the population within management objectives. Reauthorizing the State antlerless season will also maintain management flexibility within the unit, mitigating moose-vehicle collisions and other negative moose-human interactions.

PROPOSAL 157 - 5 AAC 85.045(a)(16). Hunting seasons and bag limits for moose.

Reauthorize the resident antlerless moose season in Unit 18.

Current Federal Regulations:

Unit 18—Moose

*Unit 18—south of the Eek River drainage and north of and including the Sept. 1-Oct. 15.
Carter Bay drainage—1 antlered bull by State registration permit.*

*Unit 18—that portion that drains into Kuskokwim Bay south of Carter Bay Sep. 1-30.
drainage—1 antlered bull by State registration permit.*

OR

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

*Unit 18, remainder—3 moose, only one of which may be antlered. Antlered Aug. 1-Apr. 30.
bulls may not be harvested from Oct. 1 through Nov. 30*

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for federally qualified subsistence users. According to ADF&G in their proposal, the Unit 18, remainder moose population is very high, continues to grow and can support additional harvest. While the Goodnews River moose population can support some additional harvest, the antlerless moose season can be closed by Emergency Order if needed, and the quota has not been met in recent years. The Kuskokwim moose population is demonstrating resource limitation, indicating antlerless moose hunts are needed to curb growth. Additionally, the Kuskokwim antlerless hunt is managed through limited draw permits, preventing overharvest.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 157.



Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for federally qualified subsistence users, and these moose populations can withstand additional harvest. Antlerless moose hunts are an important aspect of moose management in Unit 18.

PROPOSAL 158 – 5 AAC 85.045(a)(17). Hunting seasons and bag limits for moose.

Reauthorize a fall antlerless hunt during September and a winter any-moose season during February in a portion of Unit 19D.

Current Federal Regulations:

Unit 19D—Moose

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

Unit 19D, remainder of the Upper Kuskokwim Controlled Use Area—1 bull Sep. 1-30.
Dec. 1-Feb. 28.

Unit 19D, remainder—1 antlered bull Sep. 1-30.
Dec. 1-15.

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

Impact to Federal subsistence users/wildlife: Antlerless moose seasons must be reauthorized annually. Adopting this proposal would maintain harvest opportunity for federally qualified subsistence users harvesting under State regulations. A new fall antlerless draw permit was added in 2024, increasing harvest opportunity. But, as ADF&G states in their proposal, moose numbers in the unit substantially declined in 2023. Due to this decline, ADF&G does not intend to offer antlerless hunts in Unit 19D this year. However, re-authorizing the hunt allows for management flexibility, if opportunity becomes available in the future.

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

Rationale: Reauthorizing the antlerless moose season maintains management flexibility and harvest opportunity for federally qualified subsistence users when a harvestable surplus is available.

PROPOSAL 162 - 5 AAC 85.045(a)(18). Hunting seasons and bag limits for moose.

Reauthorize the antlerless moose seasons in Unit 20E.

Current Federal Regulations:

Unit 20E—Moose



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

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

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

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for federally qualified subsistence users. No impact to the moose population is expected since ADF&G states in their proposal that they do not plan on announcing an antlerless season in Unit 20E next year because the moose population has stabilized. However, maintaining the antlerless season provides flexibility in managing this population and maximizing harvest opportunity in the future when warranted.

Federal Position/Recommended Action: The OSM recommendation is to **support** Proposal 162.

Rationale: Reauthorizing the antlerless moose season maintains harvest opportunity for federally qualified subsistence users and retains a management tool that ADF&G can enact if needed. Conservation concerns are mitigated as this is a drawing permit hunt with a limited number of permits that can be adjusted or not announced annually based on population status.

PROPOSAL 163 – 5 AAC 85.045(a)(19)(B). Hunting seasons and bag limits for moose.

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

Current Federal Regulations:

Unit 21D–Moose

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

Antlerless moose may be taken only during Sep. 21–25 season if authorized jointly by the Koyukuk/Nowitna/Innoko NWR Manager and the BLM Central Yukon Field Office Manager. Antlerless moose may be harvested during any of the winter seasons. Harvest of cow moose accompanied by calves is prohibited Mar. 1–31
season may be announced.

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



Impact to Federal subsistence users/wildlife: Reauthorizing this antlerless season would maintain opportunity for Federally qualified subsistence users and allow easier access to moose habitat closer to rural communities. Additionally, reauthorization would maintain alignment between State and Federal regulations, reducing regulatory complexity and law enforcement concerns, which is especially important in this hunt area given the checkerboard pattern of land ownership in this area.

The Unit 21D moose population has been stable, within State management objectives and remains healthy overall (Havener 2024). The USFWS conducted surveys in 2023, indicating stable adult moose populations that are above the long-term average (Havener 2024). Additionally, ADF&G states in their proposal there a harvestable surplus of cow moose in this area.

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

Rationale: No conservation concerns exist as the moose population in Unit 21D is healthy enough to sustain antlerless moose harvest. Also, the additional opportunity to harvest moose closer to rural communities under State regulations benefits federally qualified subsistence users.

Literature Cited

Havener, J. 2024. Moose Trend Survey Summary 2023. USFWS. Galena, AK. 34 pp.

PROPOSAL 164 – 5 AAC 85.045(a)(19). Hunting seasons and bag limits for moose.

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

Current Federal Regulations:

Unit 21 – Moose

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

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

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

Impact to Federal subsistence users/wildlife: Reauthorizing this antlerless season would maintain opportunity for federally qualified subsistence users and easier access to moose habitat closer to rural communities. According to ADF&G in their proposal, additional harvest opportunity is available. The



2022 population estimation was 9,300 moose, which is within population objectives, and declining twinning rates indicate that this moose population could benefit from antlerless harvest.

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

Rationale: No conservation concerns exist as the moose population in Unit 21E can support some antlerless moose harvest. Also, the additional opportunity to harvest moose closer to rural communities under State regulations benefits federally qualified subsistence users.

PROPOSAL 165 – 5 AAC 85.045(a)(24). Hunting seasons and bag limits for moose.

Reauthorize the resident antlerless moose season in Unit 26A.

Current Federal Regulations:

Unit 26A–Moose

Unit 26A—that portion west of the eastern shore of Admiralty Bay where the Alaktak river enters, following the Alaktak river to 155°00' W. longitude excluding the Colville River drainage—1 moose, however, you may not take a calf or a cow accompanied by a calf July 1-Sep. 14.

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

Impact to Federal subsistence users/wildlife: Adopting this proposal would maintain harvest opportunity for federally qualified subsistence users under State regulations. However, federally qualified subsistence users would still be able to harvest antlerless moose under Federal subsistence regulation if this season is not reauthorized under State regulation. As noted by ADF&G in their proposal, the moose population is very sparse in this area, although hunting pressure and harvest is extremely low, minimizing conservation concerns.

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

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



PROPOSAL 190 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Modify the resident and nonresident hunt structure for sheep in Unit 19C and establish a guide concession pilot program.

NOTES: OSM recognizes and commends the Unit 19C Sheep Working Group’s immense effort and cooperation across many diverse backgrounds and viewpoints to collaboratively address concerns regarding sheep in Unit 19C.

These comments only apply to the resident hunt portion of this proposal and do not apply to the nonresident hunt portion of this proposal.

Current Federal Regulations:

Unit 19–Sheep

Sheep: 1 ram with 7/8 curl horn or larger *Aug. 10-Sep. 20.*

Unit 19C, that portion within the Denali National Park and Preserve—residents of Nikolai only—no individual harvest limit, but a community harvest quota will be set annually by the Denali National Park and Preserve Superintendent; rams or ewes without lambs only. Reporting will be by a community reporting system *Oct. 1-Mar. 30.*

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

Impact to Federal subsistence users/wildlife: Federally qualified subsistence users may currently harvest a 7/8 curl ram in Unit 19 under Federal regulations. Adopting this proposal would not affect that opportunity. Federally qualified users who harvest sheep under State permit RS380 in Unit 19C would also not be affected by adopting this proposal, as the subsistence hunt would remain open. This proposal, if adopted, would reduce opportunity for federally qualified subsistence users who harvest sheep under the general season harvest ticket hunt in Unit 19C for the next 3 years. The one-year closure precludes general season sheep harvest under State regulations, although sheep harvest by harvest ticket could still occur under Federal regulations on Federal public lands, which are quite limited in Unit 19C. The draw permit to be implemented after the one-year closure would allow for a reduced opportunity for federally qualified subsistence users who choose to harvest under State regulations.

Both hunted and nonhunted sheep populations in and around Unit 19C have decreased in concert with each other, by approximately 50% since 2017. Sheep population estimates within Denali National Park and Preserve have decreased since 2019 (Borg 2023, pers. comm.), paralleling the declining sheep populations in the adjacent Unit 19C. ADF&G survey data indicates about a 64% decrease in Unit 19C sheep abundance since 2017. Reported harvest of sheep in Unit 19C has also followed this declining trend, decreasing by about 80% from 2018 to 2022. The total number of sheep hunters has also declined by about 75% for the same timeframe (ADF&G 2024).

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



Rationale: Although opportunity for federally qualified subsistence users hunting sheep under State regulations in Unit 19C would be restricted for three years, substantial conservation concerns exist for Unit 19C sheep populations and potential increases in sheep abundance may provide more opportunity in the future. Since total sheep, legal ram, and harvest numbers have all severely decreased in the last five years, continuing to allow unrestricted harvest from the Unit 19C sheep population may exacerbate conservation concerns.

Literature Cited

ADF&G. 2024. 19C Sheep Working Group, Alaska Department of Fish and Game Science Support Presentation. October 17–18, 2024. Alaska Department of Fish and Game. Division of Wildlife Conservation.

Borg, B. 2023. Wildlife Biologist. Denali National Park and Preserve. Personal communication: e-mail. National Park Service, Healy, AK.

PROPOSAL 192 – 5 AAC 85.055. Hunting seasons and bag limits for Dall sheep.

Modify the resident and nonresident hunt structure for sheep in Unit 19C.

Please see comments on Proposal 190.



PC90

Name: Elizabeth Parker

Community of Residence: Anchorage

Comment:

I support #146, in favor of Trap-Neuter-Release of feral cats in the state of Alaska



PC91

Name: James Pengelly

Community of Residence: Fairbanks

Comment:

I wholeheartedly support proposal #189 to allow folks who drew bison hunts in 2024, and subsequently had those permits revoked due to a biological necessity, to transfer those permits to another year. It is unconscionable to think that those individuals who drew this coveted permit will not be first in line to hunt bison once the population has recovered and can sustain the harvest.



PC92

Name: Chris Perry

Community of Residence: Homer

Comment:

Proposal 131 trap ID requirements

SUPPORT

Please support this proposal to require labeling traps.

This proposal has been supported by the state troopers and wildlife enforcement in the past. The requirement to tag traps would assist troopers to help enforce any illegal trapping. It would help encourage the adherence to the code of ethics and to avoid legal actions from pushing the limits of the code of ethics.

I believe the trappers code of ethics contains mostly unenforceable guidelines and the failure or misinterpretation of trappers to comply has jeopardized other trail user groups.

The burden of cost to the trappers to comply with this is minimal, for instance, \$28 for 100 pre-embossed copper trap tags or \$72 for 500 pre-printed copper trap tags.

I know several trappers who trap both sides of the refuge boundary and label all their traps so they are legal in the refuge. They consider the cost of tags as a minimal cost of doing business.

I have been involved with four dog trapping on the same trail with foot hold traps. Three dogs were trapped by the same trapper. All these traps were set within 40 feet of the centerline of a public easement. This trapper checked his traps only once per week. The dogs involved were under very good voice

control. These trails are used heavily by bird hunters, skiers, snowshoers, hikers and bikers. This area does not have any leash laws. I have found traps on private property adjacent to this trail that the same trappers denied setting or ownership of.

I do not oppose responsible trapping. I am opposed to a few trappers that can make a large area unsafe for other user groups to safely use area trails. I believe generally the interpretation or misinterpretation of the code of ethics has opened up the public to potential harm and believe this small requirement of labeling traps would go a long ways to help solve some of these problems.

I believe this is a simple solution to a problem that's getting worse and will not go away.

Thank you for all your efforts and your consideration and please consider supporting this proposal.

Thank you for giving me this opportunity to comment.

Proposal 101 OPPOSE

I don't believe sheep should be considered for intensive management.

Proposal 126,127,128. OPPOSE

I don't believe this allows fair chase for the game. this is not much different than using drones or fly and hunt in the same day.

Proposal 147. OPPOSE

We have some of the most pristine and wild habitat in the world. Some of the game we have are unique. We have seen what invasive species have done worldwide and often with irreversible consequences.

Proposal 132. SUPPORT

Snowmachines should not be allowed to pursue any animals for any purpose. The technology has changed so much in the last 20 years. Machine now go in excess of 100mph. This is a horrible!

Proposal 133 SUPPORT

Trappers should not be allowed to pursue any animal with snow machines. The technology has changed so much in the last 20 years. Machines can go in excess of 100mph now.

Name: Nicholas Peters

Community of Residence: Eagle River

Comment:

Proposal 131 and the requirement of having identification tags on traps does nothing for law abiding trappers as illegal trappers will never put tags on their equipment. There is also a great threat as documented in the lower 48 of trappers legally set traps and snares being stolen and placed in illegal areas. There is no upside to this proposal and I strongly oppose such a law that benefits no one.

Proposal 132 is a senseless idea seeking to limit nonresidents from pursuing wolf and wolverine by snowmachine. These animals travel for incredible distances and it is impossible to cut tracks of an animal



PC93

and then pursue on foot. Whos to say the animal is 500 yards ahead or 5 miles? What is the definition of pursuit at that point? The idea that animals are being run down to the point of exhaustion is preposterous and ill-informed ideology manifest.

Proposal 133 is a senseless idea seeking to limit residents from pursuing wolverine by snowmachine. These animals travel for incredible distances and it is impossible to cut tracks of an animal and then pursue on foot. Whos to say the animal is 500 yards ahead or 5 miles? What is the definition of pursuit at that point? The idea that animals are being run down to the point of exhaustion is preposterous and ill-informed ideology manifest. We limit the methods and means by which to harvest predators and then expend vast sums of money such as in unit 17 shooting brown bears from helicopter, and aerial wolf gunning in units 13, 16, and 19 to mop up the mess after we have hamstrung ourselves to be able to effectively harvest predators.



PC94

Name: Valerie Phelps

Community of Residence: Anchorage

Comment:

The Alaska SPCA is calling on the Board of Game to amend policy 5 AAC 92.029 and allow sterilized cats to be returned to their territories—reducing overpopulation, protecting wildlife, and improving public health. Without this change, feral cat numbers will continue to rise, worsening ecological impacts.

As a cat and nature lover, I urge you to amend policy 5 AAC 92.029.

I support proposal 146.



PC95

Name: Dominick Phillips

Community of Residence: Juneau

Comment:

PROPOSAL 875 AAC 92.100.

Strongly aggainst this proposal especially item 3 as listed below on grounds of obserdity, saftey, and ethicasy.

"from any mechanical vehicle; however, a power or sailboat may be used only as a direct meansof retrieving a dead or injured bird; all boats shall remain stationary throughout the durationof the hunt, beached or anchored, within 100 yards of those discharging firearms to eliminatedriving, herding, or chasing migratory birds into hunters on land, or on other boats."

This is an obsured clause to add. In numerous spots I sea duck hunt there is no land or anywhere to safley anchor my boat 100 yards away from the spot. Forcing people to hunt out of small boats or water craft can be hazardous in a number of places either due to weather, boat traffic, or others and forcing people to do so will result in unneeded rescues, injuries, and even death.

Harrassing wildlife and pushing birds in the attempt of harvest is already illegal hunting from a stopped or anchored vessel is perfectly legal in every state I can think of making this law unprecedented and the point it wants to cover is already covered as illegal making this pointless and absurd.

Wounded sea ducks can freaken move fast dive deep and pup up far away from the initial dive. Forcing people to travel absurd distances from there shooting location to get the boat to chase the duck will result in more wounded/wasted animals. Even worse that wounded duck swims over to a flock of non wounded ducks finding that exact duck is hard possibly resulting in illegal take in an attempt to put an injured suffering animal out of its missery. I can confirm cahsing birds in a paddle craft in south easts fast moving current is unsafe and sometimes impossible.

This type of restriction does not benefit the sport instead it hinders it by making it harder and more expensive on the participant resulting in a lack of participation. The increased saftey hazards and wasted animals will be an ugly look if this proposal is accepted. This was clearly writtwn by a person who does not use the resource or partake in the activity and just wants to discourage others from enjoying an already moral, legal, and safe activity. I encourage you to do the common sense thing and regect this proposal.



PC96

Name: Emily Poray

Community of Residence: Eagle River

Comment:

I support TNR Proposal 146!

Alaska's feral cat population is rising, but current policies block humane solutions like Trap-Neuter-Return (TNR). Alaska SPCA is urging the Board of Game to amend policy 5 AAC 92.029—allowing sterilized cats to be returned to their territories to curb overpopulation, protect wildlife, and improve public health. Many states have successfully implemented TNR. It's time for Alaska to lead with science-based, compassionate animal management!



PC97

Name: Molly Porter

Community of Residence: North Pole

Comment:

I support proposal 189. The odds of drawing this tag are extremely low making it very special to draw. The people who drew this tag should have the chance that they were originally given since it it very likely they won't draw again.



PC98

Name: Tyson Porter

Community of Residence: North Pole

Comment:

This comment is in support of proposal 189.

Last year I was ecstatic to learn I had drawn a Delta bison permit. This was a tag I never expected to draw due to the astronomically low odds. In fact, before entering into the lottery I had a hard time justifying spending the money for my wife and I to be entered into the pool. I decided to cap it at 6 chances , 3 for each of us.

My excitement for drawing this tag was short lived however as I learned from ADF&G that summer I would not be issued a tag. I do not fault fish and game for the hard decisions they had to make in regard of slashing tags. However, the news was crushing.

I come from humble beginnings. As much as I've loved to hunt and in many ways my life has revolved around this passion, a bison hunt was never in my thoughts due to being so far out of reach. Upon moving to Alaska, for the sole purpose of exploring the hunting and fishing opportunities this great state has to offer, I discovered the Delta bison herd. This represents the only economically viable opportunity I would ever have to hunt a bison.

Furthermore, this tag represented an opportunity to harvest hundreds of pounds of high quality meat. We strictly eat wild game in my household, it is why we take hunting as seriously as our day jobs that pay the bills. Hunting puts food on our table.

I strongly support the proposal to reissue these tags to those who lost the opportunity originally given to them. It is likely a once in a lifetime opportunity to hunt one of these magnificent animals. The chances of drawing this tag once is extremely low, twice, even less.



PC99

Name: Shaun Porter

Community of Residence: Fairbanks

Comment:

Prop 189. Tags for bison should be awarded back to the people that drew and had them taken away those tags are so precious and those that drew should suffer a once in a lifetime opportunity



Name: Omar Ramirez

Community of Residence: Eagle River

Comment:

My name is Omar Ramirez.

[REDACTED]

Eagle River, AK 99577

I am providing a written comment to the Alaska Board of Game on:

Proposal(s) 188 and 189

I am in support of Proposals 188 and 189.

After many years of applying for a Bison Tag, I finally hit the lottery and drew DI403 for the 24-25 hunt. After being contacted by ADFG and being encouraged to begin preparing for the hunt, I arranged for my brother-in-law join in the harvest by scheduling time away from work and planning travel from Idaho (tickets purchased ~\$2000 refunded), reserved lodging in Delta (\$1500 refunded), I bought a new snowmachine (~\$19,000), new four wheeler (~\$9000), built a custom rifle meeting the hunt requirement (~\$5000), changed work schedules with coworkers, etc..... When I received the call in July of 2024 that my permit would not be issued my heart sank. I have put an incredible amount of time and money into preparing for this hunt. In fact, I've already used a week of my limited vacation time scouting by four-wheeler to understand the public access.

I understand the circumstances surrounding the tag reduction and I fully support the Departments decision to protect the resource. Because the odds of drawing this tag are likely a once in a lifetime opportunity, and that I and other tag holders have already invested time and money in the hunt, I urge the Board of Game to please defer our tags to a future hunt season rather than only allowing us to reapply during the ten-year blackout period. Only being granted the right to reapply would be a kick in the pants as we all know the odds of being drawn for this tag again in my lifetime are very low, not to mention I have already missed one season of reapplying for this tag during the December 2024 application period.

Thank you for considering my comment on Proposals 188 and 189.

Sincerely,

Omar Ramirez



Name: Richard Ray

Community of Residence: Chugiak

Comment:

I am opposed to Proposal 190 for the following reasons:

The current general season resident only harvest is leaving sheep on the mountain, as intended. In 2023 only 5 rams were harvested and 10 were taken in 2024. Aerial survey data had legal rams at 13 and 16 respectively. But, this is only part of the picture. In 2019, the survey had 33 legal rams and 115 were harvested. In 2017, the survey revealed 60 rams and 111 were harvested. Again, nearly double! Based on the correlations, there would be 30 to 50 legal rams at the beginning of 2024 - indicating a significant number of rams left by resident only pressure - More sheep on the mountain and still offering a hunting opportunity. In fact, the total resident harvest for 2022 - 2024 is less than the 2022 non-resident harvest.

Why should residents have to share the pain? Non-residents have taken 67% of the sheep in unit 19c over time and 90% in 2022. No other state allows this injustice to residents in animal allocation. Many states limit non-residents to a max of 10%. Residents deserve a fair shake! The numbers clearly demonstrate residents have not been given equal shares.

The proposal is dependent on a undesigned , unapproved and to be

implemented guide concession program. The 5 year program should not be abandoned for a undesigned and unapproved conceptual program that seems unlikely to be implemented. There current program can continue why the guide concession program is designed, formalized and implemented. All the while, leaving sheep on the mountain.

This proposal will eliminate resident opportunity and further concentrate sheep hunters in the remaining units - further exacerbating hunting pressure and potential conflicts while sheep hunting. I just finished watching a video in which the outfitter added sheep hunts in 2024. When will we learn!!

The closure of 19c was out of conservation concerns and the outrageous 90% non-resident kill and this proposal is a step to return to the old way - where residents and sheep take a seat at the back of the bus.

Lastly, I find it amazing that a guide (that has significant financial interest in 19c guiding) proposes this 'very unfriendly to residents' proposal and it is immediately approved to the Board of Game. Yes. This does sound very conflicted. It is certainly not a balanced idea and takes away resident opportunity.

Without a reasonably fair alternative, the original 5 year plan, approved and confirmed by the Board of Game, should not be abandoned after 2 years (really less as this proposal was developed and approved by the working group 1.5 years after the original plan approval).

Please reject proposal 190.

**PC102****Name:** Sheryl Ray**Community of Residence:** Chugiak**Comment:**

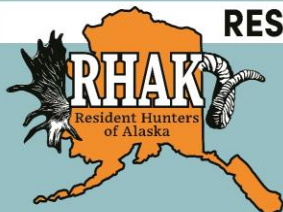
It is my strong opinion that 19C should not be closed to resident hunting. Residents should have first option and opportunity to hunt all units before non-residents. The reason 19C is at this impasse is not at the fault of residents. Nonresidents have over harvested through guide services that aren't regulated or limited to how many sheep they can harvest. Perhaps you should consider this! Also, the fact that a guide can propose a change for unit 19C to benefit his wallet is preposterous!

I am against this proposal 190.

I am against this 190 proposal closing unit 19C. I feel residents should have the opportunity to hunt all units before non-residents. The issue with low sheep numbers are not due to residents, but to non-residents using guides who don't have any quotas and have free rein to guide wherever they want and as often as they can. That is where the over harvesting comes from. Residents first!

**PC103****Name:** Resident Hunters of Alaska (RHAK)**Community of Residence:** Fairbanks**Comment:**

The current general season resident only harvest is leaving sheep on the mountain, as intended. In 2023 only 5 rams were harvested and 10 were taken in 2024. Aerial survey data had legal rams at 13 and 16 respectively. But, this is only part of the picture. In 2019, the survey had 33 legal rams and 115 were harvested. In 2017, the survey revealed 60 rams and 111 were harvested. Again, nearly double! Based on the correlations, there would be 30 to 50 legal rams at the beginning of 2024 - indicating a significant number of rams left by resident only pressure - More sheep on the mountain and still offering a hunting opportunity. In fact, the total resident harvest for 2022 - 2024 is less than the 2022 non-resident harvest.



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Resident Hunters of Alaska (RHAK)

Comments to Alaska Board of Game

Statewide Meeting

March 21 - 28, 2025

Proposals we support: 88, 90, 91, 92, 100, 101, 108, 134, 135 as amended, 144, 192

Proposals we oppose: 102-107, 109-114, 117, 123, 147, 148, 190

Unit 19C Sheep Proposals

Proposals 102 – 107 – Reauthorize nonresident sheep hunting in Unit 19C

OPPOSE

We oppose proposals 102 – 107 to re-open and allow unlimited nonresident sheep hunting opportunity in Unit 19C under a general season harvest tag as it was prior to the board's closure. We also want to make clear that RHAK never proposed to "eliminate" nonresident sheep hunting in Unit 19C or any other area. What we advocated for all along was to place limits on nonresident sheep hunters, just like every other state with wild sheep populations does.

We do not support *unlimited* nonresident sheep hunting opportunity in Unit 19C. However, we do support opening the area up again to limited nonresident sheep hunting opportunity under a draw permit system (see RHAK Proposal 108).

Proposal 108 – Reopen Unit 19C to nonresident sheep hunting under a draw permit system

This is a RHAK proposal, and we **support** it as our preferred solution for Unit 19C.

We have asked the board for several cycles to place limits on nonresident sheep hunters in Unit 19C. We expressed concerns about conflicts in the field, access issues, higher nonresident harvest rates during sheep declines, and conservation of our sheep resource.

The main rationale the board used to vote down all the RHAK proposals asking to limit nonresident sheep hunters was that there were no sheep conservation concerns under full-curl management. Other reasons the board used were that putting nonresidents on draw



permits “doesn’t provide stability to the guide industry” and would mean a decrease in funding for the Division of Wildlife Conservation (DWC) due to fewer nonresident license and tag sales.

Interestingly, the Guide Concession Program (GCP) the board has been promoting as the only solution to these known problems would also decrease funding to DWC and likely put many guides out of business.

Whether or not the Department has conservation concerns for the sheep population in Unit 19C under full-curl management, unlimited nonresident sheep hunting opportunity has known negative effects that the board has outlined over the years, to include crowding, conflicts in the field, access issues, and undue competition with resident hunters.

We are asking the board to open Unit 19C to nonresident sheep hunters, but place limits on nonresident sheep hunters via a draw permit system with a limited allocation of permits, or to set a harvest guideline quota for nonresident sheep hunters.

Proposal 190 – Modify the resident and nonresident hunt structure for sheep in Unit 19C, and establish a guide concession pilot program

OPPOSE

This proposal from the Unit 19C Sheep Working Group (SWG) asks to close all resident sheep hunting opportunities in 2025, then put all resident and nonresident sheep hunters on draw permits with a limited allocation until a guide concession program is implemented in the unit.

There is currently no need to close or restrict resident sheep hunting opportunity in Unit 19C! Resident sheep hunters harvested 5 rams in 2023, and 10 rams in 2024, the two years it has been open to only resident sheep hunting. The area biologist does not expect resident harvests to substantially increase under a resident-only sheep season. Yes, the Unit 19C sheep population is in severe decline, but resident sheep hunting does not currently (and never did) contribute to those declines. Continued resident general harvest sheep hunting opportunity in Unit 19C poses no conservation concerns.

The sheep declines in Unit 19C are primarily weather related, but the problems we see in Unit 19C, and why the unit is currently closed to all nonresident sheep hunting, stem entirely from the board’s continued allowance – until 2022 – of unlimited nonresident sheep hunting opportunity during the decline, and the known problems associated with unlimited nonresident sheep hunting opportunity.

The board continues to claim that the problem is/was “too many guides,” and limiting guides via a concession program is the only answer. But it’s really too many nonresident sheep hunters who are required to hire a guide being given unlimited sheep hunting opportunity by the Board of Game.

We continue to advocate for limits on nonresident sheep hunters in Unit 19C and other areas where there are no limits. That’s the proper solution and under the board’s authority to impose. See RHAK proposals 100, 108, and 192.



Proposal 192 – Modify the resident and nonresident hunt structure for sheep in Unit 19C

SUPPORT

This is a RHAK proposal originally submitted as an Agenda Change Request (ACR) to the board in hopes it would outline why it – and the 19C SWG ACR that is now proposal 190 – did not meet the criteria for acceptance. However, both our ACR and the 19C SWG ACR were accepted.

We support this proposal, but our preferred solution is RHAK proposal 108.

Statewide Proposals

Proposals 90 & 91 – Require all goat hunters to pass an online mountain goat quiz prior to hunting

SUPPORT

The Department already has this quiz available for certain area goat hunts and we see no reason why it isn't required for all goat hunts. Even in areas where nannies are allowed to be taken, education never hurts. Guides should also have to take the quiz (see our comments on proposal 92).

Proposal 92 – Require all sheep hunters to complete an online education course

SUPPORT with amendment to also require guides to take the course

We support this proposal because education never hurts, and this may result in fewer sub-legal harvests. It's likely that the ADF&G sheep information pamphlet on how to judge a legal ram has helped to decrease sub-legal take, but it's not required.

While this proposal if passed would include both resident and nonresident hunters, it does not include guides. While guide licensing requirements require knowledge of judging sheep to determine legality, a good portion (3%) of the sub-legal sheep harvest comes from guided nonresident hunters. The nonresident guided hunter isn't the one judging whether a ram is legal or not; it's the guide. So, in that respect, guides should also be included in any required online education.

We understand that experienced sheep hunters and guides won't want to, or may not need to, take an online course, and we are sympathetic to that argument against this proposal. However, 15 minutes to watch an online education course is not that much of a burden.

Proposals 97 & 98 – Lengthen the time period hunters are restricted from using aircraft for hunting sheep

SUPPORT



RHAK has opposed what is known as Proposal 207, the regulation restricting the use of aircraft for spotting sheep during sheep season, but if the regulation is in place **it should apply to all sheep hunting seasons**, as proposal 98 asks for.

Proposal 100 (RHAK) – Limit nonresident sheep hunters statewide in areas where they are not currently limited

Note: Board support has said that our proposal 100 is outside the scope of Statewide regulations because 5AAC 85.055 is not on the call. The 2012 Statewide Cycle B meeting had Chapter 85 on the call. We don't see anything after that where Chapter 85 was on the call. If Chapter 85 will never be on the call for Statewide regulations, it makes it impossible for us and others to submit any statewide proposals such as this asking to institute new draw permit hunts for any species. We can't do that under Chapter 92, as that only refers to already-existing draw permit hunts. See our comments below on what the board has told us in the past about submitting this type of proposal for Statewide regulations, rather than regionally.

In the past when we submitted regional proposals to limit nonresident sheep hunters to draw-only hunts in areas where they aren't currently limited, the board has told us that such a regulation would be better if proposed as a statewide change. Then, with proposals like this one (Proposal 100), the proposal is flagged as being "outside the scope" of the Statewide regulations meeting.

The intent of this proposal, and what we are asking, is to limit all nonresident sheep hunters statewide to draw permits only in areas where nonresident sheep hunters aren't currently limited, **or to establish a statewide harvest guideline level for nonresident sheep hunters to where they don't take more than 35% of the total harvest from any one subunit. (5AAC 92.008).**

As Chapter 92 is on the call for Statewide regulations, it appears the board can hear and address this proposal under 5AAC 92.008.

Simply put, nonresident sheep hunters need to be limited statewide in opportunity or harvest levels in areas where they are not currently limited.

Proposal 101 – Add sheep to the list of species identified as important for providing high levels of human consumptive use

SUPPORT

At the last Region III meeting the board changed the Intensive Management guidelines for Unit 19 and added aerial wolf control to a portion of Unit 19C. These changes were ostensibly to benefit moose, but much of it was also to hopefully benefit sheep.

Adding sheep to the IM list would greatly help to establish intensive management programs in the areas where it may be needed to benefit declining sheep populations. Without sheep within the IM list, it makes it difficult to do any predator management to specifically benefit sheep.



Sheep are a customary and traditional subsistence animal in several GMUs important for providing food for Alaskans. They should be included in the list of IM species.

Proposal 134 – Allocate 90 percent of all moose drawing permits to residents

SUPPORT a minimum of 90 percent of all moose drawing permits to residents

A draw permit hunt means there isn't enough of a game population for everyone to have the opportunity to hunt. So, how is it that we have a moose draw hunt (DM 809, 810, 811) with an allocation of 20 permits, *yet half of those (50%) go to nonresident hunters*? That kind of draw permit allocation should never be allowed, regardless if it is considered a "trophy" moose area. Residents should have a clear priority to all draw permit hunts for all species, "trophy" or not, in all areas. That may even mean some low population draw hunt areas don't have any nonresident allocation.

We continue to be the only western state that does not give a substantial hunting opportunity priority to its resident hunters. Not only does the board guarantee high percentages of draw permits are awarded to nonresidents, but the board also allows open-for-all draw permit hunts where hunt-bookers from the lower 48 flood the application pool with tens of thousands of applications to the point nonresidents are able to get 25% or more of the permits.

We want to share our state's wildlife resources with other hunters from the lower 48 and elsewhere and bring up friends and family to hunt and have that opportunity, but there has to be limits in place so that residents have a clear hunting priority.

We strongly support this proposal. All moose draw permit hunts should have a clear and strict resident priority allocation *with a minimum of 90 percent of the permits awarded to residents*.

Proposal 135 – Allocate 10 percent of big game drawing permits to nonresidents

OPPOSE as written

SUPPORT as amended to only include moose, caribou, deer, elk, goat, sheep, and brown bear as follows:

We do not support 10% of **all** big game drawing permits going to nonresidents. If that were the regulation, nonresidents would be guaranteed 10% of all bison draw permits, whereas the coveted Delta bison permit is currently awarded to at most 1% of nonresidents. There are also some very low-population draw hunt areas where nonresidents should not have any hunting opportunity at all until the population recovers.

See our comments on proposal 134. The board should seriously consider why this and other proposals like it will keep coming forward. Resident hunters are becoming more educated about what's been going on and they know the system we have here is not fair or right.



What we hear from nonresident hunters we meet at shows and fairs, when we explain the high nonresident draw permit allocations we have in Alaska, is the same comment: "We *would never allow that in our state!*" So, why do we allow it here?

For moose, caribou, deer, elk, goat, sheep, and brown bear draw permit hunts, we support a **minimum of 90%** of those permits being allocated to resident hunters, and "**up to**" **10% going to nonresidents**. Again, there are some draw hunts that should have no nonresident allocation, or less than 10% of the available permits.

Proposal 147 – Delegate authority from the Board of Game to the Commissioner of the Department of Fish & Game

OPPOSE

We strongly oppose this proposal as it would give ADF&G Commissioner's now and in future the authority to add animals to the clean list or introduce indigenous or non-indigenous game animals to new areas of the state without going through a rigorous Board of Game proposal and approval process.

Keep this authority within the Board of Game.

Thank you to board members for your service and attention to these issues,

Resident Hunters of Alaska



PC104

Name: Erin Reynolds

Community of Residence: Anchorage

Comment:

SUPPORT FOR PROPOSAL #146.

The feral cat population in Anchorage is growing and our current methods of controlling it are failing. Without intervention we risk the spread of disease to domestic pets, excessive predation, and disruption of sensitive ecosystems.

I strongly urge the board to allow TNR management to be controlled by communities in order to create right-sized solutions for their particular situations. Many states and cities across the country (including those with inclement weather) have successfully implemented TNR programs, leading to more manageable and healthier feral cat populations.



PC105

Name: Jessalynn Rintala

Community of Residence: Juneau

Comment:

I'm the author of proposal 146 and writing in support. I will keep this brief as I know the board has heard this issue many times and I'd like in the spirit of Orville Huntington to focus on new information.

Unfortunately I won't be able to attend the statewide meeting in person, but I'm disappointed in the department's comments on this proposal. They are 2022 comments verbatim. I understand cats are not so much the primary focus of the Alaska Department of Fish and Game, agency that manages some of the world's best and last wild fisheries, and staff are often tasked to speak to some weird stuff at these meetings well outside their normal wheelhouse. I get it. However, the department did not even address the incorrect testimony they provided to the board at that same meeting. The board at a minimum deserves reliably factual department advice.

I would like very much to chart a path forward on the growing feral cat issue in the state. We agree on so many things—especially the deleterious effects of these cats on wildlife, which is all of ours to protect. And yet the department continues opposing this path that people much closer to the issue repeatedly endorse. Both the department and board continue to do nothing while watching the problem grow: every cycle this is brought to your attention.

Perhaps it is not yet a problem in every backyard, but nor was it in mine two years ago, and now it is. I once again ask the board to let those of us who wish to help with this issue do so.

Thank you all for your time and service, both staff and board; the state of Alaska is all the better for it.



PC106
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admin@goatalliance.org
www.goatalliance.org

Alaska Board of Game
P.O. Box 115526
Juneau, AK 99811-5526
Email: dfg.bog.comments@alaska.gov

March 6, 2025

Dear: Members of the Alaska Board of Game,

Re: Subject: Support for Proposals 90 & 91 – Mandatory Mountain Goat Identification Quiz

On behalf of the Rocky Mountain Goat Alliance (RMGA), we are writing to express our strong support for Proposals 90 and 91, which would require all mountain goat hunters in Alaska to complete an online mountain goat identification quiz before hunting. These proposals align with successful wildlife management strategies exercised in other jurisdictions and reflect the best available science on sustaining healthy mountain goat populations.

The current requirement that only hunters in Units 1, 4, 5, 6C, and 6D complete the online identification quiz has proven effective in reducing the percentage of nannies harvested. Expanding this requirement statewide, as proposed in Proposals 90 and 91, will further promote responsible hunting practices and conservation efforts. Mountain goat research and hunting surveys bring to light several key points in support of these proposals:

- Reducing the harvest of female (nanny) goats is critical to maintaining stable and resilient populations. Female mountain goats have low reproductive rates and excessive harvest of nannies can significantly impact population sustainability.
- Educational efforts reduce female harvest: British Columbia's long-standing education-based approach has successfully increased the proportion of males harvested without requiring additional restrictions. This education is currently voluntary but there are similar efforts underway promoting mandatory hunter education.



- Harvest data shows female selection remains an issue: Despite Alaska's existing point-based harvest penalty system, females still make up 28% of the total mountain goat harvest statewide and recent data from many of the state's registration hunts show an even higher nanny harvest rate.
- Reducing female harvest would increase long-term hunting opportunities as nannies are assigned two points while billies are only one. This is especially true in registration hunts during which ADFG will shut down the hunt early by emergency order once a certain number of harvest points are reached. Essentially, there will be twice as much hunting opportunity if hunters harvested only billies.
- Similar management changes in Alaska have worked: The Kenai Peninsula and Cordova penalty systems (which prohibits a hunter from hunting in a given area for five years if a female is harvested) resulted in reducing female harvests by 40% and 29%, respectively. Education measures, such as the proposed quiz, could yield similar improvements without the need for additional restrictions
- Hunter engagement and conservation: Providing hunters with mandatory training in goat identification encourages responsible harvest decisions and supports sustainable hunting without resorting to prohibitive regulatory measures.

By implementing a statewide requirement for the mountain goat identification quiz, all hunters are equipped with the knowledge necessary to make informed harvest choices, ultimately leading to healthier and more resilient mountain goat populations across Alaska and therefore also increasing hunter opportunity.

RMGA supports Alaska's continued focus on education as a tool for effective wildlife management and commends the Board for considering these proposals and for its continued commitment to sustainable wildlife management.

Thank you for your time and dedication to Alaska's natural resources.

RMGA Board of Directors

Rocky Mountain Goat Alliance
Email: admin@goatalliance.org

cc: Marvin Kwiatkowski, RMGA Chair





PC107

Name: Randy Rogers

Community of Residence: Soldotna

Comment:

The decreasing cost of night/thermal vision equipment is allowing more trappers to equip themselves to broaden the amount of time they can pursue furbearers. The equipment helps ensure the correct animal is targeted and adds a level of safety regarding possible unwanted downrange damage. Please give serious consideration to adopting proposals such as 126 and 127.

Having lived in unit 19C and taking two Dall rams in the area, I fully support the excellent proposal 102.

From the desk of

Sam Rohrer
P.O. Box 1388
Kodiak, AK 99615



PC108
1 of 2

March 7, 2025

Kristy Tibbles
Executive Director, AK BOG
P.O. Box 115526
Juneau, AK 99811-5526

RE. 2025 BOG Statewide Meeting Comments

Chairman Fletcher and BOG Members,

Thank you for serving our state and its wildlife resources and thank you for taking the time to read my comments on Statewide proposals.

Many of the proposals try to take a "one size fits all" approach to wildlife management in our state. Alaska, however, is too large of a state for this too work. Hunting customs and practices, weather, terrain, and numerous other factors play an important role in what regulations "work well" in one region verse another region. I urge that you keep this in mind as you make your decisions, and when possible either oppose proposals that take too broad of an approach or split them up to be heard on a region by region basis.

Proposal 87 Oppose

I ask that you oppose proposal 87. In a marine environment like Kodiak, there are some sea ducks that can only be hunted from the water, as the birds rarely fly close enough to the shore. In addition, the proposal as written would *REQUIRE that ALL boats be beached or anchored within 100 yards of those discharging firearms*. This is not only impractical, but also unsafe. Often the surf is too great to beach a boat and safely leave it unattended. Or a father might drop a son and his friend off on a cold wet day, to hunt one side of a bay, while he goes back to drink hot coffee in the cabin, like I did this last fall. Under this proposed regulation, this would be illegal.

Further, it is not clear which boats must be beached or anchored within 100 yards of those discharging firearms. The proposal says *ALL*. This means if I drive my large 34' boat 20 miles from town, then anchor it up in a safe calm location and get in a small inflatable to go find a reef to sit on to hunt sea ducks that as soon as I am more than 100 yards from my large boat, I am in violation.

This proposal takes a one size fits all approach, is unworkable and unsafe in a marine environment. I ask that you unanimously reject this proposal.


Proposal 123 Oppose

Proposal 123 would allow remuneration in order to obtain or grant proxy authorization. In other words a person could pay a person to harvest an animal for them, OR a person who wants to harvest more than the legal limit, could actually pay another person to give them a proxy so they can hunt more.

The proposal falsely states that this is allowed on federal lands, however that is incorrect. The Federal Subsistence Board authorizes a Designated Hunter Program, which is similar to the States Proxy Hunter Program. However remuneration is **not allowed** under the federal system.

Giving or receiving remuneration to fill another person's bag limit is a bad idea and it is unnecessary. I ask that you unanimously reject this proposal.

907-486-4074


sam@kodiakbearcamp.com



Proposal 126, 127, and 128 Pass with Amendment

Proposals 126, 127, and 128 would allow the use of enhanced night vision and forward-looking infrared devices for taking furbearers statewide. While this proposal makes sense for wolf and coyote hunting in interior Alaska, I am concerned about the implications for furbearers in a marine environment like fox and river otter on Kodiak.

Fox and river otter routinely work the beaches on Kodiak on low tide cycles during the night. There is little to no cover for them and their only protection is the darkness. I am concerned that these 2 species will be vulnerable to overharvest if night vision and flir are authorized.

If the board chooses to pass these proposals, I ask that you exclude Unit 8 (Kodiak), so that it can be considered next year when Unit 8 is in cycle.

Proposal 135 Oppose

Proposal 135 would guarantee that 90% of the available hunting permits went to resident hunters. Additionally, if a hunt has less than 10 permits, no non-resident tag would be issued.

If this proposal were passed, there would only be 7 non-resident tags issued on Kodiak, as the vast majority of the hunts have less than 10 permits. This proposal would all but eliminate the guiding profession on Kodiak Island and have deep economic consequences for our community. The consistent guided non-resident harvest of mature bears is an important part of the Kodiak Brown Bear Management Plan. In addition, with an increase of resident hunters it is anticipated that more female animals would be taken and the overall number of tags would decrease.

In addition, both the state and the Feds are trying to reduce goat population numbers on Kodiak Island. If this proposal passed, then the number of non-resident goat permits currently issued would be substantially reduced, this would result in fewer goats being harvested.

This proposal takes a one size fits all approach, would decimate the guiding economy in Kodiak, and would be bad for the overall health of the brown bear and mountain goat populations on Kodiak. I ask that you unanimously reject this proposal.

Thank you for taking the time to thoughtfully read my comments. I appreciate all that you do for Alaska!

Respectfully,

Sam Rohrer
Kodiak, AK

907-486-4074

sam@kodiakbearcamp.com

**PC109****Name:** Craig Rose**Community of Residence:** Eagle River**Comment:**

Hello,

I am writing regarding proposals 188 & 189 due to the cancelled bison tags for 24-25 season. I was the recipient of DI404 tag having applied for bison tags on Delta hunts plus others in The State for the past 3 plus decades. This is the only bison permit I have drawn. While I appreciate the difficulty The Board faces making decisions year over year I wanted to make my voice heard. While one proposal offers something of a consolation prize to be allowed to have the permit erased (so to speak) and allow those whose permits were canceled to re-enter the draw without waiting for 10 years I don't feel that that is the best decision in all cases. I'll be 57 in a couple months. I likely don't have another 30 years to apply for and actually be able to go hunt bison. Based on random draw demographics I suspect a lot of those in this situation won't even live in Alaska in 5-10 years making additional difficulty in being able to participate in a not near future hunting opportunity. Case in point. of my long time neighbors here in Eagle River,. Twenty-ish years my senior he was still an avid outdoorsman and hunter. He taught school in bush Alaska and the Copper Valley for 20 plus years. He too had the great fortune to draw DI404, only to have his permit cancelled last year due to this very unfortunate mass die off. Sadly, he passed unexpectedly in January of this year. I urge the Board to opt for allowing recipients of the canceled bison tags to be integrated into the hunts over the next couple years hunt. Even if it can't be done in one season. I would certainly, happily wait for an opportunity to be able to hunt in the next 2 to 5 years without having to go through the draw process for another 20- 30 years. In closing, I would like to see The Board honor the permits given in 2024 and allow those recipients whose permits were canceled be able to hunt with those permits in 2026, rather than going through the permit process for another 5, 15 or 30 years.

**PC110****Name:** Matt Roster**Community of Residence:** Wasilla**Comment:**

Proposal 87 - The state already has strict enforcement of motorized use in regards to bird hunting. Human powered watercraft such as kayaks, rafts, sculling boats, etc are a more than reasonable for fair chase of waterfowl. Anchoring is sometime impossible due to water depth and our huge tide swings.

Proposal 97 - The youth hunt should have the same sheep spotting restrictions as the regular season. This allows for a better quality hunt for our state's youth without interruption by buzzing aircraft.

Proposal 99 - This is an unenforceable rule, and it will give complete freedom to aircraft. It will be a free for all on airplane sheep scouting and hunter harassment after august 20th. This may be one of the greediest proposals i've ever read.

Proposal 100 - This may be one of the best sheep proposals to encourage fairness to residents and nonresidents.

Proposal 113 - It's amazing how the guide industry eagerly wants to shut down RESIDENT YOUTH SHEEP HUNTING to forward their own financial endeavors.

Proposal 129 - I support a minimum caliber change but starting at .243/6mm which will be more inclusive to youth hunters.

**PC111****Name:** Craig Schwanke**Community of Residence:** Craig, formerly Dillingham**Comment:**

I support proposal 133 prohibiting the use of snowmobiles to approach or pursue wolverine. This practice was originally legalized for wolves to aid with predator control and I have successfully used this method to harvest wolves. Wolverine are not major predator of ungulates. Wolverine are less abundant, smaller, slower, less weary and easier to successfully pursue with a snowmobile than wolves. I witnessed several individuals harvest wolverines by pursuit with snowmobiles when the practice was not legal for wolverine and some of the illegitimate justification for legalizing this practice was that it was already occurring. Wolverine are a unique, low population/density furbearer and should be afforded the protection of not being chased down and harvested with a snowmobile.

I oppose proposal 87. The use of boats is a common practice for waterfowl hunting and it is not realistic to require boats to be 100 yards away from those discharging firearms. Waterfowl blinds are commonly constructed around boats. A boat is often necessary to quickly pursue crippled birds and this proposed regulation would increase crippling lost. Current laws sufficiently prohibit harassing and pursuing boats that are under power.

**PC112****Name:** Charles Snyder**Community of Residence:** Anvorage**Comment:**

127- should allow artificial light to be used in sport hunting furbearers. Not hide them in trapping regs. Under no circumstances, should Knight vision be on anybody's person or partys person during the months of big game hunting for Moose, Caribou, Sheep or Bear.

**PC113****Name:** Logan Snyder**Community of Residence:** Wasilla**Comment:**

85: Don't punish hunters for the mistakes of others, some sheep will never reach full curl due to genetics but are fine to harvest in their old age. the age requirement should stay in place. With experience and quality optics aging sheep is possible and sustainable.

101: great idea, we want to ensure healthy sheep populations forever

124: this has been long needed, to many remote shacks and sheds, some even abandoned should not be included in the 1 mile rule.

126, 127, and 128: we should allow thermal and night vision to be used to harvest predators statewide. There is no shortage of predators and the the opportunity to successfully hunt them is very limited and can be very difficult, the prey species could benefit from the increased predator harvest, and it could also cut down down on trapping conflict in more urban areas while still harvesting predators. It will also increase opportunity for sportsmen in winter.

131: we do not need this absurd law, it has been fine as is for 100+ years, this is based in an extremely anti trapping agenda

132/133: leave the law as it is, we need to encourage as much wolf harvest as possible

150: we need to allow as many opportunities as possible to harvest brown bears in all zones that are not managed as trophy brown bear areas.

166: makes perfect sense and should be adopted



PC114

Name: Mike Soik

Community of Residence: Anchorage

Comment:

Proposal #131

I oppose proposal #131. The author of this proposal wants to identify illegally set traps and snares to help law enforcement. This makes no sense because if a person is trapping illegally why would they put tags on their traps/snares that would identify themselves. Why should a trapper in remote Alaska have to put tags on their traps/snares when there isn't a domestic animal anywhere near their trapline? Trappers have had their traps/snares stolen, damaged, and tripped, so what happens if a person that doesn't like trapping steals and moves a trap/snare that is legally set and places it in an area/manner that is illegal? How does the trapper prove that they did not set the trap/snare illegally?

Thank you for your consideration of my comments and I ask that you reject this proposal.



PC115

Name: Elizabeth Solger

Community of Residence: Juneau

Comment:

As a bird watcher and somewhat reluctant cat lover, I am writing regarding Proposal 146.

While I did not comment during the comment period in 2022 I see that the Department has not addressed any concerns raised by the public in this new proposal.

I agree that feral cats, in fact, all outdoor cats, have a negative impact on wildlife, but I don't agree with the opposition to allowing TNR (Trap Neuter Release) practices.

As a nature enthusiast, I value the impact that evidence-based decisions have on our wildlife, I am concerned that the Department has not dedicated any expertise or research to the topic of TNR in Alaska.

While some research has been conducted Down South we all know that Alaska is unique in its terrain, among other things. I want more birds

I have personally spent time and money removing, rehabbing, and adopting out cats from a feral cat colony in downtown Juneau. Housecat life is not necessarily appropriate for all feral or semi-feral cats so at this point we've only chosen to remove the friendly ones who seem to want to live inside. As we make more progress with the friendly ones the thing I've noticed is that it's an impossible battle if we're not "fixing" the sexually mature ones from the colony who are less comfortable around humans.

Communities should be able to determine whether TNR is appropriate for their terrain and personnel/volunteer resources. The TNR prohibition is clearly not positively impacting the amount of feral cats in our communities. Rescuers are limited in their ability to help, I request that the Department allow the use of a tool that has been successful in other locales. Australia, for example, is a similarly hostile climate for non-native species, they have found success in TNR programs that protect wildlife through the humane handling of non-native cats.

I support any amendment to regulation that permits the implementation of humane TNR practices with whatever surgical language the board feels appropriate to both protect our wildlife and support reduction of feral cats in Alaska. Thank you for your time & service.

Name: Theresa Yvette Soutiere

Community of Residence: Juneau

Comment:

I support Proposal 146, TNR, because it works. In Juneau, there are many colonies of semi-feral cats. People will try to care for them, but will not bring them in for euthanasia. This simply serves to increase the feral population. TNR would allow those that want to care for these colonies to ensure they do not grow. A mother cat can have multiple litters each year, expanding the colony and having a terrible impact on local wildlife. Though TNR still means pressure on local wildlife, it is far less than that of a cat colony without limits to its population.



PC116



Chairman Fletcher,

Mr. chairman and members of the Board, thank you for the opportunity to submit comments for your consideration during the March statewide meeting.

85. Migratory bird hunting guide services. **Neutral.** Before adding additional regulations, the department should be able to explain if this request is warranted or is this additional red tape that will reduce hunter opportunity.

86. Harvest tickets and reports for sea duck take. **Opposed.** With the low harvest of sea ducks in Alaska, I believe the HIP program is sufficient to assess harvest levels.

87. Unlawful use of boats while hunting waterfowl. **Opposed.** This would be a huge burden to hunters and a nightmare for AWT to enforce. There are adequate rules in place now to prohibit the concerns suggested in the justification.

88. Add wood bison to the list of cultural purposes. **Opposed.** This request is too early in the reintroduction effort. Once bison are established and there is a fairly large number of surplus animals to harvest, this should be reconsidered. If this request is adopted, applications from communities would take the entire harvestable surplus. The cost of releasing these animals was paid for by conservation groups, such as Safari Club International, in hopes of hunting these animals once they reached huntable numbers. I am not aware of any financial help coming from communities that would be requesting these animals for cultural harvest.

89. Hunter education, orientation requirements and guide required. **Opposed.** A few guides have proposed this for years and it has never been adopted for several good reasons. The cost of a guided moose hunt is so high now that your average wage-earning hunter cannot afford to hunt. Guide operations on state land are overcrowded in many areas and this would add to that conflict issue.

However, I do support a requirement for additional education for non-resident hunters that are not guided or accompanied by an Alaskan resident. If a program is adopted, it should be readily available online and phased in over a couple seasons.

90. Hunter education for hunting mountain goats in Units 1, 4, 5, 6C and 6D. **Amend** to include all goat hunts that are not guided. I support more hunter education as long as it is available online and not too burdensome to hunters. This effort should be phased in over a two-year period.

91. Goat hunter quiz. Support or **Take No Action** due to the action taken on 90.

92. Sheep hunter orientation. **Support for non-guided** hunters and phased in over a two-year period.

93. Change sealing requirement. **Opposed.** The sealing requirement was implemented to positively identify a set of sheep horns in the event of any questions about the particular animal. It is an inconvenience to hunters but so is sealing bear hides and furbearers but necessary to obtain needed data for management.



94. Change definition of full curl. **Opposed.** This definition would render marginal full curl sheep illegal. The system used now has been in place and successful for years, no need to change a proven technique.

95. Repeal age criteria for sheep horns. **Opposed.** It is a well-known fact that not all sheep reach full curl, even in their later years. I do not support judging legality by age, but these are not the rams we should protect, if the objective is to maintain full-curl rams.

96. Repeal age criteria for sheep. **Opposed.** See justification in 95.

97. Change aircraft restrictions to Aug. 1 to Sept. 20. **Support.** I believe the author's justification is valid. By not starting the aircraft restriction prior to the youth hunt, a loophole was created for abuse by some, that has been seen in the youth hunt and pilots flying late on the 9th then killing the spotted sheep the next morning. Sheep hunting has to be held at the highest ethical standards if we hope to keep it from a limited entry draw system.

98. Lengthen the period aircraft are prohibited to Aug. 1 to Oct. 15. **Support.** I support this request to make the regulation clear and equal to all. It's not fair to restrict hunters during most of the season then allow the use of aircraft to spot sheep during expanded seasons.

99. Shorten the aircraft prohibition period. **Opposed.** See comments on 97 and 98.

100. Limit non-residents in sheep and goat draw hunts. **Opposed.** This just adds more confusing regulations to the system. The guide concession program will achieve most of the concerns in the request if adopted.

101. Add sheep to IM list. **Support.** Although sheep numbers are primarily controlled by weather, this status change will provide for additional options for managers.

102-118. Subunit 19C sheep hunting. **Opposed to all.** Sheep population density is primarily controlled by weather conditions and the current restrictions are not going to recover the population trend unless the weather becomes more favorable.

190. Proposed action by sheep working group. **Support.** I believe the proposal drafted by the sheep working group is a reasonable solution to the issues faced in 19C. Adoption of this request will also give all groups involved three years to evaluate the response in the sheep population relative to weather conditions, lamb survival and limited harvest. The key to success of this effort is the implementation of a guide concession program on state lands.

192. Modify the hunt structure in 19C. **Opposed.** The proposal submitted by the sheep working group was developed by a broad group of hunters and addresses the issues more fairly for all hunters.

119. Change the boundary between Units 21E and 21D. **Support.** Justification seems logical.



120. Change the boundary between Units 25C and 25D. **Support.** This would clarify the boundary and reduce confusion.

121. Divide Subunit 15C into two subunits. **Opposed.** There are some physiographic differences in Subunit 15C, as we see in all Units, but there is no clear justification that this change is necessary or will improve the management of the area.

122. Allow proxy hunting for plains bison. **Opposed.** The odds of drawing a bison tag have always been less than 1%. By adding proxy hunting the odds will be far worse.

123. Allow remuneration to proxy hunters. **Opposed.** When you proxy hunt, the objective is to help someone unable to hunt for themselves, not to get paid for helping. This is why "Market Hunting" was prohibited years ago.

124. Change permanent dwelling to permanent domicile. **Support.** This will help clear up the confusion on where a person can establish a bait site for bear hunting.

125. Define "developed recreation facility". **Support.** Provides clarification.

126. Allow night vision and forward-looking infrared devices for hunting furbearers. **Neutral.** When this method was adopted for Region III in March 2024, I assumed the board wanted to "test" the method and request a report from AWT concerning any issues. If AWT reports no serious issues with this provision, then it should be allowed statewide to be fair to all hunters.

127-128. **Neutral.** See note in 126.

129-130. Establish a minimum caliber for moose hunting. **Neutral.** This request has been before the Board several times and has never been adopted. As we all know, the most important concern is "shot placement" and has very little to do, within reason, with caliber or bullet design. However, the author's concerns are justified. The availability of AR-15 style rifles, chambered in 223 Remington, shooting 55 grain full metal jacket bullets is common but not recommended to harvest moose. There is also the concern that with adoption of this regulation, hunters will be required to purchase a new rifle and there will be an argument about availability of ammunition.

131. Require ID tags on traps. **Opposed.** I understand the author's concern and as a long-time trapper, I support his concern for accountability and ethical practices in the field. However, adoption of this request would be of little value to AWT for long-line trappers and would be burdensome to tag and maintain tags on hundreds of trap. This request has been made before the Board several times and has never been approved.

132. Prohibit non-residents from pursuing wolves and wolverine with a snow machine. **Support.** This style of harvest should be very limited because it is not fair chase hunting. It should be allowed for subsistence hunting, where fair chase is not a primary concern over harvesting an animal for meat or fur. Hunting caribou from a power boat while they are swimming is another example of a practice allowed for by subsistence users but not allowed for non-residents.



133. Prohibit the use of snow machines to pursue wolverine. **Support.** Unlike wolves, wolverine do not occur in large numbers or wide distribution. An indication of concern for wolverine numbers has been a reduction in the trapping seasons with many units closing at the end of February.

134. Allocate 90% of all moose draw tags to residents. **Opposed.** The department will have data to help determine if this request is needed to secure a resident preference. Currently, the non-resident harvest is about 3% of the total animals taken annually, while they pay about 85% of the management cost in license and tag sales. It will be interesting to learn what percentage of the draw tags actually are awarded to non-residents in an “open to all” draw.

135. Guarantee 10% of each draw hunt to non-residents. **Opposed.** Since most of the “open to all” draw hunts result in over 90% of the tags going to residents, a guaranteed 10% to non-residents would reduce the number of tags to residents in some hunts.

136. Change the Musk Ox and Bison draw system. **Opposed.** This system has been in place for many years and seems to be as simple and fair as it can be. I would support one bison or musk ox tag per household but keep the remainder the same. When your odds are less than 1% to draw a bison tag, there is very little that can be done to change your odds other than increasing the number of applications you can apply for.

137. Change draw hunt system. **Opposed.** Similar comments as in 136, the current system is not complicated and is equally fair to all participants. A first-time applicant has the same odds as any other person, which is encouraging when compared to a preference point or bonus point system.

138. Remove musk ox tag requirement. **Support.** Housekeeping to align the regulation with the practice in the field.

139. Change the evidence of sex for horned animals. **Support.** This removes another cumbersome requirement for hunters to follow.

140. Eliminate evidence of sex requirement. **Opposed.** I can support this request in hunts that allow the harvest of either gender but not for only one. Although the cost for DNA testing for gender is lower, on a statewide basis the cost could be prohibitive to check every animal. AWTs would be spending a large amount of their time and efforts to collect tissue samples for DNA testing. Retaining evidence of gender is an inconvenience to hunters but a necessary requirement in areas where only one gender is legal.

141. Change transfer of possession process. **Support.** Since we are reporting most of our hunt information online, it only makes sense to allow for this. No hunter in the field has a copy of the transfer of possession form but everyone has an iPhone.

142-143. Remove the permit requirement to sell trophies. **Support.** This will save time for the department and the person selling the trophies.



144. Reduce the time before selling unclaimed taxidermy work. **Support.** It seems reasonable that a person having taxidermy work done should be able to pay for or make arrangements to complete the transaction in 60 days.

145. Add Eurasian eagle-owl to clean list. **Neutral.** The author's request is for him to own this species so he can be paid for his presentations. There must be a policy prohibiting a person being paid for showing species on the clean list that I am not aware of.

146. Allow the release of sterilized feral cats. **Strongly Opposed.** Capturing a portion of a feral cat colony and sterilizing them is only a small part of the problems with cat colonies. The author is correct stating that the TNR group has asked the board before for permission to catch, sterilize and release stray cats. The Board has denied their request for several reasons. The more important concerns were the spread of disease, killing songbirds and killing small game, especially spruce grouse. Feral cats are the most efficient predator on small game and songbirds.

PETA's position on TNR, "We believe that trap, vaccinate, spay/neuter, and release programs are acceptable when the cats are isolated from roads, people, and other animals who could harm them; regularly attended to by people who not only feed them but care for their medical needs; and situated in an area where they do not have access to wildlife and where the weather is temperate."

147. Delegate authority to the Commissioner for clean list species. **Opposed.** I believe the public and Board has done an adequate job when requested to add species to the clean list. The department has always conducted the research and provided their findings prior to Board action.

148. Wolf predator control limits. **Opposed.** Implementation of intensive management plans are legislatively authorized powers of the Department of Fish and Game and are not regulations subject to the Administration Procedure Act

Ted Spraker

[REDACTED] Soldotna AK 99669

Email: [REDACTED]

**PC118****Name:** Jay Stanford**Community of Residence:** Port Alsworth**Comment:**

My name is Jay Stanford and I am a life long Alaskan resident. These are my comments for a variety of proposals.

I am in favor of proposals 90, 91, and 92. I think it is a positive when you have the opportunity to educate hunters before they enter the field. A simple online test might help a hunter to make a more informed decision. While in the field.

I oppose proposal 93 on removing the permanent seal on sheep horns. The permanent plugs are used throughout North America to seal wild sheep and it is a useful tool in tracking horns. Plastic seals would be easily removed and make it harder to tell where rams came from, especially on mounts. If anything hunters and ADF&G sealers need to be educated on the proper placement of the plugs. I have seen dozens of rams sealed and never seen a rams horns damaged during this process.

I oppose proposals 95 and 96 on removing the 8 year old or older as being part of the ways to make a sheep legal. Some rams genetics will never allow them to become full curl and parts of the state are known to not produce full curl rams. There needs to be a way to make those rams legal and the 8 year old or older methods is that. Counting rings can be tricky and should only be done by an educated hunter. Many times it requires hunters to be well within shooting distance to determine the age. Another great reason the age criteria should be allowed is if you have two rams side by side and ones a full curl six year old and the other is a non full curl 12 year old. Which is the better ram to harvest for the heard?

I strongly oppose proposal 100 to limit sheep harvest by nonresidents to 35% statewide. Certain parts of the state there is more nonresident participation due to the remoteness of the area and would hurt those operators working in those areas. Nonresident hunters bring tons of money to the state through license and tag sales along with being a positive economic impact in rural parts of the state. Limiting these sheep hunters would negatively affect the state. Residents already have an unlimited hunting opportunity across the state.

For proposals pertaining to 19C, I support the working group and encourage them to continue to work towards a plan for the area.

I strongly oppose proposal 135, allocating nonresident draw tags to 10%. This would eliminate many draw hunt opportunity for nonresidents; negatively impacting the state through loss of license and tag sales, and rural economies through loss of money spent in those areas. For example this would completely wipe out the nonresident participation in Kodiak brown bear hunts. It would disregard a management plan that has been in place for decades and one that works. This would greatly negatively affect many small businesses that rely on nonresident money coming in from these draw hunts.

**PC119****Name:** Michael Sturm**Community of Residence:** Anchor Point**Comment:**

I am writing in support of proposal 127, allowing the harvest of fur bearers using infrared or thermal devices. This will aide in predator control through hunting as well as reduce risk of injury during night time trap checks.



PC120

Name: Margaret Sullivan

Community of Residence: Fairbanks

Comment:

I am writing in support of Proposal 189. I am in support of reinstating bison permits for 2026 that were revoked in 2024 due to the drowning of several bison in the spring of 2024.

This permit is rare to obtain and is truly a “once in a lifetime” win, even if you Are an Alaska resident who can reapply in 10 years.

I hope you will pass Proposal 189 and allow the revoked 2024 bison permit holders to use their permits in 2026. Thank you.

Sincerely,

Margaret Sullivan

Fairbanks, AK



PC121

Name: Justin Talley

Community of Residence: Kodiak

Comment:

85 oppose What is the point of this to make a transporter or even a float plane pilot that is transporting people to and from the field register as a waterfowl guide is over board. A guide is responsible for knowing all rules and regulations including waterfowl identification. A pilot of a water taxi or airplane is not expected to have this level of knowledge.

86 oppose The sea duck population in Alaska is nothing like that in Washington. Biologist from Ducks Unlimited, USFWS, US Forrest service and ADFG have not raised concern about sea ducks in the state. Only a small percentage of sea ducks winter near Homer and cannot be the litmus test for state wide regulations.

87 oppose First and foremost this would end King Eider hunting in St. Paul. This would have huge financial and economical impacts on the community. Furthermore this is not practical even if you put people on the shore to hunt an area on accessible by boat due to rocks , tides and dangerous areas it is not practical to keep the boat within 100 yards of the hunters. Also a boat with the motor secured as required by law and drifting is legal and safer than sitting on tidal beaches or rocks that leave people stranded and require search and rescue.

Board of Game Statewide Regulations Meeting

March 21-28, 2025

Tanana Chiefs Conference (TCC) is a consortium of 37 federally recognized tribes based in Fairbanks, Alaska and serving more than 18,000 tribal citizens and residents of Interior Alaska. TCC serves its member Tribes in providing a unified voice in advancing the sovereign rights of tribal governments through the promotion of physical and mental wellness, education, socio-economic development, and protection of tribal cultures and ways of life of the Interior Alaska Native people. TCC is committed and directed by full board resolutions to advocate for policies that protect traditional hunting practices, decrease hunting pressure from nonresident trophy hunters, safeguard our subsistence way of life, and prioritize conservation efforts to ensure healthy game populations for future generations. The following comments outline our positions on specific proposals before the Board of Game, reflecting our commitment to sustainable wildlife management and the protection of Indigenous hunting rights.

Proposal 87: Restricting Boat Use in Waterfowl Hunting

TCC opposes Proposal 87 that seeks to limit boat movement in waterfowl hunting by requiring boats to be anchored or beached within 100 yards of those firing weapons. Many Indigenous hunters rely on boats for traditional waterfowl harvesting, particularly in remote areas with extensive wetlands. Restricting their movement could make it more difficult to access birds. The existing law (5 AAC 92.100) already prohibits hunting from a moving boat unless the motor is off and the boat is no longer in motion. This regulation sufficiently addresses concerns over herding and chasing birds, making additional restrictions unnecessary and burdensome for legal hunters, especially subsistence users.

Proposal 88: Permit to Take and Use Game for Cultural Purposes

TCC supports Proposal 88 that seeks to amend 5 AAC 92.034 to include wood bison as a species eligible for permits allowing their take and use for cultural purposes. This proposal is critical for cultural revitalization, education, and the preservation of Alaskan Native traditions, particularly in communities near the Minto Flats State Game Refuge where wood bison have been reintroduced. Allowing cultural use of wood bison ensures that Indigenous communities maintain agency over conservation efforts and can incorporate these animals into traditional practices. *While TCC opposes reintroduction efforts, this proposal is about Tribal inclusion in management decisions.*

Proposal 89: Nonresident Hunter Education Requirements

TCC supports Proposal 89 that seeks to require nonresident moose hunters to complete a hunter orientation course and be accompanied by a registered guide or resident family member. Currently, nonresidents can bypass education requirements, while Alaskan residents under 39 must complete hunter education. This proposal ensures nonresidents receive formal training on meat care, conservation, and responsible hunting, aligning them with requirements for resident hunters. Requiring education will help preserve subsistence resources and reinforce ethical hunting standards.

Proposal 92: Sheep Hunting Education Requirement

TCC supports Proposal 92 that seeks to require all sheep hunters in Alaska to complete an online course focused on identifying legal rams. Given declining Dall sheep populations,

sublegal harvests further reduce sustainable take. Implementing education requirements would help reduce misidentification errors and ensure better compliance with legal sheep harvest criteria.

Proposal 93: Changing Sealing Requirements for Dall Sheep Horns

TCC opposes Proposal 93 that seeks to replace the permanent plugging of Dall sheep horns with a nonpermanent plastic seal. This change prioritizes trophy aesthetics over wildlife conservation. The existing system effectively prevents illegal harvest and trafficking, and there is no clear justification for weakening enforcement mechanisms. Current regulations ensure the integrity of sheep management, and this proposal does not provide a viable alternative that maintains the same level of accountability.

Proposal 94: Redefining "Full-Curl" Dall Sheep

TCC opposes Proposal 94 that seeks to eliminate the "tube test" and rely solely on the "stick test" for determining a full-curl ram. This change could lead to inconsistencies in field judgments and enforcement, increasing the risk of overharvest. Without clear data on whether this change would lead to more or fewer sheep being taken, modifying an established conservation measure is premature and could undermine effective sheep management.

Proposal 95: Repealing Age-Based Criteria for Legal Full-Curl Rams**Proposal 96: Removing Age Criteria for Full-Curl Sheep**

TCC supports Proposal 95 and 96 that seeks to remove the age-based criterion (eight years old) as a determinant for legal full-curl ram harvests. Field judging the age of rams is difficult and has led to unintentional sublegal harvest. Removing this criterion would simplify regulations and focus on full-curl or broomed horns as primary indicators of a mature ram. With Dall sheep numbers at historic lows, ensuring rams reach full maturity before being taken supports long-term population recovery.

Proposal 98: Extending Aircraft Restrictions for Sheep Hunting

TCC supports Proposal 98 that seeks to extend the restriction on using aircraft for scouting sheep from the current season (August 10 – September 20) to August 1 – October 15. This would ensure all hunters, including youth and archery hunters, operate under the same fair chase principles. Reducing aerial scouting prevents excessive hunting pressure on sheep populations and promotes ethical hunting practices.

Proposal 99: Reducing Aircraft Restrictions in Sheep Hunting

TCC opposes Proposal 99, which would relax aircraft restrictions for sheep hunting, as it primarily benefits wealthy outfitters and nonresident hunters, while increasing pressure on struggling sheep populations. Dall sheep habitat consists of high elevations and valleys, where aircraft noise carries over vast distances, amplifying its impact. The current prohibition upholds fair chase principles and prevents unnecessary stress on wildlife. With sheep populations already under strain, loosening aerial scouting rules could worsen the decline, leading to fewer mature rams and further disrupting herd dynamics. We strongly oppose Proposal 99 to protect both sheep populations and ethical hunting practices.

Proposal 100: Nonresident Sheep Harvest Cap

TCC opposes Proposal 100 that seeks to convert all general season sheep hunts to draw hunts, primarily to limit nonresident harvest. However, implementing this statewide would require a

piecemeal approach, changing regulations unit by unit at regional meetings rather than through a broader, more consistent process. This approach creates unnecessary complexity and could lead to inconsistent management across units. Additionally, restricting general season hunts in favor of draw permits reduces opportunities for resident hunters and complicates access for all.

Proposals 102-107: Reopening Dall Sheep Hunts in Unit 19C

TCC opposes Proposal 102 through 107 that calls for reinstating sheep hunts in Unit 19C. Alaska Department of Fish and Game (ADF&G) closed the hunt due to severe and prolonged population declines and reopening it now would be premature. Recent data indicates that declines have been significant and ongoing, and, reinstating hunting a serious conservation risk. Prioritizing nonresident trophy hunting over resident subsistence needs is unacceptable and wildlife management should be based on conservation rather than financial and economic considerations. The argument that nonresident hunting does not impact populations fails to consider cumulative stress on a struggling species. The closures enacted to allow the population to recover should remain until the sheep numbers stabilize.

Proposal 108: Instituting a Limited Draw System for Nonresident Sheep Hunters

TCC opposes Proposal 108 that seeks to allow nonresident hunting through a draw permit system. Past harvest data shows nonresident hunters take a disproportionate share of rams. Keeping the closure in place allows populations to stabilize.

Proposal 109: Reopening Nonresident Sheep Hunting with Archery Restrictions

TCC opposes Proposal 109 that seeks to permit bowhunting-only for nonresidents. While this might reduce harvest numbers, it still poses risks to an already struggling population. Wildlife conservation should not be treated as an experiment.

Proposal 110: Changing Resident Bag Limits for Sheep

TCC opposes Proposal 110 that seeks to impose a two-year restriction on resident sheep hunters. This would disproportionately impact subsistence users who rely on these resources, creating unnecessary hardship. Conservation measures should target nonresident hunting rather than limiting resident access.

Proposals 111-117: Various Amendments to Sheep Hunting Regulations

TCC oppose these proposals that seek to introduce tiered eligibility systems based on ram age, archery-only requirements, shortened resident seasons, and modifications to nonresident allocations. Many of these proposals favor economic gains over conservation and disproportionately affect Indigenous and resident hunters. The current full-curl management system is already effective, and additional penalties or changes are unnecessary.

Proposal 116: Reinstating Late-Season Resident-Only Sheep Hunt (RS380)

TCC supports Proposal 116 that seeks to reinstate the RS380 late-season resident-only sheep hunt in Unit 19C, which was previously closed. The proposal prioritizes local hunters by allowing the harvest of one ram with $\frac{3}{4}$ curl horns or smaller, using ground-based methods without aircraft. Restoring RS380 aligns with subsistence priorities by ensuring rural Alaskans retain fair access to traditional hunting opportunities.

Proposal 119: Changing the GMU 21E and 21D Boundary

TCC opposes Proposal 119 that seeks to modify the boundary between Game Management Units (GMUs) 21E and 21D to allow residents of Grayling greater access to hunting grounds. Altering the boundary could introduce new challenges, including increased hunting pressure in Unit 21D. Without additional conservation measures, such as stricter permit requirements or antler destruction rules, there is a risk of overharvest. Additionally, historical wildlife management data must be considered before making adjustments. While expanding access for local hunters is important, any boundary changes should be implemented alongside conservation safeguards to ensure long-term sustainability of game populations.

Proposal 120: Adjusting GMU 25C and 25D Boundary

TCC supports Proposal 120 that seeks to change the boundary between GMUs 25C and 25D to follow the Steese Highway between Birch Creek and Circle, making it easier for hunters to identify. The current boundary relies on less visible geographic markers, leading to confusion. A clearly defined boundary along the highway would enhance compliance and improve navigation for hunters in the region.

Proposal 123: Removing Compensation Restrictions for Proxy Hunting

TCC supports Proposal 123 that seeks to remove the restriction on remuneration for proxy hunting. Many proxy hunters incur significant costs for fuel, transportation, and processing when harvesting game on behalf of elders and those unable to hunt. Allowing reasonable compensation would support these efforts while maintaining the integrity of proxy hunting. This also aligns federal and state regulations.

Proposal 147: Delegate Board of Game (BOG) authority to the ADF&G Commissioner to manage the Clean List (5 AAC 92.029)

TCC opposes Proposal 147 that seeks to delegate authority from the Board of Game (BOG) to the Commissioner of the ADF&G to manage the Clean List (5 AAC 92.029). This is a second attempt at Governor Dunleavy's 2024 Executive Order 124, which was widely opposed and rejected by the legislature. This proposal shifts control of Alaska's clean list—which determines approved species for entry and possession—from the Board of Game (BOG) to the ADF&G Commissioner, removing critical public oversight. Currently, changes to the clean list go through a transparent process: BOG calls for proposals, ADF&G provides analysis, the public comments, and all seven BOG members deliberate. Proposal 147 bypasses this by allowing the Commissioner to draft and approve changes with minimal notice and just 30 days for public comment. This proposal poses series risks, such as importing unapproved species that could introduce disease and parasites that threaten native wildlife. Additionally, the BOG process ensures careful evaluation, which this proposal would weaken. We urge the BOG to retain its authority.

Proposal 148: Increasing Public Oversight for Predator Control Measures

TCC supports Proposal 148 that seeks to require additional public notice and input before the ADF&G Commissioner can activate an Intensive Management (IM) predator control plan. This ensures transparency and prevents unilateral administrative actions without Board and public input. Balancing predator control with public accountability strengthens trust in wildlife management decisions.

Thank you for your consideration. TCC urges the Board of Game to uphold policies that support sustainable, ethical, and fair wildlife management.

Mahsi' choo,
TANANA CHIEFS CONFERENCE



Brian Ridley
Chief/Chair



Yukon Koyukuk Sub-region Opposing Board of Game Statewide Proposal 119

WHEREAS, The following are Federally recognized by the U.S. Government and maintain government to government relationships: Allakaket Traditional Council, Loudon Tribal Council, Huslia Tribal Council, Kaltag Traditional Council, Koyukuk Traditional Council, Nulato Tribal Council, and Ruby Tribal Council and

WHEREAS, The Yukon-Koyukuk sub-region tribes have occupied the areas or portions of the areas known to the Alaska Board of Game as Game Management Units (GMU) 21D, 21C, 24C and 24D for over 10,000 years and

WHEREAS, The Koyukon Athabascan People of these Tribes have harvested, hunted and fished to survive off these lands since time immemorial and

WHEREAS, The Tribal members of the above mentioned Tribes, hold inherent rights to safeguard their ancestral lands, cultural heritage and sovereign governments

WHEREAS, Board of Game Statewide Proposal 119 seeks to enact a Game Management Unit (GMU) Boundary change for GMU 21 E to take a portion of GMU 21D so as not to have to abide by the current antler destruction regulations associated with the current RM834 permits and

WHEREAS, GMU 21D contains several Native Allotments that belong to Tribal members of the above mentioned Tribes or their descendants and the original boundaries were established based on the traditional hunting grounds and


WHEREAS, The proposed boundary change would lead to increased hunting pressure from non-local hunters seeking trophy antlers resulting in higher hunter traffic in the area and


WHEREAS, Increased trophy hunting traffic would directly impact local subsistence hunters tribal and non-tribal citizens alike by increasing the competition for subsistence resources critical for the food sovereignty of the above mentioned Tribes and their members and

NOW THEREFORE BE IT RESOLVED that Yukon-Koyukuk Subregional Advisory Board opposes the Alaska Board of Game Statewide Proposal 119.

CERTIFICATION

I hereby certify that this resolution was duly passed by the Yukon Koyukuk Subregional Advisory Board on March, 6, 2025 at Fairbanks, Alaska and a quorum was duly established.


1st Chief Charlie Green


1st Chief PJ Simon


1st Chief Derek Starr


1st Chief Calvin McGinty


1st Chief Percy Lolnitz


1st Chief Gloria Patsy


1st Chief Stewart Cleaver

LAW OFFICE OF KNEELAND TAYLOR, P.C.

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PC124
1 of 16

January 27, 2025

Alaska Board of Game
P.O. Box 115526
Juneau, AK 99811-5526

Submitted online at www.boardofgame.adfg.alaska.gov

Subject matter: Comments for consideration at the
Statewide Meeting March, 2025

Dear Members of the Board of Game:

I am submitting these comments as an individual, and not the representative of any organization. I have lived in Alaska for 50 years and been somewhat of an activist in matters of wildlife policy for more than 25 years. I think of myself as a voice for wildlife, and a voice for non-consumptive users. My favorite recreational activities are hiking, mountaineering, skiing and wildlife viewing. I am a member of the Anchorage Advisory Committee, and participate as a member of the Game Subcommittee.

I will start with Proposals 131 and 148 which I submitted, taking them out of numerical order. I will then continue commenting on other proposals in numerical order.

Proposal 131. Support. This proposal if enacted would require trappers to attach identification tags to body gripping traps, leghold traps, and snares or to the cables or chains securing these traps and snares to the ground, trees, or bushes. Rather than having a trapper's name shown on ID tags, Proposal 131 contains language which would allow trappers to identify their traps and snares with only a personal identification number (PIN). The name of the individual would be held by the Department in confidence; with disclosure only to law enforcement, and persons

Comments for Board of Game: Statewide Regulations: March Meeting 2025.

Page 1 of 11



whose pet or child is injured in a trap. The Department could with the issuance of trapping licenses provide each trapper with a computer generated PIN so that the trapper could have tiny tags prepared and attached, or the PIN could inscribed directly onto traps. Compliance need not be burdensome, and need not interfere with the efficacy of a well constructed set. The Anchorage Advisory Committee, of which I am member, endorsed this proposal unanimously.

I submitted a similar proposal for trap identification tags which was considered by the Board of Game at the Board's January, 2022 meeting in Wasilla. That proposal did not contain a provision providing for confidentiality. That proposal was Proposal 228. Law enforcement in 2022 very strongly endorsed proposal 228. I quote **in full** the written comment of the Department of Public Safety, Division of Wildlife Troopers supporting Proposal 228 in 2022; as follows:

Proposal 228. AWT agrees. There are no other ways in Alaska to passively take fish/game with unmarked devices except by trapping. Crab/shrimp pots, burbot set lines, fish wheels, bear bait stations, gill nets, etc., all require markings. Trappers should be held to the same standard other resource users are. Trap/snare identification would greatly enhance AWT ability to enforce illegal traps and incidental catches of moose, caribou and dogs. Secondly, in the instance a trap is stolen or removed the trapper could report this to AWT much like when other resource users call to report shrimp/crab pots stolen or lost. One of the situations that is most common is when a dog is found dead in the trap and the trap is taken with the dog owner. Enforcement is unable to return the trap and there is a lost opportunity to educate and let the trapper know what happened-for the good and bad of it. AWT must also store traps with no leads with no way to return it or issue a citation if warranted. It has been rumored that trappers worry AWT would check their gear for such markings or somehow tamper with their gear. AWT would NOT routinely field check to look for ID number unless warranted. AWT spends an exorbitant amount of time trying to identify the owners of traps in both cases of violation or when stolen. Trapping does not have the same accountability as other resource users. The marking of traps /snares could be done with a unique anonymous number assigned to each trapper to prevent retribution from angry dog owners or anti trappers if that was a concern. If the number were punched/inscribed onto the trap, it would

also aid AWT in recovering stolen traps. Metal tags could also be issued from ADFG. The proposal to have an affixed or stamped means of identification would simply bring this method of take into alignment with ALL other resource users. [Emphasis in the original.]

A copy of the relevant pages of the AWT's comments made in 2022 is attached.

Not only did the Division of Public Safety support Proposal 228 in its written comment, but the individual wildlife trooper who testified almost begged the Board to enact the proposal, repeatedly apologizing for taking so much of the Board's time to hear all the reasons why identification tags are a good idea.

I assume that the AWT will once again strongly endorse identification tags, and at the March 2025 Board meeting support Proposal 131.

If compliance is felt to be burdensome to trappers, compliance could be phased in over a period of years: with implementation first in highly populated game management units such as Units 7, 14, and 15, and only later in remote parts of the state.

The Anchorage Advisory Committee endorsed this Proposal 131, unanimously.

Proposal 148. Support. It is the opinion of the undersigned Kneeland Taylor that the Department is mismanaging, as a matter of law, at least several intensive management plans (IM Plans) in various Game Management Units (GMU's) throughout the state of Alaska. Intensive management and aerial shooting of wolves are authorized in Alaska state law only in accordance of AS 16.05.255(e-g) and AS 16.05.783(a). In federal law, 16 USC 742j-1 prohibits the shooting of wolves and bear while airborne, unless done in conjunction with a State authorized program to protect wildlife, which in Alaska includes duly authorized IM Plans.

Both AS 16.05.255(e-g) and AS 16.05.783(a) require the Board to make specified findings, regarding current conditions pertaining to the relevant prey species and the relevant predators. The authority to make these findings is not given to the Commissioner by these two statutes. It is given only to the Board,

The Department, with the approval of the Board, has been violating the

relevant statutes, and Article VIII, Section 4 of the Alaska Constitution, because:

- (1) some of the Department's IM Plans are based on conditions existing many years prior to Board approval, and not then-current conditions;
- (2) because the Commissioner is usurping authority granted only to the Board, and not the Commissioner, by the use of a process in which unnecessary IM Plans are classified as "inactive" but left open for as much as six (6) years, subject to activation at the discretion of the Commissioner;
- (3) the Commissioner can exercise his/her discretion without providing the public with prior, meaningful notice; and
- (4) without providing the public with an opportunity to comment on the Commissioner's exercise of his/her discretion, in accordance with Alaska's Administrative Procedure Act.

Proposal 148, if enacted, would require the Department to change its practices, and bring into compliance the Department's administration of multiple IM Plans.

The Anchorage Advisory Committee, of which I am a member, approved this proposal unanimously.

The Department in a Note regarding Proposal 148 which appears in the Proposal Book states as follows:

Note: Conducting management activities and exercising administrative authority to implement intensive management plans are legislatively authorized powers of the Department of Fish and Game and are not regulations subject to the Administrative Procedure Act.

The undersigned disagrees with that statement, and notes that the Department's position is currently being contested in litigation pending in the Superior Court, in a declaratory judgment action filed by the undersigned Kneeland Taylor. The undersigned's action [*Kneeland Taylor v. State of Alaska, et al*, Case



No. 3AN-23- 08548CI] is currently stayed by order of the Superior Court pending the outcome of a Supreme Court appeal concerning the standing of another individual in another declaratory judgment action. See *Michelle Stone Bittner v. State of Alaska, et al*, Supreme Court, Case No. S18944].

Alaska's intensive management statute was enacted when Tony Knowles was governor. The undersigned understands that the bill enacting AS 16.05.255(e) was the result of a compromise between Gov. Knowles, and members of the Legislature who sought a stronger bill making predator control easier to carry out. At roughly the same time, on November 5, 1996, a citizens ballot initiative concerning same-day-airborne hunting of wolves appeared on the ballot, statewide. A copy of the "State of Alaska Official Election Pamphlet" is attached to these comments. It outlines the position of the proponents, "The Wolf Management Reform Coalition" which included former Governor Jay Hammond. The Election Pamphlet also outlines the position of the opponents of the 1996 ballot initiative.

A majority of voters, statewide, approved the ballot initiative, and it was enacted into law. That ballot initiative was codified as AS 16.05.783(a). It prohibited same day airborne and aerial shooting of wolves except when specified emergency conditions were found to exist.

Two years later, the Legislature amended AS 16.05.783(a) so as to effectively repeal it. But proponents, in the year 2000, collected enough signatures to put the issue on the ballot again, and in a statewide election, in the year 2000, the voters of Alaska overrode the Legislature and re-enacted AS 16.05.783(a), as originally enacted by the voters in 1996.

Both AS 16.05.255(e), and AS 16.05.783(a) have been amended since the year 2000, but the amendments have only marginally changed the two statutes: both statutes are essentially unchanged since the year 2000.

As outlined above, it is the opinion of the undersigned that the Department is misconstruing and therefore violating both statutes in its administration of IM Plans in multiple GMU's. The process which the undersigned believes violates the two statutes were described in testimony of Wildlife Conservation Director J. Scott Ryan at the March 2023 Board meeting, on March 21, 2023, when the Board re-authorized an inactive IM Plan for Unit 15C. Mr. Scott's testimony was as follows:



Thank you Mr. Chairman. As we've seen with – as the Board has seen recently, we are coming up against intensive management plans that are due to expire. **We often – we have regularly come to the Board and asked for author – you know, adoption of a — reauthorizing those plans with a variety of changes, plans to either use them or leave them inactive.** It is a – you know, for – like Mr. Fowler and myself and others, the – our predecessors did all the hard lifting, you know, the heavy lifting, and got those in place and we can adjust things as we learn new information. **We have better data for sure but keeping those plans in place really gives us the tools to react if we need to.** And we do have some active plans and a little bit later in this meeting we're actually going to talk about a new plan that's coming up.
[Emphasis added.]

Clearly, Mr. Scott indicated that the Department (i.e. the Commissioner) keeps old, inactive plans open, and asks for re-authorization, so that the Department can in its discretion use aerial predator control, in the future, if the Department believes it needs to, in the future.

There are quite a few inactive IM plans in Alaska. The Department's website lists the following GMU's as having inactive IM plans: Units 9C, 9E, (Northern Alaska Peninsula) Unit 9D (Southern Alaska Peninsula), Units 12, 20B, 20D, 20E, 25C (upper Yukon/Tanana), Unit 15c (Kenai), Unit 21E.

Mr. Scott at the January 2025 BOG meeting in Wasilla spoke in support of a proposal authorizing Department employees to shoot bears and wolves from helicopters and fixed wing aircraft in Unit 16B. Mr. Scott expressed the view at that time that the numerous comments opposing the proposal were the result of a misunderstanding, an over-reaction to a mere housekeeping measure.

Mr. Scott said that the Department would **never** go ahead with sending Department employees into Unit 16B in helicopters and fixed wing aircraft without giving prior notice. One of the principal purposes of Proposal 148 is to require the Department to provide the public with meaningful prior notice, and an opportunity to comment, **before the helicopters and aircraft are sent in.** If Mr. Scott meant what he said, then the Department should have no objection to the Board enacting a regulation mandating prior, meaningful, public notice.

But Mr. Scott's assertion of "never" going ahead with helicopters and fixed wing aircraft without public notice is not true. The Department did exactly that in regard to the Mulchatna Caribou IM plan. What is generally understood to be "public notice" was not given. I use myself as an example. I learned of the plans to send in the helicopters and fixed wing aircraft shortly after the March 2023 Board meeting. I learned from a friend who was in the room when the Department's plans to shoot bears and to shoot wolves directly from helicopters and fixed wing aircraft (manned by Department employees) were disclosed to people attending the meeting. Even then, the discussion was to shoot 12-30 bears, and not 96 which is what the Department did in 2023. Disclosure at the March 2023 Board Meeting occurred, long after public testimony was closed and long after the only option for opponents to "comment" was to file an action in court, requesting a restraining order on an expedited basis.

Proposal, 148, if enacted would give the public the opportunity to comment when the Department makes a preliminary determination to activate a previously inactive IM plan. If proposal 148 is approved, the public could comment without rushing off to court, without employing attorneys, and in accordance with a process within the Department's purview.

The Board and Department should support Proposal 148. It makes sense, and conforms with the statutory framework enacted in the 1990's by Legislature, the Governor, and voters of Alaska. Until those statutory provisions are substantively amended, the Board and Department should follow the clearly stated dictates of those statutes.

Proposal 92. Support. This proposal would, if enacted, require sheep hunters to complete a hunter education course to be designed by the Department. It is a good idea in light of the statewide decline of Dall Sheep. I would hope that the Department in its hunter education course would include information on leave-no-trace camping in the mountains. Non-consumptive users like myself treasure our mountain terrain, uncluttered with trash, fire rings, and evidence of previous visitors.

Proposals 97 and 98. Support. These proposals would extend the time when hunters are restricted from using aircraft to hunt sheep, with the idea being to prohibit the use of aircraft to spot sheep during any season when sheep hunting is open. The use of manned aircraft to spot sheep often disturbs sheep and has the effect of chasing them off of ledges and slopes with prime vegetation,



I am a mountaineer: a “peak bagger”. I know from personal experience just how easy it is to unintentionally alarm sheep and cause them to move far away from me as I move up a mountain toward a summit, and as I down-climb. Aircraft can do the same thing, especially when flying close enough to get a good view of the extent of the curl on the horns of rams.

I have heard the complaints made by resident Dall sheep hunters that professional guides know where the full curl rams are located because they see sheep as they fly clients and supplies into remote lodges. Seeing sheep out of an aircraft’s window when flying in supplies or clients is entirely different from flying close to Dall sheep with the intention of checking out horn size.

Spotting is a kind of harassment, and harassment should not be permitted, at any time of the year. Not by anyone, including tourists and locals going “flight seeing” at other times of the year.

Proposal 100. Support with Amendments. This proposal was made by Resident Hunters of Alaska, and provides numerous alternatives regarding the hunting of Dall sheep, including some provisions I support, and some I don’t. My intention here is to state what I think, and refrain from commenting on most of the other proposals regarding Dall sheep.

My view is that all Dall sheep hunts in Alaska should be draw hunts. Some hunts should be any ram hunts, or half curl hunts. It is clear that focusing all hunting pressure on full curl rams is detrimental to the genetic diversity of Dall sheep.

Only a limited number of permits for Dall sheep hunts should be issued, and the numbers issued should be conservative, in order to give sheep a break. Moratoriums should be declared on sheep hunts in some GMU’s until there is meaningful recovery. For instance, a moratorium should be declared on all Dall sheep hunting on the Kenai Peninsula where there is only a remnant population.

Some permits should be allocated to non-resident hunters so that professional guides, their assistants, staff, and suppliers can continue their lifestyles. But the majority should be allocated to residents, only.

Special working groups, such as the Unit 19C working group are a good idea.



One reason, among others, is that non-consumptive users have sometimes been given a voice in working groups; and inclusion of voices of non-hunters promotes discussion of new ideas not often heard by the Department and the Board.

Proposal 101. Oppose. Proposal 101 would classify Dall sheep as a prey population important for providing high levels of human harvest for consumptive use. The proposal is made by the Department. The Department fails to cite or mention the controlling statutory provisions which are AS 16.05.255(k)(2) and (k)(3). Those statutes, taken together, define “identified big game population”. They state as follows:

AS 16.05.255(k)(2) "high level of human harvest" means the allocation of a sufficient portion of the harvestable surplus of a game population to achieve a **high probability of success for human harvest** of the population based on biological capabilities of the population and considering hunter demand.

AS 16.05.255(k)(3) “identified big game prey population” means a population of ungulates that has been identified by the Board of Game and that is **important for providing high levels of harvest for human consumptive use**”

There is also 5AAC 92.106. It provides, in relevant part, as follows:

“For purposes of implementing AS 16.05.255(e)-(g), the Board of Game (Board) will

(1) consider the following criteria when identifying big game prey populations that are important for providing high levels of human consumptive use:

(C) **utilization for meat: a population that is used primarily for food.**

Dall sheep in Alaska cannot honestly be found to be a population that is “important for providing high levels of harvest for human consumptive use”, or a “population that is used primarily for food”. Sheep hunting is primarily a trophy hunt, and the biological capabilities of sheep in Alaska will never be enough to satisfy the high demand of residents and non-residents who want to go sheep hunting. A determination by the Board that Dall sheep are “important for providing

high levels for human harvest” would be arbitrary and capricious.

There is a reason why Dall sheep were not listed as a prey species when AS 16.05.255(e-g) was enacted in the 1990's and why no attempt to add sheep to the list of prey species has been made for the 25+ years since the IM statute was enacted. The reason is that Dall sheep will never be important for providing high levels of meat for human harvest.

The proponents of intensive management for Dall sheep need to go to the Legislature and try to get IM for Dall sheep approved there. The current statutory definitions, cited above, and the definition contained in the regulation, cited above, simply do not allow intensive management of Dall sheep.

Proposal 125. Oppose. Proposal 125 would define “developed recreational facility” for purposes of bear baiting as a state-maintained facility with signage. But there are numerous developed recreational facilities which are not state maintained. The Mt. Alyeska ski area is an example. So also is the Alaska Huts Association Manitoba Cabin with its three yurts, sauna, and other out buildings privately maintained. Most developed Nordic ski areas, with parking lots, warming huts, restrooms, and groomed ski trails are privately maintained. Hunters seeking to take bear over bait should be required to use care to stay more than a mile away from these areas, before enticing bears to come into close proximity with recreational users of these areas.

Proposals 126, 127, 128. Oppose. These three proposals would, if enacted, authorize electronically enhanced night vision and forward looking infrared devices, to the arsenal of weapons and devices which hunters and trappers could use to make it even easier to take Alaska's wildlife. Alaska's wildlife is not as abundant as it was when I came to Alaska 50 years ago, and part of the problem is over-hunting. Restrictions on the arsenal of weapons and devices which hunters can use to take wildlife are a good idea. Technology makes it easier to harvest wildlife. If Alaska's unique wild lands and wildlife are to be conserved for future generations, then ever-more sophisticated technology for accessing and harvesting wildlife needs to be disallowed.

Proposal 134. Support with amendment. Proposal 134 would allocate to residents 90% of moose drawing permits. There should be an allocation to residents of most moose drawing permits, but the exact percentage allocated to non-residents



should be high enough to allow professional guides and their assistant guides, staff and suppliers to continue operating and enjoying their lifestyle.

Proposal 154. Oppose. Proposal 154 would re-authorize antlerless moose hunts in the Anchorage Management Area. As written, the proposal, if enacted, would allow rifle moose hunting, in the City of Anchorage, without special safeguards to protect the safety of the City's many thousands of residents who walk, cycle, hike, and recreate in the City's open spaces. While the Anchorage Area Biologist indicated to the Anchorage AC that his plan was to issue permits only to hunt moose in Chugach State Park, Proposal 154 contains no such restrictions. **As written** the Proposal would allow rifle moose hunting in Kincaid Park, Campbell Airstrip Park, and on public lands adjoining the Tony Knowles Coastal Trail, Ship Creek, and elsewhere.

Anchorage's Code of Municipal Ordinances addresses hunting on Municipally owned lands. Enactment of Proposal 154 might set up a potential Municipal/ADFG clash, that is unless conditions are attached to approval of Proposal 154 making it clear (1) that antlerless hunts in the Anchorage Management Area are restricted to Chugach State Park, and (2) the same special conditions applied to other moose hunts on the Hillside apply to antlerless hunts.

Thank you for considering my comments.

Sincerely,

Kneeland Taylor



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Public Safety

DIVISION OF ALASKA WILDLIFE TROOPERS
Office of the Director

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Main: 907.269.5509
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January 5, 2022

Chairman Stosh Hoffman
Alaska Board of Game
P.O. Box 115526
Juneau Ak, 99811-5526

Dear Chairman Hoffman:

The following comments give a brief description of the positions that the Department of Public Safety, Division of Alaska Wildlife Troopers have on the proposals that are up for consideration at the January 2022 meeting in Wasilla.

In general, when the board considers seasons and or bag limit changes, the Alaska Wildlife Troopers request that every effort possible be made to align the season dates and bag limits with adjacent game management units and/or subunits. This is mainly due to enforceability of multiple seasons in multiple locations as well as consistency of the regulations for the public. When the board considers proposals having to do with allocation or biological concerns, AWT is generally neutral in position.

AWT recognizes that regulations are developed by the Alaska Boards of Fish and Game through the public process to support management plans. Further, all management plans rely upon public compliance with regulations to achieve success. Enforcement is a crucial element needed to ensure long-term compliance with regulations by the public. The Alaska Wildlife Troopers request the board recognize that the division has limited resources and manpower and any new regulation scheme or area restrictions may place an additional burden on AWT.

Comments on specific proposals are included in this letter.

Thank you for your time,

Captain Derek DeGraaf
Alaska Wildlife Troopers

**Proposal 99**

This problem exists primarily because dog owners do not have their pets on leash. Any situation that reduces the motivation to keep dogs on leashes has a detriment to both public safety and moose health due to increased dog vs dog fighting, dog vs people attack, dogs chasing moose, and dog vs pack animal attacks. AWT is regularly dispatched to calls for service where moose are agitated due to being chased by unsecured dogs. Enforcement of such a regulation would be very challenging, like our disagreement of proposal 199. How would anyone know if "public funds" were used to fund the trail or campground? Such areas would require new signs and marking. How would a trapper or AWT know if a dwelling was "permanent" or not, or a cabin was "less than 800 square feet" or "unoccupied a majority of the time?" This proposal as written would be very difficult to enforce.

Proposal 198

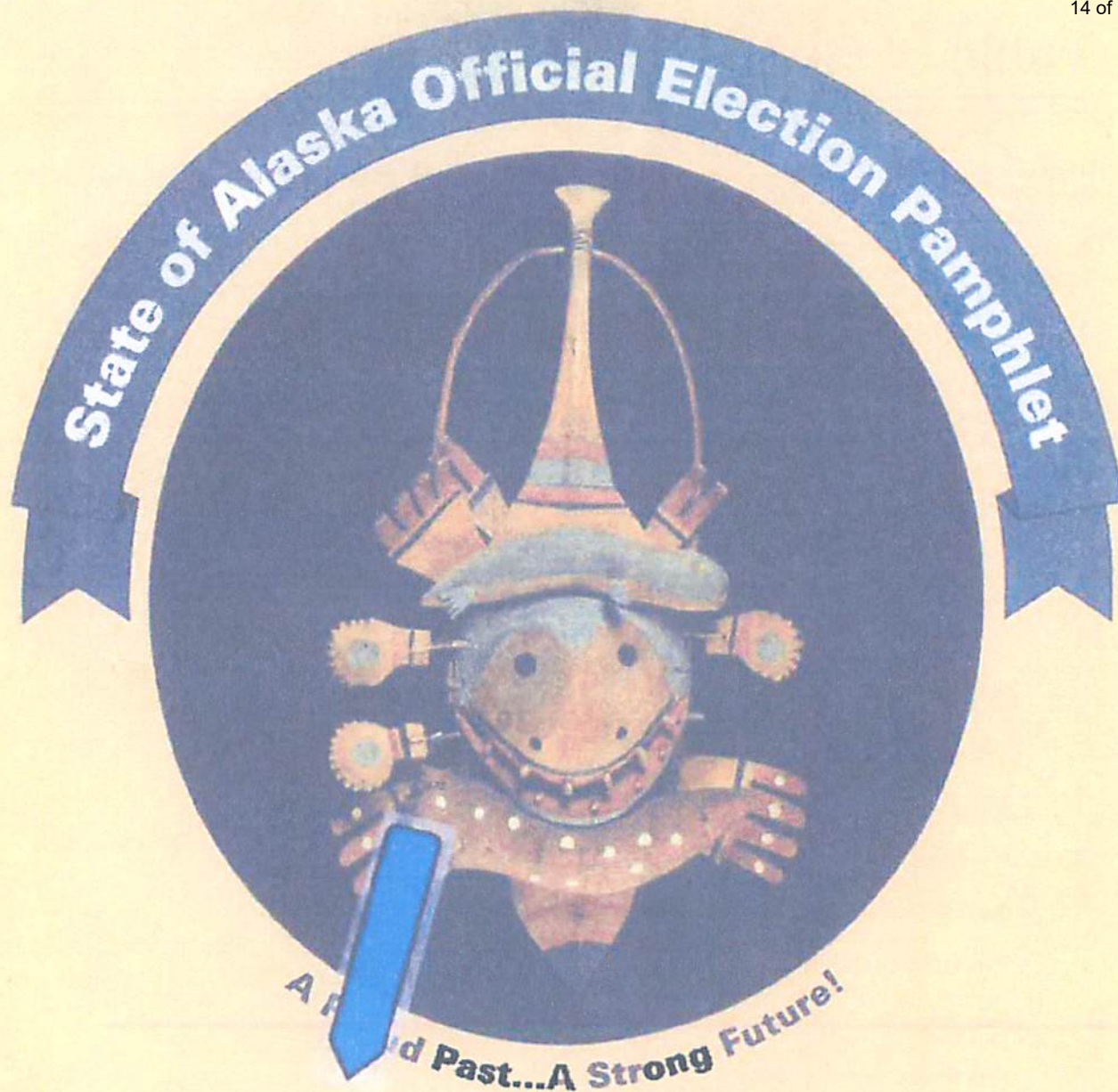
By implementing a 50-mile distance, the burden on hunters and AWT to figure out cabin locations in such a large footprint would be high. The number of reported violations would be expected to skyrocket, causing a heavy workload on our troopers, possibly taking them away from other more critical resource protection cases.

Proposal 199

In principle, AWT recognizes the safety concerns articulated in this proposal for a 50-yard setback. There are enforcement concerns. Many of these trails are not properly marked, many do not align to what few maps exist currently, sections of trails often "move" in the winter with snow/ice coverage, and when they flood during melt off, determining proper trail location will be challenging. What will be considered the "map" used to document the trail? There is no standard. This would be challenging to enforce until these are notated on a proper publicly accessible map and markings/notifications are in place.

Proposal 228

AWT agrees. There are no other ways in Alaska to passively take fish/game with unmarked devices except by trapping. Crab/shrimp pots, burbot set lines, fish wheels, bear bait stations, gill nets, etc., all require markings. Trappers should be held to the same standard other resource users are. Trap/snare identification would greatly enhance AWTs ability to enforce illegal traps and incidental catches of moose, caribou, and dogs. Secondly, in the instance a trap is stolen or removed the trapper could report this to AWT much like when other resource users call to report shrimp/crab pots stolen or lost. One of the situations that is most common is when a dog is found dead in the trap and the trap is taken with the dog owner. Enforcement is unable to return the trap and there is a lost opportunity to educate and let the trapper know what happened-for the good and bad of it. AWT must also store traps with no leads with no way to return it or issue a citation if warranted. It has been rumored that trappers worry AWT would check their gear for such markings or somehow tamper with their gear. AWT would NOT routinely field check to look for ID number unless warranted. AWT spends an exorbitant amount of time trying to identify the owners of traps in both cases of violation or when stolen. Trapping does not have the same accountability as other resource users. The marking of traps/snares could be done with a unique anonymous number assigned to each trapper to prevent retribution from angry dog owners or anti-trappers if that was a concern. If the number were punched/inscribed onto the trap, it would also aid AWT in recovering stolen traps. Metal tags could also be issued from ADFG. The proposal to have an affixed or stamped means of identification would simply bring this method of take into alignment with ALL other resource users.



Legislative Reference Library
100 Seward St., Suite 400
Anchorage, AK 99501

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✓ VOTE ALASKA!

NOVEMBER 5, 1996

REGION II



BALLOT MEASURE NO. 3

Bill Prohibiting Same Day Airborne Hunting

BALLOT LANGUAGE

This bill would bar hunting wild wolf, wolverine, fox, or lynx the same day a person was airborne. However, the Board of Game could allow aerial wolf control if the Commissioner of Fish and Game declared a biological emergency, where wolves in a specific area were causing irreversible loss of a prey population. The law wouldn't apply to people airborne the same day on regular, scheduled commercial flights. Breaking the law would be a misdemeanor. The penalty could be jail time up to one year, a fine up to \$5,000, and forfeiture of aircraft or gear used in the offense.

Should this initiative become law?

Yes ☐
No ☐

LEGISLATIVE AFFAIRS AGENCY SUMMARY

This measure prohibits persons from shooting wolf, wolverine, fox, or lynx on the same day that the persons were airborne. This measure would not apply to persons who were airborne only on certain commercial flights. This measure allows the Board of Game to permit shooting of wolves from the air under certain conditions. A violation of this measure would be a misdemeanor.

FULL TEXT OF PROPOSED LAW

Be it enacted by the people of the State of Alaska

Sec. 16.05.783. PROHIBITION OF SAME-DAY AIRBORNE HUNTING. (a) A person may not shoot or assist in shooting a free-ranging wolf, wolverine, fox, or lynx the same day that a person has been airborne. However, the Board of Game may authorize a wolf control program involving the shooting of wolves from the air if

- (1) the Commissioner of Fish and Game makes written findings based on adequate data demonstrating that a biological emergency exists and that there is no feasible solution other than airborne control to eliminate the biological emergency, and
- (2) the program is conducted only by Department of Fish and Game personnel
- (3) the program is limited to the specific geographical area where the biological emergency exists, and
- (4) the program removes only the minimum number of wolves necessary to eliminate the biological emergency.

(b) This section does not apply to a person who was airborne the same day if that person was airborne only on a regularly scheduled commercial flight.

(c) A person who violates this section is guilty of a misdemeanor, and upon conviction is punishable by a fine of not more than \$5,000, or by imprisonment for not more than one year, or by both. In addition, the court may order the aircraft and equipment used in or in aid of a violation of this section to be forfeited to the State.

(d) In this section,

(1) "free-ranging" means that the animal is wild and not caught in a trap or snare;

(2) and "biological emergency" means a condition where a wolf population in a specific geographic area is causing the irreversible decline of a prey population to the point that the prey population may not likely recover without implementing wolf control.

STATEMENT IN SUPPORT

Proposition No. 3 gives all Alaskans their first opportunity to **VOTE ON WHETHER AERIAL HUNTING OR TRAPPING OF WOLVES SHOULD BE BANNED** except when conducted by the state to avert a biological emergency and no other feasible solutions are available. Wolverines, fox and lynx would be included in the ban.

CURRENT REGULATIONS PROVIDE THAT WOLVES CAN BE SPOTTED, TRACKED AND PURSUED WITH THE USE OF AIRCRAFT before landing and shooting. Under heavy lobbying pressure from special interest groups seeking ever higher hunting quotas, **THE LEGISLATURE IS PURSUING A RECKLESS COURSE OF MANDATING WOLF CONTROL TO TRIPLE THE HARVEST OF WOLVES** in vast areas of Alaska. **This will artificially increase moose and caribou numbers far beyond historic levels and can only be accomplished by aerial hunting and trapping.** The Wolf Management Reform Coalition organized this initiative effort because **WE FEEL WOLVES SHOULD INSTEAD BE HUNTED ON A FAIR CHASE BASIS AND MANAGED FOR BIOLOGICAL REASONS RATHER THAN POLITICAL ONES.** The Coalition includes ex-Governor Jay Hammond, ex-Lt. Governor Lowell Thomas Jr., Jim Brooks - former Commissioner of Fish and Game, Douglas Pope - former Chairman of the Board of Game and other long time Alaskans, many of whom are hunters.

The same day use of an aircraft to spot, track and pursue other big game animals has long been banned except in very limited circumstances because it does not constitute fair chase hunting. The current law which permits **SO-CALLED "LAND AND SHOOT" HUNTING OR TRAPPING IS VIRTUALLY UNENFORCEABLE** in Alaska's vast wilderness and in fact encourages unlawful conduct on the part of wolf hunters and trappers. And the practice of artificially increasing moose and caribou to unrealistically high levels through aircraft assisted wolf

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BALLOT MEASURE NO. 3

Bill Prohibiting Same Day Airborne Hunting

control will lead to the long term deterioration of the wolf, moose and caribou populations. Already, **THE AVERAGE NUMBER OF WOLVES REPORTED KILLED IN 1994 IS DOUBLE THE AMOUNT KILLED IN 1989.** This does not account for the illegal and unreported take, which may equal the reported harvest.

THE INITIATIVE ALLOWS CONVENTIONAL HUNTING AND TRAPPING of wolves and other furbearers and permits the practice of nonlethal darting of those animals from the air for scientific, research, or nonlethal control programs carried out by the state. **A biological emergency, that would permit the state to engage in aerial hunting under the initiative, arises when trend information indicates that wolves are causing a moose or caribou population to decline and that population cannot reasonably be expected to recover without wolf control.**

In the lower 48 predator populations have been all but wiped out. **WE SHOULD REMAIN DIFFERENT AND WORK TO KEEP ALASKA'S WILDLIFE POPULATIONS IN BALANCE BY MANAGING THEM ON A BIOLOGICAL BASIS WHILE PROMOTING FAIR CHASE HUNTING.** Vote yes on Ballot Measure 3 for that future.

Douglas Pope
Joel Bennett
Co-Chairs, Wolf Management Reform Coalition
(907) 272-8577

STATEMENT IN OPPOSITION

Three good reasons exist for Alaskans to vote NO on Ballot Measure #3. First, the new law is not needed. Second, the new law would prohibit necessary wildlife conservation and management programs which benefit wildlife and people. Third, managing wildlife by ballot initiative discourages public participation in the management process.

1. The Federal Airborne Hunting Act already prohibits shooting wildlife from an aircraft. Also three Alaska state regulations prohibit aerial shooting and land-and-shoot hunting of furbearers, including wolves. Current regulations on "same-day-airborne" shooting were challenged as inadequate protection of furbearers in a 1994 lawsuit. The judge denied the complaint, based on evidence from Fish & Wildlife Protection Division and ADF&G that the regulations properly protect furbearers, including wolves.

Under current laws, if predation is identified as the main reason for a low moose or other prey population, no action can be taken unless the Board of Game approves a plan first.

A 1994 ADF&G survey of Alaskan voters (not just hunters) found that 47% of Alaskans surveyed supported wolf control "in some areas of the state to increase moose and caribou numbers". About 37% opposed the idea.

2. Even the smallest, most confined management action -- designed to increase numbers in a severely depressed prey population or to curb wildlife disease -- could not use aircraft effectively if this Act is approved by voters. If wolves zero in on pet dogs, sled dogs, or livestock, immediate and "pack specific" action could not be taken using aircraft. The Act would make it impossible for the State to use aircraft for any reason except a "biological emergency" in a prey population (moose, sheep, caribou, etc.).

"Biological emergency" is defined too narrowly in the Act. A careful reading of the initiative reveals that aerial control could occur only if:

- wolves or other predators are causing an irreversible decline of the prey; and
- there is adequate data establishing that the above is true.

"Irreversible decline" and "adequate data" are not defined. Lawyers and courts can easily claim the need for more data or that the decline is not "irreversible".

In addition, the use of tranquilizing darts fired from aircraft could not occur unless a new law allowing that activity was passed. This needlessly disallows a basic wildlife management and research tool.

3. Managing wildlife by ballot initiative discourages public participation in the management process. Alaska's regulation making process is open to anyone who cares to participate. Regulations can be made and promoted -- or opposed -- by anyone. The Board of Game is obligated to base its decisions on factual information or risk revocation of its actions by the courts.

In summary, please vote NO on Ballot Measure No. 3 because:

- a) wolves and other large furbearers are adequately protected under existing laws and populations are thriving;
- b) the Act would unnecessarily hamper needed management and research;
- c) the Act would discourage informed public participation in the wildlife management process.

Al Franzmann, D.V.M., Ph.D.
for the Alaska Outdoor Council, Inc.
(907) 455-4262

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**PC125****Name:** Craig Tessen**Community of Residence:** Fairbanks**Comment:**

As a lifelong Alaskan, winning a once-in-a-lifetime permit is a dream come true—only to have the opportunity slip away due to circumstances beyond a hunter's control. Proposal 188 ensures fairness by reinstating permits for DI403 and DI404 hunters whose tags were canceled last season. The proposal recognizes the years of anticipation and planning that go into these hunts and helps ensure hunters don't lose their hard-earned opportunity. Please, allow us our permits back.

**PC126****Name:** Lake Thompson**Community of Residence:** Fairbanks**Comment:**

Proposal #81 - I do not support the implementation of a minimum trap check period anywhere in Alaska. The primary basis for this position is that a requirement to check traps within a set time window could force a trapper to be out in hazardous weather conditions. If a trapper were facing a man-made deadline for checking traps, he could be faced with the severe cold of arctic winter or intense storms of coastal Alaska. These conditions (and others) could be life-threatening.

Another scenario could involve a trapper suffering from illness or injury. Facing an artificial deadline, the trapper could once again be forced to venture out under circumstances which could lead to further injury or even death.

In addition, low population densities of many furbearer species do not justify checking traps frequently. The number of animals caught under this scheme would not cover the trapper's expenses. Trappers must make a profit to justify the time and effort they invest. Trapping systems in Alaska have evolved over decades to be as efficient as possible. Trappers have learned that allowing several days to pass between trap checks allows for efficient harvest of the renewable fur resource.

A minimum trap check period would place an unnecessary burden on law-abiding trappers, with no benefit to the furbearer resources. I do not support the implementation of a minimum trap check period. Proposal #131 - I do not support a requirement that identification tags be attached to traps and snares anywhere in Alaska. Proponents of this concept suggest that trap tags would reduce or eliminate trapping violations. That is idle speculation. Only law-abiding trappers would obey this new regulation. "Outlaw" trappers would ignore the requirement, as they do with other regulations. Thus, trap tags would serve no useful purpose and would place an unnecessary burden on law-abiding trappers.

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

been made in recent years in Alaska.

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

I do not support implementation of a regulation requiring identification be attached to all traps and snares.



October 21, 2024

To: Board of Game

To: Ryan Scott, Director of the Division of Wildlife Conservation, Alaska Fish and Game

From: Unit 19C Sheep Working Group

The Unit 19C Sheep Working Group members want to thank the Board of Game for creating the working group and giving it the opportunity to focus on understanding and addressing the key issues facing sheep in Game Management Unit 19C. Our group was comprised of nine individuals who collectively represented subsistence users, nonconsumptive users, guides, transporters, private landowners, and general Dall sheep hunters (see enclosed roster). During discussions regarding recommendations to be made to the Board of Game, including discussions regarding pending proposals and development of an Agenda Change Request, Board members Stosh Hoffman and Jake Fletcher did not participate. They reserved taking any action at the working group level in favor of fully participating as Board of Game members.

The group has worked hard through two facilitated two-day workshops (in June and most recently in October 2024) to be in a position to make recommendations. These recommendations are based on conservative management to ensure long-term sustainability of the Unit 19C Dall sheep population, sharing impacts among user groups, and exploring novel approaches to address declining sheep populations and increasing challenges between interest groups. Our recommendations are based on the best science (western and traditional knowledge) available, and we encourage the Alaska Department of Fish and Game to continue to learn about sheep populations, specifically adding radio collars to better understand mortality issues. Regarding any form of predator control, the sheep working group wants to assure positive results without causing unintended consequences, clear biological objectives that are measurable, humane control methods if used, clear efforts to gain public support, and most importantly to let science guide any steps regarding predator control. At this time, the sheep working group wishes to see the guidelines above followed and the research documenting mortality prior to any predator control for sheep.

The Unit 19C sheep working group made a specific proposal recommendation based upon a guide concessionaire program being in place. If this program isn't in place in time, the sheep working group would like to meet again in April 2026 to explore alternative possibilities. The sheep working group will do its best to be present with all members for the Board of Game discussions to be held in Anchorage in March 2025. To further assist the Board and implement the working group's mandate, the team went through the existing proposals submitted to the Board and wish to make the following recommendations. The sheep working group supports proposal 92 recommending hunter education. The group neither supports nor opposes proposals 93-101, 110, and 115-117. The sheep working group opposes proposals 102-109, 111-114 and 118 because these proposals are inconsistent with our proposal to the Board.

Once again, the Unit 19C Sheep Working Group expresses its gratitude to the Board for putting their faith into the working group to propose recommendations and better understand and address



the key issues facing Dall sheep in Unit 19C. Most members of the working group support these recommendations.

Sincerely,

Unit 19C Dall Sheep Working Group

Enclosure: Unit 19C Working Group Membership Roster

Note: Summaries for the June and October Working Group meetings are online at:

<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=06-25-2024&meeting=webconference>

<https://www.adfg.alaska.gov/index.cfm?adfg=gameboard.meetinginfo&date=10-17-2024&meeting=webconference>



Alaska Board of Game

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Juneau, AK 99811-5526

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Unit 19C Sheep Working Group Members

Jerry Burnett, Board of Game, Chair

Stosh Hoffman, Board of Game Member

Jake Fletcher, Board of Game Member

Scott Crowther, Anchorage Advisory Committee

Brett Gibbens, McGrath Advisory Committee

Mike Litzen, Guide with Dall sheep hunting experience in Unit 19C

Michelle Quillin, Fall season Dall sheep resident hunter

Chait Borade of CIRI, Unit 19C private landowner

Patricia Owen, Denali National Park & Preserve, non-hunting use of Unit 19C

Working Group members may be reached by contacting:
Kristy Tibbles, Executive Director, Alaska Board of Game
Email: kristy.tibbles@alaska.gov | Phone: (907) 465-6098
www.boardofgame.adfg.alaska.gov



Proposal 88: Oppose, There is not even a huntable number of Bison yet. When there is this can be re visited with data to support such a regulation.

Proposal 89: Oppose

Proposal 90: Support, Many registration hunts close very early in the hunt because hunters are harvesting nannys. This is taking goat hunting opportunities away from hunters in that regulatory year AND future regulatory years!

Proposal 91: Support, Many registration hunts close very early in the hunt because hunters are harvesting nannys. This is taking goat hunting opportunities away from hunters in that regulatory year AND future regulatory years!

Proposal 92: Support, Sublegal harvest is higher than it should be. This is in part to new sheep hunters going afield with a lack of knowledge.

Proposal 93: Oppose

Proposal 94: Oppose

Proposal 95: Oppose, There is no biological difference in a 7 year old ram being killed that is full curl which happens quite frequently and a ram being killed on accident because the hunter thought he was 8... Aging rams is actually one of the more reliable tools an experienced sheep hunter has to determine if a ram is legal.

Proposal 96: Oppose, There is no biological difference in a 7 year old ram being killed that is full curl which happens quite frequently and a ram being killed on accident because the hunter thought he was 8... Aging rams is actually one of the more reliable tools an experienced sheep hunter has to determine if a ram is legal.



Proposal 97: Support with Amendment. Dates to be Aug 1 through Oct 15th to encompass all general season and drawing hunt dates.

Proposal 98: Support

Proposal 99: Oppose, The restriction should not be relaxed.

Proposal 100: Support, Nonresidents harvest 40-50% of the sheep on average. There is no other state in the union that allows general season harvest allocation to non-residents of this magnitude. Add the fact that guided sheep hunts are fetching \$30-40K and the amount of resources a nonresident is using to kill a sheep in competition with residents is ever increasing.

Proposal 101: Support

Proposal 102: Oppose

Proposal 103: Oppose

Proposal 104: Oppose

Proposal 105: Oppose

Proposal 106: Oppose

Proposal 107: Oppose



Proposal 108: Support

Proposal 109: Support

Proposal 162: Oppose

Proposal 111: Oppose

Proposal 112: Oppose

Proposal 113: Oppose

Proposal 114: Support

Proposal 115: Oppose

Proposal 116: Oppose

Proposal 122: Oppose, Bison tags are already very difficult to draw and this regulation will just incentivize more hunters to apply to allow a proxy hunter.

Proposal 123: Oppose, Paying people to proxy hunt for you is very anti game management.

Proposal 124: Support

Proposal 125: Support



Proposal 126: Oppose

Proposal 127: Oppose

Proposal 128: Oppose

Proposal 129: Oppose

Proposal 130: Oppose

Proposal 131: Oppose

Proposal 135: Support, Nonresidents have no allocation restriction in most drawing hunts meaning it is possible for nonresidents to draw all of the available permits. While this is statistically unlikely nonresidents have been drawing more and more tags simply because nonresident opportunities in the lower 48 have been restricted in recent years driving more applicants to Alaska.

No other state in the Union allows this unrestricted allocation of nonresident permits.

The worst part about this is most drawing hunts are a drawing because of the nature of the access therefore meaning that the most abused nonresident allocations are such that are preventing Alaskans from hunting affordably in their home state!

Muskox is probably the most egregious of them all! Residents can't draw a tag because 30-50% of the tags are drawn by nonresidents! It's criminal!



I will add that if the BOG continues to look at each hunt individually under 2017-222-BOG then for each hunt they make a draw it will just shift the pressure to neighboring units exacerbating the problem and not addressing the issue at the root of the issue. Non resident applications will continue to rise every year as the internet continues to democratize information for hunters.

The following are results from the 2024 draw and are the most egregious in nature to allocation.

Brown Bear/Grizzly

DB375/2 Non Resident tags drawn out of 8 tags-25%
DB376/2 Non Resident tags drawn out of 8 tags-25%
DB468/2 Non Resident tags drawn out of 20 tags-20%

Bison

DI454/3 Non Resident tags drawn out of 10 tags-30%
DI351/3 Non Resident tags drawn out of 11 tags-30%
DI352/1 Non Resident tag drawn out of 5 tags-20%

Elk

DE318/5 Non Resident tags drawn out of 25 tags-20%
DE717/10 Non Resident tags drawn out of 46 tags-22%

Goat

DG342/2 Non Resident tags drawn out of 8 tags-25%
DG343/1 Non Resident tag drawn out of 3 tags-33%

DG471/9 Non Resident tags drawn out of 35 tags-26%
DG472/6 Non Resident tags drawn out of 12 tags-50%
DG473/5 Non Resident tags drawn out of 13 tags-38%
DG474/12 Non Resident tags drawn out of 70 tags-17%
DG476/24 Non Resident tags drawn out of 50 tags-48%



DG478/16 Non Resident tags drawn out of 81 tags-20%

DG720/2 Non Resident tags drawn out of 8 tags-25%

DG363/9 Non Resident tags drawn out of 28 tags-32%

Moose

DM447/2 Non Resident tags drawn out of 10 tags-20%

DM448/1 Non Resident tag drawn out of 3 tags-33%

DM795/3 Non Resident tags drawn out of 6 tags-50%

DM802/21 Non Resident tags drawn out of 67 tags-31%

DM808/16 Non Resident tags drawn out of 51 tags-31%

DM818/10 Non Resident tags drawn out of 25 tags-40%

DM820/7 Non Resident tags drawn out of 15 tags-47%

DM892/5 Non Resident tags drawn out of 8 tags-63%

DM920/9 Non Resident tags drawn out of 20 tags-45%

DM922/7 Non Resident tags drawn out of 50 tags-14%

Muskox

DX001/5 Non Resident tags drawn out of 10 tags-50%

DX003/13 Non Resident tags drawn out of 40 tags-32%

Proposal 141: Support

Proposal 142: Oppose

Proposal 143: Oppose

Proposal 144: Oppose



Proposal 190: Support



December 6, 2024

BY COMMENT PORTAL

Kristy Tibbles
Executive Director
Alaska Board of Game
kristy.tibbles@alaska.gov

Re: Comments Regarding BOG Proposals 188 and 189, Delta Junction Bison Permits

Dear Ms. Tribbles and the Alaska Board of Game,

Every February thousands of Hunters check the ADF&G draw results to see if they were one of the lucky few to draw a tag. For most, they will come away empty-handed and a few will draw a tag of a lifetime. I was one of those few in 2024 when I drew a Delta Bison tag! In April, I received an email from Ellie Mason giving me a hunt start date so that I could start planning my hunt. This is truly a once-in-a-lifetime tag, as the odds of drawing the tag are extremely low. My partner and I eagerly began the planning process, booked lodging in Delta Junction, upgraded a freezer, and put other fall plans on hold.

On July 24, 2024, I received a phone call from Ms. Mason rescinding my tag. Needless to say, I was and remain extremely disappointed. When I received this call, it had been 3 months since the April email and nearly 6 months since the day I drew the tag. I have taken time off work, purchased ammunition that met the requirements for the hunt, along with other gear, booked lodging, and spent dozens of hours researching locations, and generally getting excited to take part in this hunt. This is also time and investment spent on this hunt rather than planning another over-the-counter hunt, many of which are now less than a month away from opening. Like many Alaskans, I plan on eating game meat throughout the winter, and to be successful, hunts must be planned long in advance. While I understand that surveys are completed during the summer, and I support managing herds for longevity and providing hunters the opportunity to harvest, it is extremely discouraging that I would receive this information this late into the season.

Ms. Mason, the following press release, and the ADF&G biologists and managers said that there has been discussion within ADF&G to ask the Board of Game to defer these rescinded tags until a later date. We have been told that there are two potential outcomes. The first is that we will potentially have the opportunity to hunt our tags in 2026. The second is that we will be able to enter the drawing before our 10-year waiting period.

I would urge the Board of Game to strongly consider allowing me and the other hunters to hunt our tags in 2026. While I appreciate that ADF&G has, at a minimum,



proposed that we be allowed to enter the drawing within the 10-year/lifetime window, the odds that any of us will draw this tag again is around 0.2%. Many people put in for this tag for their entire life and never get drawn, the likelihood of it happening a second time is astronomically low. Furthermore, we were not able to apply in the 2025 draw application period, further narrowing our very low odds. Not only is the way that this played out in 2024 inherently unfair by giving some hunters opportunity while not others to harvest, it essentially means that the odds are that none of the hunters whose tags were rescinded will ever have the opportunity to hunt bison again in our lives.

On a closing note, regardless of the outcome of this hunt, and given that the Bison herd had another unusual mortality event several years ago resulting in a quota, and with the the nature of this being a tag with extraordinarily low draw odds and a once in a lifetime opportunity, I urge that ADFG and the Board of Game develop a proactive strategy to ensure that the unfair allocation of tags does not happen in the future, and a contingency plan be developed to ensure that the department has the tools to ensure they can address these events in the future in a way that does not leave hunters like me reeling from having a one of the greatest feelings ever to the lowest feeling ever.

Thank you for your time and consideration, and for working to advocate for hunters in Alaska.

Sincerely,
Lang Van Dommelen



Members of the Board of Game,

I ask that you **OPPOSE** and **DO NOT ADOPT** amended language offered in **Proposal 87**, which reportedly aims to address illegal driving or chasing of waterfowl by hunters and/or vessels associated with waterfowl hunters. While I would support changes that would help improve compliance with ethical and fair-chase waterfowl hunting practices, the proposed language in 5 AAC 92.100(a)(3) is problematic and would create regulatory confusion and severely restrict the ability of hunters to participate in traditional hunting practices.

The proposed language in Proposal 87 suggests that **“all boats shall remain stationary throughout the duration of the hunt, beached or anchored, within 100 yards of those discharging firearms to eliminate driving, herding, or chasing migratory birds into hunters on land, or on other boats”**. The proposed language broadly restricts “all boats” without consideration for the diverse ways in which waterfowlers may utilize vessels over a wide range of hunting scenarios. Vessels might be used strictly as a mode of motorized transportation to and from a hunting location, or they may serve as both the transportation as well as the platform from which participants conduct their hunt. Boat usage might also be as simple as operating a paddled kayak or canoe to access a pond or tide flat to hunt puddle ducks, or a more complex situation where sea duck hunters may utilize layouts boats or a shore blind and a different motorized tender vessel to retrieve harvested birds in open water. While I suspect this proposal might be targeting the latter scenario and hunting of sea ducks, the proposed language casts a large net, restricting or eliminating hunting opportunities across the spectrum of common waterfowl hunting practices.

The flat topography of the tide lands we hunt in coastal Southeast Alaska and the rapid rise and fall of the water level during a tide cycle, due to that topography, makes it impossible to meet the requirement of maintaining “all boats” beached or anchored within 100 yards of shooting locations. As an example, I travel to hunting areas on a 22-foot motor vessel. I generally anchor my vessel 300-400 yards from my hunt locations because that is where the vessel can be safely secured in an adequate water depth and avoid vessel stranding due to tidal activity. I then disembark from that vessel to access my hunting location through a combination of paddling and/or towing a kayak loaded with decoys, guns, and blind onto the tidal flat. Often gear is carried an additional distance across dry land to reach my hunting site where we wait for the tide to flood our hunting location. While I can maintain my kayak at my hunt site due to its small size and portability, implementation of the proposed language and 100-yard metric on “all boats” would preclude use of my traditional hunt locations due to the fact there is generally not enough water to float a larger vessel, or there would be unreasonable safety concerns with stranding my motor vessel on the tidal flat if attempting to comply with that 100-yard restriction during the flood and ebb of the tide cycle.

Instead of hunting over decoys, some hunters choose to “jump shoot” waterfowl, a method where they actively walk around and sneak up on ponds or stream channels that may hold ducks or geese. As with the previously described hunting method, these hunters also travel to a bay or tidal flat and anchor their vessel in a safe location but then set off on foot to look for game. Due to the size of some tidal flats, jump shooters may walk up to a half mile from



their anchored vessel during a hunt. Again, the proposed 100-yard boat-based shooting limitation would severely restrict these hunters from participating in their traditional hunting methods and prevent them from accessing large sections of the tide lands.

In conclusion, the proposed language requiring "all boats must remain stationary throughout the duration of the hunt" is also problematic as it is in direct conflict with the previous sentence described in the existing regulation, which allows the use of boats to retrieve dead or injured waterfowl. The amended language as offered would lead to confusion for hunters and Alaska Wildlife Troopers on the application of the regulation, severely reduce/eliminate opportunities for lawful hunters participating in long established fair-case hunting methods and introduce unnecessary safety issues with potential strandings of vessels on tidal flats.

I strongly urge the board to **OPPOSE** the proposed language offered in **Proposal 87** due to its generic application which will create burdensome restrictions on hunters and their unmanned vessels that are not associated with the active harvest or recovery of game. 5 AAC 92.080(5) already prohibits the driving, herding, or molesting of game animals with a motor vehicle, so it seems that the issue brought forward by the proposer is largely addressed under current regulation. It does seem reasonable however, that the board might consider adopting new language under the waterfowl prohibitions regulation, similar to that language found in 5 AAC 92.080(5), which directly asserts that herding, driving, or harassing waterfowl by mechanical vehicle is prohibited, as follows:

5 AAC 92.100 UNLAWFUL METHODS OF HUNTING WATERFOWL, SNIPE, AND CRANES.

(a)(7) except as otherwise specified, with the use of a motorized vehicle or motor-driven boat to harass waterfowl, snipe, or cranes or for the purpose of driving, herding, or molesting waterfowl, snipe, or cranes.

Thank you,

Mike Vaughn
30+ year SE Alaska waterfowl hunter
Sitka, AK



PC131

Name: Matthew Vos

Community of Residence: Palmer

Comment:

Fully in support of 127. To be able to utilize infrared or night vision optics for fur bearing animals.

Reasoning: opens up opportunities to be able to hunt and enjoy time spent outdoors after work in the long dark winter hours and Help with predator control.



PC132

Name: Juliette Vries

Community of Residence: Unalaska

Comment:

Proposal 146

I have heard talk among coworkers that since we have a yard cat the rat problem is way less. Also seems when one cat left another would prop up. Our yard cat is taken care of by coworkers.

I'm pro TNR.



2025 BOG Comments

I wish to comment on Proposal 101 which would add Dall Sheep to the Intensive Management Statute.

According to the Division of Subsistence records, only 266 sheep across 36 communities are killed each year.

This pales in comparison to the numbers of caribou (25,000), deer (10,000) and moose (7,000) that are taken each year.

Furthermore, Dall Sheep being found in difficult to reach mountainous areas and their relative small size when compared to caribou and moose makes the justification for this proposal dubious at best.

On May 9th of 2024, Alaska Fish & Game biologist Brad Wendling gave a presentation on Dall Sheep to Denali tour guides and drivers and NPS staff.

I audio recorded and posted the presentation here: <https://soundcloud.com/denali07/dall-sheep-presentation-5-9-24>

In this presentation, Brad mentioned the start of a collaborative study with the National Park Service in Denali to study sheep both inside and beyond Denali's borders.

This study is important as Brad mentioned that statewide Dall Sheep populations had in many areas, declined by 50-70%. Denali has also been severely impacted with a 2024 sheep population of 805 adult animals.

This would be one of the lowest populations of sheep in Denali since the 1940's.

The decline in Dall Sheep populations is believed to be directly related to a significant increase in heavy snow/icing events during the winter and is attributed to global climate change.



This is not the first time such heavy snowfall/icing events had been reported. During Dr. Adolph Murie's landmark study of sheep and wolves from 1939-41, Murie discovered that it was primarily heavy snow/icing events that caused Denali's steep sheep decline from the 1920's of 5,000-10,000 Dall Sheep to where they bottomed out at 500 by 1945.

It should be noted that Murie found that wolves were not responsible for this steep decline in sheep numbers but that it was due to heavy snow and icing events which sheep are especially vulnerable to.

It would later be mentioned that even as little as a foot of snow can prohibit sheep from reaching their food sources during the winter months. All of the above, makes Dall Sheep populations especially fragile to such conditions and weather events.

Furthermore, such conditions promotes poor body condition and record low population pregnancy rates of only 18-44%. Those lambs that do survive birth are generally born with low birth weight making them more vulnerable to mortality.

For reference, most ungulate populations have consistent pregnancy rates from 85-100% in healthy adult females.

Other changes are less precipitation impacting the quality of vegetation and the advancements of shrubs into alpine habitat crowding out those food sources.

When you factor in all of the above, it makes absolutely no sense to promote additional hunting of sheep when these populations are under such climate change threats. Nor would the killing of wolves improve this to any significant degree not only due to more intense winters but also changing vegetation within their habitat.



What is needed is a moratorium on all sheep hunting in those areas where significant population declines have taken place. Combine with this moratorium and there should be expanded studies on impacts to critical sheep habitat with its vegetation changes, continued studies on impacts caused by heavy snow/icing events with its inherent increased mortality, poor body conditions of winter survivors, poor pregnancy rates, mortality of lambs that survive the birthing process but are born with low birth rate, etc.

The reality is, is that Dall Sheep may be the most imperiled of Alaska's larger species due to climate change. Ignoring climate change does not change its impacts to sheep (or other wildlife such as caribou) or to hunters.

It is time that the BOG recognizes these impacts and reacts accordingly in a positive manner.

Please vote No on Proposal 101.

Proposals 126, 127 and 128 - Night Vision and Thermal Optic Use

Proposals 126, 127, and 128 would allow the use of electronically enhanced night vision and forward-looking infrared devices (FLIR) for taking furbearers statewide.

Night vision goggles and FLIR devices allow trappers to more easily ID and locate animals through barriers such as snow and darkness. FLIR in particular detects infrared radiation emitted from a heat source and creates a picture instead of amplifying visible light. FLIR devices make it possible to detect the heat of animals against cooler backgrounds and are available in handheld cameras and cameras that can be attached to a smartphone, goggles, and rifle scopes.

Okay, let us take a brief look at some of the technology and allowances that is used to kill wildlife.



Planes, motor boats, all terrain vehicles, snowmachines, RV's, high powered rifles with scopes, pistols, binoculars, guides, traps, snares, baits, longer hunting/trapping seasons, higher bag limits and for trappers - they are not required to check their traps/snares and can in fact leave an animal legally in a trap for days, weeks or months.

Additionally, they can saturate an area with an unlimited number of snares.

They can place these traps/snares near multiple use/ski trails, parking lots, campgrounds, pullouts, beach access areas, nor are they required to warn the public with signage or include contact information. Nor are they required to compensate dog owners for any injuries or deaths that their traps or snares cause.

The BOG has essentially tried to make hunting and trapping as easy as possible to kill a wide variety of wildlife and to do so in many different unethical ways.

Since when was hunting and trapping ever supposed to be easy? In its purest form, it is about using the knowledge, skill, and perseverance of the hunter against the animal while providing for the real possibility of the animal escaping.

Fair chase is what makes hunting, hunting. Without it, it is just killing without ethics, respect for the animal, or respect for the land. It is selfish consumption without regard to anything beyond death to that animal.

Allowing the use of night vision goggles and FLIR devices continues and expands that lack of respect further. It makes a mockery of the concept of fair chase and ethical hunting and trapping practices.

I encourage you to reject these three disgraceful proposals and to further promote ethical hunting/trapping practices.



**Proposal 147 - THE DEPARTMENT OF FISH AND GAME
PROPOSES TO HAVE THE BOG DELEGATE ITS AUTHORS TO
MANAGE 5 AAC 92.029, COMMONLY REFERRED TO AS THE
CLEAN LIST, TO THE COMMISSIONER**

I ask that you oppose this proposal.

Sincerely,

Bill Watkins



Name: Tyler Welker

Community of Residence: Anchorage

Comment:

Thank you to the Board for your time and attention. I'm commenting on proposals 85-88 on my own behalf.

Proposal 85, if passed would require ANY transport service to obtain a guide license to transport anyone who is being transported for the purpose of legal hunting; even if no guide services are actually provided...which they aren't. On a personal note, I hire a transport service 2-3 times over the course of the waterfowl hunting season. This proposal is obviously designed to make the process of transportation more expensive and burdensome; with no benefit to game management or conservation. This hardly seems like something that the Board would wish to accomplish. As an added note, many people utilize transportation services to partake in sport and personal use fisheries; the need for a guide license for these activities has never come up to the best of my knowledge. Why the double standard?

Proposal 86, if passed would require a harvest report for sea ducks harvested statewide. This is an unnecessary burden, given that there is already a HIP (harvest information program) survey in place to accomplish the exact same thing; already administered by the state of Alaska. The proposal as written makes no mention of how this reporting requirement will be funded. Given the minuscule harvest of sea ducks over the course of Alaska's short sea duck hunting season; mid November until the end of the season on December 16th, January 22nd on Kodiak Island and Saint Paul Island, the cost and regulatory burden of such a law simply doesn't make sense, since the issue is already being addressed by the HIP survey.

Proposal 87, if passed would eliminate the use of a moving boat for the purpose of waterfowl hunting. In addition, any boat used in the course of waterfowl hunting MUST be anchored within 100 yards of the hunting activity. For reference, the purpose of this proposal is to prevent a "guide" from using a boat to flush resting waterfowl in order to force the harassed birds towards waiting hunters. This is already illegal! In addition, shooting at birds from a moving boat (under engine power) is also already illegal. The problem with this proposal is that it would effectively outlaw legal means of hunting waterfowl. For example, a hunter paddling a canoe would be prohibited from shooting at a bird while the canoe is in motion. In addition, hunting from a boat floating downstream on a creek or river would also be in violation of the law. This proposal would make criminals out of people that are engaged in legal and commonly accepted hunting practices. In addition, and as alluded to earlier, if a hunter hires a transporter to be dropped off at a selected hunting location; would the transporter be required to remain within 100 yards of the hunter for the duration of the hunt? This proposal, if passed, would create an unreasonable burden (and legal limbo) on currently legal hunting activities and would address nothing that is not already illegal.

Proposal 88, if passed would reclassify both species of goldeneye (Common and Barrow's) and Bufflehead as sea duck species. This has already been determined to be in the scope of federal law and beyond the scope of the Board. For reference, the above mentioned species are biologically sea ducks, but are not considered sea ducks for the purpose of hunting regulation.

It is my sincere hope that the Board will see fit to not make hunting more difficult, expensive, and confusing by passing any proposal that doesn't effectively address an issue that has already been addressed in order to placate a few Kachemak Bay residents. I thank the Board for their time and consideration.

Tyler Welker



Western Interior Alaska Subsistence Regional Advisory Council

c/o Office of Subsistence Management
1011 East Tudor Road, MS 121
Anchorage, Alaska 99503-6199
Phone: (907) 787-3888, Fax: (907) 786-3898
Toll Free: 1-800-478-1456

In Reply Refer To:
OSM.B25017

MARCH 06 2025

Jake Fletcher, Chair
Alaska Board of Game
Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, Alaska 99811-5526

Dear Chair Fletcher,

I write to you on behalf of the Western Interior Alaska Subsistence Regional Advisory Council (Council) to provide the Council's comments on proposals that will be considered during the March 21-28, 2025, Statewide Board of Game (BOG) Meeting.

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

The Council held a public meeting on February 25-26, 2025, in Fairbanks, and took up three BOG Proposals. Please see the Council comments below.

Proposals 95 & 96: Repeal the age criteria for the definition of full-curl horn ram.

The Council **supports** Proposals 95 & 96, which would remove one of the three criteria for determining a legal full-curl ram. As the Council submitted one of these proposals, rationale for support is within the proposal itself, namely that accurately ageing a sheep in the field at a distance is extremely difficult even for experienced sheep hunters.



The Council suggests that if the BOG is reluctant to enact this regulation, that it be passed for a test period, set to sunset in six years, or two BOG cycles. This will allow time to gather data on sublegal sheep harvest using only the measuring the curl and broomed tips methods to be able to compare to sublegal harvest utilizing all three methods for determining a full-curl ram.

Proposals 119: Change the boundary between Units 21E and 21D.

The Council opposes Proposal 119, which seeks to change the boundary between Units 21E and 21D. The Middle Yukon Fish and Game Advisory Committee is opposed to this boundary change and the Council believes that any change in boundaries should be agreed upon by all relevant Advisory Committees. Additionally, the passage of this proposal would misalign State and Federal boundaries for the Unit 21 subunits, which would lead to increased regulatory complexity.

The Council thanks you for the opportunity to comment on these proposals. If you have any questions or would like to follow up, please contact me through our Subsistence Council Coordinator Nissa Pilcher at (907) 891-9054 or nissa_pilcher@ios.doi.gov.

Sincerely,

A handwritten signature in black ink that reads "Jack Reakoff".

Jack Reakoff
Chair

cc: Federal Subsistence Board
Interagency Staff Committee
Western Interior Subsistence Regional Advisory Council
Office of Subsistence Management
Benjamin Mulligan, Deputy Commissioner, Alaska Department of Fish and Game
Mark Burch, Assistant Director, Division of Wildlife Conservation, Alaska Department of Fish and Game
Administrative Record



PC136

Name: Jarin Wilbourn

Community of Residence: Anchorage

Comment:

Proposal 92 5 AAC 92.003

Fully support this proposal

As a young sheep hunter that moved up from the lower 48 only a few years ago. I believe it would be a great step forward to require hunters to pass/attend a class on aging, judging and studying mature rams. It is already being done for Kenia moose and is a requirement for bow hunters to attend a class before hunting in areas such as JBEAR or areas such as DM920 & DM922. We are all aware the numbers of sheep are much less than 30 years ago and every sheep taken before being legal is a step back on the conservation of these animals. This program could be a simple way to ensure new sheep hunters have a base line of education and knowledge of sheep and could perhaps allow a handful of sub legal rams live a few more years to help grow a population before being harvested once legal.



PC137

Name: Bennett Wong

Community of Residence: Fairbanks, Alaska

Comment:

Although I support the proposal with amendments, I want to rescind proposal 145. I must amend it in collaboration with biologists, regulators, and interested organizations. I intend to return to the Board of Game with a more substantial proposal and support, which would allow for the importation and usage of the Eurasian Eagle Owl as an education ambassador, valuing and supporting wildlife education and conservation while safeguarding this species.

Name: Eric Anslinger

Community of Residence: Fairbanks



PC138

Comment:

The night vision/thermal proposals are an easy yes, a part of the state was already authorized for use. The draw we currently use is the best/most fair in the country, I strongly oppose any bonus or preference points proposals. I will never support antlerless moose hunts in 20A until access improves. The Board needs to review CUA's statewide most of them need to be removed. Hunter effort can become wider spread allowing for less dense populations of moose which is inline with ADFG objectives.

Name: Tom B

Community of Residence: Anchorage



PC139

Comment:

It is the responsibility of Alaska Game and Fish to manage wildlife for Alaska residents rather than outside interests. As a long time Alaskan native, I can say that more needs to be done to manage wolves and bears which are limiting recovery of our much needed caribou and moose populations. Allowing the same day harvest of bear and wolves for flights into hunting areas will be a step in the right direction to assisting in recovery of our much needed food sources. Alaskans, both rural and urban, depend on harvesting moose and caribou as part of our livelihood to feed out families and pass on the tradition to the next generation. Over the last few winters, the weather has devastated the moose and caribou population but predators remains constant or increasing throughout the state; as a result, caribou and moose populations are having a difficult time recovering. Increasing the harvest and ability to harvest predators for Alaskans will help us better manage our wildlife and help ungulate populations recover to sustainable level where we can put sustainable food on our tables for our families as well as continue our tradition. We (as Alaskans both rural and urban) need more opportunity to harvest predators such as bear and wolves as a necessity to managing and maintaining out sustainable moose and caribou populations.

Name: Ross Beal

Community of Residence: Fairbanks



PC140

Comment:

I do not support the implementation of a minimum trap check period anywhere in Alaska. The primary basis for this position is that a requirement to check traps within a set time window could force a trapper to be out in hazardous weather conditions. If a trapper were facing a man-made deadline for checking traps, he could be faced with the severe cold of arctic winter or intense storms of coastal Alaska. These conditions (and others) could be life-threatening.

Another scenario could involve a trapper suffering from illness or injury. Facing an artificial deadline, the trapper could once again be forced to venture out under circumstances which could lead to further injury or even death.

In addition, low population densities of many furbearer species do not justify checking traps frequently. The number of animals caught under this scheme would not cover the trapper's expenses. Trappers must make a profit to justify the time and effort they invest. Trapping systems in Alaska have evolved over decades to be as efficient as possible. Trappers have learned that allowing several days to pass between trap checks allows for efficient harvest of the renewable fur resource.

A minimum trap check period would place an unnecessary burden on law-abiding trappers, with no benefit to the furbearer resources.

Name: Ross Beal

Community of Residence: Fairbanks

Comment:

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

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

been made in recent years in Alaska.

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



PC141

Name: Sherri Borchert

Community of Residence: Anchorage

Comment:

I wholeheartedly support changing the law to allow TNR. Many studies are available to prove TNR does not negatively affect wildlife and does help control community cat populations.



PC142

Name: Donavon Coatney

Community of Residence: Clam Gulch

Comment:

I have no comments for the proposals below just that I am for and against as indicated.



PC143

Name: Katie Dahncke

Community of Residence: Anchorage

Comment:

As a long time Anchorage resident and animal advocate, I fully support and request the passing of this proposal. Humanely managing the feral and community cat population by TNR is the only way to solve this issue. TNR is a proven method for controlling cat overpopulation. Alaska needs to catch up to the rest of the country in allowing and encouraging TNR.



PC144

Name: Chad Ensminger

Community of Residence: Big lake

Comment:

I support ensuring those who did not have the chance to hunt in 24-25 to have tags reinstated for 26-27. These tags are very difficult to draw and to have them stripped away is not fair to the hunter or the system we live and die by. Many hunters will be too old to productively apply and hunt this specie again. Do the right thing and honor those who drew but did not receive the permit.



PC145

Name: Michael Gallagher

Community of Residence: Anchorage

Comment:

I have been a hunter Since my father took me hunting when I was a little kid. When I moved to Alaska about 50 years ago I started to putting in for permits. I have put in for the Delta Bison hunt for 49 years. I was so excited to get a Bison permit last year. When I received a call from Alaska department of fishing game biologist and informed me that they had to cancel numerous permits due to death of many bison. I can't tell you how disappointed I was. I did mention to the biologist that I understand why they had to do it, and I support their decision. I know I don't have another 49 years, so I ask the Board to consider to reinstate our permits for 2026.

Thanks Mike Gallagher



PC146



PC147

Name: Connor Lohse

Community of Residence: Anchorage

Comment:

Support the use of night vision such as infrared and thermal for night hunting predators.



PC148

Name: Vince Lowery

Community of Residence: Kenai Peninsula

Comment:

Amend the requirements for Alaska-licensed guides to ensure financial and conservation benefits remain within the state, as follows:

To preserve the integrity of Alaska's hunting and fishing industries and ensure that financial benefits contribute to state conservation efforts, I propose that all Alaska-licensed big game guides be required to meet the residency definition outlined by the Alaska Department of Fish and Game (ADF&G).

Specifically, applicants for an Alaska guide license must:

Be a resident of Alaska as defined by ADF&G—meaning they must have physically lived in the state for the 12 consecutive months immediately preceding their guide license application and cannot claim residency in any other state or country.

Resubmit proof of residency annually to maintain their guide license.

Ensure tax contributions remain in Alaska by requiring that licensed guides file Alaska state taxes and demonstrate that their primary business and personal financial obligations are within the state.

If nonresident guides are allowed to operate under an Alaska license, they should be required to pay a significant nonresident guide fee, ensuring they contribute financially to Alaska's conservation efforts and do not undercut resident guides who reinvest in the state's economy.

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

Currently, nonresident guides can obtain an Alaska guide license without living full-time in the state, allowing them to take financial earnings out of Alaska while benefiting from its natural resources. This puts Alaska residents at a disadvantage, as out-of-state guides contribute less to conservation funding and often underprice resident guides who must sustain their business year-round.

Requiring guides to meet Alaska residency standards will ensure that:

Hunting and fishing industries remain beneficial to Alaskans.

Revenue generated from guiding activities is reinvested into the state's economy.

Conservation efforts funded by resident hunters and fishers receive appropriate financial support from the guiding industry.

The number of nonresident guides operating under an Alaska license is limited to those willing to make a substantial financial contribution to the state.

How does this impact Alaskan hunters and fishers?

By maintaining an Alaska residency requirement, we ensure that hunting and fishing in the state remains accessible and well-managed for Alaskans, rather than being exploited by individuals who do not contribute financially or personally to the state's conservation efforts. If this issue is not addressed, we risk further loss of opportunities to out-of-state business interests, weakening the long-term sustainability of Alaska's hunting and fishing resources.

Conclusion

This proposal seeks to limit the number of nonresident guides taking financial resources out of Alaska while benefiting from its wildlife. The Board of Game should implement stricter residency requirements for licensed guides or impose a high nonresident guide fee to offset their economic impact on resident hunters and fishers. By doing so, Alaska can preserve the integrity of its guiding industry and ensure its financial benefits remain within the state.



PC149

Name: Ken Miller

Community of Residence: Fairbanks

Comment:

Please consider utilizing a point system for those that do not draw permits. 1 point per species per year.

It works really well in states I have lived in in the lower 48.

Thank You 😊🙏



PC150

Name: Jeffrey Moore

Community of Residence: Wasilla

Comment:

There is a question the residents of Alaska deserve to know the answer to, Is the board of Alaska fish and game and the state of Alaska more concerned with revenue from permit fees or fairness to the public?

My wife and I have put in as residents for moose permits almost every year since 2002 and never drawn one, yet there are people that draw these tags multiple times and in some instances back to back years. It almost seems corrupt some of the instances I've heard of.

I support a point system

I support if an individual or party draws for a particular species a long waiting period before they can apply again.

As an amendment to the above, I propose having a first and second draw. The first draw would be for individuals or parties that have never drawn that specific hunt that they're applying for. The second would be for any leftover tags that were not given out in the first draw, for individuals or parties that have drawn that specific hunt before. Also if applying as a party, all individuals in the party must not have drawn the specific hunt to be eligible for the first draw.

In closing, If the board or the state opposes coming up with a fair system to give all Alaskans a fair chance to draw these tags, it shows there must be some form of corruption in the current system, ie. tags for donations, for friends and family etc.

Name: Carly Neumuth

Community of Residence: Anchorage

Comment:

to many feral cats especially spenard area, need to control population spay/ neuter release would slow down the population and help with wildlife



PC151

Name: Rebecca Owens

Community of Residence: Anchorage

Comment:

Dear Members of the Alaska Board of Game,

I write on behalf of the Alaska SPCA and the broader community of Alaskans who care deeply about humane, effective, and science-based solutions to the challenges posed by free-roaming cat populations. I urge this board to amend the current regulation that prohibits the release of sterilized cats back into their environments, a restriction that effectively bans

TrapNeuterReturn (TNR) programs in Alaska.

The Problem

Feral cat populations exist in every part of Alaska, and they continue to grow despite efforts to remove them. Without intervention, unsterilized cats breed rapidly—one pair can lead to thousands of offspring over time. The unfortunate reality is that removal efforts alone—whether by euthanasia or shelter placement—do not work. New cats will move into vacated



PC152

areas, and the cycle of overpopulation continues.

Current regulations prevent organizations like the Alaska SPCA from implementing TNR, a widely accepted, research-backed strategy for humane population control. Without this option, the only choices are to euthanize healthy animals or leave them to reproduce unchecked—both of which contradict responsible wildlife and community management principles.

The Science Behind TNR

Decades of research and real-world application show that TNR programs successfully reduce free-roaming cat populations over time. Here's how it works:

1. 2. 3. Trap – Cats are humanely captured and assessed for health and socialization.

Neuter/Spay – Cats are surgically sterilized, vaccinated, and marked for easy identification

Return – The sterilized cats are returned to their territory, where they no longer reproduce and help prevent the influx of new, unaltered cats.

A well-managed TNR program has three major benefits:

- Population Control: By preventing new litters, TNR gradually reduces the overall number of feral cats.
- Reduced Predation Pressure: Sterilized cats spend less time hunting and more time defending territory, leading to a decline in wildlife predation over generations.
- Improved Public Health: Vaccinated, monitored colonies reduce the spread of disease and minimize nuisance behaviors like yowling and fighting.

TNR and Wildlife Protection Can Coexist

We acknowledge concerns about the impact of free-roaming cats on wildlife, particularly on birds and small mammals. But eliminating TNR doesn't solve this problem—it worsens it. Instead of stabilizing cat numbers and reducing their hunting activity, a ban on TNR allows populations to keep growing, increasing the impact on native species.

By allowing TNR, we can work in partnership with game management agencies to track colony numbers, prevent uncontrolled breeding, and focus sterilization efforts in areas where ecological concerns are highest.

A Path Forward

I respectfully request that the Board of Game revise the current prohibition on releasing

sterilized cats and instead allow for regulated TNR programs under licensed animal welfare organizations. This approach has been successfully implemented in many other states and municipalities across the U.S., including areas with delicate ecosystems.

By making this change, the Board would:

- Empower organizations like the Alaska SPCA to take proactive, responsible action
- Reduce feral cat populations over time, lessening their impact on wildlife
- Improve public health and community well-being

This is an opportunity for Alaska to lead with science, compassion, and effective policy—one that benefits cats, wildlife, and Alaskans alike.

Name: James Siegel

Community of Residence: Anchorage

Comment:

Thermals and other night vision technology should be allowed in the state of Alaska for hunting of all animals period.



PC153

Name: Harrel Thomas

Community of Residence: Anchorage

Comment:

I believe the absolute benefit for all feral cats is TNR as it is humane and necessart to reduce population of feral cats !



PC154

Name: Brent Wolfer

Community of Residence: Eagle River

Comment:

Rebuttal to Proposed Amendment to 5 AAC 92.100 Restricting Boat Use in Waterfowl Hunting

I oppose the proposed amendment to 5 AAC 92.100, which seeks to restrict the use of boats for hunting waterfowl. The proposed changes impose unnecessary restrictions on hunters, undermine traditional hunting practices, and lack practical justification. Below are the reasons for my opposition:

1. The Proposal is Out of Touch with Waterfowl Hunting Practices



PC155

It is concerning that the individual responsible for this proposal is not a waterfowl hunter and does not have firsthand knowledge of the practices or challenges faced by Alaska's hunting community. This proposal appears designed to reduce waterfowl hunting opportunities rather than address any legitimate concerns about conservation or ethical hunting practices. Such intent undermines the credibility of the proposal and unfairly targets a community that abides by long-standing, effective regulations.

2. The Proposal is Inconsistent with Common Practices in Other States

Many states, including waterfowl-rich regions such as Arkansas, Louisiana, and Texas, allow the use of motorized boats for hunting as long as the motor is turned off and the boat's momentum has ceased before firing. This common-sense regulation ensures ethical hunting while allowing hunters to access otherwise unreachable areas. Alaska's existing regulations already align with these widely accepted standards, which balance conservation with practicality. The proposed restrictions go far beyond what is necessary or effective.

3. The Proposal Undermines Traditional and Subsistence Hunting

Boats are a vital tool for hunters, especially in Alaska's wetlands, rivers, and coastal areas. Subsistence hunters and rural residents often rely on waterfowl as a significant food source, and these restrictions would disproportionately impact them. Requiring boats to remain stationary, beached, or anchored adds unnecessary hardship to those who rely on boats for access and safe hunting.

4. Safety Concerns

Forcing hunters to beach or anchor their boats during a hunt introduces significant safety risks:

Weather Hazards: Alaska's waterways are unpredictable, and requiring boats to remain stationary limits hunters' ability to respond to changing conditions.

Emergencies: Mobility is essential for responding to emergencies, such as capsizing or adverse weather. Limiting this mobility could lead to avoidable accidents.

5. Conservation and Enforcement

This proposal is unnecessary from a conservation perspective:

Existing federal and state regulations, including bag limits and seasons, effectively manage waterfowl populations and ensure ethical hunting.

Enforcement of this proposal would be impractical and prone to misinterpretation, especially in Alaska's vast and remote waterways.

Alternative Solutions

Rather than imposing restrictive and impractical measures, ADFG should:

Strengthen education programs to promote ethical hunting practices.

Focus on enforcing existing regulations that already ensure ethical and sustainable hunting.

Engage with the waterfowl hunting community to address concerns collaboratively without imposing burdensome restrictions.

Conclusion

This proposal is out of touch with the realities of waterfowl hunting in Alaska, unfairly targets hunters, and provides no meaningful conservation benefits. It disregards widely accepted practices in other states, imposes unnecessary safety risks, and disproportionately impacts subsistence hunters. I urge the ADFG to reject this proposal and instead work toward balanced solutions that respect Alaska's hunting traditions and practical needs.
